

Filtered Data Export

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS01

**2. Do you consider that this part of the High Quality Design chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:** Good and appropriate design should be encouraged such as respecting local characteristics and special qualities. This policy is supported, a policy which is consistent and in line with the NPPF. I have no specific comments to make as regards this policy.

**2(b). If no, please give details of why you consider this part of the High Quality Design 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 High Quality Design 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 High Quality Design 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 High Quality Design chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the High Quality Design 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 High Quality Design chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design 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 High Quality Design 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.:**

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**4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the High Quality Design 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 High Quality Design 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.:**

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**Organisation (where relevant):** OBK Land and Planning Ltd

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**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS02

**2. Do you consider that this part of the High Quality Design chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:** I support this policy which seeks to optimise the density of a site and makes efficient use of land.

**2(b). If no, please give details of why you consider this part of the High Quality Design 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 High Quality Design 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 High Quality Design 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 High Quality Design chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the High Quality Design 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 High Quality Design chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design 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 High Quality Design 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.:**

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**4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the High Quality Design 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 High Quality Design 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.:**

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**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:** 10. High Quality Design

**1. To which part of the High Quality Design chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** DS04

**2. Do you consider that this part of the High Quality Design chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:**

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**2(b). If no, please give details of why you consider this part of the High Quality Design 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 High Quality Design 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 High Quality Design 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.:** To say that “Development in East Devon will deliver high quality multi-functional Green and Blue infrastructure in accordance with Natural England’s Green Infrastructure Framework” should be an aim only to be achieved “where possible”. This is a very prescriptive approach and could, realistically, be difficult to achieve on a lot of housing sites where the aim is to optimise density and design schemes which are compatible with the local character. This policy could prove too onerous and good/ appropriate landscaping for the location is the key.

**3. Do you consider that this part of the High Quality Design chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the High Quality Design 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 High Quality Design chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design 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 High Quality Design 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.:**

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**4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?: No**

**4(a). If yes, and you wish to support this part of the High Quality Design 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 High Quality Design 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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:** 11. Sustainable Transport and Communications

**1. To which part of the Sustainable Transport and Communications chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** TR01

**3. Do you consider that this part of the Sustainable Transport and Communications chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Sustainable Transport and Communications chapter, please use this box to set out your comments.:** I fully support this policy which places a priority on walking/ cycling for new development.

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:**

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**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB05

**2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:**

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**2(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not legally compliant. Please be as precise as possible.:** This policy seeks biodiversity net gain (BNG) of at least 20% unless there is “a demonstrable visibility problem to achieve this target”. The national BNG target is 10% which itself can be difficult and unrealistic to achieve on some sites and onerous on the developers. I object to this policy and the BNG target for East Devon in the Local Plan should be 10%, in line and consistent with national policy and guidelines.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.:**

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**4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?:**

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**4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.:**

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**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:** 13. Our Outstanding Biodiversity and Geodiversity

**1. To which part of the Our Outstanding Biodiversity and Geodiversity chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** PB08

**2. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Introduction chapter, please use this box to set out your comments.:** I support this policy. It is important that where tree/ hedge losses are justifiable and unavoidable to access a site for instance, it is appropriate to compensate elsewhere either on or off-site.

**2(b). If no, please give details of why you consider this part of the Our Outstanding Biodiversity and Geodiversity chapter is not legally compliant. Please be as precise as possible.:**

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is sound?:**

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**3(a). If yes, and you wish to support the soundness of this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.:**

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**4. Do you consider that this part of the Our Outstanding Biodiversity and Geodiversity chapter complies with the duty to cooperate?:**

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**4(a). If yes, and you wish to support this part of the Our Outstanding Biodiversity and Geodiversity 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 Our Outstanding Biodiversity and Geodiversity 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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS01

**2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:** I support this policy. Access to open space and sports facilities is important and a key consideration in accommodating new development.

**2(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not legally compliant. Please be as precise as possible.:**

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation 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 Open Space and Sports and Recreation chapter is sound?:**

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**3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:**

-

**3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation 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.:**

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**4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?:**

-

**4(a). If yes, and you wish to support this part of the Open Space and Sports and Recreation chapter's compliance with the duty to co-operate, please use this box to set out your comments.:**

-

**4(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter fails to comply with the duty to co-operate. Please be as precise as possible.:**

-

**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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:** 14. Open Space and Sports and Recreation

**1. To which part of the Open Space and Sports and Recreation chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** OS02

**2. Do you consider that this part of the Open Space and Sports and Recreation chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:** I support this policy and having nothing further to add.

