

Comments and Organisation	Observations and decisions Overview Steering Group (OSG)
<p>EDDC LPA</p> <p>Yellow highlight where examiners input is suggested</p> <p>Blue highlight where EDDC makes suggestions</p> <p>Green highlighting where other statutory authorities are called upon</p> <p>i. The reduced number of policies compared to the Regulation 14 version, and the more recent removal of several allocations to which Officers had raised concerns about justification/rationale, is welcomed. The determined and holistic approach to endeavour to address matters important to the community, including climate change and local employment opportunities, are also notable.</p> <p>ii. In some cases there does however appear to be somewhat of a disconnect between the evidence cited in supporting text and the decisions on aspects of the policies, including the mix of uses within the employment allocations, which the Examiner may wish to consider.</p> <p>iii. Many of the policies also continue to give very limited or loose locational</p>	

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<p>requirements for development, which may still result in proposals (e.g. live-work units, holiday accommodation) being supported in more unsustainable locations.</p> <p>iv. In addition, there is a risk in some policy wording of development being supported or even 'strongly supported' for its contribution towards infrastructure improvements or other desired outcomes, seemingly by giving weight to these matters above all other considerations. In addition, there is some ambiguity (e.g. policies T1 &amp; T2) as to what can be classed as a 'contribution', which could in theory be just a small financial contribution. It is suggested that the Examiner may wish to consider how this could better be addressed in policy wording to provide support for appropriate development as well as for the desired infrastructure / wider outcomes.</p> <p>v. More generally, further tightening up (or even removal) of policy/policy clauses may be appropriate to facilitate plan implementation and mitigate unintended consequences.</p> <p>page 136</p> <p>vi. Finally, also related to implementation, some individual policies in their own right or in combination with others, could place a considerable and potentially unreasonable</p>	<p>weight of contributions creating ambiguity.</p> <p>T1 &amp; 2. Unintended consequences. This should not result in the policy being deleted, happy for Examiner to reword to limit this happening.</p>

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<p>burden for additional checking and assessment on our Development Management officers, and wherever possible it would be more appropriate to explicitly place the onus on developers to demonstrate compliance, for example in DC2.</p> <p><b>Policy-specific Comments</b></p> <ul style="list-style-type: none"> <li>· <b>CFS1 Community Sports Hub</b> – no objection in principle to the proposed development, but as flagged at Regulation 14 stage, we would query deliverability of the scheme, particularly in terms of the lead body to take this forward, the significant funding package required etc.</li> </ul> <p>We are also seeking confirmation from the Highways Authority that the access can be achieved, including for cyclists and pedestrians. On policy wording, we would suggest that to increase certainty, the policy requires “all” of the facilities listed to be included, rather than ‘including’. Also, in respect of a ‘reserve site’, given that there is no longer an identified reserve site in the Plan, this would be better described as an ‘alternative site’ and to consider extending the period in which development starts beyond 3 years which appears to be very short.</p>	<p>Most of these are general comments, and the Steering Group are happy to leave these comments to be assessed by the Examiner. A lot are common generic feedback provided by LPA’s in relation to NP’s, especially those that are aspirational.</p> <p>Financial deliverability is not a policy requirement and there is EDDC sports funding 106 money from Parish based strategic development which has a substantial 6 figure pot of money and there is match funding from England Hockey. Both can <b>only be</b> accessed when the development is given the green light.</p> <p>Health check and Reg 14 comments did not flag up deliverability as an issue.</p> <p>Highways happy with all site allocations</p> <p>Agree with all 3 suggestions</p>

