

Filtered Data Export

Full name: Lucy White

Organisation (where relevant): Lucy White Planning Limited

Other party name (if relevant): National Grid Electricity Distribution (South West) Plc (NGED)

Proposal:

4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED) (formerly Western Power Distribution (South West) Plc, in response to the Regulation 19 East Devon Local Plan which is subject to public consultation. Introduction NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers. In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons. Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm: a) whether the lines can be accommodated within the development site; or b) the viability and feasibility of diverting and/or undergrounding overhead lines. This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. NGED cannot

be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan. In light of the above, NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:

1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.

2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;

3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.

4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED. Strategic Policy WS01 The Local Plan allocation for the proposed new community of circa 8,000 dwellings is traversed by NGED's Exeter Main 132kV line, a strategically important electricity supply line within East Devon. This infrastructure serves thousands of residents and businesses in the Exeter area and is critical to maintaining supply in the short, medium and long-term. Any proposals to divert or underground this line would be highly challenging and disruptive to supply and NGED would object to development proposals which are reliant upon such works. NGED has licence obligations to operate the network economically and efficiently. Therefore NGED's preference is for the overhead line to remain in situ and any proposals for a new settlement to be designed around them. The retention of the strategically important Exeter Main SGP and distribution station is critical to maintaining the city's electricity supply and cannot be prejudiced by development proposals which would themselves place a significant additional burden on the electricity supply. Moreover, it is not always possible to divert 132kV lines and if a diversion were possible, it would need to accommodate two larger terminal towers and a 10m wide corridor above the undergrounded cables, which would be required to remain open land. Such land is unsuitable for buildings, public highway and any other development which would obstruct access to the cables. Early consideration of the overhead lines in the masterplanning process can enable the lines to be sensitively and efficiently designed

into the development. NGED alerted East Devon Council to the presence of the line and its requirements at the Regulation 18 stage. Strategic Policy WS01 does not refer to the existing electricity infrastructure or the need to safeguard this infrastructure through the development of the new community. NGED notes and welcomes the policy requirement for an allocation-wide masterplan, Infrastructure Delivery Strategy and Phasing Plan to be submitted and approved prior to commencement of any development. To ensure the masterplanning process is effective in safeguarding the existing electricity infrastructure, Policy WS01 should be amended to include reference to the 132kV lines and the need to incorporate the lines in situ through the masterplanning exercise. NGED also notes that around 150 hectares of land will be required as Suitable Alternative Natural Greenspace (SANGs) to meet Habitat Regulations requirements. Land beneath overhead powerlines could be utilised for SANGs and other biodiversity net gain enhancements.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development at the West End chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

The Local Plan allocation for the proposed new community of circa 8,000 dwellings is traversed by NGED's Exeter Main 132kV line, a strategically important electricity supply line within East Devon. This infrastructure serves thousands of residents and businesses in the Exeter area and is critical to maintaining supply in the short, medium and long-term. Any proposals to divert or underground this line would be highly challenging and disruptive to supply and NGED would object to development proposals which are reliant upon such works. NGED has licence obligations to operate the network economically and efficiently. Therefore NGED's preference is for the overhead line to remain in situ and any proposals for a new settlement to be designed around them. The retention of the strategically important Exeter Main SGP and distribution station is critical to maintaining the city's electricity supply and cannot be prejudiced by development proposals which would themselves place a significant additional burden on the electricity supply. Moreover, it is not always possible to divert 132kV lines and if a diversion were possible, it would need to accommodate two larger terminal towers and a 10m wide corridor above the undergrounded cables, which would be required to remain open land. Such land is unsuitable for buildings, public highway and any other development which would obstruct access to the cables. Early consideration of the overhead lines in the masterplanning process can enable the lines to be sensitively and efficiently designed into the development. NGED alerted East Devon Council to the presence of the line and its requirements at the Regulation 18 stage. Strategic Policy WS01 does not refer to the existing electricity infrastructure or the need to safeguard this infrastructure through the

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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Proposal:

4. Development at the West End

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1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS01

2. Do you consider that this part of the Development at the West End chapter is legally compliant?: Yes

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2(b). If no, please give details of why you consider this part of the Development at the West End chapter is not legally compliant. Please be as precise as possible.:

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3. Do you consider that this part of the Development at the West End chapter is sound?: No

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4. Do you consider that this part of the Development at the West End chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development at the West End chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Development at the West End chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

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6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:

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4. Development at the West End

1. To which part of the Development at the West End chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: WS10

3. Do you consider that this part of the Development at the West End chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development at the West End chapter is not sound. Please be as precise as possible.: THE EAST DEVON PRE-SUBMISSION LOCAL PLAN (FEBRUARY 2025) REPRESENTATIONS ON BEHALF OF NATIONAL GRID ELECTRICITY DISTRIBUTION (SOUTH WEST) PLC These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED) (formerly Western Power Distribution (South West) Plc, in response to the Regulation 19 East Devon Local Plan which is subject to public consultation. Introduction NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers. In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons. Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm: a) whether the lines can be accommodated within the development site; or b) the viability and feasibility of diverting and/or undergrounding overhead lines. This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should

take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan. In light of the above, NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:

1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.
2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.