**2(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not legally compliant. Please be as precise as possible.:**

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation 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 Open Space and Sports and Recreation chapter is sound?:**

-

**3(a). If yes, and you wish to support the soundness of this part of the Open Space and Sports and Recreation chapter, please use this box to set out your comments.:**

-

**3(b). If no, please give details of why you consider this part of the Open Space and Sports and Recreation chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation 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.:**

-

**4. Do you consider that this part of the Open Space and Sports and Recreation chapter complies with the duty to cooperate?:**

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**4(a). If yes, and you wish to support this part of the Open Space and Sports and Recreation 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 Open Space and Sports and Recreation 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.:**

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**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP01

**2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** Clyst St Mary should be defined as a Service Village where some development should be allowed. I support for this policy.

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

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Spatial Strategy 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 Spatial Strategy chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** Clyst St Mary should be defined as a Service Village where some development should be allowed. I support for this policy.

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

-

**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Introduction 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.:**

-

**4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Spatial Strategy 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 Spatial Strategy 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. :**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP03

**2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.:**

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**2(b). If no, please give details of why you consider this part of the Spatial Strategy 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 Spatial Strategy 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 Spatial Strategy 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 Spatial Strategy chapter is sound?:** Yes

**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy chapter, please use this box to set out your comments.:** A “Minimum Contribution from Emerging/ future Neighbourhood Plans” of 72 dwellings is identified for Bishops Clyst (Clyst St Mary and Sowton). It is important to stress that this is a “Minimum” figure for Clyst St Mary and, on this basis, I support this policy.

**3(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Introduction 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.:**

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**4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Spatial Strategy 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 Spatial Strategy 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. :**

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**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

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**Proposal:**

3. The Spatial Strategy

**1. To which part of the Spatial Strategy chapter does your representation relate?:**

Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** SP08

**2. Do you consider that this part of the Spatial Strategy chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Spatial Strategy chapter, please use this box to set out your comments.:**

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**2(b). If no, please give details of why you consider this part of the Spatial Strategy chapter is not legally compliant. Please be as precise as possible.:** The part which says, "up to the boundaries" should be removed and this should read as follows – "layouts should be designed in such a way that further phases are not prejudiced or compromised in any way and can come forward for development having regard to the provision of pedestrian, cycling and vehicular access".

**2(c). Please set out the modification(s) you consider necessary to make this part of the Spatial Strategy 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 Spatial Strategy 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 Spatial Strategy chapter is sound?:**

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**3(a). If yes, and you wish to support the soundness of this part of the Spatial Strategy 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 Spatial Strategy chapter is not sound. Please be as precise as possible.:**

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**4. Do you consider that this part of the Spatial Strategy chapter complies with the duty to cooperate?:**

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**4(a). If yes, and you wish to support this part of the Spatial Strategy 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 Spatial Strategy 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. :**

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**Other party name (if relevant):**

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**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.:** WS09

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

**2(a). If yes, and you wish to support the legal compliance of this part of the Development at the West End chapter, please use this box to set out your comments.:**

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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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**2(c). Please set out the modification(s) you consider necessary to make this part of the Development at the West End 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 at the West End chapter is sound?:** No

**3(a). If yes, and you wish to support the soundness of this part of the Development at the West End 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 at the West End chapter is not sound. Please be as precise as possible.:**

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**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.:** I broadly support this policy such as the provision of cycling/ walking infrastructure, where possible (my underlining). 30% tree canopy cover should be a target only to be achieved “where possible” because this level of tree canopy cover is, realistically, difficult to achieve on a lot of housing sites where the aim is to optimise density and design schemes which are compatible with the local character. Good and appropriate landscaping is the key rather than an arbitrary aim for tree canopy coverage of 30% which may provide difficult to achieve in practice.

**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.:**

-

**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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**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.:** SD14

**2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance 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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**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.:** As background and context for this submission, CSL have an interest in the site at Sidmouth Road, being the southern part of the Proposed Area for Development under Policy BisC12 – land east of Clyst St Mary - in the Submission Version of the Neighbourhood Plan for Bishops Clyst Parish. As such, CSL supports this site at BisC12 in the Neighbourhood Plan, as shown on Map 9 for residential development to provide a mix of housing. I support this policy so far as it seeks to accommodate “at least 72 dwellings” in Clyst St Mary. That this states that this is a minimum requirement as regards the number of dwellings and that this will need to come forward specifically in the village of Clyst St Mary is important. As noted above, the Neighbourhood Plan for Clyst St Mary is well advanced, being at the Submission

Version stage, and the site at Sidmouth Road referred to as BisC12 in the Neighbourhood Plan has been included in all previous iterations of the plan, it would appear to be sensible and logical to include this site as an allocation in the East Devon Local Plan. On this basis, the Local Plan would reflect the wishes of the local Clyst St Mary community, and the two plans would be consistent with one another.