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<ul style="list-style-type: none"> <li>· <b>CFS2 Sport &amp; Community Facilities</b> – it could prove difficult in implementation to assess whether a ‘demonstrable community need’ exists. Therefore suggest making it clearer that the development to be supported is floorspace for sports / recreation / community use.</li> <li>· <b>D1 High Quality Design</b> – overall, welcome the efforts to make this policy more implementable, but suggest some further changes are required: <ul style="list-style-type: none"> <li>○ Clause 2 - as there should not be any “significant impact on visual amenity”, suggest this clause needs revising to avoid/minimise impact.</li> <li>○ Clause 6 - to be aware that whilst we support the intention, we cannot currently insist or enforce that the lighting is powered by renewable energy.</li> <li>○ Clause 8 - could be strengthened by making linking into existing networks and connections to sustainable travel options an absolute, with enhancement and facilitating future connectivity, ‘wherever practicable’.</li> <li>○ Clause 11 on signage – to be aware we can only consider highway safety and visual amenity, and only then where consent is required.</li> </ul> </li> </ul>	<p>Agree with suggestion.</p> <p>Clause 2 agree</p> <p>6. Onus is on developers so it was put to into the policy SG do not want clause deleted</p> <p>8. agree with changes</p> <p>11. SG are ware that not all signage is under planning law as seen in the policy wording “new signage requiring consent”</p>

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<p>· <b>DH1 and DH2 Heritage – Ahead of sight of comments from Historic England which will be key, and in line with our previous comments</b>, we would prefer to see these 2 policies combined. Also suggest further revision may be necessary to avoid duplication and possible conflict with strategic policy. We would suggest as a minimum that the requirement in clause 1 should be to conserve OR enhance in line with national policy. Also, whilst supporting the principle of making heritage assets more energy efficient, we would raise a concern about the blanket support given in the final policy clause, which we would suggest needs to be more caveated to avoid harm to significance of the asset.</p> <p>· <b>DC1 and DC2 Energy efficiency &amp; renewable energy in new and existing buildings – suggest that DC1 and DC2 be combined as the split between new and</b></p>	<p>Historic England did not comment, positive response to the NP</p> <p>SG Prefer separate policies but if combined, each MUST be clearly identifiable and covered within a new policy.</p> <p>Clauses make up the content of a detailed design and layout proposals that are to be produced by a developer. .Onus on developer</p> <p>Clause 1 SG agree on change to conservation OR enhance but, NO to the need for a reference to national policy as this is just duplication. Prefer to add at the end <b>“and their local settings”</b> as this adds local context to the policy.</p> <p>Making buildings energy efficient is a Plan wide feature SG happy for <b>“and avoid harm to significance of the asset”</b> to be added to Clause 4</p>

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<p>existing development seems somewhat unclear here as aspects of each policy would appear to be applicable to both. This may also be a more appropriate place to incorporate a clause (currently in DH1) regarding renewable energy in historic buildings.</p> <p>Suggest also that a clause is added to paragraph 1 in DH2 to allow for the role of trees, shrubs and other vegetation is cooling and shading buildings.</p> <p>· <b>DC3 Sustainable Drainage</b> – support this policy, but clarification would be useful as to whether this would apply to householder extensions, and changes of use - perhaps by insertion of 'wherever applicable'.</p>	<p>SG Prefer separate policies but if combined, both are to be clearly identifiable and covered within a new policy.</p> <p>SG Prefer clause to remain in DH2 as the community feel strongly about this issue being linked with Parish wide Heritage assets.</p> <p>Green spaces have multiple advantages and why would the SG want to be seen to prioritise cooling and shading of buildings? SG not in favour of this suggestion: and there is no information in justification to state why shading and cooling is being prioritised. Happy for the role of trees and shrubs in cooling and shading building to go in the justification section.</p> <p>Agree with insertion</p>

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<p>Suggest that 'usually covered with grass' is removed from the definition of swales in favour of 'sloping, vegetated sides' to reflect that alternative natural vegetation will have greater benefits for biodiversity than amenity grassland.</p> <p>· <b>DC4 Residential storage</b> – Support this policy, but as per our previous comments, we would suggest that the requirement be strengthened by quantifying a minimum no. of cycle storage spaces to be provided according to dwelling size (for example, this is 1 per bedroom in the Cranbrook plan). Moreover, it would be appropriate to require rather than simply 'encourage' the cycle storage.</p> <p>· <b>DC5 District Heating Schemes</b> – aware this policy has had technical input from consultants providing support to the Plan, but for clarity and to aid implementation, suggest the first sentence should be revised to read, "Across the neighbourhood plan</p>	<p>Agree with addition</p> <p>A minimum is provided per dwelling but this is not related to dwelling size/ bedrooms. Happy to adopt 1 per bed as Cranbrook – as this is likely to increase the minimum overall.</p> <p>Agree change to policy so that it reads <b>are required</b> instead of "are encouraged"</p>

