

# East Budleigh with Bickton Neighbourhood Plan



**Public Consultation on Draft Plan  
(Response to Landowner Representations)  
14<sup>th</sup> April to 20th June 2016**

## Summary of representations received from Landowners

Representations were received from the following landowners:-

- 3 representations and 13 comments

Landowner	Representations		
	Policy Number	Objecting/Supporting/ Comment	Representation Number
<b>Mr and Mrs Hill</b>	Policy D2/ Paragraph 14.28	Comment	RN023-01
<b>Dominic Tyler (on behalf Space Architects UK Ltd) acting on behalf of Mrs and Mrs J Hill</b>	Policy D2	Objecting	RN006-01
<b>Clinton Devon Estates (CDE)</b>	Policy L2	Objecting	RN025-02
	Policy G2	Objecting	RN025-04
	Policy N2	Objecting	RN025-05
	Policy N3	Objecting	RN025-06
	Policy B2	Objecting	RN025-07
	Policy D2	Objecting	RN025-09
	Policy D3	Objecting	RN025-11
	Community Action 28	Objecting	RN025-10
	Community Action 18	Objecting/Supporting	RN025-03
	Chapter 4:- Vision	Objecting	RN025-01
	Paragraph 13.8	Objecting	RN025-08

## Landowner Representations by Policy

### Policy L2 – Budleigh Salterton Cricket Ground and Pavilion

Proposals that would result in the loss of all or part of the cricket ground and pavilion will not be supported unless alternative and equivalent space is provided.

Alternative provision will be required to meet the following criteria:

- a) the alternative site must be of an equivalent or larger scale to the existing provision;
- b) a new Pavilion will be required of equivalent or better quality and scale to the existing provision;
- c) the quality of the alternative site must be of an appropriate recreational standard; and
- d) the location of the alternative provision must be accessible by foot, and parking facilities should be provided.

Proposals that would result in the loss of all or part of the cricket ground and pavilion will not be supported unless alternative and equivalent space is provided.

Landowner	Comments	Major Issues Identified	Response	Proposed change
<b>Clinton Devon Estates (CDE)</b> (RN025-02)	<p>CDE agree that as a responsible landowner they will assist the Cricket Club to relocate although due to land constraints they feel more flexibility is required during this process.</p> <p>CDE consider they have no contractual obligation to provide facilities on the land that are the responsibility of the Cricket Club.</p> <p>Suggests rewording cricket ground</p>	<p>Flexibility is required in the Policy given the constraints on available and suitable land.</p> <p>CDE do not have contractual obligations to re- provide facilities on the land that are the responsibility of the Cricket Club e.g. Pavilion</p>	<p>The Policy sets criteria for the replacement of the Cricket Ground which due to the increased incidence of flooding is desired by all parties.</p> <p>The comments of CDE are welcome in respect of their recognition that as landowner they will facilitate this relocation process. It is accepted that CDE have no contractual obligation to provide facilities on site that are the Cricket Club responsibility and criteria b) will be deleted.</p>	<p>Textual changes to Policy L1 :- criteria b) to be deleted and 'pavilion' removed from line 2</p> <p>See also Representation RN22-03 from Budleigh</p>

## Policy L2 – Budleigh Salterton Cricket Ground and Pavilion

	<p>relocation: 'Alternative provision will be required to meet the following criteria, except where specific circumstances dictate otherwise and where justification to that effect is put forward...' In addition criterion b) should be deleted.</p>		<p>However it is still considered that the criteria other than criteria b) must be met unless there are exceptional circumstances that can be proven by the landowner. This is to ensure, unless there are exceptional circumstances, the same level of provision should be provided.</p> <p>This is in accordance with the NPPF (paragraphs 28, 70, 74) and Strategies 3 and 4 of the Local Plan that seek to promote the retention of community facilities including sports venues.</p>	<p>Salterton Town Council.</p>
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## Policy G2:- Off Road Parking

The policy seeks to ensure that developments are designed to include off-road parking. For all new residential developments, the following minimum standards shall apply for the provision of off-road parking:

- 1-bed house/flat 1 off-road car parking space
- 2-bed house/flat 2 off-road car parking spaces
- 3-bed house/flat 2 off-road car parking spaces
- 4-bed house/flat 3 off-road car parking spaces
- 5+ bed house/flat 4 off-road car parking spaces

Development proposals that will result in the net loss of public car parking facilities in the village centre will be resisted.

Landowner	Comments	Major Issues Identified	Response	Proposed change
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**Policy G2:- Off Road Parking**

**Clinton Devon Estates(CDE)**  
(RN025-04)

The Plan seeks higher levels of on-site car parking than required by Policy TC9 of the Local Plan. This could undermine other design objectives and lead to more suburban designs.

A more flexible approach is suggested to allow for the circumstances of individual sites and enable high quality designs to come forward that better reflect the vernacular of the area.

CDE suggest re-wording the policy to say 'New developments should provide off-road parking to ensure that pressure on limited existing parking is not increased. 1 bed 1 space; 2 or more beds, min 2 spaces.'

The Plan includes no justification for the higher levels of on-site car parking contained in Policy TC9.

Higher standards could undermine the objectives of the Local Plan and lead to more suburban designs not in keeping with the vernacular of the area.

East Budleigh has high levels of car ownership which reflects the reliance on private transport to access work and/or recreation and the restricted nature of public transport. With high levels of car ownership there can be pressure to find car parking spaces leading to on-road parking particularly in the older parts of the village where the roads are particularly narrow. These include sections of Vicarage Road, Middle Street, adjacent to Drakes School and the road running through Yettington. This can create a danger to vehicular transport and pedestrians. The latter due to the lack of footpaths along many of these narrow roads.

The Neighbourhood Plan seeks to ensure off-street parking is provided for new developments to reduce these dangers and ensure pressure on existing limited parking is not increased. It also seeks to retain the existing car park at Hayes Lane to enable some residents living in High Street to have a safe place to park their cars and avoid congestion on the narrow roads.

It however recognised the standards proposed are higher than Local Plan standards as detailed in Policy TC9 for larger dwellings. This would be contrary to

Textual changes to Policy G2 to ensure conformity with the standards in Local Plan Policy TC9.

See also representation RN024-02 from EDDC.

