

Consultation Statement

June 2020



Bridestowe & Sourton Neighbourhood Development Plan Consultation Statement

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Overview

Bridestowe and Sourton are adjoining parishes in the district of West Devon; both are rural parishes, separate and distinctive, yet sharing common threads and jointly using certain amenities and facilities. Both parishes face similar challenges - reduction in public transport, rural isolation, oversubscribed local schools and concern about potential inappropriate development. Both share a desire to have a voice in the local development that will occur in the decades ahead.

With this commonality, Bridestowe and Sourton Parish Councils, encouraged by central government, decided in 2013 to develop a joint parish plan. It was agreed that Bridestowe PC would hold the funds for the project and be the lead body in grant applications. With the development of a new Strategic Plan by West Devon Council, which proposed allocating new housing to Bridestowe, a decision was taken in July 2014 to 'upgrade' to a neighbourhood development plan that, unlike a parish plan would, if successfully adopted, have statutory power and become part of the Development Plan for the Parishes.

1. Introduction

1.1 This statement has been prepared by the Bridestowe and Sourton Neighbourhood Development Planning Group on behalf of Bridestowe and Sourton Parish councils to accompany its submission to West Devon Borough Council of the Bridestowe and Sourton Neighbourhood Development Plan under Regulation 15(2) of the Neighbourhood Planning (General) Regulations 2012

1.2 This Consultation Statement has been prepared to fulfil the legal requirements of Part 5, Section 15 of the Neighbourhood Planning (General) Regulations 2012 by:

- Detailing the persons and bodies who were consulted about the proposed neighbourhood development plan;
- Outlining how these persons and bodies were consulted;
- Providing a summary of the main issues and concerns raised;
- Reviewing how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

1.3 It meets the requirements of Regulation 15 to provide a detailed description and record of the pre-submission consultation required by Regulation 14. It also contains details of the earlier consultation undertaken when developing the joint Development Plan Draft Neighbourhood Plan (Draft Plan). The Draft Plan and the Plan have been prepared by the Neighbourhood Plan Steering Group, comprising Parish Councillors and Parish resident volunteers, together with the support from the officers of West Devon Borough Council.

1.4 This Consultation Statement summarises all statutory and non-statutory consultation undertaken within the local community and with other relevant bodies and stakeholders in developing the proposed Plan. It describes how some of the concerns that arose during the statutory pre-submission consultation have been addressed and what changes have been made to convert the Draft Plan into the Plan.

1.5 The Steering group has endeavoured to ensure the Neighbourhood Plan, initially a parish plan, should be a plan developed by the residents of the two parishes for the parishes. Considerable efforts were made to ensure that all residents, societies, clubs and businesses in the parishes were involved at every stage in the plan making process. The various consultation exercises carried out during the process of developing the Pre- Submission Plan are summarised in this Consultation Statement.

2. Aims of Consultation Process

2.1 The aims of the Bridestowe & Sourton Neighbourhood Development Plan consultation process were:

- To involve as many of the two communities as possible throughout all consultation stages of Plan development so that the Plan was based on the views of local people and other stakeholders from the start of the Neighbourhood Planning process;
- To ensure that consultation events took place at critical points in the process where decisions needed to be taken;
- To engage with as wide a range of people as possible, using a variety of approaches and communication and consultation techniques; and
- To ensure that results of consultation were fed back to local people and available to read (in both hard copy and via the parishes' websites) as soon as possible after the consultation events.

2.2 All updates on the Neighbourhood Plan process, and information about forthcoming consultation exercises and events, were published monthly in Bridestowe and Sourton Extra newsletter distributed across both parishes, particularly useful for those without e-mail.

The Neighbourhood Plan has been a standing item on both Parish Councils' agenda since work began, and regular updates on progress have been given.

3. The stages of consultation of the neighbourhood plan

Stage	Time period
I. Inception - The Parish Plan	February 2013 - October 2014
II. Residential and Business Survey Stage	April 2015 - October 2015
III. Initial Plan Development Stage	January 2015 – May 2016
IV. Advanced Plan Development Stage	June 2016 – August 2017
V. Conversion of Pre-submission draft to Submission draft	September 2017 - December 2017
VI. Regulation 14 Consultation	Late January - March 2018
VII. Plan revision in light of Reg.14 responses	April 2018 - September 2018
VIII. Preparation for Regulation 16 and SEA report	October 2018 - June 2020

Stage I. Inception February 2013 - June 2014 The Parish Plan

3.1 The seeds of a Neighbourhood Development Plan date back to 2013 when both Bridestowe and Sourton Parish Councils, encouraged by central government to develop a local plan, decided to engage in the process and a parish plan format was chosen. At a well attended meeting on 25th February 2013, residents of both parishes and PC councillors listened to a presentation by Martin Rich of Community Council of Devon voted and then after discussion voted to start the process of developing a Parish Plan. A 'joint plan' was deemed appropriate as both parishes have similarities and share certain facilities and services. The preparation of a Parish plan was seen as an important opportunity for the community to help address many of the issues of concern. Volunteers came forward from both parishes and a working group was formed at a meeting 30th April 2013. A constitution was adopted at a meeting held on 25th June 2013.

3.2 The group started by writing introductory articles for the monthly newsletter (Bridestowe and Sourton Extra - BaSE) which were informative and helped garner support for the project.

Funding

3.3 In the previous November 2012 Bridestowe and Sourton Parish Councils had been successful in their application for a grant from the Town and Parish Fund for £1000 for the production of a Parish plan which was matched by grants from both PCs & Devon County Council. The £2000 would cover costs of room hire, display boards and printing of questionnaires.

3.4 An initial consultation in May - October 2013 at the very start of the process of producing a **parish plan**; included a short questionnaire on what people liked and disliked about living in the two parishes, what they would wish to see in the future and what they would not want. The annual Ram Roast and the Harvest Supper provided further opportunities for the public to give views and also for recruiting new members to the Steering Group. Using a large scale map and post-it notes residents were asked to put a note on where they lived and give some comment or feedback about living in the parishes. The highest number of positive comments were scored by a wish to preserve the primary school, shop and pubs and the tranquil landscape. The least wanted was housing development, renewable energy installations and speeding traffic through the villages.

Positive attributes

Primary school, shop/PO
 Stunning landscape/tranquil setting
 Churches, pubs, halls
 Good community spirit

What do you want for the future

Better local transport
 New houses in small clusters
 Facilities/activities for young people

Negative attributes

Poor local public transport
 Lack of affordable housing for young people and for over 50s
 Slow Broadband speeds

What don't you want in the future

Large housing development
 Wind turbines/solar arrays
 Speeding traffic through villages

3.5 With this basic information the main concerns and aspirations of the residents were identified, namely to manage future development whilst preserving the character of the communities and not despoiling the highly valued landscape. This helped to form the vision for the future. The next stage was to grapple with a much more detailed community questionnaire that would provide the finer detail/evidence from which a development plan could develop.

Conversion to Neighbourhood Plan

3.6 When the Government incorporated further changes to planning law and it became apparent that the local borough council intended to allocate housing to Bridestowe, a decision was made by both parish councils to 'upgrade' to a neighbourhood plan that unlike a parish plan would, if successfully adopted, have statutory power. It was important to impress upon the communities the significance of this up grading and seek their approval. An article in the monthly newsletter outlined the benefits of a neighbourhood plan and a public meeting in both parishes in June/ July 2014 was held to determine whether to upgrade to a neighbourhood plan. The majority view was that a neighbourhood plan would be more effective in shaping future development in line with public opinion. Those attending each event were invited to leave their contact details/email addresses so that they could receive regular updates and submit comments. This email list was augmented at each public meeting.

3.7 The two parishes of Bridestowe and Sourton were formally designated as a Neighbourhood Area in December 2014 through an application to West Devon Borough Council under the Neighbourhood Planning Regulations 2012 (part 2 S6). The designated area follows the parish boundary of the combined parishes.

Stage ii. Residential and Business Survey stage - January 2015 - October 2015

The Questionnaire

3.8 One of the key consultations took the form of a comprehensive questionnaire sent to all residents in both parishes in April 2015. Copies were distributed with the monthly newsletter and a group of volunteers ensured that households in the more remote areas received a copy.

The detailed questionnaire was designed to gain the opinions from residents, existing local businesses and even interested parties beyond the boundaries (those wishing to live in the area in the future or with business links). The choice of questions reflected issues from the initial parish plan survey. Thus every household had the opportunity to express their views about the Plan, the Parish and its future.

3.9 Despite the length of the questionnaire - 42 questions in the main section and another 26 in the supplementary sections for business owners and older people - most people completed the whole questionnaire, and few people omitted any significant parts.

Most questionnaires included information about all members of the household and the households from which completed questionnaires were received included a total of 397 people; this is 40% of the total population of the parishes of Bridestowe and Sourton (Total population 996 in the 2011 census).
(The results of the questionnaire are given in Appendix III of the main NP document)

Engaging with hard-to-reach groups.

3.10 A separate questionnaire was employed to gain specific information on the subject of ‘Open Spaces, Sport and Recreation’ and it was the views of young people that were sought specifically. Only 15 young respondents had completed the ‘Needs of Young People’ section of the general questionnaire.

3.11 Social media has been used with links from the Community Facebook with the expectation of connecting with younger residents but direct contact through the schools and youth groups was more effective and ensured that their views were more fully represented. 100 questionnaires were sent out and 46 returned. One section was for Sourton residents only, to address the reduced response rate seen in the general questionnaire and in fact half the respondents were from Sourton.

3.12 Of the 46 respondents 38% were less than 21 years and altogether 47% under 50 years of age.
(The results appear in Appendix VII of the main NP document)

The greatest interest in a new activity was for keep fit (29), tennis (20), dance(16) sports training(15).
The most popular location for a pitch was adjacent to Bridestowe Village Hall (16)

Summary of the main issues raised in the public consultation in 2015	
Environment and Heritage	Conserving valued landscape
Housing	Development built within village envelope or on the edges Small pockets of developments rather than one large site Need for some low cost housing Sensitive design
Employment/Economy	Impediments to employment opportunities - lack of skilled labour and premises Need for improved broadband speeds
Transport and traffic	Speeding traffic Parking congestion Poor public transport
Low Carbon development	Only small scaled renewable energy installations
Community wellbeing	Need to protect existing amenities Poor recreational facilities specifically for over 12s Lack of facilities for physical activities Maintaining the strong community spirit

Additional data

3.14 As well as the information coming from the communities important published sources were consulted including

- data on population, demographics, employment, health, housing, deprivation, education and car ownership obtained from the Office of National Statistics and other HMG sources
- local information and the latest national trends and statistics to assess housing need for the area.

3.15 It was important for the working group to understand fully the relevant legislation and policies that had a bearing on the draft Plan. At the end of this stage the steering group had the findings of the residential and business surveys from which to draw up a vision and key objectives to underpin the emerging Neighbourhood Plan.

Stage iii. Initial Plan Development Stage - September 2015 – May 2016

3.16 The need to have working groups was recognised once the findings of the extensive survey had been collated. The working groups, made up of members of the community, business owners and parish councillors, each worked on a key area - housing, employment, business economy, transport, environment and recreation.

Themes were identified that would form a basis for a set of aim and objectives:

- housing tailored to meet the needs of the community
- development that sits well in its setting
- conservation of the landscape
- promotion of the local economy
- protecting and enhancing recreational /social facilities

3.17 At each monthly meeting the working groups gave their feedback to the main group and through discussion the Aims and Objectives were refined. Every meeting was advertised in the monthly newsletter, with an invitation to the public to attend. All meetings were minuted.

Arising from the public meetings, a consultation group of 48 households was established. Some were individuals that had expressed an interest in being involved from the outset and others were invited to come forward from both parishes to represent specific sectors of the community, for example, the pre school, the youth groups, businesses and churches. It was important that the area was well represented demographically.

