

Yarcombe Neighbourhood Plan

Written Evidence Base Report

DRAFT

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Preface

This first written evidence report was prepared during the month of July 2014. It is based on the published and other documents that were found by or provided to the consultants who have prepared the report during that month.

Readers will find there are gaps in this first report as we are awaiting some information requested. It is also important to note that the report represents a snapshot in time, of evidence available to date. Further written evidence which becomes available during production of the neighbourhood plan will need to be taken into account in addition to that recorded in this report.

The key questions and messages which have been drawn from the written evidence base explored are preliminary and we await local perspective to these before finalising this report.

Supplementary evidence reports will be published over the coming months as more evidence comes to light from local evidence gathering being done through community surveys and consultation.

Any reader that may have recent and relevant evidence to contribute to the neighbourhood planning process is invited to contact their parish clerk.

We are grateful to the contributions made to this report by Lisa Turner, officer at the Blackdown Hills Area of Outstanding Natural Beauty.

***Stuart Todd, Director, Stuart Todd Associates and
Paul Weston, Community Consultant
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PART 1

Summary

This summary is intended to help make the content of the full report on the written evidence base more 'digestable' (given its length) and introduce the main report's findings. While it serves to summarise the key points from the main report, it is important to recognise that there is much valuable information in the main report with which those involved in the development of the neighbourhood plan should be cognisant.

Introduction

Planning policy and proposals need to be based on a proper understanding of the place to where they relate, if they are to be relevant, realistic and address local issues effectively. It is important that the neighbourhood plan is based on robust information and analysis of the local area; this is called the 'evidence base'. Unless policy is based on firm evidence and proper community engagement, then it is more likely to reflect the assumptions and prejudices of those writing it than to reflect the needs and aspirations of the wider area and community.

*We are advised that "the evidence base needs to be proportionate to the size of the neighbourhood area and scope and detail of the Neighbourhood Plan. Other factors such as the status of the current and emerging Local Plan policies will influence the depth and breadth of evidence needed. It is important to remember that the evidence base needs to reflect the fact that the plan being produced here will have statutory status and be used to decide planning applications in the neighbourhood area. It is necessary to develop a clear understanding of the neighbourhood area and policy issues covered; but not to review every piece of research and data in existence – careful selection is needed."*¹

The Parish Council already has a good understanding of many of the key issues of relevance to the local community and to the development of a neighbourhood plan. There are also plenty of sources of information available which set the relevant national and area-wide policies which set the context for the neighbourhood plan. These include:

¹ Neighbourhood Planning Roadmap, Locality, 2013 - <http://locality.org.uk/resources/neighbourhood-planning-roadmap-guide/>

- the Government’s National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG);
- the ‘strategic’ planning policies being produced by East Devon District Council (EDDC) through its Local Plan (covering the whole District) and the Villages Development Plan Document (Villages DPD); and,
- the Blackdown Hills Area of Outstanding Natural Beauty’s (AONB) documents such as policy on renewable energy installations and design guidance for houses.

These all provide valuable background and context that needs to be understood before the neighbourhood plan can be prepared. To complement these and broaden our understanding of the parish and its community we have also referred to a number of other documents, which are listed in this report. This report aims to provide a synopsis of the written evidence base. This includes an appraisal of key plans, policies, programmes, strategies, surveys, studies and data produced at District, BHAONB and parish levels.

It is important to recognise that this report provides a snapshot in time of available documented evidence. There may be other written reports and data which become available in due course which do not currently feature in this report but which may need to be taken into account as the neighbourhood plan develops.

Evidence gathered through consultation with the community through events, discussion and the community questionnaire is documented in other reports. All of this evidence will be considered together in due course to help identify the key themes, the Vision and Objectives and policies for the draft neighbourhood plan.

Key Planning Documents

There are a number of key planning documents which are relevant to most of the topic areas analysed in this report. It is important to understand, in general terms, what these documents are and the implication of their content to the neighbourhood plan.

