

Bridestowe and Sourton Neighbourhood Development Plan

Independent Examiner's Report

October 2020

Barbara Maksymiw

Independent Examiner BSc (Hons), MSc, MRTPI

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Summary

I have been appointed by West Devon Borough Council to carry out an independent examination of the Bridestowe and Sourton Neighbourhood Development Plan.

The examination was carried out between August and October 2020 and was undertaken by considering all the documents submitted to me, including the written representations. I visited the Neighbourhood Development Plan area on 13 August 2020.

The plan is based on extensive engagement with the local community and provides a distinct set of policies, relevant to the needs of local people. The Neighbourhood Development Plan provides for the modest housing needs identified in the Plymouth and South West Devon Joint Local Plan.

Subject to a number of modifications set out in this report, I conclude that the Bridestowe and Sourton Neighbourhood Development Plan meets the Basic Conditions and I am pleased to recommend that it should proceed to referendum.

I recommend that the referendum should be confined to the Neighbourhood Plan area.

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1. Introduction

1. Neighbourhood planning is a relatively new process, introduced by the Localism Act 2011, which enables local communities to develop planning policies to guide development in their area and help to shape the places where they live and work.

2. The parishes of Bridestowe and Sourton are situated in West Devon, about thirty miles to the west of Exeter and twenty miles north of Plymouth. Both parishes share common land in the Dartmoor National Park. The two parishes both straddle two Local Planning Authority areas - West Devon Borough Council and Dartmoor National Park Authority. They are both rural parishes with a combined population of nearly 1,000, according to the 2011 census. Bridestowe has a village centre and provides a range of services, while Sourton is a smaller village with no clear nucleus. The villages have two thriving primary schools which are oversubscribed, but the area faces the challenges of rural isolation and the reduction in public transport. The beauty of the area makes it a popular holiday destination and place where retired people aspire to live.

3. The A30 dual carriageway, which is the main access route into Cornwall, bisects the NDP area, with the main Tavistock to Okehampton road running north south, bisecting Sourton village.

4. The purpose of this report is to assess whether the Bridestowe and Sourton Neighbourhood Development Plan (NDP) complies with the relevant legislation and meets the Basic Conditions, which such plans are required to meet. Where necessary, the report makes recommendations about changes or modifications to the plan to ensure that it meets the legislative requirements.

5. The report also makes a recommendation about whether the NDP should proceed to the referendum stage. If there is a positive recommendation at referendum, the NDP can be “made” by West Devon Borough Council and Dartmoor National Park Authority and so become part of the wider development plan and then used by both authorities to determine planning applications in the plan area.

2. Appointment of the independent examiner

6. I have been appointed by West Devon Borough Council with the agreement of Bridestowe Parish Council and Dartmoor National Park Authority, to carry out this independent examination. The Neighbourhood Planning Independent Referral Service (NPIERS) has facilitated my appointment. I am a chartered town planner with extensive planning experience in local government and therefore have the appropriate qualifications and experience to carry out this examination. I am independent

of the qualifying body and have no land interest in the area that might be affected by the plan.

3. The role of the independent examiner

7. The role of the independent examiner is to ensure that the submitted NDP meets the Basic Conditions together with a number of legal requirements.

8. In examining the NDP I am required, under Paragraph 8(1) of Schedule 4B of the Town and Country Planning Act 1990, to check ¹ that:

- the policies in the plan related to the development and use of land for a designated neighbourhood area; and
- the policies in the plan meets the requirements of Section 38 of the Planning and Compulsory Purchase Act (that is, it specifies the period to which it has effect, does not include provision about excluded development and does not relate to more than one neighbourhood area); and
- the plan has been prepared for an area that has been designated under Section 61G of the Localism Act and has been developed and submitted by a qualifying body.

9. I must also consider whether the NDP meets the Basic Conditions set out in Schedule 4B of the Town and Country Planning Act 1990 (as amended). A plan meets the basic conditions² if:

- having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the neighbourhood plan
- the making of the plan contributes to the achievement of sustainable development
- the making of the neighbourhood plan is in general conformity with the strategic policies of the development plan for the area
- the making of the neighbourhood plan does not breach, and is otherwise compatible with European Union (EU) obligations

10. Regulations 32 and 33 of the Neighbourhood Planning Regulations 2012 (as amended) set out two additional basic conditions. These are:

- the making of the neighbourhood plan is not likely to have significant effects on a European

¹ Set out in paragraph 8(1) of Schedule 4B of the Town and Country Planning Act (as amended)

² Set out in paragraph 8(2) of Schedule 4B of the Town and Country Planning Act (as amended)

site ³ or a European offshore marine site ⁴ either alone or in combination with other plans or projects and

- having regard to all material considerations, it is appropriate that the neighbourhood development order is made where the development described in an order proposal is Environmental Impact Assessment development (this does not apply to this examination as it is not about a neighbourhood development order).