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The employment and housing allocation for 596 homes and 2.4 hectares of employment plus community facilities is intersected by the 132kV overhead electricity line to the south of the allocation site. The allocation policy makes no reference to the overhead line or the need to safeguard the line, retaining it in situ throughout the development. NGED welcomes the policy requirement for an agreed masterplan to be established for the whole site before any development parcels can be brought forward for development. To ensure the effectiveness of the policy to safeguard electricity infrastructure through this masterplan, specific reference should be made to the need to retain the infrastructure in situ. NGED reserves the right to comment further on the policy for the new

community through the second phase of the Regulation 19 consultation. For accuracy, please refer to NGED as National Grid Electricity Distribution throughout the Local Plan documentation. The organisation is no longer referred to as Western Power Distribution. I trust you find the above comments helpful and constructive. NGED would be willing to meet with Officers to discuss the proposals for the new settlement in further detail if that would be helpful. If you would like to arrange a meeting, please contact me to discuss further.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD20

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: Yes

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

1. Strategic Policy SD20 - Development Allocations at Kilmington Place Land Limited welcomes the identification of land at Kilmington to deliver new residential development over the plan period, namely at Kilm_09b and Kilm_10. Kilmington is recognised as a service village under Policy SP01, capable of accommodating new development in accordance with the spatial strategy, with a minimum of 59 dwellings to be achieved within the Neighbourhood Plan area over the period 01.04.2020 – 01.04.2042. The cumulative total capacity of allocations identified under Policy SD20 achieves 42 dwellings. Land East of George Lane, Kilm_09b is allocated for 23 dwellings. The site represents the easternmost of two fields sandwiched between the northern built-up edge of Kilmington and the A35 corridor. The western field is allocated for 14 dwellings in the Kilmington Neighbourhood Plan (Made in October 2022) which covers the shorter plan period of 2020-2031. Place Land broadly supports the proposed capacity of 23 dwellings for Kilm_09b. This capacity figure is informed by a presentation by Place Land to the Council's Strategic Planning Committee in January 2022, which indicated a potential capacity of 35 – 40 dwellings for Kilm_09 a and b combined. Since this presentation, further design work has been undertaken to refine the concept layout, including preparation of a landscape appraisal, initial drainage strategy, walkover ecology survey and heritage appraisal. Copies of these studies and concept proposals for the site, prepared by Lacey Hickie Caley Limited accompany these representations. The findings of the additional surveys confirm that Kilm_09 (a and b combined) is capable of accommodating around 39 dwellings in a sensitive manner which respects the special landscape qualities of the National Landscapes and the setting of the listed buildings and mitigates any harm through the design and layout. The surveys submitted

in support of this representation are summarised below.

Landscape The allocation site lies within but on the edge of the East Devon National Landscape; its northern extent is defined by the A35. To the north west of the site lies the Blackdown Hills National Landscape, although land immediately north of the allocation site is not a protected landscape.

2 The landscape and visual appraisal identifies the main impact of the development of the allocation to be on views from the A35 on the approach to the site from the west, where the site can be appreciated as open fields with views to the Baptist Church in Kilmington. In the wider protected landscape of the National Landscapes the site is seen in the context of the rest of the village and its development would have a minimal adverse impact on the protected landscapes. The proposed layout strengthens the established hedgerow and tree planting along the northern boundary, safeguarding a 10 metre corridor for additional landscaping to mitigate the visual impact of development when viewed from the Blackdowns National Landscape and to enhance the health and wellbeing of new residents through separation from the A35 corridor. New and additional planting is proposed along the site's other boundaries to maintain and enhance the established visual enclosure of the site and soften the visual impact of new built development. An orchard is proposed to the south of the site and the existing weak field boundary planting through the centre of the site would be bolstered through additional tree planting to introduce a strong framework of landscaping. The landscaping would be sufficient to mitigate the landscape and visual impact of the proposed development on the National Landscape and assimilate the development into its context.