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<p>area, including but not limited to the LDO District Heating Area (Figure 27), proposals for new development that demonstrate that they will produce less than 150kg of CO2 per kWh from heating systems will be supported”.</p> <p>.</p> <p><b>DC6 Community-led Renewable Energy</b> – as some of the examples of benefits fall outside statutory planning/land-use matters, suggest these are moved to the supporting text.</p> <p>· <b>EC1 Beare Farm</b> – query whether the addition of a cross-reference to the heritage policies of the NP are sufficient to address the questions we raised at Regulation 14 regarding whether the suitability of, and impact on, these listed buildings has been sufficiently considered.</p> <p>We are seeking the views of Historic England through the current consultation. Also, suggest that the final bullet under point 2 of this policy is</p>	<p>Agree with changes</p> <p>No examples provided by EDDC so difficult for the SG to respond. Hopefully the Examiner will ask for clarity on this issue.</p> <p>We have also added text in the justification that this site is inalienable and controlled by NT legislation. In the Policy we have X referenced to our own heritage policies, but EDDC unsure this is enough. As the Plan sits under LPA legislation and NPPF this should not have to be added into the policy.</p> <p>Historic England supports the NP</p>

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<p>a listed as a standalone criteria, and that a point of reference is given for the 'Killerton Estate objectives'.</p> <p>· <b>EC2 Crannaford Crossing</b> – as per previous comments, whilst we consider that a light industrial use could be suitable at this location, we have serious reservations (which the plan proposers are aware of) about the generation of additional traffic (vehicular, pedestrian and cyclist) over the level crossing of the uses proposed, in relation to rail safety in particular. In contrast to the explanation on page 90 regarding our earlier request to remove the playpark and children's nursery uses, we wish to clarify that this was solely based on our safety concerns. We are seeking the views of Network Rail through the current consultation. In terms of the policy wording itself, it is considered unclear what 'selective development' means in practice.</p> <p>· <b>ET1 Tourism</b> – there is a risk of this policy being open to abuse / wide interpretation</p>	<p>Agree for this to be a standalone criterion</p> <p>Happy with class uses specified in the policy. The classes utilised have been supported by community and could add to the what the Parish has to offer it's community. There is no need to include Light industrial as this is an existing class use for this site.</p> <p>National Rail response was requested, and no policy wordings or class uses have been provided. The SG have concerns about validity of NR data.</p> <p>Happy to get rid of term 'selective' and just use the term "development"</p> <p>Good for the examiner to consider this feedback and to consider if a rewrite of the policy can clarify expectations/ interpretations.</p>



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<p>as a matter of compliance with the basic conditions. It is suggested that reliance or cross-reference to the Local Plan policy here would be adequate, with the addition of</p> <p>the local requirement for the accommodation to be for 'holiday purposes only' and for support for new build accommodation to be removed.</p> <p>· <b>ET3 Campsites</b> – notwithstanding previous discussions, we would wish to see a definition being given to 'small scale' within the policy to increase the control it would provide and aid effective implementation.</p> <p>· <b>H1 Blackhorse Gardens</b> – the policy infers that the development sits within the</p>	<p>NPs are not supposed to X ref to LP</p> <p>Do not need this addition. This is already in the policy see bullet point 4, for ' holiday purposes only'</p> <p>SG Strongly disagree, but happy for Examiner to strengthen location within the site specifics list.</p> <p>Small scale is not defined in LPA policy see E16 and it is difficult to specify within a policy, as the local context determines what is small scale. What is small scale in one area will be large scale in another. SG happy for the Examiner to maybe use "proportionate to the actual size of the site and the nature of the setting" but this is still difficult to legislate.</p> <p>Agree to changes SG Happy to provide airport noise contour map on PC website</p>