11. A further Basic Condition was added by legislation on 28 December 2018. The Neighbourhood Planning (General) Regulations 2012 para 1 states:

- In relation to the examination of neighbourhood development plans the following basic condition is prescribed for the purpose of paragraph 8(2)(g) of Schedule 4B to the 1990 Act-
- The making of the neighbourhood development plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

12. As independent examiner, having examined the plan, I am required to make one of the following recommendations:

- that the plan as submitted can proceed to a referendum; or
- that the plan with recommended modifications can proceed to referendum; or
- that the plan does not meet the necessary legal requirements and cannot proceed to referendum

13. If the plan can proceed to referendum with or without modifications, the examiner must also consider whether the referendum area should be extended beyond the neighbourhood plan area to which it relates.

14. West Devon Borough Council and Dartmoor National Park Authority will consider the examiner's report and decide whether they are satisfied with the examiner's recommendations and will publicise their decision on whether the plan will be subject to referendum, with or without modifications. If a referendum is held and results in more than half of those voting in favour of the plan, the Council and Dartmoor National Park Authority must "make" the neighbourhood plan a part of their development plan. The plan then becomes part of the development plan for the area and is a statutory consideration in guiding future development and determining planning applications in

³ As defined in the Conservation of Habitats and Species Regulations 2012

⁴ As defined in the Offshore Marine Conservation (Natural Habitats &c) Regulations 2007

the area.

4. Compliance with matters other than the basic conditions

15. In autumn 2014, Bridestowe and Sourton Parish Councils applied to West Devon Borough Council and Dartmoor National Park Authority for the Parishes to be designated as a neighbourhood planning area. In December 2014, the parishes were designated as a Neighbourhood Area in accordance with the Neighbourhood Planning (General) Regulations 2012. The designated area covers both parishes and does not cover any other Neighbourhood Area and the qualifying body is Bridestowe Parish Council . The NDP covers the period from 2016-2034, which is the same plan period as the Plymouth and South West Devon Joint Local Plan which was adopted in 2019.

16. The preparation of the plan has been managed by the Bridestowe and Sourton Joint Neighbourhood Development Plan Working Group made up of parishioners and representatives from both Parish Councils. The Group has also had professional assistance from AECOM and neighbourhood planning consultants.

17. I am satisfied that the NDP includes policies that relate to the development and use of land and does not include provision for any excluded development. The Bridestowe and Sourton NDP therefore meets the requirements set out in para 8 above.

5. The examination process

18. The documents which I considered during the course of the examination are listed in Appendix 1.

19. The general rule⁵ is that an examination is undertaken by the consideration of written representations only. Having considered all the information before me, including the representations made to the submitted plan (the Regulation 16 responses), I was satisfied that the Bridestowe and Sourton NDP could be examined without the need for a public hearing.

20. During the course of the examination it was necessary to clarify several matters with West Devon Borough Council, Dartmoor National Park Authority and the Parish Council. These are set out in Appendix 2 to this report. I was provided with prompt and helpful responses to my questions and I am satisfied that I had all the information I required to carry out the examination.

⁵ PPG para 004 ref id 41-004-20140306

21. As part of the Neighbourhood Plan Examination process, it is important for the examiner to understand the context of the neighbourhood plan in the wider area and its overall character, as these shape the issues and policies set out in the plan. I therefore made an unaccompanied site visit to the area on 13 August 2020.

22. The plan has been assessed against the guidance in the National Planning Policy Framework (NPPF) dated February 2019 in accordance with paragraph 214 of Appendix 1.

6. Consultation

Consultation process

23. Effective consultation and engagement with the local community is an essential component of a successful neighbourhood plan, bringing a sense of public ownership to its proposals and helping to achieve consensus. The policies set out in the NDP will be used as the basis for planning decisions – both on local planning and on planning applications – and, as such, legislation requires neighbourhood plans to be supported by public consultation.

24. In line with the Neighbourhood Planning (General) Regulations 2012⁶, the NDP Working Group has prepared a Consultation Statement for the NDP which sets out how the group approached public consultation, who was consulted and the outcomes.

25. Throughout the plan preparation process, the NDP Working Group has sought to consult and engage as wide a range of people as possible and feedback has been used to inform the content and scope of the plan. The first step involved sending out a questionnaire to all households and local businesses in April 2015, asking them to consider what they thought was important about their parish, features they valued, aspects they did not like and changes they would like to see. This generated a good response rate of 38%. A separate questionnaire was used to gain young people's views on open spaces, sport and recreation. The focus of the NDP was to ensure appropriate tailored development that met local need and did not impact negatively on the highly valued landscape.

26. In April 2016 a housing needs assessment was carried out to obtain up-to-date evidence of local housing needs over the NDP plan period.