National Planning Policies

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England, setting the parameters within which the planning system, local planning authorities and Neighbourhood Plans should work and be set. In effect, together with relevant statutory legislation, the NPPF along with its companion National Planning Practice Guidance (NPPG) set out the ‘rules’ within which the planning system has to operate. The

NPPF is set within the context of a ‘presumption in favour of sustainable development’². Translating this to what it means for Neighbourhood Plans, it states that *“neighbourhoods should:*

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and,*
- *identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.”*³

The NPPF also sets out the planning context within which Neighbourhood Plans should work. *“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:*

- *set planning policies through neighbourhood plans to determine decisions on planning applications; and,*
- *grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.”*⁴

It goes on to state that *“Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.... Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.”*⁵

The National Planning Practice Guidance (NPPG) amplifies the policies in the NPPF and provides further detailed and technical guidance. It contains explanations of the main processes that a neighbourhood plan must go through and also sets out the ‘basic conditions’ with which a neighbourhood plan must comply before proceeding to a local referendum and being ‘made’ (approved), which are as follows.

² See paragraph 14 of the NPPF for the definition of the ‘presumption in favour of sustainable development’. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

³ Paragraph 16, NPPF, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf states

⁴ Paragraph 183, NPPF, Department for Communities and Local Government, 2012 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁵ Paragraph 184, NPPF, Department for Communities and Local Government, 2012 https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

- a. *having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).*
- b. *having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.*
- c. *having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.*
- d. *the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.*
- e. *the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- f. *the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
- g. *prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).*⁶

East Devon Local Plan (Saved and Emerging Plans)

As a result of the planning system going through significant changes in recent years, the current planning policies for East Devon are those which have been ‘saved’ and which were part of the East Devon Adopted Local Plan 1995 – 2011 (adopted in 2006)⁷. The majority of policies in the Local Plan were ‘saved’ in 2009 and will be used until replaced by new policies in an adopted Local Plan. A new Local Plan is currently in preparation and until it is adopted, these policies will continue to have some ‘weight’ in the decision making process. The weight will vary with the degree to which the policy is still relevant in terms of evidence and national policy.

At the time of compiling this report, the emerging Local Plan is undergoing its Public Examination.⁸ The new Plan will set the strategic context and strategic planning policies with which the neighbourhood plan needs to be in ‘general conformity’. The neighbourhood plan will not be able to contest the overall scale of housing proposed, broad location or site specific housing allocations deemed as ‘strategic’ in the Local Plan, once

⁶ Paragraph 065, National Planning Practice Guidance, DCLG, 2014. The basic conditions are set out in [paragraph 8\(2\) of Schedule 4B to the Town and Country Planning Act 1990](#) as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.

⁷ See <http://www.eastdevon.gov.uk/forwardplan1995-2011.htm#top> for further details.

⁸ Further information on the Plan’s progress is available via the following link - <http://www.eastdevon.gov.uk/localplan> The Inspector of the Plan has ‘paused’ the Examination, requiring further work to be done before proceeding, scheduled for re-convening for further hearings in October 2014.

adopted. Other policies deemed as 'strategic' and identified in Part 1 of the emerging Local Plan will also need to be used as the policy framework within which the neighbourhood plan is set. These strategic policies can only be amplified or given 'granularity' (further detail) in the local context where they provide added value in policy terms. Policy NP1 'Neighbourhood Planning in East Devon', states:

*"East Devon District Council will support and encourage Parish and Town Councils, and if accepted in law local community groups (Neighbourhood Forums), to produce Neighbourhood Plans for their Parishes and/or defined neighbourhoods. Neighbourhood Plans must show how they implement the strategic policies (Part One) of this Local Plan but can choose to supersede or over-write all or any of the Development Management Policies (Part Two) of this plan."*⁹

Provisional Key Questions and Messages

The end of each topic section in the main report sets out a series of key questions and messages from the documents and data reviewed. This is not simply a re-stating of facts or policies but, instead, seeks to interpret them and focus on 'what it all means' and key matters which need thinking about as the neighbourhood plan is prepared. It is the first step between a factual review of the literature and identifying key themes and possible policy areas that the neighbourhood plan may need to deal with. However, it must be remembered that the key questions and messages presented herein are from an analysis of written material only. They will need to be reviewed and supplemented by the response from local consultation and community questionnaires that is being conducted by the neighbourhood plan steering group in parallel with the examination of the written evidence.