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<p>57dB-60dB airport noise contour. However, it has been noted in reviewing this version of the plan, that this is incorrect. The sites in fact lies entirely within the 60-63dB noise contour where more sensitive uses such as residential are not normally considered suitable, or at least not without further evidence on noise mitigation and viability. In such a situation, any development should be acoustically designed to achieve the lowest practicable internal noise levels in order to meet with the standards set within BS8233 and recommended by the World Health Organisation. We would not normally support the allocation of the site unless it can be demonstrated that noise levels within any residential area will not exceed those recommended by the World Health Organisation due to concerns about noise. On other aspects, if the policy is retained, as well as reflecting this, we</p> <p>we suggest replacing 'include the following' with 'for' to avoid ambiguity and also that the plan producers clarify why live-work units are restricted to less storeys than the dwellings.</p>	<p>Happy to add to justification Any residential development falling entirely within the 60 – 63 airport noise contour should be acoustically designed to achieve the lowest practicable internal noise levels in order to meet with the standards set within BS8233 and recommended by the World Health Organisation.</p> <p>Raised with EDDC that the Clystlands site bringing forward 5 new dwellings that also fall entirely within the 60 – 63 airport noise contour and that the officer report and full approval with conditions does not make any mitigation constraints <b>on any of these 5 buildings</b>. 22/049 FUL 21/0241/FUL 20/2535/FUL 20/1617 /FUL</p> <p>agree to use 'for'</p> <p>SG want to share information with the Examiner as to specifications within this policy. Chalet and 2 storey builds are to ensure topography is taken into consideration in the</p>

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<p>· <b>H2 Broadclyst Station site</b> – Whilst this is not considered to be the most logical location for new housing, it is acknowledged that this will have a close relationship with the Cranbrook Blue Hayes development as this develops out. We would however query whether the flood risk and ecological constraints have been</p>	<p>layout of the 4 dwelling development so as to ensure that dwellings are not too evident on the skyline and to be in line with key design features of Blackhorse design. Chalet bungalows are to be built at the higher levels within the site and 2 storey dwelling at a lower topographical location.</p> <p>Maybe a separate condition needs to be added to the policy on the layout of the site.  <b>“to include 2 chalet bungalows and 2 storey dwellings placed at appropriate topological levels on the site to ensure that the skyline is not dominated by the dwellings.”</b></p> <p>SG agree that it does not matter which is type of house is a work live unit, so perhaps a rewording will be acceptable. 4 dwellings, 2 of which are to be live work units.</p>

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<p>adequately assessed to underpin the principle of the allocation. Related to this, we would question the inclusion of the triangular area of the land within the allocation as it is entirely in flood zone 2/3.</p> <p>The definition of self-build should also be explicitly linked to the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) or the latest version, as cited in the self-build policy.</p> <ul style="list-style-type: none"> <li>· <b>H3 Broadclyst Village Site</b> – we welcome the addition of a footpath link to the allotments, but would also wish to see footpath connections made through the site to the wider footpath network (an illustrative map can be provided).</li> <li>· <b>Policy justification to housing allocations</b> – this should refer to Strategy 27 of the Local Plan, rather than Strategy 35, which relates specifically to Rural Exception Schemes for up to or around 15 dwellings only. Although the allocation at Broadclyst (policy H3) could have been suitable for a Rural Exception Scheme, it is immediately</li> </ul>	<p>As we have a condition within the policy for a detailed assessment of flood risk. A usual planning application process requires flood mapping to be provided so this triangular area will be evident. But if Examiner wants flooding to be more effectively covered within the policy this will be supported. Flooding has also been considered in the viability assessment</p> <p>Happy for self-build H6 to be cross referenced in this policy, or to add text along the lines of: <b>The self-build dwellings will be required to follow the definitions in full in Policy H7</b></p> <p>Until layout of the site is drawn up to include: housing, roads and footpaths it will not be possible for an illustrative map to be provided, but the footpath location is somewhat pre-determined as it has to be away from the main vehicular access.</p> <p>Happy to refer to Strategy 27, but used Strategy 35 as this site is outside the BUAB which is not specified in the Strategy 27</p>