### Policy G2:- Off Road Parking

			national and local policy (Strategy 5B of the Local Plan and Paragraph 29 of the NPPF ) that seeks to achieve sustainable development. It is also agreed these higher standards could hinder the development of high quality designs that reflect the vernacular of the area and enable developments to blend more appropriately into the high quality landscape.	
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### Policy N2 – Protection of Local Green Spaces (Local Green Areas)

The following local green spaces, as shown on the Proposal Map have been designated in accordance with paragraphs 76 and 77 of the NPPF:-

1. Churchyard adjacent to All Saints Church
2. Green space adjacent to Church Hall
3. Recreational ground, Vicarage Road
4. Land adjacent to Salem Chapel
5. Green verges at the entrance to the village and on both sides of the B3178 south of East Budleigh village
6. Conservation area to rear of Middletown Lane
7. Public green space, Brookfield Road
8. The Pound
9. Land adjacent to the village hall
10. War memorial

Proposals for development in a Local Green Space will be resisted, unless they are ancillary to the use of the land or for a public recreational purpose

## Policy N2 – Protection of Local Green Spaces (Local Green Areas)

Landowner	Comments	Major Issues Identified	Response	Proposed change
<b>Clinton Devon Estates(CDE)</b> (RN025-05)	<p>CDE owns sites 3, 6, 8 &amp; 10 and makes specific points on the following sites:-</p> <ul style="list-style-type: none"> <li>Site 3 - as landowner CDE makes the point they may wish to re-provide the recreation field in a new location.</li> <li>Site 6 – CDE lease the land as a private garden and do not believe the site adds to the character of the area.</li> <li>Site 8 - is leased by CDE to the Parish Council and have indicated that the right of vehicular access to Pound Barn should be retained.</li> </ul> <p>CDE suggest rewording the policy to state: 'Proposals for built development in a Local Green Space will be resisted, unless they are ancillary to the use of land or for a public recreational purpose.'</p>	<p>Whether the local green spaces 3, 6, and 8 should be designated as local green space.</p> <p>There should be more flexibility in the development permitted in these local green spaces</p>	<p>There is no objection to the addition of the word 'built' into Policy N2, to provide extra flexibility in the Policy.</p> <p>This policy is in general conformity with Strategies 3 and 4, which seeks to protect and/or secure recreational open spaces for the benefit of the local community. The local green spaces named in the Policy have been justified with reference to the criteria outlined in the NPPF for local green spaces designation.</p> <p>Sites 3 and 8 fully meet the definition of an important local green space as detailed in NPPF paragraphs 76 and 77. Site 3 is of historic importance and Site 8 has a recreational importance.</p> <p>Site 6 has been designed for its wildlife value and has a number of protected species on the site. It is recognised that the site is currently privately rented from CDE although it has been rented by several individuals over the years and remains outside any residential curtilage. It is highly visible from East Budleigh</p>	<p>Textual changes to Policy N2 - insertion of word 'built' into Policy N2.</p> <p>See also representations:-</p> <p>RN024-14 from EDDC and RN012-04 from the Environment Agency.</p>

## Policy N2 – Protection of Local Green Spaces (Local Green Areas)

			footpath 14 making a contribution to the rural character and biodiversity of this important footpath linking the village with the open countryside and the River Otter. Given its current status it is considered appropriate to incorporate the green space as a wildlife area within the proposed green corridor in Policy N4 when the private rental comes to an end. Its status as a local green space should however remain given its visibility from a public right of way and its wildlife value.	
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## Policy N3 – Protection of Allotment Space (Area 11 on the Proposals Map)

Proposals that would result in the loss of all or part of existing allotment spaces will not be supported unless alternative and equivalent allotment space is provided.

Alternative allotment provision proposed as part of such proposals will be required to meet the following criteria:

- a) the scale of the alternative site must be of an equivalent or larger scale to the existing allotment provision;
- b) the quality of the alternative site must be of equivalent standard in terms of layout and soil character to the existing allotment provision; and
- c) the location of the alternative provision must be accessible by foot, parking facilities should be provided and the allotment provision should be within or adjacent to the built-up area of the village.

The Neighbourhood Plan proposes the inclusion of the allotments on the local planning authority's register of Assets of Community Value in accordance with Policy C1.



**Policy N3 – Protection of Allotment Space (Area 11 on the Proposals Map)**

Landowner	Comments	Major Issues Identified	Response	Proposed change
<p><b>Clinton Devon Estates(CDE)</b> (RN025-06)</p>	<p>CDE considers the existing Policy is too onerous and that the replacement of any allotment space should be based on the number of plots rather than the size of the site. This to reflect modern requirements for smaller but well serviced plots</p> <p>They suggest rewording as follows:-: 'Alternative allotment provision proposed as part of such proposals will be required to meet the following criteria: a) The number of plots provided must be equivalent or greater than the existing allotment provision...'</p>	<p>The replacement of any allotment space should be for an equivalent number and quality of plots rather than for an equivalent size of site.</p>	<p>This Policy seeks to retain allotment space for the benefit of the community and is in conformity with local (Strategy 3 and 4 of the Local Plan) and national guidance contained in the NPPF (para 28, 70, 74).</p> <p>The comments of CDE are welcome in respect of their recognition that as landowner they will facilitate the provision of an equivalent number and quality of plots .It is also agreed that the number and quality of plots is more relevant than the size of the site.</p> <p>It is however considered important that the size of individual plots should reflect the needs of the allotment holders and take account of the National Allotment Association Policy on allotment plot sizes. It is the policy of this national society to encourage flexible provision which best fits the aspirations and capabilities of present and future plot holders.</p> <p>In this respect the starting point for individual allotment plots will be the traditional size of allotments of 10</p>	<p>Textual changes to Policy N3 criteria a) to take account of CDE comments and b) the traditional size of allotment plots.</p> <p>Supporting text to be included to justify the size of allotments plots proposed.</p> <p>See also representation RN024-15 by EDDC.</p>

### Policy N3 – Protection of Allotment Space (Area 11 on the Proposals Map)

			rods/poles or 250 sq. m .This size will be template for the subdivision of allotment land where appropriate. Policy N3 will require allotment plots to be 250sq metres in size, unless it can be proven that as the result of consultation with allotment holders smaller and better service plots are acceptable. If as a result of this consultation some smaller plots are preferred these plots should not be below 125 sq. metres in size (half size plots)	
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### Policy B2 – General Design Principles

The Neighbourhood Plan requires all developments, including alterations to existing buildings, to be sympathetic of the character and scale of surrounding buildings and landscape. Proposals will be expected to demonstrate compliance with the following criteria:

- a) Preservation and enhancement of the locally distinctive built, historic and natural environment;
- b) Designed to take account of site characteristics, respecting and utilising the best qualities of local distinctiveness including layout, siting, scale, height, proportions and massing, orientation, architectural detailing, landscaping and materials;
- c) Density of housing will reflect the existing grain/density/pattern of surrounding development;
- d) No significant adverse impact on residential amenity for existing and future residents;
- e) New buildings should be of individual design that respects the local character. There is room for imaginative new design sympathetic to the traditional buildings of the Parish and in new developments of more than 5 dwellings more than one housing design may be appropriate;
- f) Natural traditional building materials and methods should be used for alterations and extensions to old buildings and preferably for new buildings;
- g) Roofs should be pitched unless there is a functional or aesthetic reason not to do so;
- h) For new build developments of 5 or more dwellings gardens should consist of a usable space and be of a minimum size of 100 sq. meters