The key questions and messages presented in summary here are reproduced from the topic sections, and, should be regarded as *provisional* in nature. They will need to be reviewed by the neighbourhood plan steering group to ensure that they capture the local perspective and to ensure that the 'flavour' of issues and messages coming out of the review of documents is an appropriate and accurate interpretation. This review will also give the groups the opportunity to update any statements or actions reproduced from parish plans and other local evidence which may now be out-of-date.

⁹ p.240, Local Plan (Proposed Submission (Publication) November 2012 Incorporating Changes Consulted on 23rd August to 7th October 2013), East Devon District Council, 2013

Natural Environment

(landscape, flora, fauna, flood risk, biodiversity, habitats, geology)

Key Questions and Messages

- We live in a precious and sensitive environment nationally recognised for its landscape quality and flora and fauna.
- What must be preserved and/or enhanced?
- Do we need to introduce or extend protection measures within the parish?
- How can we help increase biodiversity and ecological networks?
- Should we be creating new woodlands, if so where?
- How can we help facilitate sustainable farm management?
- How can we ensure that new development has minimum adverse effect on the natural environment?
- How best can we ensure development is appropriate to landscape character in terms of design, quality and visual appearance?
- How can we best alleviate and or minimise the risk of flooding?
- Should greater weight be sought for the policies of the Blackdown Hills Management Plan in the neighbourhood plan or 'signpost' it as a material consideration?

Built and Historic Environment

(cultural heritage, historic buildings, conservation areas, archaeology, settlement characteristics and vernacular, built form and design)

Key Questions and Messages

- National, AONB and Local Authority policies support neighbourhood plans having policies which reflect local distinctiveness to ensure development is in-keeping with the local built environment.
- There is a desire to see heritage and historic assets should be protected.
- There is a desire to ensure that the character and form of the villages and rural landscape is not eroded if development takes place.
- There is a desire to ensure that the design of any new development is in-keeping with the existing character of the built environment.
- Does the community agree that these remain the priorities for the parish?
- There is an opportunity to give the Village Design Statement (VDS) real weight by introducing a policy in the neighbourhood plan which stresses the importance of

appropriate design and 'signposts' the VDS, requiring decision takers on planning applications to take full account of its content.

- The neighbourhood plan could also give the AONB Design Guide for Houses real weight by taking a similar approach.
- Should greater weight be sought for the policies of the Blackdown Hills Management Plan in the neighbourhood plan or 'signpost' it as a material consideration?

Population and Housing

(socio and demographic characteristics, affordable housing needs, social housing and intermediate housing needs, housing market and prices, housing stock and types, development potential and capacity, historic completion rates, planning site histories and applications)

Key Questions and Messages

- The cost of buying a house in the parish is prohibitive for most people who live locally and want to get on the housing ladder.
- If any development takes place, small scale housing which is affordable to local people (local needs housing) is likely to be more acceptable.
- There are concerns about accepting more housing in the parish although opinion was divided when the community was asked the question in 2005. The 2012 housing needs survey response has suggested that residents support the principle of small scale development where it meets local needs, which were identified in the survey report as a need for 7 affordable homes.
- There is a desire to see a balance in the demographic characteristics, dwelling types and household types in the parish.
- Does the community agree that these remain the priorities for the parish?
- If housing is needed in the parish, should housing sites be allocated in the neighbourhood plan, or is the community content with accepting the EDDC process of allocating sites, or is it content to allow the Local Plan together with neighbourhood plan 'criteria based' policies to steer development to appropriate places / locations (and away from inappropriate locations)?
- If the community decides that it would prefer to allocate housing sites in the neighbourhood plan, is it prepared to accept potentially additional time and resource implications of following this route?
- No sites have been identified in the Strategic Housing Land Availability Assessment (SHLAA) or draft Villages Development Plan Document (DPD) for small scale development.

- Should greater weight be sought for the policies of the Blackdown Hills Management Plan in the neighbourhood plan or 'signpost' it as a material consideration?