3.18 All members of this consultation group have been sent and given the opportunity to comment on and contribute to all documents prepared by the Steering Group, in tandem with everyone else who was encouraged to access and comment on the evolving documents. The households involved in the consultation group include more than 10% of the population of the two parishes. Their feedback has been a valuable contribution in the consultative process.

3.19 Members of the working group attended Local Authority training sessions which helped the group understand the implications of the basic conditions which a neighbourhood plan will be tested against at examination stage, the types of issues which could potentially be addressed through a planning policy, the existing Local Strategic Plan of West Devon Borough Council's as well as the policies of the National Planning Policy Framework.

3.20 By January 2016, the Aims and Objectives (in Chapter 4) were in draft form and policies were emerging but the working group was aware of a lack of specific information about housing need; WDDB's data was out of date. The steering group approached the Community Council for Devon for assistance on conducting a Housing Needs survey and Bridestowe Council, as the lead council, was successful in applying for a grant from the National Lottery to cover the cost of running it.

The importance of having a Housing Needs Assessment

3.19 In April 2016 the second crucial consultation that targeted all residents was carried out; a housing needs assessment. It was essential to obtain up-to-date evidence of exactly how many new houses were needed in the next 10 -15 years.

The aims of the survey were:

- to identify the types of housing in which people currently live to gain an accurate assessment of the housing stock, its size and status.
- to assess the likely future needs of older residents (aged over 55)
- to identify those households who currently have a need for affordable housing and,
- to wish to remain living in the villages.

It was publicised using articles in the parish newsletter and local newspaper and displaying posters across the two parishes.

Copies were delivered to every household across the two parishes via the local shop. Additional copies were left at the shop, pubs and community buildings. The local newsletter also advertised the survey.

A total of 410 survey forms were distributed, to each household in the two parishes.

3.20 On 2nd April and 9th April, two community events, one in each parish hall, were held. This was a joint exercise: to offer assistance to complete the assessment form, (an officer from the Community Council of Devon attended both meetings to assist with form completion) **and** to display the vision, main aims and objectives and the direction of emerging policies of the plan. Printed copies of this first version were provided for people to take away with a comment form. The event was combined with a 'pop up' breakfast bar. The informal atmosphere of these events encouraged a good attendance. Bridestowe session attracted 31 attendees and Sourton's 22.

3.21 Summary of the main issues and concerns raised at this consultation event:

New local housing only for local people, preservation of valued countryside, reduction in traffic and traffic speed, Sourton would become a target for unwanted development .

Affirmative comments were received about the main vision and objectives ; two commented that they felt there should be reference in the Vision statement to the strong community spirit that prevailed and the feeling of safety from living in a low crime area.

Outcome of HNA

3.22 137 surveys were returned (33% of all households), with 73 from Bridestowe and 55 from Sourton. 89% of respondents said they were in favour of a small number of homes for local people being built if the need for affordable housing were proven.

A total of 12 households in the two parishes were identified (9 in Bridestowe and 3 in Sourton) as being in current housing need, 11 of which will need a 1- or 2- bedroom home and one will need a 3-bedroom home. Of these 9 will need affordable rented accommodation, whilst 3 could afford shared ownership.

105 (77%) of the responding households included at least one person over the age of 55 – most of whom were aged between 55 and 75. Of these 18 plan to move in the next 5 years, mostly to a home better suited to the needs of older people, or closer to family or support, but less than 10% planned to downsize. None of the households with older people that planned to move in the next 5 years anticipated needing affordable housing.

The assessment highlighted the imbalance within the existing housing stock with higher than national average numbers of larger homes.

(The results of the Housing Needs Assessment are given in Appendix III of the NP main document)

Progress had been made at the end of this stage; an initial version of the plan that included an overarching vision, themes and objectives available for consultation plus reliable upto date information on housing need had been obtained that would ensure that the plan's housing policies were tailored to the local community.

iv. Policy Development Stage June 2016 – September 2017

3.23 During this period the NP steering group concentrated on developing a fuller draft plan. Small group meetings were used to hone the policies. Summaries were included in the monthly newsletter and at the annual Ram Roasts in Bridestowe and Produce Shows at Sourton display boards were deployed to draw attention to the key themes and developing policies . These were good opportunities for the community to comment and residents were very supportive of the project. Verbal feedback was noted down and response forms handed out to those who wished to comment in writing. These well attended events attracted residents from both parishes. At the next monthly working group meeting in September feedback was evaluated and in response to feedback changes made, namely

- Strengthen the design and environmental policies ensuring they reflect community wishes and are effective in managing future development
 - Strengthen the policies relating to heritage assets and wildlife conservation
- Some feedback was concerned with non-planning related issues such as speeding traffic, provision of safe road crossings and inadequate public transport. These issues were grouped together in Appendix X 'Community Aspirations' and may well become projects led by the Parish Councils.

3.24 The next version of the plan was made available to the communities in printed forms and online with an Executive Summary that was distributed to every household. It was accepted that not everyone would read the plan in full but the summary included all the salient points .

Copies of the draft were available and updated versions available via the websites.

No negative feedback was received which reassured the working group that the communities were in full support of the project. There was some impatience that the Plan was taking a long time to be

completed. A couple of planning applications were put forward at this time.

At a public meeting led by Bridestowe Parish Council on 13th September 2017 an application for 24 houses in Bridestowe was discussed. It was significant that many of the residents made reference to the draft Plan, although they recognised that as it was not 'made' it had no statutory weight.

Monthly bulletins in the newsletter aimed at keeping people informed and maintaining interest.

v. Conversion of Pre-submission draft to Submission draft September 2017 - December 2017

3.25 At this stage there was consultation with LAs on the draft policies and it was important to ensure they are in general conformity with emerging Joint Local Plan

One of the challenges the working group faced in late 2017 was the uncertainty that arose from developing a neighbourhood development plan when the local authorities were doing similarly. Policies referenced in the Core Strategy *Our Plan* were superseded by policies of the Joint Local Plan. Great care had been taken to ensure the draft Plan conformed to the existing 2011 document and also aligned to the emerging Plan policies.

Feedback from WDBC and Dartmoor National Park was used to revise and reword policies .

vi. Regulation 14 consultation. January 2018

3.26 As required under Part 5, Section 14 of the Neighbourhood Planning (General) Regulations 2012, Bridestowe & Sourton Working Group (B&SWG) completed a 6 week Pre-Submission Consultation on the Draft Neighbourhood Development Plan between January and March 2018

Within this period the working group:

- a) Publicised the draft neighbourhood development plan to all that live, work, or do business within the parish.
- b) Outlined where and when the draft neighbourhood development plan could be inspected
- c) Detailed how to make representations, and the date by which these should be received.
- d) Consulted any statutory consultation body (referred to in Paragraph 1 of Schedule 1 of the Neighbourhood Planning (General) Regulations 2012) whose interests may be affected by the proposals within the draft neighbourhood development plan.
- e) Sent a copy of the proposed neighbourhood development plan to the local planning authorities

How people were consulted

3.27 The newsletter explained the consultation process and how to make representation. It provided a link to the full version of the Pre-Submission Plan available on both parish websites. Paper copies of the draft Neighbourhood Plan were made available at both village halls, the 3 churches, primary schools, Riverside stores and pubs. Also a contact number was provided so that a copy could be delivered on request. Posters were displayed drawing attention to this key consultation.

Formal written representations were received from a total of

- 7 individuals
- 6 public bodies / organisations
- 1 developer on behalf of landowner
- 2 local business owners
- 1 childcare provider (*Treetops*)

4. List of those consulted

4.1 Every effort was made to consult with the residents of both parishes and certain groups were approached for collective insights

- the consultation bodies:

West Devon Borough Council
Dartmoor National Park Authority
English Heritage
Natural England
SouthWest Water
Environment Agency

- other local groups and organisations

St Bridget's Church, Bridestowe
Methodist Church, Bridestowe
St Thomas à Becket, Sourton
Youth Group
Treetops Pre School Group
Primary Schools, Bridestowe and Boasley
Head of Federation of local schools
Local business owners

vii. Plan revision in the light of Reg.14 responses

4.2 A summary of the comments and the Neighbourhood Plan Group's response is included in Appendix C. Comments from the WDBC and DNPA were helpful in pointing out inconsistencies and any lack of conformity to existing legislation and to Local Plans.

With advice from professional planning consultants the policies were overhauled to ensure clarity of wording and consistency of policy. We were advised that the plan would be more streamline if additional information appeared in separate appendices and this advice was helpful in achieving a more concise document.

Allocation of sites

4.3 Initially allocation of sites had been resisted in the belief that more affordable homes could be delivered through exception sites. Comments from the consultation group during this period reflected a feeling of frustration that several applications had come forward over which the communities had little influence as the Plan was at a draft stage. The Local Authority was in favour as is reflected in their Reg 14 response (OP.2) Allocation of sites was suggested as a means of ensuring that the 3 remaining sites would be developed in a manner that reflected the community's wishes. As a consequence the decision was made to allocate sites and draft policy 'mini briefs' were drawn up. A suggestion was put forward that Bridestowe's boundary be redrawn to encompass the sites, all of which were outside but adjacent to the existing boundary. This seemed an effective measure and a new development boundary drawn.

4.4 New policy that reflected the communities' anxiety about flooding and protecting the natural environment had been included and all these changes were presented through the newsletter and at both villages' annual events in July. Positive feedback endorsing these changes was received with no negative comments apart from two comments on the protracted time taken to complete the Plan.

Bridestowe Parish Council agreed the adoption of the new boundary at a meeting on July 12th 2018.

The only negative comments centred on frustration that the draft Plan had not been able to curb the recent housing development application.

A summary of how issues and concerns from the community have shaped policy

Concerns expressed	Policy development
Development will mar the beautiful surrounding landscape and the natural and historic environment.	Feeds into several policies aimed at achieving harmonious balance, specifically on general landscape(EH1) and preserving the natural environment (EH4 and EH5)
Developments should be small scale - no more than 15 units	Allocation of sites would achieve phased development (H3a-b.) However not able to restrict to a specific minimum number of units that people wanted
Fear of inappropriate development within Bridestowe village	Creation of new settlement boundary endorsed by community (Policy H2) By allocating sites within the settlement it is possible to have more say over the design, style and nature of the development. Exception sites may provide affordable homes.
Concern about inappropriate development within Sourton village	Tight settlement boundary drawn, using the rationale provided by the DNPA minimising the opportunity for any development - only be permitted within the boundary. Any further development, other than infill, will need to be on exception sites which should ensure that affordable homes are the priority.
Concern that affordable homes are for local people, particularly young couples	Settlement boundary makes it possible for exception sites to come forward. Policy (H4) states that exception sites must be for local allocation.
Anxiety that new build will not enhance existing built environment	Policy H5 - Design and quality to ensure that good design is paramount and reflects local character. Reference to advisory Village Design Statement (Appendix IV)
Increasing concern about historic flooding of Bridestowe village plus effects of climate changes .	Inclusion of a specific flood risk policy (H8)
Concern about problems in Bridestowe caused by on-street parking	Specific criteria included in policy to address this .(H7) Higher allocations than government guidelines but reflecting concern that emergency vehicles/ refuse/recycling lorries cannot access sites.
Need to safeguard valued green spaces in both villages	Support demonstrated for proposing designation of village greens, sports field and cricket pitch. (EH3)
Concern about inadequate car parking facilities near Sourton village hall	This has been flagged up as a community aspiration rather than a development policy, as land has yet to be identified that might be suitable and available for purchase.
Concern about overspill parking on old A386 at Sourton Down, caused by new business premises	This addressed by Policy E1 - businesses having to accommodate parking within business premises

Need to preserve the strong community spirit and to improve social opportunities	More of a community aspiration (Appendix X) but protection of existing and provision of future facilities will contribute to social wellbeing (CWI and CW2)
Concern that there are no facilities for children of any age in Sourton	By drawing up a settlement boundary so that exception sites are likely to be near the centre of the village - creating a nucleus in the middle of the village, rather than further ribbon development, should make it more likely that facilities for youngsters can be provided. Youngsters living in the new developments will live fairly near to each other, making provision of recreational facilities more likely than if new houses are dotted randomly along the A386.
Promote local businesses and business opportunities. No point having homes but no jobs.	Policies supporting new small scale business development and expansion of existing businesses (E1 &E2)

viii Preparation for Reg. 16

4.5 As the Plan was being prepared for Regulation 16, two new concerns were raised by WDBC's new Neighbourhood Plan officer. These were:

- that one of the allocated sites obtruded on Bridestowe's conservation area and would be controversial with English Heritage.
- that the settlement boundary would serve as a better planning tool if it was coterminous with the two approved planning applications' sites.

