



Clyst St Mary & Sowton (Bishops Clyst) Neighbourhood Plan (First Review)

Submission Version Representation Form

The modified Clyst St Mary & Sowton (Bishops Clyst) Neighbourhood Plan has been prepared by Bishops Clyst Parish Council.

It has been formally submitted to East Devon District Council who are legally required to undertake public consultation. The consultation closes at 9am on **17th March 2025**.

Please use this form to make representations (comments) on the Plan.

Using this form

Please use a separate form for each representation you wish to make and state your name or organisation on each page. Please note we cannot accept anonymous responses. Your name, address and your comments will be made publically available on our website. Other personal details (signature, personal email address and telephone number) will not be visible.

Return your completed form(s) and any additional information to East Devon District Council:

By email: planningpolicy@eastdevon.gov.uk

By post: Angela King, Planning Policy team, East Devon District Council, Blackdown House, Border Road, Heathpark Industrial Estate, Honiton, EX14 1EJ

To arrive not later than 9am 17th March 2025. Representations received after this may not be accepted.

Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of producing the neighbourhood plan and may inform other Planning Policy work. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. The content of your representation including your name and address will be recorded electronically and made available our website. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the [Neighbourhood Planning Representations Privacy Notice](#) on the data protection pages on our website.

Part A – Personal Details

Please enter your details as appropriate below. Please note your full name and address must be provided as a minimum. Please see page 1 for details on how we use your data.

Your Personal Details

Title:	Mr
First name:	David
Last name:	White, BSc (Hons), MRICS
Job Title (where relevant):	Estates Investment Manager
Address:	Devon & Cornwall Police, Buildings & Estates, Police HQ, M
Postcode:	EX2 7HQ
Telephone number:	
Email address:	

Your Agent's Details

If you are using an agent, please fill in your title, name and organisation above and the full contact details of the agent below. Where applicable, an agent will be the point of contact for any correspondence.

Title:	
First name:	
Last name:	
Job Title (where relevant):	
Address:	
Postcode:	
Telephone number:	
Email address:	

Part B - Representation Details

Enter Your Name/Organisation in the box below (Please state this on each sheet):

Office of the Police and Crime Commissioner for Devon and Cornwall and the Isles of Scilly and Devon and Cornwall Police.

Question 1

To which section of the Neighbourhood Plan does this representation relate?

Please state in the box below, the point of reference for your representation (this means the policy, paragraph number or other reference as appropriate)

Policy BisC10 - Infrastructure

Question 2

Please use the box below to explain why you are supporting or objecting to this part of the plan. If your comment relates to a specific area of land or site please identify it on a map if possible. Continue on a separate sheet if necessary.

The Office of the Police and Crime Commissioner for Devon and Cornwall and the Isles of Scilly and Devon and Cornwall Police (the Police) wish to object to the draft wording of Policy BisC10 which relates to the delivery and necessary provision of physical and social infrastructure requirements arising from all proposals for new development within the Parish, in order to offset its impacts.

Paragraph 101 of the revised National Planning Policy Framework (NPPF) now requires decision-makers to give significant weight to the importance of delivering new, expanded or upgraded "public service infrastructure" when considering proposals for new development. As such, "blue light" services - which covers police related infrastructure - is cited within the description of "public service infrastructure."

As drafted, the existing wording of Policy BisC10 does not reflect the revised requirements for "public service infrastructure" as set out in paragraph 101 of the revised NPPF arising from new development, nor the significant weight that should be afforded to it in the decision-making process.

We note that the emerging Neighbourhood Plan recognises the development pressure on the Parish with the identification of a proposal for the creation of a 'second new community' close to the eastern boundary in the emerging East Devon District Local Plan. To this end, paragraph 8.32 states that "major new development must not put an intolerable strain on local infrastructure just to achieve the desired growth numbers for the District" Notwithstanding this, it is inevitable that major development of this scale will put greater pressure on police resources and infrastructure not only within the Neighbourhood area, but the wider Greater Exeter area as well.

In addition to this, paragraph 8.34 states that "whilst major development proposals are expected to make a significant contribution towards improvements to the physical and social infrastructure of the neighbourhood area," Devon & Cornwall Police are concerned that draft Policy BisC10 makes no expressed reference to "public service infrastructure" which is now within the revised NPPF.

The principle of seeking police contributions is well established within planning policy, and therefore it is critical that draft Policy BisC10 is modified to ensure that sufficient police infrastructure in connection with new development is sought, and of which aligns with the principles of the revised NPPF in paragraph 101, so that it enables the faster delivery and provision of public service infrastructure for the Police.

Please note that Devon & Cornwall Police will also be making representations to the emerging East Devon Local Plan, Regulation 19 consultation on matters in relation to public service infrastructure requirements - specifically blue light services - arising from major new development in the District.

Enter Your Name/Organisation in the box below (Please state this on each sheet):

The Office of the Police and Crime Commissioner for Devon and Cornwall and the Isles of Scilly .

Question 3

Please use the box below to say what changes you would suggest should be made to the plan?

It will be helpful if you are able to put forward your suggested revised wording of any policy or text or suggested alternative policy boundary as appropriate. Please be as precise as possible and continue on a separate sheet if necessary.

The Office of the Police and Crime Commissioner for Devon and Cornwall and the Isles of Scilly and Devon and Cornwall Police (the Police) would suggest the following amendment to draft Policy BisC10:-

All proposals for new development must deliver the necessary provision for physical, social and public service infrastructure to offset its impacts. Applications for residential development will be required to demonstrate how the infrastructure needs of the development are addressed either through provision on-site, or through developer contributions be it those identified in the IDP, or other appropriate infrastructure improvements that are sought to ensure that the necessary infrastructure improvements are secured. Proposals for new development that cannot demonstrate adequate measures to deliver appropriate infrastructure provision to offset its impacts will not be supported.

Enter Your Name/Organisation in the box below (Please state this on each sheet):

The Office of the Police and Crime Commissioner for Devon and Cornwall and the Isles of Scilly and Devon and Cornwall Police (the Police).

Question 4

If your representation is seeking a change to the Plan, do you consider it necessary to speak at the examination?

Please note if you select 'No' your representation(s) will still be fully considered by the independent Planning Inspector by way of written representations.

Please select as appropriate:

- No, I do not wish to speak at the examination
- Yes, I wish to speak at the examination

If you have answered yes above and wish to speak at the examination, please outline in the box below why you consider this to be necessary:

Please note this will not be regarded as a binding decision but will help us in our planning of the examination. The Inspector will ultimately determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the Examiner does not consider it necessary to hold a public examination, consideration will be given by way of written representations.

Future Correspondence

Please indicate by selecting yes or no as appropriate, whether you wish to be notified of:

1. The publication of the recommendations of any person appointed to carry out an independent examination of the Bishops Clyst Neighbourhood Plan? Y N
2. The adoption of the Bishops Clyst Neighbourhood Plan? Y N

Enter Your Name/Organisation in the box below (Please state this on each sheet):

The Office of the Police and Crime Commissioner for Devon and Cornwall and the Isles of Scilly and Devon and Cornwall Police (the Police).

Signature

Please sign and date your form in the box below.

Please note a signature is required by the Planning Inspectorate. If filling in the form electronically it can be an 'electronic signature' by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the Inspector.

Signature: David White, BSc (Hons) MRICS

Date: 14th March, 2025