## Policy B2 – General Design Principles

for 3+ bed dwellings and 50 sq. meters for 1-2 bed dwellings. The garden sizes for smaller infill plots of less than 5 dwellings and for plots on developments over 5 dwellings, but adjacent to existing property, may be required to be larger than these minimum standards to reflect the size and shape of gardens in the immediate surrounding area;

- i) The development does not contribute to, or suffer from, adverse impacts arising from noise, light or air contamination, land instability or cause ground water pollution;
- j) The development utilises sustainable construction methods, minimises the use of non-renewable resources and maximises the use of recycled and sustainably sourced materials;
- k) Carbon reduction measures, for instance solar panels or water heating panels are encouraged but should be sited discretely. Where they would feature on the front elevation or would be prominent within the Conservation Area, consideration should be given to mounting them at ground level;
- l) Easy access for all members of the community;
- m) Safe environments that minimise opportunities for crime;
- n) Designs that can be easily adapted to accommodate changing lifestyles and technologies.

This policy should be read in conjunction the other policies in the Neighbourhood Plan, particularly Policy N1

Landowner	Comments	Major Issues Identified	Response	Proposed change
<b>Clinton Devon Estate(CDE)</b> (RN025-07)	CDE consider that the gardens sizes stated in criterion h) are inflexible and do not reflect site specific constraints.  CDE suggest the following wording: - 'h) "For new build developments of 5 or more dwellings, gardens should consist of usable space. Normally, gardens should be of a minimum size of 100 sq. m for 3+ bed dwellings and 50+ sq. m for 1-2 bed dwellings unless specific circumstances dictate otherwise. In	Criteria h) on garden size should be more flexible to reflect site specific constraints.	This policy is in general conformity with local (Strategy 48 of the Local Plan) and national policies which seeks to create high quality designs that are sympathetic to the character of the area and reinforce local distinctiveness.  It however agreed that flexibility is required in this policy where there are specific site constraints (see also representation RN024-18)	Textual changes to Policy B2 to introduce more flexibility into the minimum garden standards.  See also representation RN024-18

## Policy B2 – General Design Principles

such circumstances, the amount of garden space provided should be maximised as far as other design considerations allow”

## Policy D2 :- Housing Supply and Site Allocation

Future development up to 2031 will be allocated on the following sites (as shown on the Proposals Map):-

- a) Frank’s Patch – for up to 3 dwellings consisting of 1 and 2 bed terraced dwellings.
- b) Carters Yard – 10 dwellings consisting of 1, 2 and 3 bed dwellings.

These sites are outside the Built-up Area Boundary and being allocated as exception sites. In accordance with Strategy 35 of the East Devon Local Plan at least 66% of the dwellings will be affordable homes with the type and tenure of these affordable dwellings demonstrated through an up to date robust housing needs survey. The affordable dwellings will be subject to a local lettings policy in Perpetuity that ensures their availability for people with a local affordable housing need and a connection with the Parish.

An appropriate and detailed landscaping scheme is to be included as a material part to this allocation to ensure that in time the development is able to blend appropriately into its surroundings

Landowner	Comments	Major Issues Identified	Response	Proposed change
<b>Mr and Mrs Hill</b> (RN023-01)	Request by owners to add site C082 as a housing site in the Neighbourhood Plan for 4 houses two of which will be affordable.	The site is suitable for an exception scheme of affordable housing.	Sufficient sites have been identified in Policy D2 to meet the identified need within the Parish. The site identified in Policy D2 (Frank’s Patch) is more sustainable in accordance with the sustainability objectives of the Local Plan (also see supporting documentation site sustainability appraisal and Landscape sensitivity	Textual changes to paragraph 14.28 to reflect the comments received

**Policy D2 :- Housing Supply and Site Allocation**

			<p>assessments).</p> <p>However, the landowners are now suggesting they will provide affordable housing under Strategy 35 and Policy D2. Therefore if they were to submit a planning application that meets the requirements of national and local policies including those within the Neighbourhood Plan it is recognised that the development of this site could provide affordable housing during the Plan Period.</p>	
<p><b>Dominic Tyler (on behalf Space Architects UK Ltd) acting on behalf of Mrs and Mrs J Hill (RN006-01)</b></p>	<p>In accordance with Strategy 27 the site to the west of the Old Vicarage should be included in the Neighbourhood Plan. The site is outside the settlement boundary but follows an established boundary that does not encroach on open countryside. Although classed as agricultural it is small in size and has limited opportunities for meaningful agriculture. Density to reflect surrounding development. Access from private drive from Vicarage Road. DCC Highways have not objected to proposed access. Will include affordable housing in accordance with Strategy 34.</p>	<p>The site is suitable for inclusion in Policy D2 but to only provide affordable housing in accordance with Strategy 34 of the Local Plan.</p>	<p>Please note this representation has now been superseded by Representation RN023-01.</p> <p>Comments on this particular representation are as follows.</p> <p>The intent of Policy D2 is to provide community led affordable housing on identified exception sites on sites outside but adjacent to the BuAB (in conformity with Local Plan Strategy 6 and 27, which allow Neighbourhood Plans to allocate land for development outside of the built-up area boundary and Strategy 35 of the Local Plan which allows for exceptions housing to come forward beyond the boundary where there is a demonstrated affordable housing need).</p> <p>The Sites identified in the Policy D2 are</p>	<p>None in relation to this representation but see comments in relation to representation RN023-01 which supersedes this representation.</p>

**Policy D2 :- Housing Supply and Site Allocation**

			<p>deemed to be the most sustainable according to a site sustainability analysis carried out to support the Neighbourhood Plan and sufficient for the need identified.</p> <p>This site has been put forward as a Strategy 34 site which would not deliver affordable housing, a key objective of the Neighbourhood Plan. Strategy 34 of the Local Plan requires 50% affordable housing on sites within the BuAB for rural settlements such as East Budleigh. The thresholds applicable to Strategy 34 are the minimum set out in government guidance. In light of the Court of Appeal decision in May 2016 on rural thresholds, the NPPG now states in rural areas within an AONB sites of 6-10 houses are required to provide a commuted sum and it is only sites of 11+ dwellings that are required to provide affordable housing. As this site is intending to provide 4 dwellings it would be exempt from providing affordable housing and therefore is not in accordance with Policy D2.</p> <p>The site is also located on Grade 1 agricultural land so is contrary to Policy P3 of the Neighbourhood Plan (as currently stands but also see comments to representation RN024-05) and its location outside the BuAB is contrary to Policy D1 of the Neighbourhood Plan</p>	
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The Landowner Clinton Devon Estates has provided several in-depth comments that are summarised below (Representation RN025-09).