Also the Planning Officer posed an alternative means of delivering affordable housing; redrawing the development boundary to make the site adjacent to the cemetery an exception site and then engaging in a community housing programme. At a meeting in early December 2018, Rob Ellis, Community Housing Lead Officer South West, outlined broadly to the steering group what could be achieved with such a programme. However after subsequent conversations with the landowner, it was clear that he wished for the site to 'contain a commercial residential development of appropriately apportioned mixed housing' and so this option was not pursued.

4.6 To address the two concerns raised, it was proposed that the obtrusive site was withdrawn as an allocated site and the settlement boundary redrawn more tightly.

These proposals were put forward to the community through an article in the newsletter (BaSE March 2019) that included the rationale for, and map of, the new development boundary. The reasons for possible exclusion of the Pool Hill site were given. A comment return slip was supplied plus contact details for responses with a 4 week consultation period.

Five reply slips were returned approving the revisions; one respondent believed that the removal of the potential controversial site at Pool Hill undermined local democracy. An agent for the landowner of the withdrawn site expressed in writing disapproval of this decision. The chair of the working group responded reiterating the reasons. The reply was acknowledged and no further comment has been received.

Copies of the responses appear in Appendix D: Schedule of Comments and Responses.

Approval was sought from both parish councils who endorsed the changes at meetings in late March and April 2019.

In early 2019 the aspiration was that the plan could be submitted for Reg 16 and examination. However due to the fact that changes had been made to the plan post Reg 14, which included allocating sites for housing Natural England, as part of the SEA/HRA screening process, raised concerns about the potential impact of development on the neighbouring National Park. (attached to Basic Conditions Statement)

The DNPA was contacted and reconfirmed that they had no concerns.

The WDBC NP Officer agreed that in the light of Natural England's comments and concerns relating in particular to the allocation of sites for housing, a Strategic Environmental Assessment should be conducted.

4.7 In July 2019 an application for 'Technical Support' was successful and the lead Parish Council subsequently commissioned AECOM, via the Locality Neighbourhood Plan Technical Support programme, to undertake the SEA .

This assessment comprised a number of stages, including scoping and the preparation of an Environmental Report, which required consultation with key stakeholders ,Natural England, Historic England and Environment Agency.

On December 9th the SEA report was received. It was encouraging for all involved in the Plan formation that the report was supportive and stated 'it is considered that the Neighbourhood Plan *'is likely to lead to long term significant positive effects for the quality of of residents and community vitality'*. (SEA report page 27).

In February 2020 the working group forwarded the SEA report to Natural England to ascertain if it allayed their initial concerns. In their positive response received in May 2020, they suggested only a minor tweaking of the text was required to tighten up the conclusions relating to mitigation of impact of development on the National Park landscape. This was done with guidance from Nick Chisholm-Batten (Associate Director Environment - Policy and Appraisal, AECOM) and finally the plan, with its supporting documents, was ready for the next stage of the process - Regulation 16.

Summary

4.8 Since its inception in July 2014, the Bridestowe and Sourton Neighbourhood Development Plan process has involved engagement with residents of both parishes, initially to identify the issues of concern and then to design and refine the consultation findings. The latter have involved regular updates to the Bridestowe and Sourton websites, regular bulletins in the monthly newsletter delivered to every household and a series of consultation events.

At the administrative level the NP team has had meetings with officers from West Devon Borough Council and these have informed and guided the development of the Plan.

The team would like to express their thanks and appreciation of advice and guidance given by professional planning consultants Deborah McCann and Jo Widdecombe.

Above all, the NP team and the Parish Councils would like to express their thanks towards the residents who have contributed and supported this project. We are confident that the resulting Plan is a genuine and fair representation of how they would like to see their communities develop over the coming years.

Summary Timeline of Consultation

Date	Activity
May 2013	Public Meeting to roll out Parish Planning process
August 2013	Initial Questionnaire to parishes (Likes/dislikes)
June/July 2014	Public meetings to agree update to Neighbourhood plan
August 2014	Public Event (Ram Roast)
December 2014	Designated as a Neighbourhood Area
April 2015	Comprehensive questionnaire circulated
July 2015	Preliminary results published in newsletter and online
June 2015 onwards	Working groups meet feeding back to monthly open meetings with monthly updates in newsletter
October 2015	Additional survey on Recreation and Environment
November 2015	Preparatory work on organising a Housing Need Assessment (HNA)
April 2016	HNA delivered to all residents of both parishes
June 2016	Consultation event in Bridestowe & Sourton for HNA + first Draft Plan
July 2016	Received formal feedback HNA
November 2016	Results of HNA published in newsletter + online Draft NP rolled out to parishes
January 2017	Draft plan to both local authorities
March 2017	Feedback from local authorities with appropriate revision Professional input and revision Executive summary circulated + online + feedback on draft
June 2017	Revising policies with those of emerging JLP
July - August 2017	Public Consultations at annual events
Sept - Dec. 2017	Conversion of draft NP to Regulation 14 Submission
Jan - March 2018	Regulation 14 with statutory agencies, authorities and the public (10 weeks)
April 2018	Revision in light of feedback from consultation
June 2018	Professional input: consideration of Regulation 14 comments and incorporation of amendments plus some policy refinement
July 2018	Public consultation at Ram Roast & Sourton Show showing revisions from Reg 14 responses and seeking feedback on revised policy, boundaries and site allocations
September 2018	Pre Submission Draft NP to the 2 local authorities
December 2018	Consultation with NP Officer :need for SEA following post Reg 14 allocation of sites for housing
February 2019	Further revision of Bridestowe's settlement border and consultation on exclusion of Pool Hill site
March 2019	Identified need for SEA
April 2019	SEA/HRA screening
July 2019	Application for Technical Support for SEA report
December 9th 2019	SEA report received
May 2020	Natural England's response to SEA report
June 2020	All documents submitted to WDBC: Regulation 16

APPENDICES

APPENDIX A: Letter to statutory bodies on Pre-Submission Consultation

Bridestowe and Sourton Neighbourhood Plan
Neighbourhood Planning (General) Regulations 2012
Consultation Under Regulation 14

Dear Sir/Madam,

Bridestowe and Sourton Parish Councils and the Neighbourhood Plan Working Group have been preparing a joint Neighbourhood Development Plan for the two parishes in close consultation and engagement with the local communities. The Plan sets out a vision for the future of the parishes and planning policies which will be used to determine planning proposals locally until 2034.

The Plan has now reached the stage where formal 'Regulation 14' consultation is being undertaken with a wide range of statutory authorities, organisations and interested parties, as well as further consultation with the public and local communities.

The Regulation states that all consultees must respond within a 6 week period. The consultation opens for comment on **Monday 15th January 2018** and your comments and representations should be returned no later than **Monday 5th March 2018**.

These can be emailed

- ali.young53@btinternet.com

or submitted by post to

- Glebe Park, Pig's Leg Lane, Bridestowe, Okehampton, EX20 4ER

A copy of the draft Neighbourhood Development Plan is attached along with a comment form.

Hard copies of the draft Plan are available from the address above.

We welcome any comments you may have.

Yours faithfully,

Alison Young
Secretary, Neighbourhood Plan Working Group

APPENDIX B List of statutory consultees on Pre-Submission Consultation(Reg.14)

WDBC	strategic.planning@swdevon.gov.uk
DNPA	forwardplanning@dartmoor.gov.uk,Nicola.glassbrook@devon.gov.uk,
Devon County Council	Tina.Henry@devon.gov.uk,
Devon County Council	pressofficer@dsfire.gov.uk
Devon Fire & Rescue	groundstability@coal.gov.uk,
COAL	david.stuart@english-heritage.org.uk,
English Heritage	sarahjane.BARR@devonandcornwall.pnn.police.uk,
Devon & Cornwall Police	harvey.gardner@devonandcornwall.pnn.police.uk,
Devon & Cornwall Police	public.affairs@ee.co.uk,
EE	mark.naylor@english-heritage.org.uk,
English Heritage	marcus.salmon@environment-agency.gov.uk,
Environment Agency	info@environment-agency.gov.uk,
Environment Agency	enquiries@wwutilities.co.uk,
Gas Utilities	Alexis.Field@highwaysengland.co.uk,
Highways England	Gaynor.Gallacher@highwaysengland.co.uk,
Highways England	ross.simmonds@historicEngland.org.uk,
Historic England	mail@homesandcommunities.co.uk,
Homes & Communities	ldf@exeter.gov.uk,
IDF	info@marinemanagement.org.uk,
Marine management	dpm@monoconsultants.com,
Mono Consultants	consultations@naturalengland.org.uk,
Natural England	townplanningwestern@networkrail.co.uk,
Network Rail	ian.turnbull@nhs.net,
NHS	info@westdevoncvcs.org.uk
West Devon CVS	mdunn@southwestwater.co.uk,
South West Water	jane.evans@three.co.uk,
Three	emf.enquiries@ctil.co.uk,
Vodafone & O2	sacross@westernpower.co.uk,
Western Power	admin@ocrasport.org.uk,
OCRA	contactus@devonwildlifetrust.org.uk,
Devon Wildlife Trust	enquiries@plymouthrec.org
Plymouth & Devon Racial Equality Service	admin@okehamptoncollege.devon.sch.uk
Dartmoor Federation of Schools	andrew.postlethwaite@fsb.org.uk,
FSB	team@businessinfopoint.co.uk,
Business information Point	csc.caredirect@devon.gov.uk,
Disability Services	adrian@ministry.plus.com,
Rev.Adrian Brook	kevin.ball@devon.gov.uk,
Cllr. Kevin Ball	cllr.john.hockridge@westdevon.gov.uk,
Cllr. John Hockridge	cmott@westdevon.gov.uk,
Cllr. Caroline Mott	tellgeoffrey@geoffreycox.co.uk,
Geoffrey Cox MP	
Local landowners	
Brian & Angela Coward	brianangelacoward@btinternet.com,
Laura Leigh	Winstode-house@yahoo.co.uk
Derek Northcott	Town Farm, Bridestowe
David Pellow	Hursdon Farm, Cowsen Lane

ALL RESIDENTS OF BRIDESTOWE AND SOURTON
are invited to a public meeting to start a consultation on:

"What do both our communities want to meet future needs in Bridestowe and Sourton"
MONDAY 25TH FEBRUARY 2013



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- Bridestowe Village Hall news page 2
- Citizen's Advice Bureau page 4
- Methodist Church news page 7
- Items for sale pages 7 & 14
- Bridestowe Cricket Club pages 14 & 19
- Riverside Stores page 15
- St Bridget's news pages 16
- Bridestowe Scouts pages 17-19
- Garden Club report page 20
- Bridestowe W.I. page 26
- Comets pages 29 - 30
- Sourton Round Up pages 30-31
- Forthcoming events page 32

BRIDESTOWE
METHODIST HALL
7.30 pm
Speaker: Martin Rich
(Devon Association of
Parish Councils)
**Everyone is invited to
take part and give
their views.**
Substantial funding has
been secured to draw up a
joint Parish Plan for
Bridestowe and Sourton.
This will identify the needs
and aspirations of residents
of Sourton and Bridestowe
and set out the actions as to
how these can be

Bridestowe and Sourton look to the future

Almost fifty parishioners of both Sourton and Bridestowe attended a public meeting on Monday 25th February to hear Martin Rich from the Community Council of Devon describe the process of developing a joint Parish Plan and outline the benefits such a Plan could bring to both communities.