⁶ Regulation 15 of the Neighbourhood Planning (General) Regulations 2012

27. Throughout the stages of plan preparation which followed, the NDP Working Group posted regular updates to the Bridestowe and Sourton websites, regular bulletins in the monthly newsletter delivered to every household and a series of consultation events.

28. By December 2017, the Pre Submission version of the plan had been converted into a Submission Draft Plan, paving the way for the first formal consultation on the Regulation 14 Draft Neighbourhood Plan in early 2018. A local newsletter explained the consultation process and how to make representations and provided a link to the full version of the Pre-Submission Plan which was available on both parish websites. Paper copies of the draft Neighbourhood Development Plan were made available at both village halls, the three churches, primary schools, Riverside stores and pubs. Also a contact number was provided so that a copy could be delivered on request. Posters were displayed drawing attention to the public consultation on the NDP.

29. The final Reg 16 consultation on the Submission Draft version of the NDP was carried out between 29th June and 10th August 2020.

30. It is clear from the Consultation Statement that the NDP Working Group has engaged very widely with the local community and kept people informed as the plan progressed. This consultation process has helped to ensure that the community's vision for the NDP area has been clearly shaped by the views and priorities of the community. This is:

“To secure a strong future for both parishes by supporting sustainable development that meets the needs of current and future residents without detriment to the unique and highly prized landscape and environment and without jeopardizing the strong community feeling that exists and the feeling of safety and security that residents value”

Representations received

31. Preparing the NDP has involved two statutory six-week periods of public consultation. The first on the Regulation 14 Draft Plan, took place between January and March and 16 December 2018. In all, seventeen representations were received – seven individuals, six public bodies / organisations, one developer on behalf of a landowner and three local business owners.

32. The second consultation on the Submission Draft NDP was managed by West Devon Borough Council and took place between 29th June and 10th August 2020. This generated just four responses – one from West Devon Borough Council, three from statutory consultees and one from Dartmoor National Park Authority.

33. Occasionally in this report I refer to representations and identify the organisation making that particular comment. However, I have not referred to every representation in my report. Nonetheless, I can assure everyone that each comment made has been looked at and carefully considered.

34. From the evidence in front of me, it is apparent that the Bridestowe and Sourton NDP has been subject to appropriate and extensive community engagement involving much time and effort by the NDP Working Group. They are to be congratulated for all their efforts and for producing a comprehensive NDP. I am therefore satisfied that the consultation process which has been followed complies with the requirements of the Regulations.

7. Compliance with the basic conditions

35. In my role as independent examiner I must assess whether the NDP meets the Basic Conditions⁷ set out in the Regulations as described in paras 8-11 above.

36. I have considered the Bridestowe and Sourton Neighbourhood Development Plan Basic Conditions Statement produced by the NDP Working Group, and other supporting documentation, to assist my assessment which is set out below.

National Policy

37. National planning policy is set out in the National Planning Policy Framework (NPPF) and in the supporting Planning Practice Guidance (PPG). At the heart of the planning system is a presumption in favour of sustainable development, which applies to all levels of plan making. For neighbourhood plans, this means that neighbourhood plans should support the strategic development needs set out in Local Plans and plan positively to shape local development. Planning Practice Guidance⁸ states that all plans should be prepared positively, be shaped by effective engagement with the local community and contain policies which are clearly written and unambiguous. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.

⁷ Para 8(2) of Schedule 4B of the Town and Country Planning Act (as amended)

⁸ Planning Practice Guidance Paragraph: 041 Reference ID: 41-041-20140306

38. Section 5 and Table 4 of the Basic Conditions Statement provides a comprehensive assessment of how each of the policies in the NDP conform with the relevant guidance in the NPPF. This very comprehensive assessment means that the NDP satisfies the basic condition that it has regard to national policies and advice. In response to my query, the NDP Working Group has confirmed that the wording of paragraph 8.8 on page 19 of the Basic Conditions Statement requires some editing to make clear that the qualifying body opted to undertake SEA voluntarily, in response to issues raised by Natural England regarding the proposed Sourton settlement boundary.

- **Amend para 8.8 of the Basic Conditions Statement to make clear that the qualifying body opted to undertake SEA voluntarily, in response to issues raised by Natural England regarding the proposed Sourton settlement boundary. Remove “8.2” from the middle of the paragraph**

Sustainable development

39. The qualifying body also has to demonstrate how a neighbourhood plan contributes to the achievement of sustainable development as set out in the NPPF⁹. Section 6 and Table 5 in the Basic Conditions Statement sets out an assessment of how each policy in the NDP impacts on the three strands of sustainable development - the economic, social and environmental objectives aspects. I therefore conclude that this Basic Condition is met.

Development Plan

40. The NDP also has to demonstrate that it accords with the strategic policies of the Development Plan. The two parishes both straddle two Local Planning Authority areas - West Devon Borough Council and Dartmoor National Park Authority - and so reference has to be made to both local authorities' strategic policies.