Issue	Comments by CDE
<p><b>Level of affordable housing in East Budleigh</b></p>	<p>CDE consider that the level of housing need identified from the 2015 Housing Need Survey is likely to under-represent the true levels of affordable housing need in the Parish. CDE consider that this is due to the actions of the Chair of the Parish Council, at the time of the survey, asking households not to complete the survey. There is evidence for 3 affordable houses, but due to the Chair's actions CDE believe that the level of affordable housing need is likely to be greater. It should be noted, as detailed below, in the responses to CDE comments, this uncorroborated accusation is categorically rejected by the Chair of the Parish Council.</p> <p>CDE see no justification for the assessment that there is a need for 13 extra dwellings in the next 10-15 years. This is an arbitrary figure or based on out of date evidence of need in Budleigh Salterton (see below). No further Housing Need Survey was carried out as part of the Neighbourhood Plan process. The absence of this information means the assessment of affordable housing need is incomplete and does not support the assertion there is a low need for affordable housing in the Parish. This is also at odds with common sense that East Budleigh is one of the most affluent but less affordable parts of East Devon.</p> <p>CDE conclude that the evidence base used to identify the allegedly low level of affordable housing is highly unsound and relies on 2011 Census information and type of dwellings residents wish to see from a survey carried out as part of the Neighbourhood Plan process. They state if the Neighbourhood Plan seeks to rely on housing need data to support its proposals to minimise housing supply in the village and ensure the only housing that comes forward is exception housing the data should be complete, in line with government guidance, robust.</p>
<p><b>Level of affordable housing need in Budleigh Salterton</b></p>	<p>CDE state that under paragraph 14.19 Budleigh Salterton is grouped with East Budleigh for the purpose of assessing affordable housing need. The need for affordable housing in Budleigh Salterton was assessed in 2011 and CDE now consider this is now very out of date and does not take account of updated information, most notably the March 2015 Strategic Housing Market Assessment.</p> <p>CDE conclude that the statement that the delivery of 19 affordable units in the town “.... indicates that no need for the Neighbourhood Plan to meet any of the affordable housing needs of Budleigh currently or in the affordable future” is not an accurate reflection of the facts. As the plan relies on this out of date information as part of its wider justification this would mean this part of the Plan is unsound.</p>
<p><b>Overall position on affordable housing need</b></p>	<p>CDE state as the Neighbourhood Plan seeks to establish a housing policy based on the unproven premise there is a low level of affordable housing need in the Parish. However the evidence is either incomplete (level of affordable housing need in East Budleigh) or wholly out of date (level of affordable housing need in Budleigh Salterton). As a result Policy D2 is unsound as it is</p>

Issue	Comments by CDE
	not robust and not based on a proper assessment of need.
<b>Sites to be allocated for residential use within the BuAB</b>	While Clinton Devon Estates have concerns about the adequacy of evidence to allocate land for housing within the Plan they would still support the allocation of some land for residential development. However as part of any process to allocate land they would like to include any identified sites within the Built-up Area Boundary. The Proposals Map should be amended to identify these sites. CDE wish to see allocated Frank's Patch and land below Syon House(see below)
<b>The availability of the Carter's Yard site</b>	<p>Criterion 2 of Policy D2 allocates Carter's Yard for 10 dwellings, 66% affordable. CDE have repeatedly made it clear to the Parish Council the land is not available (and will remain so) as it is the location of an existing business and subject to a commercial tenancy. As Policy D2 makes reference to this site it is unsound.</p> <p>CDE also consider that Carter's Yard is in an elevated position at the southern end to the village. This is in conflict to the Plan's vision and objectives to protect the character of the area, by allocating the least well located available sites and would conflict with the Plan's vision to embrace sustainability.</p> <p>CDE recommend Carter's Yard should be deleted from Policy D2 as makes this part of the Plan unsound.</p>
<b>The availability of the site at Frank's Patch</b>	<p>CDE welcome the reference to Frank's Patch in Policy D2, however as it is allocated it should be included in the BuAB. The proposal map should be amended accordingly.</p> <p>It is considered by CDE that the Plan is too onerous in requiring three, one or two bed terraces as there is no evidence to justify the number of units or style of design. The form and number of units within any scheme should flow from careful assessment of the site's technical constraints and architectural options.</p> <p>CDE recommend Criterion a) of Policy D2 should be amended to read:-</p> <p>" Frank's Patch for up to 4 dwellings"</p>
<b>The availability of the site at Syon House</b>	<p>CDE wish to see the land adjacent to Syon House allocated for development as it is deliverable and is technically achievable.</p> <p>CDE consider that given the site's low lying position in relation to other sites – and sustainable location much closer to village facilities, the site is more suitable for development compared to Carter's Yard and other sites. Flood sensitivity is not an issue as given the technical work undertaken for a recent planning application it can be shown that any development on the site can be properly and safely drained.</p> <p>CDE point out that the suitability of the land for residential development has been assessed a number of times. The land</p>



Issue	Comments by CDE
	<p>(identified as site C059) was assessed as part of the Council SHLAA process and found suitable for development. In the Draft East Devon Village Plan 2014 the site was considered alongside Carter’s Yard (site C307) and was allocated for development. This Plan concluded:-</p> <p><i>“Site C059 (Land adjacent to Syon House) is preferred to Site C307 (Carter’s Yard) as it is in closer proximity to village facilities and is in a less elevated and prominent position in the landscape. Development of Site C307 would increase the linear expansion of East Budleigh ..... and linear development is not a settlement feature of East Budleigh”</i></p> <p>In relation to the highway merits of Syon House compared to Carter’s Yard CDE refer to the Draft East Devon Village Plan that stated <i>“ Site C059 (land adjacent to Syon House) is fine as access can be derived from the South. Site C307 (Carter’s Yard) is acceptable in principle but there will need to be new footways, pedestrian crossing facilities, alterations to speed limits etc.”</i></p> <p>CDE conclude by suggesting that allocating the site will be more sympathetic to protecting the character of the village, compared to Carter’s Yard and it would deliver more sustainable development that can meet the proper needs of residents.</p>
<b>The availability of the site north of Vicarage Road</b>	CDE refer to Paragraph 14.36 of the Plan that refers to a planning application for three dwellings on land to the north of Vicarage Road. As the application has been withdrawn, there is no planning permission on the site CDE suggest there is no prospect of it making a contribution to it meeting the village’s affordable or wider housing needs.