In a nutshell the joint Plan should reflect the views of everyone in both communities, it should not only identify which features are characteristics people value but also highlight local problems and opportunities. It should spell out how residents want the communities to develop in the future and prepare a plan of action to achieve this. The excellent attendance at the public meeting would indicate a strong interest in engaging in this process.

The next step is to bring together a group of people who will take the project forward. **The input of younger people is especially important.** If you would like to play an active part in the project, please complete a green form; these can be obtained from Riverside Stores and from both Parish Council Clerks (details below). If you wish to receive information about the Parish Plan or receive copies of Parish Council minutes in the future, please give your email address to the Clerks.

Bridestowe: Peter Daniels bridestoweparishcouncil@yahoo.co.uk
Sourton: Mel Leonard sourtonclerk@hotmail.co.uk



Contents

- National Trust events page 2
- Book review page 3
- Citizen's Advice Bureau page 4
- Riverside Stores page 15
- St Bridget's news pages 16, 22-23
- Bridestowe P.C. pages 18-19
- What's cooking? page 20
- Okehampton Library news page 23
- Garden Club report page 24
- Bridestowe Cricket Club page 29
- Bridestowe W.I. page 30
- Sourton Round Up pages 34-35
- Forthcoming events page 36

**Bridestowe and Sourton's
Joint Parish Plan moves
forward**

After the excellent attendance at the public meeting last month, the next step is to bring together those who are interested in taking part in creating the joint Parish Plan. Thank you to those who have already volunteered. However more volunteers are needed! There is still time to fill in an application form available from Riverside Stores or the parish council clerks. The clerks will email/post a form on request. The final date for returning forms is Sunday 14th April.



All those wishing to be involved (even if you have not filled in a form!) are invited to a meeting at Sourton Parish Hall on **Tuesday 30th April** at 8pm.

Bridestowe clerk: Pete Daniels 01837 861244 and bridestoweparishcouncil@yahoo.co.uk

Sourton clerk: Mel Leonard 01837 861230 and sourtonclerk@hotmail.co.uk



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 Treetops news page 3
 The Cinnamon Trust pages 4 & 9
 Sourton Round-up page 8
 Sourton Parish Council page 9
 White Hart news pages 10-11
 News from the Castle page 14
 Riverside Stores page 12
 Freecycle page 16
 Joint Churches' report pages 23-24
 Bridestowe P.C. report page 29
 Garden Club report page 32
 Nordic Walking page 37
 Forthcoming events page 40
 Bumper edition this month!



Bridestowe and Sourton Neighbourhood Plan Questionnaire

Do you care about what happens in Bridestowe and Sourton?
 The Localism Act 2011 gives developers much more power to do as they wish, **UNLESS** we have a Neighbourhood Plan setting out what we, as residents do and do not want.
 A Neighbourhood Plan gives us real power to control *development* in our parishes.



Bridestowe & Sourton Housing Need Survey

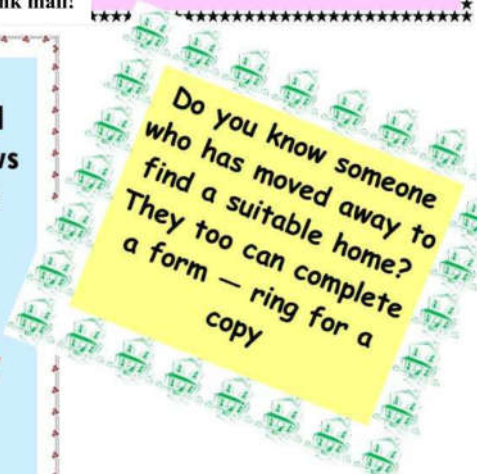
IMPORTANT
Arriving through your door SOON!

It's in a brown envelope and it's not junk mail!

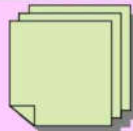


Your Parish Council would like your views on housing in the Parish

The results of the survey could ensure a supply of affordable housing for local people



Please spend a few minutes filling in the form



Contact Janice Alexander

Deadline for completed surveys - 22nd April

If you need any advice or assistance with the HNS please come along Saturday 2nd April, 10-12, Bridestowe Village Hall or Saturday 9th April, 10-12 in Sourton Parish Hall (Janice Alexander will be attending this one). We are very grateful to Dugards Country Diner who will be offering a delicious breakfast menu. Also a draft of the joint Neighbourhood Plan will

...re the chance to
 ...ature development
 ...pinion counts - so
 ...plete this
 ...ood Plan Survey
 ...by the end of April

Community events such as the Ram Roast, local whist drives and monthly bacon baps sessions were opportunities to publicise the Plan and get feedback in an informal setting.



The Bridestowe and Sourton Neighbourhood Development Plan 2016-2034

Executive Summary



A full copy of the Draft Neighbourhood Development Plan is available on the village websites: www.bridestowe.org www.sourtonpc.co.uk

A number of printed copies are available in Riverside Stores in Bridestowe or the White Hart in Bridestowe.

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
OP.1	West Devon Borough Council and Dartmoor National Park Authority	Overall plan	<p>1. Conformity with the Development Plan and meeting the Basic Conditions. As you are no doubt aware, one of the 'basic conditions' that neighbourhood plans must fulfil is to be in conformity with the strategic policies of the Local Development Plans that are extant at the time of the examination of the NP. For West Devon, this is currently the Local Development Framework, including the 2011 Core Strategy and associated documents, except where this is out of date and the NPPF takes precedence.</p> <p>However, it is possible that emerging policy will be adopted by the time of the NP examination as the Plymouth and South West Devon Joint Local Plan (JLP) is currently being examined and is expected to be adopted in 2018. If this is the case, the plan should reference the JLP rather than the Core Strategy. These comments therefore assume that the JLP is the relevant Local Development Plan for the Bristow and Sourton NP. A list of strategic Development Plan policies is included as Appendix 1 to this letter.</p> <p>For Dartmoor National Park, the relevant strategic policies are contained within the Local Development Framework Core Strategy Development Plan Document 2008 and the Development Management and Delivery Development Plan Document adopted July 2013, referred to as the Dartmoor Local Plan in this document. A list of strategic policies for Dartmoor are published on their website and are included at Appendix 2. The DNPA is currently in the process of reviewing its Local Development Plan, with examination and adoption anticipated to happen during 2019/2020.</p> <p>The first draft Local Plan is likely to be published in September 2018 and will include revised strategic policies which will likely affect the strategic context for this neighbourhood plan.</p>	<p>Plymouth, West Devon and South Hams ' Joint Local Plan is anticipated to be finalised in early 2019 and will set out the overarching strategy for the area, setting out where development will take place, what areas should be protected, and how the area will change through to 2034.</p> <p>In this neighbourhood Development Plan, we have sought to follow the principles set out in the currently available public consultations version of the Joint Local Plan as far as possible. Until the new Joint Local Plan has been officially adopted we are however required to comply with the existing Local Development Framework Core Strategy Development Plan Document (2006-2026) which was adopted by West Devon Council in 2011.</p> <p>Similarly we have sought to comply with DNPA's Local Development Framework Core Strategy Development Plan Document 2008</p>

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
OP.2	West Devon Borough Council and Dartmoor National Park Authority	Overall plan	<p>2. It is clear that thorough consultation and research has been undertaken: Chapters 1 to 4 draw out some key issues for the local community and clear objectives for the plan. However, no site allocations have been made and this appears to be a missed opportunity to deliver local development that would help meet these objectives. Possible development sites have been mentioned in the plan, but their status is unclear. While an NP can be used to set out community opinion on development sites, it is not certain how much value this has, as without proper site allocations in the plan, very limited weight can be given to the community views given.</p>	<p>After consideration and heeding advice, site allocation was deemed the best way of proceeding with the 3 sites that remain undeveloped.</p>
OP.3			<p>3.A development boundary around Sourton is identified on a map, but its status is unclear. There appears to be no policy that relates to it. As a matter of general principle, this is unlikely to be supported by the Council given that Sourton has not been identified as a sustainable place for development by the JLP or the DNPA Local Development Plan. Without the boundary, Sourton would be considered 'countryside', and subject to JLP Policy TTV31 and DNPA Policy COR2 which allows for only very limited development in special circumstances. In contrast, the principle of development within a development boundary is assumed to be acceptable. Development outside the boundary may also be acceptable in accordance with JLP TTV30 and TTV31. So it is difficult to see what benefit a development boundary around Sourton is likely to achieve.</p>	<p>A development boundary was drawn as a response to a successful planning application to WDBC in 2015. It indicated that Sourton's status had been revised by the LA. A very tight boundary was drawn using the rationale of DNPA and approved by PC after public consultation. The justification for the boundary is to ensure that any future housing needs development, should it occur, will be close to the existing village nucleus augmenting a sense of community and preventing sprawl. We believe the boundary is a safeguard against isolated pockets of development throughout the parish.</p>
OP.4			<p>4. Evidence base. No evidence to back up the proposed policies has been seen by the LPA. Appendices are mentioned in the plan but these did not appear to be available on the Brestowe website at the time of the consultation. It is important to ensure that all relevant background evidence is readily available by the time of submission at Reg 15, particularly for those policies that are not given strategic context through the JLP or Dartmoor Local Plan.</p>	<p>This was an omission. Appendices had been on the website but when revised were not uploaded. They are now available via both parishes' websites.</p>

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
1	West Devon Borough Council and Dartmoor National Park Authority	Chapter 1. <u>Introduction and Background</u> Para 1.5.5, Fig 3 and Fig 5	While sites proposed by developers in the NP area may be useful background information, there is no information about how, when or why these sites have been proposed and their status is therefore unclear. Suggest removing this list of sites and the maps in Figs 3 and 5 to a background document.	More information given + some rewording (page 10). Site maps now in Chapter 5 with relevant policy. Site assessments in Evidence Base, Appendix V.
2		P.11 Sourton's boundary	Who was the development boundary adopted by and what was the process? While the LPA is generally supportive of minor changes to existing development boundaries within neighbourhood plans, drawing a new development boundary around a settlement that has not been identified as a sustainable place for development by the Local Plan raises issues as discussed in the general comments above	The settlement boundary was drawn and adopted by the PC following community consultation. DNPA 's rationale for drawing up boundaries was used. The justification for the boundary is to ensure that any future housing needs development should it occur will be close to the existing village nucleus augmenting a sense of community and preventing sprawl.
3		Para 1.5.8 Why the Landscape is important	Reference to National Park designation recognising nationally important landscape quality would seem appropriate here.	This is referenced in the Plan in Chapter 1, page 11
4		<u>Chapter 2 : Planning Policy Context</u> P. 16	.Suggested rewording: ' <i>Policy Framework (NPPF) sets out national planning policy which all local planning policy must have regard to.</i> '	This has been reworded as suggested and also revised to accord with NPPF guidance (2018)
5			Adoption is now likely to be late 2018. As discussed in general comments above, the emerging JLP is considered the most relevant Local Development Plan in terms of the Bridesdowe and Sourton NP. It would therefore be useful to have here an explanation of the most relevant JLP policies, especially TTV30 and TTV31	Date amended to early 2019 for adoption Advised by professional planners to refer to existing 2011 Local Authority Plan but show due regard to emerging JLP policies.