A date of 2030 is suggested for development to come forward through the Neighbourhood Plan process – given the advanced nature of the Neighbourhood Plan and willingness of CSL to progress a planning application for this site, this date could be changed to 2028.

**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.:**

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**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.:**

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**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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:**

6. Mitigating Climate Change

**1. To which part of the Mitigating Climate Change chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** CC06

**2. Do you consider that this part of the Mitigating Climate Change chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Mitigating Climate Change chapter, please use this box to set out your comments.:**

The requirement for all major developments to undertake an embodied carbon assessment is excessive and unjustified. This should only be required where the circumstances of the proposal raise significant embodied carbon issues.

**2(b). If no, please give details of why you consider this part of the Mitigating Climate Change 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 Mitigating Climate Change 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 Mitigating Climate Change 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 Mitigating Climate Change chapter is sound?:**

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**3(a). If yes, and you wish to support the soundness of this part of the Mitigating Climate Change 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 Mitigating Climate Change chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Mitigating Climate Change 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 Mitigating Climate Change 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.:**

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**4. Do you consider that this part of the Mitigating Climate Change chapter complies with the duty to cooperate?:**

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**4(a). If yes, and you wish to support this part of the Mitigating Climate Change 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 Mitigating Climate Change 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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:**

7. Adapting to Climate Change

**1. To which part of the Community Facilities chapter does your representation relate?:**

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**1(a). Please write down the paragraph or policy number that your representation relates to.:** AR02

**2. Do you consider that this part of the Community Facilities chapter is legally compliant?:** No

**9:**

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

Limiting this to 110 litres per day is objected to as this proposal is lacking any evidence base.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Community Facilities 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 Community Facilities 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 Community Facilities chapter is sound?:**

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**3(a). If yes, and you wish to support the soundness of this part of the Community Facilities 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 Community Facilities chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Community Facilities 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 Community Facilities 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.:**

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**4. Do you consider that this part of the Community Facilities chapter complies with the duty to cooperate?:**

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**4(a). If yes, and you wish to support this part of the Community Facilities 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 Community Facilities 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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN02

**2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:**

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**2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.:**

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:** I support the percentages which are included in the Plan which are reasonable in my opinion. I would, however, suggest that these percentages are subject to financial viability and this flexibility should be applied to all sites and not just sites Axminster.

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
No

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:**

-

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

-

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:**

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**4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?:** Yes

**4(a). If yes, and you wish to support this part of the Meeting Housing Needs 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 Meeting Housing Needs chapter fails to comply with the duty to co-operate. Please be as precise as possible.:**

-

**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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN03

**2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?:** Yes

**2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:** I support this policy. No further comments on this policy.

**2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.:**

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:**

-

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**  
Yes

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:**

-

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

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**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:**

-

**4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?:**

-

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

-

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

-

**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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN04

**2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:**

-

**2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.:**

-

**2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:** I support this policy with one exception – the requirement that 100% of all new dwellings will meet building regulation M4(2) requirements which is optional under the building regulations. This requirement is subject to “site sustainability and site viability”. However, this should be an aim and stated goal rather than a requirement which is subject to viability. New development should comply with the current building regulations and other similar requirements. This requirement is, however, far too onerous and unrealistic on 100% of all new dwellings., considering too that developments must meet many other requirements such as BNG which can compromise the financial viability of schemes.

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**

No

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:**

-

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

-

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:**

-

**4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?:** Yes

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

-

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

-

**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.:**

-

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):**

-

**Proposal:**

8. Meeting Housing Needs

**1. To which part of the Meeting Housing Needs chapter does your representation relate?:** Policy

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** HN05

**2. Do you consider that this part of the Meeting Housing Needs chapter is legally compliant?:** No

**2(a). If yes, and you wish to support the legal compliance of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:**

-

**2(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not legally compliant. Please be as precise as possible.:** I object to a mandatory percentage on self-build/ custom build housing, instead this should be based on evidenced need.

**2(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:**

-

**3. Do you consider that this part of the Meeting Housing Needs chapter is sound?:**

-

**3(a). If yes, and you wish to support the soundness of this part of the Meeting Housing Needs chapter, please use this box to set out your comments.:**

-

**3(b). If no, please give details of why you consider this part of the Meeting Housing Needs chapter is not sound. Please be as precise as possible.:**

-

**3(c). Please set out the modification(s) you consider necessary to make this part of the Meeting Housing Needs 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 Meeting Housing Needs 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.:**

-

**4. Do you consider that this part of the Meeting Housing Needs chapter complies with the duty to cooperate?:**

-

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

-

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

-

**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.:**

-