

# **Dalwood Parish Neighbourhood Plan**

## **Summary of the Representations Submitted to the Independent Examination**

### **Use of this Document**

This document sets out a summary of the representations (comments) received on the Submission Version of the Neighbourhood Plan, which were passed to the independent examiner for consideration. Please note that the full wording of all representations is available on the [Dalwood Neighbourhood Plan](https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans) page of the District Council website (found at: <https://eastdevon.gov.uk/planning/planning-policy/neighbourhood-and-community-plans>)

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

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

## **Summary of Representations**

### **1. Avison Young on behalf of National Grid**

No comments other than to confirm that their records show no National Grid electricity and gas transmission assets in the neighbourhood plan area.

### **2. Blackdown Hills Area of Outstanding Natural Beauty (AONB) Partnership**

Support the inclusion of relevant policy within the Plan, specifically policies NE1 (*Conserving and Enhancing the Natural Beauty of the Parish*), NE2 (*Preserving Tranquillity and Dark Skies*), BHE1 (*Maintaining the Built Character of the Parish through High-Quality Design*) and EE2 (*Farming - New Development Proposals*). Several suggestions made for improving clarity/accuracy of policy NE1 as well as to policy ELC1 (*Renewable and Low Carbon Energy Schemes*). Also, to ensure that throughout the plan, the text recognises that a small part of the parish (to the south of the A35) lies within the East Devon AONB and not the Blackdown Hills AONB.

### **3. Devon and Cornwall Police (DCP)**

Comment on the lack of specific reference to designing out crime, disorder and anti-social behaviour in the plan and the need for this to be covered within the plan, notwithstanding national and district policy coverage of this area. As such, DCP suggest inclusion of the following statement (or similar) where appropriate in the plan, including as a criteria within Policy HP1 (Housing Development in Dalwood): "All development proposals should consider the need to design out crime, disorder and anti-social behaviour to ensure ongoing community safety and cohesion".

### **4. Devon Countryside Access Forum**

Makes various suggestions for improvement of Figure 11 in the Plan showing Public Rights of Way in the plan area.

## 5. Environment Agency

Supportive of the plan's aim to protect and enhance the natural environment, including ecology, but suggests various ways to add additional value within the plan to matters within their remit, including regarding:

- **Biodiversity net gain** – by removing the clause 'where there is the opportunity to do so' from the criteria regarding biodiversity net gain from the criteria of Policy NE1 (Conserving and Enhancing the Natural Beauty of our Parish) in order to better reflect the direction of Government policy
- **Flood risk** – by embedding Plan Aim 1 regarding flood protection/mitigation within policy, by (a) specifying that development should consider flood risk both, in relation to locating development, and through proposing mitigation measures relating to the effects of climate change and (b) by acknowledging that 'green infrastructure' (including the green corridor of the Corry Brook) provides more than recreational, amenity and wildlife benefits but also provides benefits in terms of flood risk management and protecting water quality
- **Water quality** – by acknowledging the 'Moderate' status under the Water Framework Directive for both biological quality and physio-chemical quality elements (notably Phosphate) of the Corry Brook and the potential links with agricultural activity and consider the ways in which improvements to this status can be achieved through land use and planning. Suggested that to further the Plan aims and objectives to encourage measures to uphold best practice farming methods, examples of what this could mean in practice could be included
- **Renewable energy** - support policy ELC1 (Renewable and Low Carbon Energy Schemes) but suggest the plan acknowledges that any renewable proposals also need to demonstrate that they have no adverse impact on natural processes, such as fish pass (Hydroelectric power- HEP), flood flow (solar panels/HEP) and groundwater quality (wind turbines), and provide a Net Gain for biodiversity.

## 6. East Devon District Council

Congratulates the producers of the plan on their dedicated hard work and commitment in producing the document, and makes a range of suggests for amendments to policy wording throughout the plan, primarily to seek strengthen the requirements, regarding:

- **Policy NE1 (Conserving and Enhancing the Natural Beauty of the Parish)** – suggests several wording amendment to simplify and clarify the policy wording.