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
6	WDBC and DNPA	Chapter 3 page 19 number of houses ..30	<p>Policy TTV30 sets out indicative levels of new housing that is expected to come forward through neighbourhood plans at villages identified as sustainable locations for development. The numbers suggested are primarily for monitoring purposes: if it is found that this level of housing is not coming forward through NPs, the council will consider identifying development sites at these villages.</p> <p>Suggested rewording: <i>'West Devon Borough Council in its emerging Local Plan etc.....has suggested that a figure of 30 additional homes Bristow for the period 2014 – 2034 would be considered sustainable.'</i></p>	Reworded as suggested
7		P.21 housing need figure a bare minimum	Agreed. You could also make the point that the assessed situation is only a snapshot in time and will change over the plan period.	Emphasis made that this is a tentative figure likely to increase. Explanation of the delivery of affordable units - 8 in each five year term of Plan's 15 year span. This represents two thirds of the total to be delivered within each 5 year period and delivering 24 units over the Plan period, exceeding the minimum figure.
8		P.21 '...several sites put forward'	As above, where, when and how were these sites put forward? Presumably in the WDBC SHLAA, but this should be made clear.	Detail added <i>'...Several specific sites for possible development, were put forward by local landowners in response to WDBC call for sites (SHLAA) and one from parishioners' suggestions This took place in Feb/March 2015</i>
9		Reference to 'Exception sites' P.36	JLP policy allows for development sites outside the development boundary in rural areas, provided it is adjoining or very close to existing settlements (Policies TTV30 and TTV31) and meets local development needs. There is no expectation that this housing will be 100% affordable. Therefore such sites cannot be considered 'Exception Sites'. This statement also seems contrary to your Policy H1.	Reference to 'Exception sites' was incorrect. Redrawing Bristow's settlement boundary so that it now includes the sites identified in WDBC's SHLA. clarifies where development should take place. If the allocation of affordable housing is not met within the settlement boundary then the Exception Site Policy H4 will address it.

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
10	WDBC and DNPA	Housing Introduction	The statement that Sourton could still see development should land be put forward, seems to suggest this could mean Sourton is an acceptable location for development. This conflicts with Policy H2 and the strategic policies of DNPA.	Sourton's status remains as 'unsustainable' but DNPA classify it as a 'Rural Settlement' in their 2008 Core Strategy Development Plan. Paragraph in Chapter 1 page 10 clarifies what this implies for future development. In the village outside DNP an application has been passed by WD indicating that Sourton is vulnerable.
11		Policy H1.	Does this policy add anything to existing and emerging Local Plan policy, in particular JLP policies TTV30 and TTV31? Would suggest that this point can be made sufficiently in the introduction.	Retained to emphasise that sustainable development is the linchpin of NPPF policy.
12		Policy H2.	<ol style="list-style-type: none"> 1. It may be worthwhile adding 'or near to' after adjacent to, as this is the approach taken in TTV31 and there may be sites very close to the settlement boundary, but not adjacent it, that the Parishes may wish to support. 2. This is not consistent with national policy, which requires a threshold of more than five for an offsite contribution and more than 10 for on site. Lower thresholds within a neighbourhood plan will need evidence to show that this is justifiable and deliverable. 	<p>Policy now H5</p> <ol style="list-style-type: none"> 1. Wording changed as suggested 2. The 2018 NPPF (paragraph 63) states that the threshold may be 5 or less in rural areas. Reference to the NPPF 2018 thresholds made in Chapter 3. 3.1.1
13		Policy H3	<ol style="list-style-type: none"> 1. Information required with planning applications is set at national and district level and is set out in Local Validation Lists. It is not possible for a neighbourhood plan to require information in addition to these requirements. The wording of the policy is also problematic in that it seems to require that all development provide information, even where it might not be relevant to the proposal. WDBC are in the process of updating the Local Validation List. See https://www.westdevon.gov.uk/article/3283/Consultation-on-SH-and-WD-Local-Planning-Validation 	<ol style="list-style-type: none"> 1. Accept this is inconsistent and needs to conform with Local Validation List Policy H3 has been overhauled and elements now appear in.. Scale, density and layout H5 Green spaces EH3 Hedgerows and trees EH5

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
13 continued		Policy H3	<p>2. Second bullet point: It may not be reasonable to always expect developments to provide biodiversity enhancement. Suggest adding 'wherever possible'. Suggested additional wording: 'where possible harm to biodiversity is identified, the submission should include measures to mitigate the impact upon biodiversity.'</p> <p>3. We would recommend avoiding the words 'in keeping' as it could be considered to be overly prescriptive and to stifle innovation. Suggest something along the lines of 'new design should respond well to the surrounding environment and local distinctiveness'. Does this policy in general add anything to JLP DEV20? It also seems to largely repeat Policy H4</p> <p>5. The best way for a neighbourhood plan to protect valued green spaces is by designating them as Local Green Spaces. Has this been considered? Further information can be provided on this on request.</p>	<p>2. Reworded as suggested and H5 d reads..... c) <i>Where feasible and proportionate to the scheme enhances biodiversity;</i></p> <p>3. Accept that it does reiterate JLP DEV20 but as the JLP not adopted then need to state our criteria. Rewording of policies H3 & 4 to remove repetition and using wording that is less prescriptive appear as H5 Design and Quality of New Development</p> <p>5. Accept advice and process started. See policy EH3 – Local Green Space Designations</p> <p>The areas shown in the table below and listed in schedule on page 43 are the proposed designated Local Green Spaces. Development on these areas will not be permitted other than in very special circumstances.</p>
14		Policy H4 Quality and design	<p>As above, does this policy add significant value to JLP DEV20?</p> <p>a. The second sentence of this criteria in particular is negatively worded and potentially risks stifling innovation.</p>	<p>Accept that it does reiterate JLP DEV20 but as the JLP not adopted then need to state our criteria. <i>Reworded. incorporated in new H5 criteria. 'H5a) It demonstrates high quality design through the use of scale, density, layout, height and mass, materials and detailing, that reflects local character and distinctiveness;</i></p> <p>e) It respects and works with the existing landscape and natural and historic environment</p>
15.		Policy H5 Conversion of redundant buildings	<p>This policy appears to support the conversion of any building (modern and traditional) in the countryside into housing, regardless of its location or merits. Is this what the NP group intend? It is not difficult to stop using a building and present it to the LPA as redundant. We recommend that the policy refers to NPPF para 55, as to the need for enhancement of the site in such cases. Or include a caveat such as 'where the long term redundancy of the building has been evidenced'</p> <p>Under section 1. It is sometimes very challenging to totally protect neighbour amenity, and in many cases there is a low level of tolerable harm to neighbour amenity. As such we would recommend the insertion of the word 'adequately' before protected.</p>	<p>Policy H5 renumbered and more robustly worded as H6. Conversion of Buildings in the Countryside</p> <p>'Positively contributes' equates with 'enhancing'</p> <p>NPPF does not mention evidenced long term redundancy. See paragraphs 78 and 79 of the 2018 NPPF re development of homes in isolated rural settings – this will apply equally to new build and to conversions.</p> <p>1. Reworded e) <i>It protects individuals and property from overlooking and loss of privacy, overshadowing and overbearing impacts, and unreasonable noise and disturbance.</i></p>

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
15. continued		Policy H5	<p>a) This sentence is a concern as, generally, the LPA is resistant to extensions on historic barns in principle. A porch, for example, can be a very harmful addition to an historic barn. We would suggest removal of this part of the policy.</p> <p>In the National Park DNPA believe this policy conflicts with strategic policy DMD9 which only allows conversion of historic buildings and that consideration is given to commercial less harmful uses before residential uses. Domestic conversion of traditional buildings is often the most harmful way to re-use them because of the requirement for subdivision, new openings, insulation and changes to setting. In many cases extension and significant new openings allowed in a) and b) could significantly harm historic character.</p> <p>How does this policy mesh with the need to respect historic character and Policy H3's requirement for housing development to take account of the Historical Environment? What evidence do you have which suggests this approach will not lead to harm?</p>	<p>We recognise the importance of sensitive, appropriate additions to traditional buildings but we consider them essential to ensure that safe access, thermal efficiency and adequate lighting are provided for the building's new role as a dwelling.</p> <p>In other parts of the country additions are permitted. Stress the need for sensitive use of materials which will not harm but compliment and may even enhance appearance</p> <p>Have added to Policy H6 "Outside the National Park"</p> <p>The wording of H6c should protect the historic environment c) <i>The design will respect the original character of the building and its surroundings;</i></p> <p>See chapter 16, paragraphs 184-188 of the 2018 NPPF</p>
16.		Section 2: Employment and the Local Economy Policy E1 a. Small scale proposals	<p>In the National Park the policy conflicts with COR18 by allowing employment development in the open countryside.</p> <p>c) Consistent with the comments above, and the difficulty to sometimes demonstrate compete protection of amenity, WDBC recommend insertion of 'unacceptable' before adverse.</p> <p>d) this policy seems to want to restrict the occupation of retail space to a small group of retailers, how is this to be controlled and what evidence suggests it is justified? The planning system cannot control who leases retail space and therefore I don't believe this policy would be workable. The wording also seems unclear and could be taken to mean a very broad range of business types which could be undesirable, particularly on historic farmsteads.</p> <p>h) We would recommend 'For such developments, landscaping and green screening should, where necessary, be incorporated into the design to reduce the visual impact. Screening will not always be appropriate and should also be consistent with surrounding landscape features.'</p>	<p>Policy E1 now E1 General Business Development Guidelines Added <i>Outside the DNP and not in general countryside</i> c) Have chosen different rewording using 'significant adverse' instead of 'unacceptable impacts' E1 second bullet point • <i>the scale and nature of the proposals would not have significant adverse impacts on the amenities of adjoining businesses and householders, on the landscape or on the historic environment or sites designated for their biodiversity importance.</i> By specifying the historic environment this should protect historic farmhouses. d) Agreed - too restrictive. Substituted E1 point 4 'The scale and nature of the proposals would not have unacceptable conflicts with other land-use activities.' h) E1 final criterion • <i>landscaping and green screening is deployed, where necessary to reduce visual impact.</i></p>

Ref. No.	Contact Name and Organisation	Part(s) of the Plan to which comments apply	Comments or concerns	Changes to Neighbourhood Plan
17.	WDBC and DNPA	Policy E1.b Change of use criteria	Consider adding a minimum time over which continuous marketing must have taken place: 18 months to two years may be considered reasonable.	Policy H6 Conversion of Buildings in the countryside does not set any criterion for time length. It was felt this was too prescriptive so not included in reworded policy. Again, see chapter 16 of 2018 NPPF, which sets out the conditions and restrictions
18.		Policy E1.c Broadband & mobile phone masts	Suggest referring to 'Telecommunications' rather than broadband/mobile phone. The plan doesn't set out how suitable locations will be assessed. It also refers to the need for development to be in line with other policies in the plan although no other policies in the plan relate to telecommunications development. Is this the intention? In the National Park does it add anything more to policy DMD20	Agreed to retitle policy with no reference to other policies . Policy E 4. Communications Infrastructure a. Proposals which seek the expansion of telecommunication facilities, electronics communication networks and high-speed broadband along with improvements to connectivity will be supported so long as the proposal does not have a harmful impact on the landscape. b. Developers proposing business developments will be required to ensure that the right infrastructure and ducting is in place to enable superfast broadband.
19.		Policy E2 Tourist and recreational development	There tends to be three types of tourist development in rural areas: temporary structures such as caravans, shepherds huts etc; conversion of redundant buildings, and new permanent build holiday lets. The latter can be much higher risk as it is essentially a new build dwelling in the countryside with a holiday tie. If built, it isn't that difficult to demonstrate non-viability over a short period. It may be wise to address this issue within the policy: for example, it could say that 'new build holiday lets will only be permitted when they relate to an existing tourism facility and when a long term need has been evidenced.' a) would recommend 'unacceptable' before 'adverse'. For d), please see above comments about extensions to historic barns. The policy also allows conversion of modern agricultural buildings which, in the National Park, conflicts with Policy DMD9. In the National Park, policy DMD35 allows creation of new tourism uses to support farm diversification – this policy may be sufficient for your purposes.	Renumbered and revised. Accept the need to refer to 'existing facility' but not for 'long term need' Policy E 5. Tourism Development <i>Proposals for the development and expansion of existing tourism - related businesses will be supported providing that:</i> • <i>the scale of development is small and proportionate to existing activity and the immediate locality</i> • <i>the potential impact on neighbouring residential properties is acceptable having regard to potential noise and disturbance</i> • <i>they do not have a significant adverse impact on the landscape and are mitigated by extensive landscaping and visual screening</i> • <i>traffic, access and highway issues are satisfactorily addressed.</i> Have retained 'adverse' over 'unacceptable' See response to comment 15