**Response to comments made by Clinton Devon Estates**

<b>Level of affordable housing need in East Budleigh</b>		
Major issues identified	Response	Changes to the Plan
<p>The housing need data is incomplete and not robust.</p> <p>The housing need survey underestimates the level of affordable housing need, due to the actions of the</p>	<p>Strategy 35 of the Local Plan states <i>“Exception site mixed affordable and open market housing schemes, at villages and outside of Built-up Area Boundaries, .....will be allowed where there is a proven local need demonstrated through an up to date robust housing needs survey”</i> East Devon District Council (EDDC) state in their representation RN024-026 that Policy D2 is in conformity with this strategy.</p> <p>The estimated level of affordable housing need in the East Budleigh Parish is considered complete,</p>	No changes.

## Level of affordable housing need in East Budleigh

Major issues identified	Response	Changes to the Plan
<p>Chair of the Parish Council.</p> <p>There is no justification for the assessment that there is a need for 13 extra dwellings in the next 10-15 years.</p>	<p>realistic and justifiable. The evidence base used to identify the level of local need is robust and in conformity with Strategy 35.</p> <p>The evidence is as follows:</p> <ul style="list-style-type: none"> <li>a) The housing need survey is up to date and was conducted in October 2015. Paragraph 40 (reference 41-040-20160211) of National Planning Practice Guidance (NPPG) notes where neighbourhood plans do contain policies relevant to housing supply “these policies should take account of the latest and up-to-date evidence of housing need”. This requirement has clearly been met.</li> <li>b) The survey uses a form designed by the Community Council of Devon. This is a robust survey form and has been approved by East Devon District Council(EDDC)</li> <li>c) The Housing Needs Survey had an acceptably high return (28.1%) and those in need of affordable housing most likely will have returned the questionnaire .The Flyer from the Parish Council did not ask parishioners not to complete the survey but alerted residents that the survey was being conducted without the prior knowledge of the Council and there was not a legal requirement to complete it. The uncorroborated accusation by CDE that the flyer stopped residents completing the survey is categorically rejected by the Parish Council and is not borne out by the evidence of acceptably high return rates;</li> <li>d) Only two parishioners responded on the Neighbourhood Plan Questionnaire that the lack of affordable housing was a particularly important issue in the Parish.</li> <li>e) A housing need profile of the East Budleigh with Bicton Parish (submitted as supporting evidence) provides information on the needs within the Parish. This profile also includes evidence from the EDDC waiting list which in 2016 showed 3 people on the list with a preference to be located in East Budleigh. This accords with the local need identified in the Housing Needs Survey and the conclusion that there is currently a low level of need in East Budleigh.</li> </ul>	

### Level of affordable housing need in East Budleigh

Major issues identified	Response	Changes to the Plan
	<p><b>Conclusion</b></p> <p>We believe that current need for affordable housing in East Budleigh Parish identified in the Housing Need survey is based on complete and robust evidence. EDDC in their comments (RN024-26) agree with this evidence and recommend that Policy D2 should be amended to reflect the current affordable housing need in the Parish. At present there is only an identified need for 3 affordable units over the course of the next 5 years and EDDC recommend the identification of an exception site for 4 dwellings, comprising 3 affordable and 1 open market dwelling. The working party has taken on board the comments of EDDC and agrees with the recommendation and the comment of CDE that the Policy should only cater for the currently identified need.</p>	

### Level of affordable housing need in Budleigh Salterton

Major issues identified	Response	Changes to the Plan
<p>The evidence of need in Budleigh Salterton is out of date and therefore unsound.</p>	<p>Paragraph 16.29 of the Local Plan states “<i>For affordable housing in rural areas account will be taken of the specific need within the Parish in which the application land is sited and in addition regard will also be paid to need in surrounding Parishes</i>” The text then indicates which parishes are grouped together in respect of this paragraph and states that the town of Budleigh Salterton is regarded as a surrounding Parish.</p> <p>It will be shown in the evidence detailed below that regard has been given to identified need in the town of Budleigh Salterton and why it is also justifiable, in light of new information that has come forward through representations RN031, RN032 and RN035-10, that any identified need in Budleigh Salterton should not be used to justify an exception scheme in a small rural village.</p> <p>This approach is considered justifiable and robust given the advice in the Planning Practice Guidance which requires Neighbourhood Plans to uphold the general principle of the Strategic Policy to ensure conformity and meet basic conditions but permits a distinct local approach if justification can be provided.</p>	<p>None as a result of this representation.</p> <p>See changes in response to community representations RN031, RN032 and RN035-010.</p>

## Level of affordable housing need in Budleigh Salterton

Major issues identified	Response	Changes to the Plan
	<p>The evidence is as follows:-</p> <ul style="list-style-type: none"> <li>a) We believe that a survey of the need for affordable housing in Budleigh Salterton taken in 2011 can be taken as a reasonably accurate reflection of the situation just five years later. This view has also been endorsed by Budleigh Salterton Town Council.</li> <li>b) The March 2015 Strategic Housing Market Assessment, referred to by CDE, is an assessment of District wide need and not need within the town of Budleigh Salterton. Strategy 35 and paragraph 16.29 is clear that to justify exception housing it is local need not District need that is relevant.</li> <li>c) Budleigh Salterton can meet its own needs. The number of affordable housing both built in the period 2011-2015 (and presently being built in Budleigh Salterton) should easily satisfy the needs of its residents for the foreseeable future. Indeed, in 2011, Planning Application 11/2629/MFUL proposed 42 affordable dwellings on a site in Budleigh Salterton; however, in the associated legal document dated 28th November 2013, this number had been reduced to 21 rented affordable homes and 9 shared ownership dwellings. This surely reflects a reduced need for affordable dwellings in the town over the period 2011 - late 2013. It is noteworthy that construction has started on this development.</li> <li>d) Budleigh Salterton is not a village but a town of 5,291 people with a wide range of facilities and services making it a more sustainable location economically, socially and environmentally. The town has medical facilities and far superior employment, commercial and transport facilities, than in a small village such as East Budleigh.</li> <li>e) Budleigh Salterton is not a designated rural area as defined in the Housing Act of 2006 and it would not be a sustainable or robust approach to release rural 'exception' sites in a small village to meet a need in a town.</li> <li>f) The national definition in the NPPF of a 'rural exception site' is clear that these sites are</li> </ul>	

### Level of affordable housing need in Budleigh Salterton

Major issues identified	Response	Changes to the Plan
	<p>intended to address the needs of the local community.</p> <p>g) Under Strategy 35 of the Local Plan for a 'rural exception scheme' to be permitted the village/small town must have a population that falls below 3000 persons and it should meet an affordable housing need in the locality that would not otherwise be met. Therefore it is not considered a robust approach, given that these necessary criteria are clearly not met, for identified need in a town such as Budleigh Salterton to be used to justify the release of a 'rural exception site' in a small rural village such as East Budleigh.</p>	