Main Observations from Review of Strategic Housing Literature

- The NPPF advises that it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability and vitality of villages and smaller settlements. A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.
- The NPPF also states that assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process.
- If housing is needed in the parish, the neighbourhood plan can either allocate specific housing sites, or choose to influence allocations to be determined through the East Devon Villages DPD and / or choose to influence speculative ('windfall') proposals for development. Either option can see the neighbourhood plan set criteria based policies which 'steer' location, type, tenure, design and so on. A clear understanding of the implications of allocating specific housing sites in the neighbourhood plan should inform debate on whether or not allocations are appropriate in the plan.
- Current adopted local planning policy requires special care to be taken when development takes place within the AONB, as do AONB policies. Proposals should conserve or enhance the character of the landscape and protect the traditional local built form.
- The local authority currently requires developments of 5 or more dwellings in settlements with a population of under 3,000 to provide, typically, 40% affordable housing.
- Development allocations identified in the emerging Local Plan may change as a result of the further work being done on the plan's approach to the distribution of development which will be considered when the Public Examination reopens in October.
- The neighbourhood plan can determine additional housing numbers in the parish over and above that proposed in the emerging Local Plan but cannot reduce the number allocated by the Local Plan.
- There are numerous policies in relation to housing in the emerging Local Plan which the neighbourhood plan will need to be cognisant of and be in general conformity with.

Society, Community Facilities and Services

(culture and arts, health, GPs, dentists, social and elderly care, crime, services and infrastructure (e.g. water supply capacity and waste water treatment), local facilities such as sport, halls, pitches, leisure, recreation, park facilities)

Key Questions and Messages

- Are there any services or facilities that are at risk?
- Are there any critical service gaps?
- How will the demand for services change over the next 10-15 years?
- How will leisure demands change in future?
- What are the plans and intentions of service providers?
- Do we have any accessibility problems?
- Are public spaces and facilities fit for purpose?
- Are there other sites that could provide for recreation activities?
- What do young people want?
- How can we best provide for the active elderly?
- Are we meeting the needs of young families?

Transport and Accessibility

(public transport, rights of way, parking)

Key Questions and Messages

- The parish would like to see continuing improvement to footpaths. The AONB has a desire to achieve an accessible, connected and above-minimum-standard network of Public Rights of Way across boundaries throughout the AONB that also conserves and enhances the special qualities of the AONB.
- There are concerns about road safety and traffic speeds on the rural roads. The AONB has a desire to reduce traffic volume and speed on minor roads to provide a safer environment for walking, cycling and horse riding.
- There are concerns about road maintenance
- There are concerns about the impact of the dualling of the A303 on the parish if it proceeds.
- Do these issues remain as the priority issues for the local community?

- The AONB has a desire to ensure road and transport schemes (including road design, maintenance, signage, landscaping and safety measures) within or affecting the AONB have regard to the purpose of AONB designation and conserve and enhance the area's special qualities.

Economy and Employment

(qualifications, key economic activities and sectors, local businesses / employers, size of business, average incomes, those not in employment education or training (NEETs), economically active population, unemployment)

Key Questions and Messages

- Are there barriers to working from home successfully?
- Is there a demand for more local jobs and if so what type?
- How will the demands for local services change in future and how best can these be met?
- What do local businesses say?
- Is there scope to convert existing buildings?
- Are there any suitable sites for business development?
- How can the Parish Council help?

Energy and Low Carbon

(renewable energy, energy efficiency, carbon emissions)

Key Questions and Messages

- National, local and AONB policies seek to be positive about planning for renewable and low carbon energy, while ensuring that adverse impacts on landscape and the environment are addressed. Proposals in AONBs in particular require careful consideration.
- What are the current local views on the value and acceptability of various forms of renewable energy development?
- What protections need putting in place to prevent developments having a damaging effect on the local and wider landscape?

- If the principle of small scale renewable energy development is supported, are there any sites suitable for such development?
- National guidance suggests that neighbourhood plans are an opportunity for communities to plan for community-led renewable energy development. Is a community-owned project desirable and if so is it deliverable?
- How can we facilitate small-scale low energy adaptations to existing buildings without damaging elements of the area's natural beauty?
- Is there a case for local policies to seek 'above standard' sustainable construction and energy conservation measures are incorporated into all new development proposals?
- Should greater weight be sought for the conclusions of the Blackdown Hills AONB renewable energy assessment, translating conclusions about technologies into the neighbourhood plan or 'signposting' it as a material consideration?
- Should greater weight be sought for the policies of the Blackdown Hills Management Plan in the neighbourhood plan or 'signpost' it as a material consideration?