- **Policy NE2 (Preserving Tranquillity and Dark Skies)** – suggests that reference to the Blackdown Hills guide regarding limiting light pollution from new & replacement lighting be made a requirement within the policy wording.
- **Policy BHE1 (Maintaining the Built Character of the Parish through High-Quality Design)** – suggests the policy could be amended to apply to all new development, rather than being limited to housing development only.
- **Policy BHE2 (Protecting Locally Valued Heritage Assets)** – requests that the correct terminology relating to heritage assets is used within the policy (i.e. designated and non-designated heritage assets). Asks that the heritage status of the identified ‘valued assets’ (identified in Figure 7) is made clear and suggests that references to this figure would sit more appropriately outside the policy and within supporting text. Suggests several other wording amendments for clarity and accuracy.
- **Policy HP1 (Housing Development in Dalwood)** – expresses some concern about the designation of the proposed ‘settlement boundary’ for Dalwood in view of possible unintended implications and the need to ensure the AONB is protected from inappropriate development and that development is sustainable. Asks the examination to test further the justification for the setting of this boundary, and in particular, how it would promote the objectives of sustainable development in the local context. Also makes suggestion for several wording amends within the policy to both increase its longevity in the context of the emerging new Local Plan for the district and with regards to ensuring high standards of design of any development permitted.
- **Policy CFS2 (Improvements to Existing Local Community Facilities, Amenities and Assets)** – suggests the policy goes further in clarifying that valued community facilities are identified for protection/retention and/or improvement and that this list is not necessarily exhaustive. Also suggests improved wording here and for **Policy CFS3 (Loss of Local Community Facilities through Redevelopment or Change of Use)** to increase the enforceability of the clause for proposers of development to take account of the plan and engage with the local community at the pre-application stage.
- **Policy TA2 Rights of Way (Public Footpaths and Bridleways)** – Suggests various amends and additions to the policy wording for accuracy and amendments for clarity to the related map (Figure 11) showing public rights of way.
- **Policy EE1 (Superfast Connectivity)** – suggests the policy be extended to ensure it requires new development to be connected wherever possible.
- **Policy EE2 (Farming (New Development Proposals))** – Suggest this policy could be tightened to give better control, including that proposals should have to demonstrate an agricultural need and be of an appropriate corresponding size, and also to include requirements that lighting is minimised and screened from view.
- **Policy ELC1 (Renewable and Low Carbon Energy Schemes)** – suggests several minor improvements to policy wording and requests inclusion of reference to heritage to ensure this is given due consideration.
- **Aims and Objectives** – suggests amends to several aims/objectives for accuracy and completeness.

- **Emerging new Local Plan** – Suggest that the Plan should make reference to the work that is underway on new Local Plan for East Devon to acknowledge this and the relationship going forward.

In addition, a request was made that the Plan document be made as accessible as possible, with reference to the latest Government standards.

## **7. Exeter Airport**

Note the plan and advise it has no effect on the operation of the airport.

## **8. Highways England**

Satisfied that the proposed policies within the Plan are unlikely to result in development which will adversely impact the Strategic Road Network (which in this case includes the the A30 and the A35 trunk roads which run approximately 8km west and 2km south of the plan area respectively). Notes that no sites are allocated for development. Advises that there are therefore no specific comments to make on the plan.

## **9. Historic England**

Advises there no issues associated with the Plan upon which Historic England wish to comment.

## **10. Natural England**

Advises that there are no specific comments to make on this Plan.

## **11. Royal Society for the Protection of Birds (RSPB)**

Fully supports Policy NE1 (Conserving and Enhancing the Natural Beauty of the Parish) but comments that there is a lack of policy relating to protection and enhancement of biodiversity where it relates to new building and significant repairs or extensions of residential and commercial/agricultural buildings. Provides links to various sources /standards (current and emerging) which could be used / referenced in the plan to address this matter.

## **12. Sport England**

Provides a general response providing links to various sources of information and guidance that may be useful in the development of this plan. Makes no specific comments on the content of the Plan.

### **Note**

This document seeks to set out a factual summary of the key points made in each representation in order to give an overview. However, to view further detail and the original wording of the representations as submitted in full, please go to our [website](#).