### Overall level of Affordable housing need

Major issues identified	Response	Changes to the Plan
<p>Policy D2 is unsound and not robust as is not based on a proper assessment of need.</p>	<p>It has been illustrated above that current need for affordable housing in East Budleigh with Bicton Parish, identified in the Housing Need survey is based on sound and complete evidence and is therefore robust. EDDC in their comments (RN024-26) agree with this evidence and recommend that Policy D2 should be amended to reflect the current affordable housing need in the Parish. At present there is only an identified need for 3 affordable units over the course of the next 5 years and EDDC recommend the identification of an exception site for 4 dwellings, comprising 3 affordable and 1 open market dwelling. The Working Party has taken on board the comments of EDDC and agrees with the recommendation and the comment of CDE that the Policy should only cater for the currently identified need.</p> <p>It is also considered that there is sufficient up to date evidence that shows regard has been taken of identified need in the town of Budleigh Salterton and furthermore there is evidence and justification for why a small village such as East Budleigh should not be required to meet any identified need in Budleigh Salterton via the exception policy. In this respect we would be willing to work with CDE to develop Frank's Patch to meet the identified need.</p> <p>As a result Policy D2 is sound, robust and based on a proper assessment of need.</p>	<p>No changes.</p>

Overall level of Affordable housing need		
Major issues identified	Response	Changes to the Plan

Sites to be Allocated for Residential Use		
Major issues identified	Response	Changes to the Plan
The identified sites should be brought within the Built-up Area Boundary rather than be identified as exception sites (outside the BuAB).	<p>The proposal by CDE to include <u>possible</u> sites for residential dwellings in the BuAB has not been justified. EDDC in their representations have stated Policy D2 is in general conformity with Local Plan Strategy 6 and 27 which allows Neighbourhood Plans to allocate land for development outside of the built up area. Without a well-argued explanation the suggestion by CDE is ill-founded. There is in fact clear evidence to show the approach in the neighbourhood plan to identifying exception site(s) outside the BuAB is robust.</p> <p>The evidence is as follows:-</p> <p>a) None of the sites namely Frank’s Patch, Carter’s Yard or the field below Syon House meet the criteria as outlined in the East Devon Village Plan Consultation Document – Proposed Criteria for Defining Built-up Area Boundaries 2015. In July 2016 EDDC published a site by site assessment including these sites, as part of the Draft East Devon Village Plan, July 2016. This detailed assessment confirmed that these sites should be excluded from the BuAB.</p> <p>b) East Budleigh is in an AONB and national and local guidance is that development should be refused except in exceptional circumstances. This national guidance is reiterated in Strategy 46 of the Adopted East Devon Local Plan which further states development will only be permitted where it can be shown that it cannot be reasonably accommodated elsewhere outside the AONB. There are no exceptional circumstances to justify the release of this land for development, other than to provide affordable housing in response to an identified local need (in accordance with Strategy 35 as an exception site). Strategy 1 of the Local Plan also states that housing in smaller villages should be geared to meeting local need.</p> <p>c) On 15th January 2016 the Inspector reported on the examination into the East Devon Local</p>	No changes. Any identified sites will remain as exception sites outside the BuAB.

## Sites to be Allocated for Residential Use

Major issues identified	Response	Changes to the Plan
	<p>Plan. In paragraph 33 the inspector agreed that the District has “a housing land supply in excess of 5 years”. Meanwhile in paragraph 30 the report states in relation to the number of dwellings still to be delivered in the rural areas that “The number remaining to be delivered through Strategy 27(206 dwellings) is relatively small compared to the overall target and lack of delivery does not pose a significant threat to meeting the overall target”. There is therefore no exceptional need to include sites within the BuAB to meet a shortfall in the 5 year land supply position or to meet District wide needs.</p> <p>d) Frank’s Patch, if brought within the BuAB would be of a size that would be exempt from the provision of affordable housing under new national guidance on rural site thresholds. CDE has not indicated in their response that they intend to provide affordable housing.</p> <p>e) The field below Syon House as proposed by CDE is larger than the level of need identified. The need is for 3 affordable dwellings and EDDC recommend the Plan is amended to meet the identified need (Representation RN024-26) and a site of 4 dwellings is sufficient to achieve this. There is furthermore no justification for why the site needs to be within the BuAB if indeed CDE are committed to providing affordable housing to meet identified local needs.</p> <p><b>Conclusion relating to sites to be Allocated for Residential Use</b></p> <p>CDE provide no explanation as to either i) why the sites meet the criteria as outlined in the East Devon Village Plan Consultation Document- Proposed criteria for Defining Built-up Area Boundaries 2015 or ii) why it is necessary or what exceptional circumstances exist for any sites to allocated within the BuAB. Without a well-argued explanation the suggestion by CDE is ill-founded.</p>	

## Availability of Carter’s Yard

Major issues identified	Response	Changes to the Plan
In light of evidence	Carter’s Yard was put forward by CDE for the development of 5 dwellings in the 2012 SHLAA (as a	The Neighbourhood

## Availability of Carter's Yard

Major issues identified	Response	Changes to the Plan
<p>supplied by CDE Carter's Yard is no longer available for residential use.</p> <p>Carter's Yard is an elevated landform and its allocation would be in conflict with the Plan's vision and objectives to protect the character of the area, by allocating the least well located available sites and its vision to embrace sustainability</p>	<p>new site) and in accompanying documentation the land was identified as available for development in 2016/17. The SHLAA also stated the site was developable and was acceptable from a highway point of view.</p> <p>In choosing the site for development account was taken of the sustainability objectives used in the East Devon Local Plan. As detailed in the Neighbourhood Plan supporting documentation the document entitled "site sustainability appraisal" Carter's Yard was identified as the second most sustainable site after Frank's Patch. The Draft East Devon Village Plan in 2014 stated that the site performed better in relation to the sustainability objectives compared to the field below Syon House. This is in conformity with the Plan's vision to embrace sustainability.</p> <p>It is recognised the protection of the character of the area and the AONB landscape are important objectives of the Plan. As a result of a landscape appraisal the Draft East Devon Village Plan concluded Carter's Yard would be sensitive to change as the result of the site being located in an AONB. This was also true of the site adjacent to Syon House which was also assessed as part of the Draft East Devon Village Plan. The same assessment showed Carter's Yard is elevated but an individual landscape appraisal stated that the site has a sense of enclosure due to dense hedgerow vegetation and boundary trees and the overall conclusion was "<i>the site is in close proximity to the existing built form of East Budleigh and retention of existing boundary vegetation will help mitigate the impacts of development</i>". The document entitled "landscape sensitivity assessments" supplied with the supporting document did however find that when all individual landscape sensitivity criteria are taken into account Carter's Yard was identified as having the second least level of landscape sensitivity after Frank's Patch.</p> <p>In light of new information, and given the advice of East Devon District Council (Representation RN024-26) the site at Carter's Yard, if included in the Plan, would have been reduced in size to the brownfield footprint to meet identified need ensuring minimal impact on the character of the area. This would accord with the Plan's vision and objectives to protect the character of the area.</p> <p>Four years after the site was put forward for development the CDE Representation is now stating the site is 'unavailable for development and will remain so'. The landowner does not specify that the</p>	<p>Plan will reflect the reversal of the previous decision of CDE to release Carter's Yard for residential development and the site will be deleted from Policy D2.</p> <p>Supporting text will show support for the site on a reduced footprint should the site come forward in the Plan period as an exception site in response to identified need (through a robust housing need survey) in the Parish.</p>



