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CHARTERED TOWN PLANNERS

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Neighbourhood Planning Officer  
Planning Policy Team  
East Devon District Council  
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Honiton EX14 1EJ  
FAO: Angela King

Our ref: 4397

07 May 2025

Dear Madam

**Draft Clyst St Mary & Sowton Neighbourhood Plan: Response to Examiners' Queries Relating to Policies BisC11 and BisC12**

Bell Cornwell LLP act as planning consultants on behalf of Darts Farm Ltd. Our client is the owner of the northern part of the land which is proposed within the draft Neighbourhood Plan (draft NP) for residential development under Policy BisC12. In this connection we have been involved in discussions with the Parish Council regarding their proposal to allocate the land for residential development and the need for this to provide a number of transport benefits. As part of our work, we have also been in close collaboration with Core Strategic Land, the promoter of the other (southern) area land which is proposed for development under the policy.

Preparation of a Comprehensive Masterplan

It may be recalled that following recent discussions with East Devon officers, the two land promoters have agreed that a comprehensive masterplan will be prepared for the entire site so that there is greater information available on the likely form of development and to show how matters such as the highways link, landscaping and biodiversity gain can be dealt with. This work will draw upon an initial concept masterplan which has already been prepared and which has previously been provided as part our representations to the draft neighbourhood plan.



The initial concept masterplan already provides a good indication of how a deliverable and sensitive residential development of the land including the provision of the required link could be provided.

The comprehensive masterplan will build on this initial work and is expected to be completed in the near future. We would be happy to share this material with the Examiner as soon as it is available.

### Examiner's Queries

We note that the Examiner has sought clarification on two matters, both of which are of relevance to the land which is proposed to be allocated for development. Whilst these queries are primarily directed towards the Parish Council, EDDC and DCC, our involvement in work on the land means that we are able to provide additional information which may be of assistance to the Examiner in her consideration of the issues.

#### *Issue 1 – the Selection of the Land Under Policy Bis C12 as the Most Suitable Site*

The Examiner refers to representations made by a third party to the effect that the SEA process used by in the neighbourhood plan to identify the BisC12 site (via SEA Option 3) is flawed and that had the process been applied correctly, SEA Option 4 (which doesn't advocate development of the BisC12 site) would have been adopted.

As the draft NP makes clear, a key driver of the allocation of the BisC12 site is its ability to provide a link road which would have the effect of delivering substantial benefits to traffic, congestion and safety issues to the centre of Clyst St Mary. None of the other options are able to deliver this key benefit.

It should also be noted that SEA Option 4 included a site (Sowt 09) which would require connection to the existing foul drainage system within the village. As Parish Council and East Devon officers will confirm, South West Water have stated that this system is unable to



accommodate further development without significant improvements which are not yet planned and this raises significant questions about the deliverability of housing at Sowt 09 and thus of Option 4. This constraint does not apply to the BisC12 site which is able to connect into the existing sewer running along the adjacent A3052 and well outside of the village.

Furthermore, in addressing the specific query which has been raised by the third party, we would refer the Examiner to Table 4.9 of Strategic Environmental Assessment prepared by AECOM. This summarises the ranking of each of the different SEA options. In each case, the lower the ranking, the better the option. It will be noted that when the various rankings are totalled, Option 4 scores less well (with a higher total score of 27) than Option 3 (total score of 26). There is therefore no basis for the third party to assert that Option 4 is preferable to Option 3, which proposes the allocation of the BisC12 land, especially given the particular transport benefits which this option is able to deliver.

#### *Issue 2 – Deliverability of the BisC12 Site Allocation in Light of the Highways Authority Objection*

As outlined above, and following on from the initial concept design work which has been done, a more detailed comprehensive masterplan is under preparation to provide confirmation that development of the land can take place in a way which addresses the requirements of both the draft policy and the various site constraints.

In relation to the issues raised by the Highways Authority, we attach a note which has been prepared by Stantec, who are the highways consultants involved in working on behalf of both promoters to deliver the link road and provide other transport benefits. The note provides comfort that the Highways Authority have now accepted that they would not object to the proposals, details the various ways in which the related issues can be addressed and also outlines the wider transport benefits which would be realised through development of the BisC12 land.

We would be grateful if you could forward this information to the Examiner for her consideration and that it provides useful amplification on the issues of interest. We would be very happy to provide any more information which might be needed.



If you require any further information or clarification in the meantime, please do not hesitate to contact us.

Yours faithfully  
**BELL CORNWELL LLP**



**Iestyn John**  
**Partner**

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