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<p>adjacent to the Built Up Area Boundary within which 50% affordable housing threshold applies and the larger allocation at Broadclyst Station (policy H2) does not meet the rural exception scheme criteria (n.b. for accuracy - the affordable housing requirement under Strategy 35 is 66%, not 70% as stated on p.126 of the plan. Also, suggest as stated previously that the reference to housing at Old Park Farm Phase 3 should be deleted from Figure 41 as the land is not allocated and planning permission has been refused)</p> <p>· <b>H4 Affordable Housing</b> – Whilst we are not averse to supporting the 50% level for affordable housing on the two allocations, we do not consider much of the rationale for this in the supporting text to be relevant or accurate and should be revised. We would also question the evidence for the 50:50 tenure split as the Housing Needs Assessment showed a need for 16 homes (14 rent and 2 shared ownership) and the Local Plan tenure split is 70:30.</p>	<p>SG and parish community in total support of 50 -50 split.</p> <p>Happy for this % to be amended p126</p> <p>Happy for Park farm Phase three to be deleted as the planning status of this site is now confirmed; the planning application status at time of Reg 14 and Reg 16 was undetermined.</p> <p>SG Strongly Disagree: Affordable housing is well documented in consultations: Consistent message was that the community were in support of new houses but only on the condition that new housing provided houses for locals and to be affordable Hence 50 50 split. HNS is evidence of need and was not utilised in a hierarchical way to set the % of this policy. The 50 50 split across the three sites provides 20 affordable houses and 24 open market providing the housing survey need requirement for affordable housing. A 70 – 30 split</p>

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<p>It has also been noted that the local connection criteria deviate from that set out in our Local Plan Strategy 35 more than is supported in the justification. We are happy to support the additional step in the cascade for parish grouping, but other than this would suggest it should align to the model set out in the Local Plan.</p> <ul style="list-style-type: none"> <li>· <b>H5 New Housing</b> – whilst this policy has also been subject to substantial beneficial revision, as worded this would apply to developments of single dwellings upwards (to around 15 dwellings). It is suggested that in fact what is meant is that any development on unallocated sites which are brought forward as exception schemes should be supported by an up to date Housing Needs Survey.</li> <li>· <b>H6 Self-Build</b> – rephrasing required to remove the reference to ‘The Broadclyst NP supports’ to the type of development being supported.</li> </ul>	<p>would not deliver the HN requirement and would effect viability as seen in the viability report.</p> <p>Disagree: the Local connection is a copy and paste of Strategy 35 and the only addition is parish grouping , this wording was accepted by EDDC at Reg 14.</p> <p>Agree with changes to those made by EDDC in blue from “any .... Survey”</p> <p>Agree with changes</p>

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<p>· <b>H7 Live-work</b> – Given that, as highlighted in the supporting text the new E Use Class means live-work units can be converted to residential dwellings without planning consent, suggest a clause is added to withdraw permitted development.</p> <p>Furthermore, notwithstanding the improvements made to the Regulation 14 version, given the rise in home working and the loose definition, suggest there is a risk of this allowing residential development ‘by the back door’ e.g. a large house with a home office would appear to qualify, whereas live-work units are better described by a ratio of workspace:residential (e.g. 50:50) which is controlled by condition. The policy would also appear to allow development in unsustainable locations without further criteria.</p>	<p>With the Parish having a very poor employment density this provides evidence that there are fewer jobs than workers. Strong support from the community for live-work was to encourage and expand provision of home working, local employment and to reduce commuter traffic.</p> <p>SG Agree that PDR now allows live-work units to be converted to residential dwellings without planning consent.</p> <p>Not sure that NPs can overrule PDR’s Need examiner to advise on this.</p> <p>Feel that the list in the Policy limits development of backdoor residential development and in some respects for unsustainable locations.</p> <p>Happy for an extra clause to be added to the 4 existing bullet points at the top of the policy to limit unsustainable locations.</p> <p>Definition: SG Happy for floor ratio to be added and set by the examiner.</p>