### Availability of Carter's Yard

Major issues identified	Response	Changes to the Plan
	<p>site will remain unavailable until after 2031 but in light of their statement the Neighbourhood Plan will reflect the fact that this site, in view of the CDE representation, should be regarded as unavailable</p> <p>This is indeed regrettable given that the site has received the most support among the village community for affordable housing if local need was identified.</p>	

### Availability of Franks Patch

Major issues identified	Response	Changes to the Plan
<p>Frank's Patch should be allocated for up to 4 dwellings within the BuAB.</p> <p>The Policy is too onerous and there is no evidence to justify the number of units or style of design.</p>	<p>We are pleased that CDE agree that there is the opportunity to develop Frank's Patch for residential development. However EDDC are of the view that the site is realistically developable for a maximum of 3 dwellings. This due to an initial assessment of trees on the site by EDDC and a conclusion that there are two particularly important mature trees on the site which reduced the land available. On the basis of this advice it is not considered that Frank's Patch should be identified for up to 4 dwellings. Identifying the site for a maximum of 3 dwellings would accord with the comments of EDDC and their recommendation the Plan is amended to meet the identified local need and a site of the size proposed will meet the level of need identified.</p> <p>The size and topography of the site mean that the dwellings will be small, 1 and 2 bedroom residences and eminently suitable for affordable accommodation. This is in accord with evidence as detailed in the Neighbourhood Plan that there is an imbalance in 1 and 2 bed dwellings within the village. To seek smaller dwellings is in conformity with Strategy 1 of the Local Plan, which states that housing in smaller villages should be geared to meeting local need and Strategy 4 which promotes and encourages residential development suitable for younger people and younger families to promote more age balanced communities.</p> <p>There is also evidence contained within the supporting document "Landscape Sensitivity Assessments" that there was previously residential development on the site and that this development consisted of terraced dwellings. These dwellings were demolished as the result of a</p>	No change.

## Availability of Franks Patch

Major issues identified	Response	Changes to the Plan
	<p>fire in the 1960's. Terraced dwellings would also reflect the grain/density/pattern of surrounding development.</p> <p>However we do not agree that the site should be included within the BuAB and CDE provide no reasoned arguments to support this view. In a detailed site assessment by EDDC as part of the Draft East Devon Villages Plan, July 2006 the site was excluded from the BuAB on criteria A1 of draft criteria for defining Built-up Area Boundaries which were consulted on during the summer of 2015.</p> <p>EDDC in their representations (Representation RN024-26) have stated Policy D2 is in general conformity with Local Plan Strategy 6 and 27 which allows Neighbourhood Plans to allocate land for development outside of the built up area. By bringing the site within the BuAB would not ensure that the affordable housing local need identified by the housing need survey would be delivered. This in light of the national guidance on rural site thresholds for affordable housing for sites within the BuAB (Strategy 34 of the Local Plan)</p> <p><b>Conclusions and Changes to the Plan</b></p> <p>We agree that development of Frank's Patch should be progressed but with a view to providing 66% of the dwellings as affordable dwellings in accordance with Policy D2 and Strategy 35. We cannot see a rationale for extending the BuAB of the Parish to include Frank's Patch and believe the site should remain as an exception site. The Parish Council would be willing to work with CDE to develop Franks Patch as an exception site to deliver the affordable dwellings required to meet identified local need. This would also accord with the comments provided in representation RN024-26 from East Devon District Council.</p>	

## Availability of land adjacent to Syon House

Major issues identified	Response	Changes to the Plan
<p>The land at Syon House should be allocated for development based on CDE assertion the site is deliverable, technically achievable and has been assessed by East Devon District Council as developable.</p> <p>The site is more sustainable and would have less impact on the landscape than Carter's Yard and other sites.</p> <p>The site has more merit on highways grounds than Carter's Yard.</p>	<p>The site (C059) was identified in the SHLAA and was the site identified in Planning Application 14/2959/MOUT initially for the provision of 24 dwellings (withdrawn 2015) and then 18 dwellings (withdrawn 2016). Carter's Yard site was also identified in the SHLAA (as a new site in the 2012 SHLAA) and East Devon District Council considered the site was deliverable indicating it could be developed by 2016/17.</p> <p>The proposals for the development of the C059 site, and the Application itself, have <u>consistently</u> been vigorously opposed by the Parish Council and a large number of parishioners, for a variety of reasons:-</p> <p>a) In sustainability terms, the Draft East Devon Village Plan in 2014 stated that the Carter's Yard site performed better in relation to the sustainability objectives of the Local Plan compared to the field below Syon House as:-</p> <ul style="list-style-type: none"> <li>• In relation to the objective "to promote the conservation and wise use of land and protect and enhance the character of East Devon" the C059 site is located on Greenfield Grade 1 agricultural land compared to Carter's Yard which is on Grade 3 agricultural land and part of the site is on previously developed land. The land adjacent to Syon House is still suitable for agricultural use having been used for grazing in the recent past.</li> <li>• In relation to the sustainability objective 15 relating to flood risk while the site is in Flood zone 1, it has an access onto Frogmore Road which is in Flood zone 2/3. When Frogmore Road and Budleigh Hill is flooded (which has happened twice in the last 4/5 years) access to, and egress from, the site would be difficult, if not impossible for vehicles.</li> </ul> <p>b) A landscape appraisal was undertaken as part of the East Devon Draft Villages Plan 2014 (EDVP). While CDE quote the EDVP in the comparison of C059 to the Carter's Yard site, they omit other passages from the EDVP. The individual site appraisals on both sites concluded that as both sites are in an AONB they are sensitive to change. However while the Carter's Site has sense of enclosure and dense hedgerows the Syon site is an open landform with a sense of openness particular to the north. The site would also be visible</p>	<p>None</p>