Waste and Minerals

(quarries, minerals supply areas, waste production, facilities and recycling)

Key Questions and Messages

- What is the scope for increased and extended recycling?
- Are more local recycling points and sites needed?
- Is there scope for local recycling initiatives to complement the Council's service?
- Are local businesses and organisations doing all they can to recycle?
- Does EDDC policy on disused quarries satisfy local requirements?
- Is there a need for local policies to control future mineral exploration and extraction?

PART 2

Full Report

Introduction

Planning policy and proposals need to be based on a proper understanding of the place to where they relate, if they are to be relevant, realistic and address local issues effectively. It is important that the neighbourhood plan is based on robust information and analysis of the local area; this is called the 'evidence base'. Unless policy is based on firm evidence and proper community engagement, then it is more likely to reflect the assumptions and prejudices of those writing it than to reflect the needs of the wider area and community.

We are advised that *“the evidence base needs to be proportionate to the size of the neighbourhood area and scope and detail of the Neighbourhood Plan. Other factors such as the status of the current and emerging Local Plan policies will influence the depth and breadth of evidence needed. It is important to remember that the evidence base needs to reflect the fact that the plan being produced here will have statutory status and be used to decide planning applications in the neighbourhood area. It is necessary to develop a clear understanding of the neighbourhood area and policy issues covered; but not to review every piece of research and data in existence – careful selection is needed.”*¹⁰

The parish council already has a good understanding of some of the key issues of relevance to the local community and to the development of a neighbourhood plan. There are also plenty of sources of information available which set the relevant national and area-wide policies which set the context for the neighbourhood plan. These include:

- the Government's National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG);
- the 'strategic' planning policies being produced by East Devon District Council (EDDC) through its Local Plan (covering the whole District) and the Villages Development Plan Document (Villages DPD); and,
- the Blackdown Hills Area of Outstanding Natural Beauty's (AONB) documents such as policy on renewable energy installations and design guidance for houses.

These all provide valuable background and context that needs to be understood before the neighbourhood plan can be prepared. To complement these and broaden our understanding of the parish and its community we have also referred to a number of other

¹⁰ Neighbourhood Planning Roadmap, Locality, 2013 - <http://locality.org.uk/resources/neighbourhood-planning-roadmap-guide/>

documents which are listed in this report. A description of some of the main planning documents and how they relate to neighbourhood planning as a whole are set out below (in the section 'Key Planning Documents').

This report aims to provide a synopsis of the written evidence base. This includes an appraisal of key plans, policies, programmes, strategies, surveys, studies and data produced at District, BHAONB and parish levels.

It is important to recognise that this report provides a snapshot in time of available documented evidence. There may be other written reports and data which become available in due course which do not currently feature in this report but which may need to be taken into account as the neighbourhood plan develops.

Evidence gathered through consultation with the community through events, discussion and the community survey is documented in other reports.

All of this evidence will be considered together in due course to help identify the key themes, the Vision and Objectives and policies for the draft neighbourhood plan.

We have extracted that which we consider is most relevant from these written sources and summarised them under a series of topic headings. These topics have been derived for the neighbourhood plan's sustainability framework which the parish will need to apply to test its policies and proposals, in sustainability terms, as the plan develops. There is further explanation of how the topics have been derived below.

Deriving Topics

The topics under which the written evidence base has been analysed are based on the plan's sustainability framework.¹¹ The written evidence base report is structured in this way to enable the sustainability appraisal or strategic environmental assessment (if required) of the neighbourhood plan to be undertaken in an expedient way by providing the majority of the baseline information required for an SA / SEA at this early stage in the plan's development.