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<p>· <b>T3 Parking Provision</b> – to be aware that as advised previously, EDDC does not have published parking standards as such currently, although guidance is given in LP Policy TC9 which could be tailored to local requirements.</p> <p>· <b>NE2 Green Corridors</b> – the starting point for this policy should be protection and retention, with any damage being accepted (with mitigation) where this is unavoidable only.</p> <p>· <b>NE3 Tree Replacement</b> – The policy to be made applicable specifically for 'unavoidable' removal of trees, to reinforce that retention and protection is the starting point. Suggest the second paragraph of this policy be deleted at the request of our Landscape and Green Infrastructure officers, with reliance on national policy.</p>	<p>Parking is a huge issue in this Parish and a lot of infrastructure issues are associated with parking provision. The policy was strongly supported by the community and the section within it provided to tailor community needs and aspirations.</p> <p>Happy for examiner to advice but this policy is specifically tailored to the Parish.</p> <p>SG Agree with protection and retention and happy for stronger wording to be adopted.</p> <p>SG agree with protection and retention and happy for stronger wording to be adopted.</p> <p>SG Happy with second paragraph being deleted.</p>

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<p>· <b>NE5 Landscape and Biodiversity</b> – whilst we understand that an exception is made for householder applications being for proportionality, suggest this could be more positively worded. For example, “Development proposals should seek to contribute to a high quality and biodiversity-rich natural environment, Applications except for residential extension and alterations should demonstrate how they address the following matters:”</p> <p>Regarding net gain, given the early working draft Local Plan looks to require 20% suggest the future proofing in the policy should read “unless exceeded by strategic policy”.</p> <p>Other non-policy specific comments:</p> <ul style="list-style-type: none"> <li>· <b>Formatting and Referencing:</b> <ul style="list-style-type: none"> <li>○ Paragraph numbering is incomplete/inconsistent - it would be good practice and assist with referencing in Officer reports for paragraphs to be numbered throughout in continuous sequential order.</li> </ul> </li> </ul> <p>page 140</p>	<p>A SG observation is that the LPA are inconsistent when requesting cross referencing of local plan and national legislation . For policies they want it and in other they do not, there is a need for consistency. Examiner to advise</p> <p>.</p> <p>Agree with this change.</p> <p>Agree with the ability to future proof a high level but prefer to add something along the line of “ unless exceeded by successor legislation” which allows for changes at Local Plan as well as national level changes.</p>

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<ul style="list-style-type: none"> <li>○ Many parts of the document are well written. However, corrections need to be made for editing and typographical errors throughout the plan, including figure/page number referencing. These combined with a significant number of acronyms and abbreviations (not all of which are in the list of abbreviations), some unclear wording, wording relating to earlier versions, and/or assuming a high level of prior knowledge, inhibits flow/legibility/clarity in places. This is not reflective of the considerable hard work that is known to have gone into preparing the plan.</li> <li>○ Consistent referencing is needed throughout to the 2021 version of the NPPF 2021 and to a consistent name for the adopted East Devon Local Plan (2013-2031).</li> <li>○ Ensure correct version of the Local Plan West End Inset Map should be used throughout (the version on p.8 and p.27 appear to be an earlier draft)</li> <li>○ Consistent referencing to the latest Use Classes Order is needed throughout, and suggest clearer within allocation policies to state the use as well as give the use class reference.</li> </ul>	<p>Acknowledged all the comments and for these to be implemented in the Referendum version.</p> <p>Preference in numbered in continuous sequential order</p> <p>NPPF this has now been done</p> <p>EDLP this has now been done</p> <p>New WEI map already put in place</p> <p>The SG disagree with changing this. The plan was produced over a time period when 2 different class uses were in place. In the Call for sites and for the consultation of Sites Class uses that were valid at the time were utilised.. Change from one Class use system to</p>