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20.		Policy HCA1.a Community assets	We have not seen information provided in appendices, so cannot comment on the list of community assets. Have these been formally registered by WDBC as Assets of Community Value? It would be reasonable to allow change of use where an asset is no longer needed or viable, particularly if any of the assets are private businesses. A similar requirement for marketing could be added as suggested for Policy E1.b. above.	The community assets have not been formally registered by WDBC Have reworded policy Policy CW1 Community assets and facilities Community assets and facilities that are valued by the community will be protected and changes of use resulting in the loss of these assets will not be supported unless the following can be demonstrated: a) The proposal includes alternative provision, on a site within the Parishes, of equivalent or enhanced facilities. Such sites should be accessible by public transport, walking and cycling and have adequate car parking; or b) Satisfactory evidence is produced that there is no longer an economic justification to protect the asset and all reasonable efforts have been made to secure alternative business or community or social enterprise re-use. These community assets and facilities are listed in Appendix VII
21.		Policy HCA1.b	As above, information required with planning applications is set at national and district level and is set out in Local Validation Lists. It is not possible for a neighbourhood plan to require information in addition to these requirements. WDBC does not have a Local List. However, the neighbourhood plan is an appropriate place to identify non designated local heritage assets, and it may be more appropriate to have a policy along the lines of: 'Development should conserve or enhance the historic environment, including designated heritage assets of national importance and undesignated heritage assets of local significance and their settings. Assets of local significance include, but are not limited to, those identified in... (appendix etc)'. This wording is consistent with JLP DEV22, and would add useful local detail to it.	Accept that asking for additional information is not appropriate. Policy EH 6. Heritage Assets In accordance with national policy the potential impact of the development proposal on a heritage asset and its setting should be fully assessed. The relevant historic environment record should have been consulted as a minimum requirement. Due regard should be given to the list of non designated heritage assets which has been compiled by the communities (Appendix X)

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22.		Section 4 Delivering Low Carbon Development Policy LC1b Energy generation	<p>1. This repeats policy LC1 although changes the scale which adds confusion. It could be incorporated in LC1</p> <p>2. This wording may be better as supporting text rather than policy: local policy can no longer require standards beyond Building Regs.</p>	<p>1. Policies LC1 a and LC1b merged and retitled. Accept local policy can not ask for more than Building Regs standards so removed Policy LC1 Microgeneration energy development See comment 20</p>
23.		Section 5 : Wellbeing Policy CW1	<p>There seems to be no requirement for these facilities to be well related to the communities they are intended to serve and so reduce the need to travel, make best use of existing infrastructure and prevent the sprawl of development into the countryside. This could have undesirable consequences. In the National Park does it add anything to existing policy?</p>	<p>Policy CW 1 Community assets and facilities and Policy CW2 Sporting/recreational facilities <i>Proposals that provide for additional public open space, sports facilities, or access to shared facilities, which meet the needs of schools and the wider community, will be supported where they:</i> a) <i>Are well related to the communities they serve</i> b) <i>Do not have an adverse impact on residential amenity; and</i> b) <i>They provide suitable access and car parking.</i> <i>Any proposals for built development that are on sites used for these amenities but not associated with these uses and/or will result in the loss of these facilities, will not be supported.</i> These policies cover the points raised See comment 18.</p>
24.		Policy CW2: Communications Infrastructure	<p>b. As above, information required with planning applications is set at national and district level and is set out in Local Validation Lists. It is not possible for a neighbourhood plan to require information in addition to these requirements. Is there another way to word this in order to achieve a similar result, bearing in mind that any requirement on development must be reasonable and deliverable?</p>	<p>Agreed and rewording of policy corrects this.</p>
25.		Policy CW3 Developer Contribution	<p>As set out in CIL regs, contributions required from developers must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. They cannot be used to rectify any existing lack in facilities or infrastructure, only to provide for need generated by the development. The wording of the policy needs to reflect this. Is there a reason for saying 5 dwellings rather than, say 10? Is there evidence to suggest what community facilities are needed, based on an assessment of need and of existing facilities.</p>	<p>Agreed. Policy removed and reference in text is made to 'developer contribution' in Section 5 at the end of policy section. A specific project, popular with the community, is identified CW3 Future sporting facility at Bridestowe Village Hall A proposal to provide additional sporting facilities at the village hall site will be supported providing it doesn't impact negatively on the character and appearance of the area.</p>

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26.	Sarah-Jane Barr Police Designing out Crime Officer - South Hams, West Devon, Torbay & Dartmoor National Park		<p>As Neighbourhood Plans form part of the planning decision process and 'crime and the fear of crime' are determining factors in planning consent, it is respectfully requested that consideration is given for Policies H.3 and H.4 (H.4. states 'create safe environments addressing crime prevention and community safety') are expanded upon to reflect more detail of the subject matter. Also perhaps reference could be made under relevant subject areas, such as social and physical wellbeing, design, public realm, open spaces, housing, parking provision and environment etc.</p> <p>It may also assist the decision making process for new development if there was a requirement in the Plan for the following CPIED attributes to be referenced in Design and Access Statements, demonstrating how and where they have been implemented in the design and layout of that development:-</p> <ul style="list-style-type: none"> • Access and movement - Places with well-defined and well used routes with spaces and entrances that provide for convenient movement without compromising security. • Structure - Places that are structured so that different uses do not cause conflict. • Surveillance - Places where all publicly accessible spaces are overlooked. • Ownership - Places that promote a sense of ownership, respect, territorial responsibility and community. • Physical protection - Places that include necessary, well-designed security features as laid out in Secured by Design Guidance - Homes 2016, Commercial 2015, School's & Hospitals. • Activity - Places where the level of human activity is appropriate to the location and creates a reduced risk of crime, fear of crime and a sense of safety at all times. • Management and maintenance - Places that are designed with management and maintenance in mind, to discourage crime and disorder. <p>The above attributes will also assist in ensuring compliance with the following national and local legislation and planning policy requirements:-</p>	<p>Recognise value of advice. Mention made in the Introduction of CPIED and Secured by Design. page 11 Criterion added to Policy H4 Policy H5 Design and Quality of New Development <i>Applications for new development will be supported provided they meet the following criteria:</i></p> <p><i>f) It improves the perception of safety through design and layout, minimising opportunities for crime, fear of crime and antisocial behaviour.</i></p> <p><i>CPIED attributes included in the Village Design Statement (Appendix VI)</i></p>

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26 continued			<p>National Planning Policy Framework (NPPF) at paragraph 7 makes a clear statement that sustainable development is at the heart of its planning policy, defining three fundamental dimensions: economic, social and environmental. Crime and the fear of crime, as well as community conflict and acts of antisocial and unacceptable behaviour, can directly impact on all three of these dimensions.</p> <p>This has been reinforced throughout the NPPF, specifically at point 58 (Requiring good design) & 69 (Promoting healthy communities), which requires local authorities to produce 'Local and Neighbourhood plans' with a specific aim to create: -Safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and Safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.</p> <p>Crime and Disorder Act 1998, specifically section 17 which states that community safety must be embedded into our planning, policy and operational day-to-day activities. It states 'Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can, to prevent crime, fear of crime and disorder in its area'.</p>	
27.	Martyn Dunn Development Coordinator SW Water		<p>I would add that based on the anticipated level of new housing you suggest this is not going to cause any difficulty in our being able to support such.</p>	Noted
28.	Gaynor Gallacher Highways England SW Operations Division		<p>Highways England is responsible for operating, maintaining and improving the strategic road network (SRN), which in this case comprises the A30(T) which passes through both parishes. We are satisfied that the proposed plan policies are unlikely to result in development which will impact on the SRN and we therefore have no comments to make. However, this response does not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at that time.</p>	Noted

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29.	<i>David Stuart</i> Historic England		I can confirm that we have no comments on the Plan that we would like to offer other than to congratulate your community on its progress to date. We wish it well in taking the Plan through to being made.	Noted
30.	<i>Marcus Salmon</i> <i>Sustainable Places Planning Specialist</i> <i>Environment Agency – Devon, Cornwall & Isles of Scilly Area</i>		We note the local community's concerns regarding drainage infrastructure and we support the requirement for any new development to be appropriately served by drainage infrastructure – both in respect of surface water and foul effluent. The quote from the Devon County Landscape Character Assessment under '5. Environment and Amenities' refers to the natural environment and the area's floodplains. Also Objective 3 to 'conserve and enhance' the natural environment is welcomed. However, beyond these there is little reference and no specific policies in the plan in respect of the natural environment.	Have incorporated a specific policy - Policy H8 Flood risk following consultation and feedback from community. Also inclusion of flood map. Also from feedback from community - Policy EH 4. Wildlife Protection All developments are expected to accord with national policy and the LA plan and should not cause significant direct or indirect harm to any site designated for its wildlife value. Biodiversity enhancement plan will be required where proportionate. Proposals to protect or restore any existing features, or to create new features of wildlife habitat - particularly where these form linkage between habitats in or beyond the site - will be supported. Plus Policy EH5 Trees and hedgerows - specifically safeguards these features in development sites
31.	<i>Moira Manners, Lead Adviser, Plymouth & Tamar team</i> Natural England 5/3/18		We would like to suggest that Dartmoor Site of Special Scientific Interest, which overlaps with Dartmoor Special Area of Conservation and borders Sourton village, could be mentioned in the plan as it is an area of great environmental significance, which is not referred to. The maintenance and enhancement of green infrastructure in the villages is vital for providing corridors for the movement of species from the designated sites of Dartmoor into the wider countryside. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement.	Referenced in Chapter 5

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32.	Bridestowe Parish Council		<p>Bridestowe PC whole heartedly supports the NDP and believes that once adopted it will play a vital role in the planning process, ensuring sustainable and appropriate development that accords with local wishes and aspirations.</p> <p>The Plan has offered the community the chance to have a real say in how the parishes evolve over the next fifteen years. The policies put forward in this Plan will</p> <ul style="list-style-type: none"> • Ensure future development is appropriate in scale • Will meet the identified housing needs of the communities • Minimise the impact of new development on the surrounding countryside with its highly valued landscape. <p>Bridestowe Parish Council, as the Qualifying Body, understands that it will be responsible for maintaining and periodically revisiting the Plan to ensure relevance and to monitor delivery.</p>	Noted
33.	Sourton Parish Council		Sourton Parish Council continues to support the Neighbourhood Development Plan and its objectives to prevent inappropriate development and to support housing only when it meets identified local need.	Noted
34.	Will Ingram Individual (age 24)		As a young person who has grown up in the Plan area I have experienced the problems that the plan identifies namely lack of facilities for teenagers and the rural isolation due to poor public transport. Although I would have liked to live in the area because of a lack of employment opportunity and affordable housing inevitably I have had to move to an urban area where employment opportunities are much greater and housing is cheaper. I welcome the aims of the plan to address these key issues that impact on young people in particular.	