The topics in this report are as follows:

- Natural Environment (landscape, flora, fauna, flood risk, biodiversity, habitats, geology)
- Built and Historic Environment (cultural heritage, historic buildings, conservation areas, archaeology, settlement characteristics and vernacular, built form and design)
- Energy and Low Carbon (renewable energy, energy efficiency, carbon emissions)
- Transport and Accessibility (public transport, rights of way, parking)
- Population and Housing (socio and demographic characteristics, affordable housing needs, social housing and intermediate housing needs, housing market and prices, housing stock and types, development potential and capacity, historic completion rates, planning site histories and applications)
- Economy and Employment (qualifications, key economic activities and sectors, local businesses / employers, size of business, average incomes, those not in employment education or training (NEETs), economically active population, unemployment)
- Society, Community Facilities and Services (culture and arts, health, GPs, dentists, social and elderly care, crime, services and infrastructure (e.g. water supply capacity and waste water treatment), local facilities such as sport, halls, pitches, leisure, recreation, park facilities)
- Waste and Minerals (quarries, minerals supply areas, waste production, facilities and recycling)

¹¹ The framework (set out as an appendix to this report) is based upon the key themes identified in the sustainability appraisal (SA) undertaken for the AONB Management Plan, which itself has its roots in the strategic environmental assessment (SEA) which underpins the emerging East Devon Local Plan.

Key Planning Documents

As identified above, there are a number of key planning documents which are relevant to most of the topic areas analysed in this report. Each topic analysed in this report focuses first on summarising the key parts of these planning documents in relation to those topics so that the policy context is set out. However, it is important to understand, in more general terms, what these documents are and what they do. Therefore, the following section provides a brief explanation of each of these key planning documents.

National Planning Policy Framework

The National Planning Policy Framework (NPPF) is the Government's planning policies and guidance for England, setting the parameters within which the planning system, local planning authorities and Neighbourhood Plans should work and be set. In effect, together with relevant statutory legislation, the NPPF along with its companion National Planning Practice Guidance (NPPG) set out the 'rules' within which the planning system has to operate.

The NPPF is set within the context of delivering sustainable development, therefore setting out a 'presumption in favour of sustainable development'¹². All of its 'three dimensions' to sustainable development have a close relationship with people and housing.

"There are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- ***an economic role*** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- ***a social role*** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- ***an environmental role*** – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural

¹² See paragraph 14 of the NPPF for the definition of the 'presumption in favour of sustainable development'. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

*resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.*¹³

Translating this to what it means for Neighbourhood Plans, it states that “neighbourhoods should:

- *develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;*
- *plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and,*
- *identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.”*¹⁴

It is important to be mindful of paragraphs 183-185, which set out the planning context within which Neighbourhood Plans should work.

“Neighbourhood planning gives communities direct power to develop a shared vision for their neighbourhood and deliver the sustainable development they need. Parishes and neighbourhood forums can use neighbourhood planning to:

- *set planning policies through neighbourhood plans to determine decisions on planning applications; and*
- *grant planning permission through Neighbourhood Development Orders and Community Right to Build Orders for specific development which complies with the order.*

Neighbourhood planning provides a powerful set of tools for local people to ensure that they get the right types of development for their community. The ambition of the neighbourhood should be aligned with the strategic needs and priorities of the wider local area.

Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan. To facilitate this, local planning authorities should set out clearly their strategic policies for the area and ensure that an up-to-date Local Plan is in place as quickly as possible. Neighbourhood plans should reflect these policies and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.

Outside these strategic elements, neighbourhood plans will be able to shape and direct sustainable development in their area. Once a neighbourhood plan has demonstrated its general conformity with the strategic policies of the Local Plan and is brought into force, the policies it contains take precedence over existing non-strategic policies in the Local Plan for

¹³ National Planning Policy Framework (DCLG), paragraph 7, page 2

¹⁴ Paragraph 16, NPPF,
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

that neighbourhood, where they are in conflict. Local planning authorities should avoid duplicating planning processes for non-strategic policies where a neighbourhood plan is in preparation.”¹⁵

National Planning Practice Guidance

The National Planning Practice Guidance (NPPG) amplifies the policies in the NPPF and provides detailed or technical guidance where necessary by answering a series of ‘frequently asked questions’. It contains explanations of the main processes that a neighbourhood plan must go through and also sets out the ‘basic conditions’ with which a neighbourhood plan must comply before being ‘made’, which are as follows.

“Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in [paragraph 8\(2\) of Schedule 4B to the Town and Country Planning Act 1990](#) as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:

- h. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).*
- i. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders.*
- j. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders.*
- k. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.*
- l. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- m. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.*
- n. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).”¹⁶*

¹⁵ Paragraph 184, NPPF, Department for Communities and Local Government, 2012
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

¹⁶ Paragraph 065, National Planning Practice Guidance, DCLG, 2014

East Devon Local Plan (Saved and Emerging)

As a result of the planning system going through significant changes in recent years in terms of the statutory planning documents that need to be produced (including those produced by the local planning authority), formally, the 'development plan' policies for East Devon are those which have been 'saved' and which were part of the East Devon Adopted Local Plan 1995 – 2011 (adopted in 2006)¹⁷. The majority of policies in the Local Plan were 'saved' in 2009 as a result of a 'Direction' from the Secretary of State for Communities and Local Government. The policies are saved until replaced by new policies in an adopted Local Plan. A new Local Plan is currently in preparation (see below).

Until the new Local Plan is adopted, these saved policies will continue to have some 'weight' in the decision making process. The weight will vary with the degree to which the policy is still relevant in terms of evidence and national policy.

East Devon District Council is currently developing a new Local Plan which, when adopted, will replace the saved policies from the adopted Local Plan. At the time of compiling this report, the emerging Local Plan is mid-Public Examination, with the Inspector of the Plan requiring further work to be done on the Plan before proceeding with the Examination, scheduled for re-convening in October 2014.¹⁸

The new Local Plan, when adopted, will set the strategic context and statutory development plan strategic policies with which the neighbourhood plan needs to be in 'general conformity'. The neighbourhood plan will not be able to contest an overall scale, broad location or site specific housing allocations deemed as 'strategic' in the adopted Local Plan. Other policies deemed as 'strategic' and identified in Part 1 of the emerging Local Plan will also need to be used as the policy framework within which the neighbourhood plan is set. These strategic policies can only be amplified or given 'granularity' (further detail) in the local context where they provide added value in policy terms. Part 2 of the emerging Local Plan sets out development management policies which can be changed or added to in the local context in the neighbourhood plan where justified by evidence and policies add value (not repeating policy coverage elsewhere). Part 3 of the emerging Local Plan sets out East Devon District Council's position in relation to how they will encourage local communities to get involved in neighbourhood planning. Much of this part of the emerging Local Plan sets out advice and guidance on the process of developing a neighbourhood plan but there is one policy, NP1 'Neighbourhood Planning in East Devon', which states:

¹⁷ See <http://www.eastdevon.gov.uk/forwardplan1995-2011.htm#top> for further details.

¹⁸ Further information on the Plan's progress is available via the following link - <http://www.eastdevon.gov.uk/localplan>

“East Devon District Council will support and encourage Parish and Town Councils, and if accepted in law local community groups (Neighbourhood Forums), to produce Neighbourhood Plans for their Parishes and/or defined neighbourhoods.

Neighbourhood Plans must show how they implement the strategic policies (Part One) of this Local Plan but can choose to supersede or over-write all or any of the Development Management Policies (Part Two) of this plan.”¹⁹

Blackdown Hills Area of Outstanding Natural Beauty (AONB) Management Plan

The principal guidance document for conserving and enhancing the AONB. Local authorities have a statutory duty to prepare a management plan for AONBs at 5-year intervals, and in practice the AONB Partnership fulfils this duty for them. The current management plan runs from 2014-2019 and has been adopted by each local authority covering the AONB. It provides a strategic framework to help guide all activities affecting the AONB as far as conserving and enhancing natural beauty is concerned.

Structure of Topic Sections

Following these introductory sections, this report sets out, for each of the topics, the following:

- Sources of evidence used (which lists documents reviewed for the report and their weblinks)
- Strategic written evidence (setting out the main aims, objectives and / or policies of key planning documents relevant to the parish)
- Local written evidence (for the parish, setting out the following)
 - Main aims, objectives and / or policies of key documents relevant to each parish
 - Local level data (not already identified from documents above)
 - Parish characteristics (a short statement of what the parish is like, for that topic)
- Key Questions and Messages (which are relevant to the neighbourhood plan, arising from the written evidence reviewed)

¹⁹ p.240, Local Plan (Proposed Submission (Publication) November 2012 Incorporating Changes Consulted on 23rd August to 7th October 2013), East Devon District Council, 2013