Heritage The heritage appraisal concludes that there is no functional relationship between the listed Old Inn and the proposed allocation. The setting of the Old Inn can best be appreciated from the roadside approaches along the A35; views of the Old Inn from the allocation site are incidental and do not add to its heritage significance. Similarly the allocation site does not form part of the 'designed' or 'intended' views of the Old Inn and is therefore not within the setting of the listed building. Accordingly, the site's development would not harm the Old Inn's setting or significance. Any views of the development are already well-screened by existing vegetation although additional landscape enhancement could be delivered as part of the development, if desirable. Any impact of development on the setting of George Farm to the west of George Lane can be mitigated by avoiding building in the junction of George Lane and the A35. The listed war memorial to the north of George Lane has a very intimate setting which would not be affected by the development of the allocation.

3 Ecology The site comprises two arable agricultural fields with trees, hedgerows and other planting along the site boundaries. The northern hedgerow alongside Gammons Hill (A35) comprise two distinct sections. The western section appears to be a species rich hedgerow that has been in place for a good many years, the eastern extent beyond the field entrance is a line of overgrown beech trees, possibly planted as a hedgerow which became overgrown. This extent is of significantly lower value than the western extent. The eastern hedgerow is also species rich and contains some significant trees.

The southern hedgerow (to the north of Meadow Bank) consists of a line of trees with an understory of shrubs. None of the trees in this area are considered significant in an arboricultural context, but several are significant in an ecological context. There are a small number of trees to the rear of properties in The Orch, including one very large oak which is of significant biodiversity value. A line of small and insignificant trees, largely ash, bisects the two field, separating it in two. These trees are of low value from an ecological context and ash die back is already prevalent in this site, which will mean their demise. There is a section of defunct dry stone wall in this area. Very little of it now remains and it serves no purpose. The boundary 'bund' of Dares Field is currently of low biodiversity value. The species rich hedgerow alongside George Lane is of a similar composition and age as that alongside the A35. Two large oak trees are located within this hedgerow. Both have been butchered by Western Power as the power lines run close to and through the trees canopy. The grassland within the two fields is arable in nature. The first survey recorded 100% rye grass, shortly after this it was replaced with maize and has subsequently been returned to rye. The ecological value is negligible.

Transport The site's location on the edge of Kilmington offers good opportunities to access an existing network of footways, cycleways and public rights of way, including a footway on the A35 connecting to a footway/cycleway routing along the B3261 into Axminster. Existing bus stops are located on the A35 within 260 metres of the site. The bus services provide a service between Exeter and Axminster with services every 2 hours Monday to Saturday. Axminster Rail Station located 2.64 kilometres from the site provide hourly train services to Exeter and London Waterloo. 4 The site benefits from a good range of facilities within an acceptable walking and cycling distance. Accordingly, the site represents a sustainable location for development with reasonable opportunities to travel by sustainable transport modes. There are two potential vehicular access options. Option 1 is an access off George Lane, via a simple priority T-junction, whilst option 2 is an access off the A35 via a priority junction with a ghost-island right turn lane arrangement. Devon County Council Highways Authority has commented on Option 1 and raises no concerns to the principle of a vehicular access off George Lane. Initial consultation with National Highways on Option 2 indicate that access onto the A35 could be achieved if a departure from standards was accepted. The proposed allocation offers the opportunity to introduce additional pedestrian and cycle connections onto the A35 and into Kilmington village to the benefit of new and existing residents.

Drainage The site comprises relatively flat agricultural land; the topography falls generally from west to east at an average gradient of 1 in 33 to a low point in the north-east corner adjacent to the A35. The whole site lies within Flood Zone 1 and is at very low risk of surface water flooding. British Geological Society mapping indicates that the site is underlain by a bedrock of mudstone with superficial deposits of silt, sand and gravel in the western part of the site and sand and gravel in the eastern part. It is therefore anticipated that the use of soakaways will be practical to dispose of surface water runoff. As a worst case scenario, an infiltration basin would be located in

the north-east corner of the site to restrict run-off to greenfield rates. The accompanying layout plan incorporates the infiltration basin. Sewer records indicate that there is a foul sewer connection from the existing residential development in Dares Field, to the south west of the site. A combined sewer should be capable of draining the western part of the site by gravity. The remainder of the site will gravitate to the north-east corner and can be connected to the existing combined sewer in the A35.