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34.	Peter Deacon Individual		<p>I support the draft Neighbourhood Plan</p> <p><u>Feedback on the Neighbourhood Development Plan for Sourton and Bristestowe.</u></p> <p>Having read the document end to end, I was impressed with the level of detail, the content and the obvious amount of work which had gone into preparing it.</p> <p>it did however highlight a number of concerns around the whole subject of development in and around the Okehampton area. Being Devonian through and through, i am very proud of our delightful and spectacular county. it has so many uniques, stunning scenery, views and coastline and massive history surrounding the moors and the beautiful beaches.</p> <p>I was particularly concerned over the comments relating to development in Bristestowe and Sourton as both parishes suffer, as do most others in the area, with a lack of investment in housing and the associated infrastructure necessary to support additional homes and families. This applies to schools, doctors. hospital facilities, policing, transport, job opportunities and public transport.</p> <p>Building new affordable homes is a great concept, but with wages in the area being well below the national average, are these new homes going to be available to the local people who need them, but can't afford to get onto the property ladder.</p> <p>Are there enough job opportunities in the area, I see little in the proposals to attract new businesses or, apart from being a great place to live, what would attract people to move into the area.</p> <p>The rail link to Exeter has been discussed for a long time, and is a long time in the future if it ever happens. For local people to commute to Exeter or Plymouth is not only costly, but to drive into the centre of Exeter or Plymouth is well over an hour each way, but the salaries don't compensate for the additional cost of the travel</p>	<p>Comments noted</p> <p>We have consulted with existing businesses and identified possible sites for new businesses.</p> <p>We recognise the need for reliable, fast internet access to allow businesses based at home to flourish(Policy E3)</p> <p>The policy EH2 Farm Diversification was been included reflecting feedback</p> <p>Sourton village because of its present 'unsustainable' status, is not a focus for business development. DNP 's classification of the land falling within the Park asa rural settlement may lead to the possibility of small scale development/expansion of the existing local businesses at Sourton Down.</p> <p>There has been progress on the rail link with Exeter. Appendix VIII elaborates on this.</p>

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34. continued			<p>Any plan for development must include provision for additional infrastructure to support more people, but must also address the employment opportunities and encourage new and innovative enterprise to attract businesses and help local people who are prepared to put in the money and effort. Leisure and farm diversification are key to the future success of the area.</p> <p>Sourton specifically has a real problem with not having a proper village centre with a shop, post office, typical village green etc., the rural hamlets make it difficult to determine where any developments would be best located. Perhaps encouraging and helping to convert old farm buildings would be a better idea, but again, the other considerations already identified would need to be addressed.</p> <p>The recent announcements from central government regarding the housing issues actually make the situation worse, unless the development plans include the infrastructure and employment problems of the parishes and local area. Also, people need to be more adaptable to change as there is still an attitude amongst many local people who oppose change and oppose innovation and enterprise, change is a certainty and should be embraced and supported.</p>	
35.	Tom and Kate Hills Individuals		<p>There is not enough provision for starter homes in our village (<i>Sourton</i>). I know of 10 young people who would like to be able to afford to stay in the area. There was an outline plan for starter homes in the Prewley area - why is this not in the plan? (Tom Hills)</p> <p>Starter homes for young people should be a priority if we want our villages to prosper. There should be more opportunities on your development map. (Kate Hills)</p>	<p>Recognise need for starter homes. The Prewley area falls within the DNPA. The National Park classifies the area of Sourton as a Rural Settlement and small scale development to meet an identified local need may be supported in principle This classification is welcomed and their Policies COR2, COR18 and DMD22 would apply and our NP accords with these. Particularly welcome is the 75% affordable ratio.</p>

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36.	<p>Laura Ley Treetops Setting Director</p>		<p>I think overall the document is an amazing overview of our wonderful communities and hats off to everyone who has been involved and tasked with such a massive job. Huge congratulations in getting it to the draft phase – an immense workload.</p> <p>In view of us in particular, I feel Treetops is somewhat underestimated and undervalued within the document as we have become, since the move to the village hall site in 2008 a hub within the community and further afield for families and children alike. The setting is very well regarded within the area for childcare provision, (we have waiting lists) and we are still the Flagship childcare provider for West Devon.</p> <p>We are no longer a "playgroup" but a full day care childcare setting providing preschool 5 days a week as well as incorporating Breakfast, Afterschool Care and Holiday club services for older children up to the age of 12 years which serves all the local villages around us.</p> <p>Just some other notes I made in the draft booklet that may be if use....</p> <p>Page 8 – 2nd paragraph – Treetops in Bristestowe provides Preschool Early Years Education for the young children and transitions them into the primary school.</p> <p>Page 8 – 3rd paragraph – no mention of Preschool, Parent and toddler group, Afterschool and Holiday clubs in the Bristestowe village list.</p> <p>Page 8 – 8th paragraph- I would make a slight adjustment – "Treetops" the thriving preschool with additional Before, Afterschool & Holiday club services provider based in Bristestowe etc</p> <p>Page 8 – maybe nice to add in a photo of us somewhere in the document. – I could send over a couple of nice ones I have.</p> <p>Page 25 – There are many small businesses and trades that serve the local communities – Preschool could be added in. Treetops also employ 7 local staff out of the 10 that work here – so a good local employer/employment example.</p> <p>Page 30 – Had a thought about the Scout group ? - treetops photo maybe as "young people, sport and recreation" would include TT ?</p>	<p>Accept that Treetops role within the area is not fully described, including its contribution to local employment</p> <p>Inclusion of the following <i>"Treetops" is the thriving pre-school with additional Before, Afterschool & Holiday club services and located in part of the Bristestowe Village Hall building. It functions as a hub within the community and further afield for families and children alike. It is under pressure to expand as it not only serves the local area but also attracts children from the surrounding parishes. "</i> Chapter 1 page 8</p> <p><i>"Also of the 10 members of staff employed at Treetops Preschool, 7 live locally."</i> Chapter 3, page 24</p>

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37.	<i>Brian and Cynthia Higbee Individuals</i>		We would like to express a huge vote of thanks to all those on the committee for the time and energy they have given in the preparation of this plan and our hopes are that the recommendations, especially on proposed housing, will be respected.	Noted
38.	<i>Mark Fogerty Individual</i>		I support the draft Neighbourhood Plan	Noted
39.	<i>Georgina Hodgson Individual</i>		I support the draft Neighbourhood Plan. Thank you to you all for your hard work in producing it	Noted
40.	Guy Horswell BSc (Hons) Planning Assistant Stags Professional Services on behalf of Mr Northcott		<p>Whilst we commend the Parish for engaging with the Neighbourhood Plan process, at present we have a number of concerns with the current draft. The comments below are made on the assumption that the NP will be adopted post the adoption of the emerging Plymouth and South West Joint Local Plan (JLP) and that the NP has therefore been produced to be in broad conformity with the JLP. Advancing the NP ahead of a number of unresolved issues and the formal examination of the JLP is considered ill-advised and could lead to future issues with conformity. For example, the number of dwellings that the JLP intends to make provision for over the plan period may change following examination. This could have knock on effects for the number of houses that villages such as Bristowestowe would be expected to provide.</p> <p>The emerging JLP states that housing provision will be made for at least 26,700 dwellings over the plan period of 2014 – 2034. It should be reiterated that the NPPF makes it clear that housing figures are not to be treated as a maximum and Local Authorities should significantly boost the supply of housing and that any past shortfall should be addressed promptly rather than being spread over the whole of any new plan period. The JLP also lists Bristowestowe as a village that is able to accommodate around 30 dwellings. Clearly therefore, there is a significant need for housing with the locality, against the backdrop of a historical undersupply, and Bristowestowe is seen as a village which is suitable to accommodate some growth.</p>	<p>We are grateful to Mr Horswell for pointing out to us several ambiguities in the draft Plan, and areas in which the draft failed to meet National Statutory Guidance as set out in the NPPF.</p> <p>These areas of ambiguity and failure to meet National Guidance were also pointed out by other respondents to the draft Plan, and have been corrected in the current version, notably in Policies E2 and H2.</p> <p>We disagree with Mr Horswell when he states that without allocating sites for development we potentially fail to provide for the necessary development of new housing over the next 15 years.</p> <p>Of the five potential sites for development identified in the draft Plan, three have now been given planning approval, for developments that include 25 houses in Bristowestowe, and 6 in Sourton. Of the three other sites, two of the landowners have informed the Parish Council of their intention to seek planning approval for developments that potentially include at least a further 30 dwellings.</p> <p>Thus, without allocating sites it is very likely that, within the 15-year term of the NDP the number of sites (excluding windfall and in-fill developments) will potentially substantially exceed the estimate of 30 homes identified in the draft Joint local plan.</p>

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			<p>The NP is overall considered to be relatively supportive of the growth that is expected of Bridesstowe and Sourton, however, as discussed we have a number of concerns with the draft plan in its current form. It is noted that the NP does not allocate any sites. Although Policies H1 and H2 support housing development within the NP area, they do not provide any certainty and are not sufficiently proactive, in particular for Bridesstowe, given the status of the village in the Development Plan. It is our contention that by failing to allocate a suitable site in the NP there is a risk that the LPA will be unable to meet housing targets.</p> <p>Furthermore, as noted in the NP, Bridesstowe has no infill sites that will accommodate more than 1 or 2 houses. It is therefore, very likely, if not inevitable that a larger site will have to come forward in order to provide the number of houses that Bridesstowe is expected to deliver. Therefore, it is very much in the interests of the residents of Bridesstowe and Sourton to be involved in the site allocation process so that they can influence where they would like housing to be delivered. It is our contention that Point (a)(2) of Policy H2 is contrary to the Planning Practice Guidance and is overly onerous; it states:</p> <p>“The proposed development contributes to meeting the local housing needs (as defined in section c below) within the relevant parish for affordable and social-rented accommodation, which, for developments of more than 5 homes, constitutes a minimum of 30% of the proposed new dwellings or, for developments of 5 or fewer homes, an equivalent contribution towards the cost of such accommodation elsewhere within or adjacent to the Bridesstowe settlement boundary (see H1)”</p> <p>Paragraph: 031 Reference ID: 23b-031-20161116 of the Planning Practice Guidance (PPG) states that: “in designated rural areas, local planning authorities may choose to apply a lower threshold of 5-units or less.</p> <p>No affordable housing or tariff-style contributions should then be sought from these developments.</p> <p>In addition, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development.”</p>	<p>We submit that it is thus very unlikely that, even if the required number of homes in the final version of the JLP is increased we will have failed to identify sufficient sites.</p> <p>We have proposed in the revised NDP that the development boundary of Bridesstowe village be extended to include the outline of the proposed development sites, which will facilitate development on these sites in the future should additional development of new homes be proposed.</p> <p>We disagree with Mt Horsfall on the suitability of the Town Farm site for a large development of new homes, and, in particular, the proposal for the development to include many larger homes rather than predominantly affordable homes.</p> <p>There remain serious problems with drainage and with access to this site, as described in the response of the Parish Council to the proposal put before the West Devon Planning Committee.</p> <p>Our disagreement is now however irrelevant, as Full Planning approval has been given for this development by the West Devon Planning Committee in June 2018.</p>

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			<p>National guidance allows Local Planning Authorities to reduce the small sites exemption from 10 to 5 in rural areas, as the JLP proposes. However, it specifically states that no affordable housing or contributions should be sought from housing developments of 5 or less, even in rural areas, contrary to what Policy H2 is attempting to do. Therefore, it is important to note that, in accordance with the PPG, small sites of low numbers of units will not result in affordable housing delivery and without larger sites of at least 5 dwellings, no affordable housing (or off-site commuted sums) will be delivered. The implication of this PPG guidance is that infill sites of 1 or 2 units within the development boundary of Bridestowe, that 50% of the 2015 General Questionnaire respondents preferred, would not be obliged to provide any affordable housing or contributions towards it. Policy H2 requires developments of fewer than 5 homes to provide a 30% equivalent contribution towards affordable and social-rented housing elsewhere, within or adjacent to the settlement boundary of Bridestowe. An issue with these types of off-site commuted sums is that they do not guarantee the delivery of any housing; in order for housing to be delivered, sites are required and this requires willing landowners. This can be a particular issue in villages where surrounding land is often owned by a relatively small number of landowners. This is another issue with relying on small sites to deliver affordable housing.</p> <p>It is also our view that part b of Policy E2 is contrary to national policy as it is not in accordance with the National Planning Policy Framework (NPPF). Part b states that "The developer must provide evidence that</p> <p>the proposed development will have no adverse highways impact or adverse effects on other users of the highways or other rights of way (including pedestrians, cyclists and horse riders), or an implementable action plan to minimise any such effects" (Own emphasis)</p> <p>The third bullet point of paragraph 32 of the NPPF states that "improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe." (Own underlining). Therefore, it is clear that Policy E2, through requiring no adverse highways impacts is significantly more onerous than the NPPF allows for.</p>	