## Availability of land adjacent to Syon House

Major issues identified	Response	Changes to the Plan
	<p>from much-used footpaths in and adjacent to the Otter Valley to the east. In the document entitled “landscape sensitivity assessments” supplied with the supporting document when all individual landscape sensitivity criteria are taken into account Carter’s Yard was identified as having less landscape sensitivity than the field below Syon House.</p> <p>c) In relation to the highway merits, the comments are inconsistent. Initially it was stated by Devon County Council as part of the 2011 SHLAA “Access to the south would be impractical as the roads are narrow and without footways”. This advice was reiterated on line 5 of the document Draft East Devon Village Plan 2014 under Feedback from other bodies. However on line 14 it states ‘C059 is fine as access can be derived from the south’. In the recent planning application on the site Devon County Council stated “access from the South was possible and while Frogmore Road did not have sufficient visibility in the easterly direction for a road in that direction that has a deregulated national speed limit if the 30mph speed limit was extended to the east adequate visibility splays could then be achieved”.</p> <p>d) The development is on the ‘wrong’ side of the busy B3178. As shown on the map provided by CDE, there is no easy access to the village for pedestrians. All of the Village’s amenities - Church, Chapel, Community Shop, School, Church and Village Halls, Childrens’ Playground, both Pubs, Garage, Recreation Ground, and all bus stops are located to the west of the B3178.</p> <p>e) The size of the site proposed is out of scale to the level of local need identified in the 2015 housing need survey of East Budleigh Parish.</p> <p><b>Conclusions Relating to Land South of Syon House</b></p> <p>We disagree with the proposal that the land south of Syon House should be allocated for residential development. The objections are summarised above which show that the Carter’s Yard scores better than land adjacent to Syon House in relation to the sustainability objectives of the Local Plan. Based on individual landscape appraisals Carter’s Yard while more elevated is an enclosed landform and the Syon site is a more visible and open landform. Moreover the Syon site is proposing development out of scale with the identified need and there is no justification for why it</p>	

### Availability of land adjacent to Syon House

Major issues identified	Response	Changes to the Plan
	<p>should be included within the BuAB. In the Representation CDE do not add any information that promotes the case for such a development. The script that CDE provide merely promotes the case for the C059 site over the case for Carter's Yard. Respondents to the NP Questionnaire and the CDE Housing Needs Survey show parishioners prefer the development of Carter's Yard and Frank's Patch. The EBB Parish Council concurs with this view and in April 2016 the local MP wrote to the EDDC emphasising the concerns of a constituent relating to the development of the C059 site.</p>	

### Availability of site north of Vicarage Road

Major issues identified	Response	Changes to the Plan
<p>The site is unable to make a contribution to the village's affordable or wider housing need.</p>	<p>We disagree with the conclusion drawn by CDE that this site (C082) 'has no prospect of making any contribution to meeting the village's affordable or wider housing need'. Representation Form RN023 indicates the landowners are interested in finding a way to provide affordable and open-market housing on this site.</p> <p>The response by CDE to the availability of this site needs to be considered in the light of information received during the Consultation period. The site 082 has now been put forward by the landowners for provision of affordable and open-market housing. If national and local policies can be met in the Application, then development of this site could provide affordable housing.</p>	<p>None</p> <p>See also representation RN023</p>

### Policy D3 :- On 'site' affordable housing provision

Subject to other policies in this plan and in accordance with Strategy 35 of the Adopted East Devon Local Plan affordable housing provision on 'exception sites' is required to be provided on site. Commuted sums are not acceptable. Affordable housing must account for at least 66% of the houses built.

**Policy D3 :- On 'site' affordable housing provision**

Landowner	Comments	Major Issues Identified	Response	Proposed change
<b>Clinton Devon Estate(CDE)</b> (RN025-011)	Policy D3 duplicates a policy already set out in East Devon Local Plan and should be deleted	Policy D3 duplicates policy already set out in East Devon Local Plan and should be deleted	It is agreed that the policy duplicates Strategy 35 of the local plan, which allows for exceptions site housing to come forward at a level of at least 66% affordable housing, As the Policy requires 66% of the houses built to be affordable it does not allow for payments for off-site provision.	Policy D3 to be deleted from the Plan but text to be inserted in Policy D2 to reiterate that affordable dwellings identified as needed by a robust housing need survey will be required to be provided on site and commuted sums will not be permitted.

**Other Comments**

Landowner	Comments	Major Issues Identified	Response	Proposed change
<b>Clinton Devon Estates(CDE)</b> (RN025-03)	<b>Community Action 18</b>  CDE supports the principle of further links in the area. However CDE has reservations about a number of routes on Map 10.B and will look at each proposal for a new permissive path across its land on its individual merits	Regard should be had to the requirements of tenants and the safety of prospective users.	The Community Action seeks to create and improve linkages between existing footpaths in the Parish. This is in conformity with local and national planning policy that seeks to promote social wellbeing by the creation of new recreational space and footpaths.  CDE support for the principle of further links is noted and	No changes.

Landowner	Comments	Major Issues Identified	Response	Proposed change
			<p>welcomed.</p> <p>The Parish Council notes that CDE will look at each new permissive path across its land.</p>	
<p><b>Clinton Devon Estates(CDE)</b> (RN025-10)</p>	<p><b>Community Action 28</b></p> <p>The Neighbourhood Plan should not be dictating the form of any Housing Need Survey carried out in Budleigh Salterton.</p>	<p>It is inappropriate to dictate actions on a Parish outside the jurisdiction of the East Budleigh with Bickton Parish</p>	<p>Agreed, that the Neighbourhood Plan should not include this requirement.</p>	<p>Deletion of Community Action 28</p>
<p><b>Clinton Devon Estates(CDE)</b> (RN025-08)</p>	<p><b>Paragraph 13.8</b></p> <p>Compensation is not a matter for the NP. Condition c) should be deleted</p>	<p>Compensation is a commercial matter between CDE and tenant farmers and is not a matter for a land use document</p>	<p>Agreed</p>	<p>Textual changes to paragraph 13.8 and deletion of condition c)</p>
<p><b>Clinton Devon Estates(CDE)</b> (RN025-01)</p>	<p><b>Chapter 4, Vision</b></p> <p>CDE claim the vision is unclear and does not provide a coherent vision. CDE state if it is the intent to keep the status quo it is at odds with other challenges outlined in the Plan. CDE recommend the Vision is reworded to say “Our vision is to have a balanced community</p>	<p>The vision is unclear and retains the status quo and does not address the challenges outlined in the Plan.</p>	<p>The text reflects the Vision of parishioners and is clear in its intent to retain the character of the Parish while accepting evolution and development that is sustainable.</p>	<p>Small textual changes to the Vision to reflect the needs of the Parish.</p>

Landowner	Comments	Major Issues Identified	Response	Proposed change
	<p>which is able to adapt to the needs of all its residents but to do so in a way which protects the unique and intimate character of the Parish. Where change is necessary, this will need to be justified and will be carefully controlled”</p>			