[Further detail on the site can be found in the attached PDF]

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Wording of Policy SD20 The Neighbourhood Plan was prepared in general conformity with the Adopted East Devon Local Plan 2031 and there is a stated intention to monitor the relationship with the emerging Local Plan and undertake a review of the Neighbourhood Plan, if necessary, to ensure it takes precedence in decisions on developments in the parish (paragraph 1.1, Kilmington Neighbourhood Plan). 5 The National Planning Policy Guidance advises that where a neighbourhood plan has been brought into force, the LPA should take its policies and proposals into account when preparing the local plan and should not duplicate those policies in the neighbourhood plan unless changed circumstances justify this (Paragraph: 006 Reference ID: 61-006-20190723). For the following reasons Place Land considers that changes in circumstance justify the inclusion of the land allocated in the Neighbourhood Plan under Policy HD3 in this Local Plan within Policy SD20:

1. The Neighbourhood Plan expires in 2031, some 10 years prior to the Local Plan and whilst there is a stated intention from the Neighbourhood Plan group to review the Plan, it cannot be relied upon to ensure the ongoing allocation of the site for housing.

2. Kilm_09b is reliant on vehicular access via the land identified within the Neighbourhood Plan land (HD3). The Highway Authority, Devon County Council has advised that a satisfactory access arrangement can be secured via George Lane (see attached email and access drawing). A vehicular access via the A35 would also be taken from within the Neighbourhood Plan allocation. The allocation of Kilm_10 within this Local Plan also includes a stated preference for the highway access to be gained from Kilm_09b. Accordingly, the Local Plan allocations are interlinked with, and reliant upon, the delivery of a site which falls outside the Local Plan and which may not retain its status as an up-to-date allocation for the lifetime of the Local Plan.

3. The Neighbourhood Plan site is referred to as “Kilm 09a” within Policy SD20. However, Kilm_09a is not an allocated site within this Local Plan, it is not identified on the Policies Map and is not known by this reference within the Neighbourhood Plan. It would appear that the site reference has been carried over from earlier drafts of the Local Plan when the land was included in the site allocation.

4. Policy SD20 requires that a comprehensive development layout should cover both the Neighbourhood Plan allocation and the local plan site, with the whole site conforming with the design principles set out in Neighbourhood Plan policy. The effectiveness of this policy approach is questionable. Firstly, the design principles in the Neighbourhood Plan policy were drafted to apply to HD3 only. These policy principles cannot be conveyed to another allocation outside the Neighbourhood Plan. Policy SD20 does not clarify which elements of Policy HD3 represent the “design principles” which should apply across the whole site, leaving this open to interpretation at the submission of a planning application. Policy SD20 includes 6 some further design principles regarding buffer planting and footpath links. However the relationship between these principles and those within the Neighbourhood Plan are unclear.

5. The design principles within Policy HD3 refer to policies in the Adopted Local Plan, including EN19 and TT1. These policies will be superseded by the new Local Plan.

6. In respect of affordable housing and self-build, the Neighbourhood Plan policy requirements under Policy HD3 are overly prescriptive and onerous, requiring 50% affordable housing and a specific mix of house types for affordable housing and self-build. The policy requirements are inconsistent with the policies of this Local Plan and the prescriptive nature of the policy impedes delivery of housing (see attached copy of Policy HD3).

7. In light of these policy discrepancies and in the interests of establishing clear development principles for the comprehensive development of land at Kilm_09 (a and b), Place Land finds Policy SD20 to be ineffective and unsound in its current form. To achieve a sound policy, the wording should be amended to allocate Kilm_09 a and b under Policy SD20 with comprehensive design principles to apply to the whole site and affordable housing provision consistent with Kilm_09b. b) Place Land propose the following amended wording: Policy “Land east of George Lane is allocated for 37 homes. This site is in the East Devon National Landscape and requires very careful design to take account of its landscape setting. A comprehensive development layout should include:

- a buffer of planting to the northern site boundary (along the A35);

- safe pedestrian and cycle access with connections to adjoining roads and paths, including to southern and northern site boundaries and a west-east pedestrian/cycle link to connect to existing facilities in the village”

Policies Map For the reasons set out in respect of representations to Policy SD20, Place Land objects to the omission of land west of Kilm_09b from the policies map. In order to ensure the comprehensive delivery of development across Kilm_09a and Kilm_09b, the sites should be identified as a contiguous residential allocation on the policies map, supported by Policy SD20, as proposed for amendment by Place Land Limited.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

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2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.:

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2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Introduction chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

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3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(a). If yes, and you wish to support the soundness of this part of the Development in the Towns and Villages chapter, please use this box to set out your comments.:

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3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.:

Please see attached letter.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Please see attached letter.

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: Yes

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.:

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4(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter fails to comply with the duty to co-operate. Please be as precise as possible.:

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5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Place Land Limited has an interest in the land as promoter and would welcome the opportunity to be present at any discussions regarding the site's allocation and to explain the proposed amendments to the policy wording and the rationale for including Kilm_09a within the Local Plan allocation.