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			<p>The NP clearly states that, based on the results of the Bristow and Sourton Housing Needs Survey, there is a need for 12 affordable houses within the area. It also states that although the response rate to the survey was higher than most, the level of housing need identified must be considered a bare minimum. This seems to imply that because not all of the surveys were responded to, the actual level of affordable need is much greater than 12. The response rate to the surveys was 33% so on the basis that there were 12 identified units, through a process of extrapolation, it would not be unreasonable to suggest that there could be a need for up to 36 units. Regardless of the exact number, it is clear that there is a significant need for affordable housing and it is likely that it is significantly higher than the 12 units identified. It is also clear that small infill sites are unlikely to contribute towards this significant need. As well as the risks associated with not allocating any sites for housing, as discussed above, it also potentially creates issues with regards to the delivery of some of the NP's other non-housing related goals.</p> <p>Quite rightly, and as expected of a NP, it sets out a number of improvements that the community would like to see within the area based on the results of the 2015 General Questionnaire. In particular through Policies HCA 1.a, CW 1 and CW3 support is provided for things such as the enhancement/facilitation of the improvement or provision of community assets such as allotments, sport and recreation facilities, footpaths and public open space. The provision of these improvements would be a significant improvement to the local area and benefit to the people; however, it is also evident that the associated cost would be considerable. It is difficult to see how, without housing growth, it is possible for these facilities to be enhanced or new ones provided, as without direct funding through S106, or through increased demand from new residents, there will simply be no mechanism by which this will occur.</p> <p>The NP appears to be generally supportive of housing growth and there is a clear need for housing of various types and tenures within the NP area. However, currently the NP does not provide any certainty and is not proactive in providing these houses as no sites are allocated. It is also unclear why the NP does not allocate any sites for housing particularly as it acknowledges that the need exists and also notes that the JLP has allocated Bristow as being suitable for 30 houses and that Sourton is "vulnerable to development should land be put forward".</p> <p>It therefore seems counterintuitive to not engage in the process and allocate sites as otherwise the decision making process will be taken out of the hands of the local people.</p>	

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			<p>Whilst many of the NP policies may be sound, the overall objectives of the NP are currently not deemed to be deliverable and it is worth bearing in mind paragraph 005 of the Planning Practice Guidance on Neighbourhood Planning which states: "If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable." Possible Site As we have outlined we believe there are compelling reasons to allocate one or more sites for development. Whilst there may be a number of suitable sites with potential, we believe that the Land at Town Farm (as shown on the attached plan) would be able to deliver the greatest range of benefits whilst generating the least impacts. The site is situated within a sustainable location and the characteristics of the site make it suitable for development and growth.</p>	
41.	Steve Byrne, Director Springfield Residential Home		<p>Having attended some of the meetings of the Committee over the last two years I am aware of the vast amount of work that has been done on behalf of all the residents of our two villages. With a complement of fifty staff, Springfield Residential Home is the largest employer within the Plan area. The future prosperity of our business is dependent on being able to develop the business as the care industry continues to evolve. I am confident that the pragmatic approach shown by your committee between further development within the villages and preserving the wonderful environment that we all enjoy, will ensure that future generations will continue to enjoy living and working in a thriving community. To represent the views and wishes of all Parishioners and arrive at a Neighbourhood Plan that is acceptable to the vast majority, is a testament to the hard work and vast amount of consultation that you and your committee have carried out over several years. I would like to thank you all for your labours on our behalf.</p>	Noted

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42.	Richard Berry Northmoor Garden Machinery		<p>At the bottom of page 10 is reference to an excess of larger homes being built within the area and a lack of smaller homes suitable for younger and older residents.</p> <p>I believe the definition of "affordable" can be used out of context regarding building and planning applications. The definition of affordable homes as a percentage below normal market value in terms of their affordable purchase price is unlikely to address the needs of the local area when this document states that the average income per person is £22,453 per year.</p> <p>Can the wording of "affordable" be detailed as "starter, low income or index linked" homes to better meet local needs. An affordable below market value £300k house is irrelevant to a young couple with a £10k deposit earning £22k/year or an elderly couple with poor pension and savings provision.</p> <p>By my understanding the criteria to obtain a mortgage is roughly 3x one wage and 1x partners wage. (Large difference between lenders exist) Therefore with a £10k deposit and a following wind from the lender, the ability of someone being able pay over £110,000 is limited to those who have outside help such as parents. There is nothing within this document to help the frustrations of a young local couple wanting to enjoy the location as much as the wealthy or retired.</p> <p>Adding to this is the need to travel outside the area to find work that will pay the average wage which exaggerates the issue greatly.</p> <p>Someone traveling to Exeter to work every day as I did for 10 years will pay roughly £400/month (£4800/year) for fuel and maintenance without depreciation/finance payments, parking etc. 60 mile round trip x 5 days = 300 miles per week.</p> <p>At the bottom of page 10 is reference to an excess of larger homes being built within the area and a lack of smaller homes suitable for younger and older residents.</p> <p>While the average wage within West Devon is £22k, what is the average wage for work obtained within the parish's..</p>	<p>We are very grateful to Mr Berry for his thoughtful and constructive contribution to the consultation process for the Neighbourhood Development Plan.</p> <p>We recognise the difficulty faced by many families, particularly the vulnerable groups highlighted in this contribution, and are very keen to encourage the building of low cost affordable housing to rent as well as housing for open market sale. We also recognise the contribution made to affordability of low cost homes by factors such as thermal efficiency that affect the running costs of the buildings. We hope that our policies relating to affordable homes as set out in the revised Plan go some way towards addressing these needs, but recognise that, under current regulations we are not able to set standards higher than those that are Nationally applicable in terms of improved thermal efficiency and other aspects of building regulation that might make new homes less expensive to run and to heat.</p> <p>Paragraph 34 of the 2018 NPPF (see below) makes clear that, whilst the lower threshold for proportion of affordable homes in new developments is now only 10%, the Neighbourhood Plan should make clear what proportion of low cost, affordable homes of all types will be required in new housing developments in the area covered by the Neighbourhood Plan. We hope that our revised Plan makes this requirement clear.</p> <p>Extract from the NPPF 2018:</p> <p><i>34. Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan.</i></p>

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			<p>Is this likely to be £22K for a young couple? Take out maybe £5k per year for one car and £2.5k per year for a second car for two people working at different locations and the affordability dilemma becomes clear. Fuel poverty is highlighted but this is obviously not the only costs to stretch the average household budget. ,</p> <p>Therefore emphasis and provision for employment which generates a higher local income without the need to travel significant distances (creating a dormitory settlement) should be detailed alongside the housing needs. Otherwise the housing need is in Exeter, Plymouth, Launceston etc, and a diverse community cannot be maintained as the younger population moves away through necessity.</p> <p>Just a suggestion. . . I understand that when a house is built in West Devon a negotiated levy is added to provide help for local projects or maintenance which can be applied for by the local council. To help persuade developers provide obtainable starter homes. Could this levy be removed from "starter, low income, index linked" homes and only be applied to the higher priced properties of say £150k and above. Adding a higher levy to these £151 k+ homes to offset the income lost on the starter homes etc.</p> <p>Not all employment with an average or higher wage is office, tourism or quiet industries. We all use vehicles, agricultural machines, lawn mowers, equestrian, woodworking and building tools. Yet to manufacture, supply, service or repair any of these creates a noise etc that people object to. Provision for employment opportunities and locations should cover all small scale industries to create the sustainable community that the surveys suggest is wanted within the parish's. Without suggesting a connection between wealth and academic abilities, it should be acknowledged that provision should be made for those who are not suited to IT or tourism but can add a value to the community with their more creative, hands-on abilities. Trades such as those listed above are called upon by people within the community yet those trades cannot exist in the local area! Surely this cannot be right. Can more weight be added to this document to cater for all industries and abilities to encourage a broader range of younger generations to stay locally and therefore justify the housing "need".</p>	

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			<p>Look down any of the streets at the buildings that predate WW2 and most people would agree that its these properties that make the character of the settlements. These properties are all different in some way to it's neighbour which gives a soft yet diverse character. However any developer is likely to propose houses that have an "Estate" look as already seen in recent developments. Building regulations don't really help as straight lines are often cheapest and easier to calculate and build than more organic forms of builders form the past, And to give an architect license to create something interesting is often expensive or controversial to look at. Other than detailing the materials used and that a random appearance is to be achieved i'm not sure of how this can be enforced. But I know that i would rather look at something interesting and individual than some of the stock buildings currently favoured by developers.</p>	
43.	J. Sanders, individual	Revision of Bristestowe's dev. boundary & exclusion of Pool Hill site	<p>I think the changes make a lot of sense so I would support them. Thank you on behalf of the community for all your hard work in pulling together and honing the NP</p>	Noted
44.	A & G Allen individual	As above	<p>We both agree with the planners that the NW of Pool Hill is unsuitable for development and we support the revised development border.</p>	Noted
45.	Angela Elkins individual	As above	<p>Planning approval should not have been given to the 2 sites - south of Pig's Leg Lane and Town Meadow. The village voted for the NW of Pool Hill site and it's ludicrous that planning consent should be prevented by outside bodies' objections. I have no problems with the 2 new sites providing proper parking/traffic control measures are observed. But what about the democratic vote? It's the only one of new sites not being pursued! The NDP is a magnificent piece of work by the way.</p>	
46.	Graham Young individual	As above	<p>I approve of both these revisions. It is important to prevent inappropriate development that could spoil our village.</p>	

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47.	<i>Alister King-Smith, Stags, Chartered Surveyors and Estate Agents</i>	Site allocations	Letter on behalf of Mr and Mrs Northcott expressing concerns on both sites allocated for housing and disappointment on exclusion of Pool Hill site owned by their client. (Doc 1.a)	Response from Steering Group addressing concerns. (Doc. 1.b) No changes made to Plan
48.	Corine Dyke, Lead Adviser, Sustainable Development Team – Devon, Cornwall & Isles of Scilly Natural England 24/4/19	Allocation of sites post Reg 14	<p>Habitats Regulations Assessment Screening We agree with the conclusion of the report of no likely significant effect upon the named European designated site: Strategic Environmental Assessment Screening We welcome the production of this SEA Screening report. We have concerns about the proposed development boundary which appears to be quite loosely drawn. The boundary includes sizeable undeveloped areas, including areas that appear to be water or green space. Land within the development boundary benefits from the presumption for development. No evidence could be found to support the choices made to include or exclude sites from the development boundary or about the landscape impact of new development on the undeveloped areas within the proposed development boundary and we recommend that such evidence is prepared.</p> <p>We also have concerns about the potential landscape impacts of the two allocation sites, and especially site number 4. The site assessment in the evidence document states that 'The site faces the open moorland that lies within Dartmoor National Park and has uninterrupted views over the intervening farmland, towards the tors and open moorland'. The sites are very close to the National Park and form part of its close setting. It is unclear whether the landscape impacts of the allocations can be successfully mitigated in accordance with the NPPF para 172. We advise that further evidence/assessment is needed.</p> <p>Based on the material provided, it can currently not be concluded that the neighbourhood plan will not result in significant environmental effects.</p>	<p>The development boundary for Bridestowe has been redrawn to ensure it is coterminous with the sites that have already received planning consent.</p> <p>We believe that the nature of the sites has been misinterpreted as they do not include areas that are water or green space.</p> <p>Evidence has been presented to support inclusion/ exclusion sites in response to Natural England's concerns, Technical Support was applied for and an SEA undertaken as requested. The SEA report robustly supports the Plan</p>

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49	<p>Carol.Reeder@naturalengland.org.uk 20/5/20</p>	<p>Chapter 5 Allocation of sites' policies</p>	<p><i>"All I think is needed is some tightening up of the conclusions so it is clear that with the measures proposed likely impacts on the landscape of the national park can be mitigated."</i></p>	<p>NE invited to respond to SEA report Additional wording in policy H3a and its justification Reference made to Dartmoor National Park Management Plan-2020-2025</p>