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<p>It is suggested that many of the above issues could be overcome by 'minor amendments' agreed between the Qualifying Body and the Local Planning Authority.</p> <ul style="list-style-type: none"> <li>· Length and Tone: <ul style="list-style-type: none"> <li>○ Notwithstanding work that has been undertaken since Regulation 14 stage, this has focused on number and wording of policies, and plan text would still benefit, if the opportunity was afforded, from greater brevity and focus on relevant factual information and referencing to supporting evidence. This could be achieved by removing unnecessary repetition and statements of opinion where they do not add to the justification of policies or are not substantiated, and moving some detailed findings or matters relating to earlier stages on plan making to appendices and cross referring to that information where relevant.</li> </ul> </li> </ul>	<p>another is clearly covered in the Site by Site analysis documentation and the class uses in the Policies today are those presently in use. . Except EC3 which is an error and will be updated in the examination process.</p> <p>The SG agreed that these could be easily overcome.</p> <p>SG would like to inform the examiner that a lot of text already being culled and placed into to evidence chapters.SG consider that an examiner of such extensive NP experience, will be able to judge what contextual information before a policy and the justification text after the policy is not required.</p>



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<p>whilst having wider aspirations, the EDDC Climate Change Strategy target of being zero carbon by 2040, which is referenced throughout the plan is not legally binding and is primarily focussed on the operation of the Council itself, rather than the district of east Devon as a whole. As a result the status/force of this strategy has been overstated in the plan as currently presented, but if</p> <p>Broadclyst Parish Council has not already done so, a climate change emergency could be declared and/or an aim included for net zero to be achieved in all development within the parish by 2040.</p> <ul style="list-style-type: none"> <li>○ The plan should consistently promote an access hierarchy to favour first pedestrians, then cyclists, then public transport and lastly private motor vehicles, including in the allocations, in order to align with the intent to address climate change, health and wellbeing.</li> <li>○ Figure 19 of the supporting text for the Community Hub – justification should be provided for the assertion that the allocation will reduce greenhouse gas emissions in (note this is an example of detail in the plan that would be more appropriate in an appendix).</li> </ul>	<p>This was in D1 but has been taken out as it duplicated EDLP strategy policy and was therefore seen as just a repetition in legislation.</p> <p>Broadclyst Parish has set targets in place.</p> <p>This access hierarchy is in place in Policy DC1 point 10 and should not be repeated in site allocations</p> <p>SG happy for Examiner to consider</p>

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<ul style="list-style-type: none"> <li>· Objectives: <ul style="list-style-type: none"> <li>○ We are generally supportive of the vision, aims and objectives of the plan.</li> </ul> </li> <li>Notwithstanding biodiversity net gain is reflected in the draft policies, we would highlight that the Natural Environment objective as currently worded to, 'ensure development does not have an adverse impact on the natural environment or mitigation is provided if impact is unavoidable' is not compatible with Government policy to enhance the natural environment.</li> <li>· Terminology - Noted that some of the smaller communities/clusters of dwellings in the parish are referred to in text and in policy as 'settlements' and to ask the examiner to consider if the implications of the use of this term for places that under strategic policy are not defined as such, means an alternative term would be preferable throughout.</li> <li>· Relationship to new emerging Local Plan <ul style="list-style-type: none"> <li>○ Ensure the plan is clearer about the status of the emerging Local Plan and the relationship with this plan (p.7 of the NP)</li> </ul> </li> </ul>	<p>SG Happy to see what Examiner suggests.</p> <p>SG happy to see what the Examiner suggests</p> <p>Thought this has been done on p 7 SG happy for examiner to make suggestions.</p>

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<ul style="list-style-type: none"><li>○ Amend the text on p.95 to make it clear that the possible preferred site for allocation at Broadclyst in the early working draft of the emerging new Local Plan is not an 'allocation'.</li></ul>	Happy to re label this site as one that <b>had been submitted</b> for housing in the EDDC call for sites 2017 – 2021. It is also noted that it has been allocated in the Emerging local plan, but there is reference to the fact that it has been allocated in the Broadclyst NP.