41. The Neighbourhood Development Plan has been prepared to ensure that it is in general conformity with the two development plans that cover the area, namely the Plymouth and South West Devon Joint Local Plan 2014-2034 (JLP) which was adopted in 2019 and the emerging Dartmoor Local Plan 2018-2036 (DLP). Table 6 of the Basic Conditions Statement sets out an assessment of how each policy in the NDP is in general conformity with these two plans.

⁹ NPPF paragraph 16

42. A number of the policies are designed to support and amplify the policies in the higher level Local Plans so that they are relevant to the particular needs and priorities of the parishes.

43. From my assessment of the plan's policies in the rest of my report, it is evident that the strategic policies of the adopted Plymouth and South West Devon Joint Local Plan 2014-2034 (JLP) and emerging Dartmoor Local Plan have generally been carried through to the NDP. Therefore, subject to the recommended changes set out in Section 8 below, I conclude that the NDP is in general conformity with the strategic policies of the development plan and therefore this basic condition is met.

Basic Conditions – conclusions

44. I have considered the Basic Conditions Statement, the supporting evidence and representations made to the Bridestowe and Sourton NDP and I am satisfied that the Plan as submitted follows the general principles set out in national planning policy and contributes to the achievement of sustainable development. It sets out a positive vision for the parishes and policies to protect their distinctive character while accommodating development needs.

45. At a practical level, however, a few of the policies in the Submission NDP need some minor adjustment to ensure that they comply with the NPPF and the strategic guidance in the two adopted Local Plans. I have therefore suggested a number of modifications in Section 8 below, to help ensure that the plan accords with national and strategic guidance and therefore meets the basic conditions.

European obligations and Human Rights Requirements

Strategic Environmental Assessment (SEA)

46. The SEA Directive aims to provide a high level of protection to the environment by ensuring that environmental considerations are included in the process of preparing plans and programmes. A neighbourhood plan must be compatible with European Union obligations as incorporated into UK law, in order to be legally compliant. Key directives relate to the Strategic Environmental Assessment Directive and the Habitats and Wild Birds Directives. Regulation 15 of the Neighbourhood Planning Regulations as amended in 2015 requires either that a Strategic Environmental Assessment is submitted with a Neighbourhood Plan proposal or a determination is made by the responsible authority that the plan is not likely to have "significant effects."

47. The Bridestowe and Sourton Neighbourhood Plan has been screened in by West Devon Borough Council as requiring a SEA. Screening was undertaken voluntarily by the Steering Group in

conjunction with the three statutory bodies for SEA (the Environment Agency, Historic England and Natural England) and Dartmoor National Park Authority.

48. A SEA Scoping Report was then prepared and released for consultation with the three statutory bodies for SEA for a period of 5 weeks. Following the scoping stage of the SEA process, reasonable alternatives were developed and appraised and assessments of drafts of the NDP were undertaken.

49. The final Environmental Report was produced by AECOM in June 2020. This concludes that the Bridestowe and Sourton Neighbourhood Plan is likely to lead to significant long-term positive effects in relation to the 'Population and Community' and 'Health and Wellbeing' SEA themes. These benefits largely relate to the Neighbourhood Development Plan's focus on providing new housing to meet local needs in accessible locations, the protection and provision of new community infrastructure in Bridestowe, the protection and enhancement of open space and sports and recreational facilities in the area, and the protection and enhancement of the quality of the public realm and neighbourhood distinctiveness. Any potential negative effects resulting from the Neighbourhood Development Plan in relation to flood risk, landscape character, biodiversity and the historic environment are site based and likely to be appropriately avoided and mitigated, since the NDP has strong policies for protecting and conserving the natural and historic environment

50. A Habitat Regulations Assessment (HRA) screening was also carried out as part of the NDP area falls within the Dartmoor Special Area of Conservation (SAC).

51. A Habitat Regulations Assessment was carried out to support the Neighbourhood Development Plan in February 2020. This concluded that due to the limited amount of development proposed, and its separation from a European Site, it is considered that the Bridestowe and Sourton Neighbourhood Plan will not have a significant effect on a European site and that therefore further assessment under the Habitats Regulations is not required.

52. As the Habitat Regulations Assessments and Environmental Reports prepared to support the NDP have all been prepared in light of the updated basic condition referred to in para 11 above, this leads me to conclude that the necessary legislative requirements have been met and that the basic condition is complied with.

Human rights requirements

53. Paragraph 8.1 of the Basic Conditions Statement provides a brief statement which confirms the NDP Working Group's view that the NDP is compatible with the requirements of EU obligations in

relation to human rights, in that considerable emphasis has been placed throughout the consultation process to ensure that no sections of the community have been isolated or excluded. I could also see from the Consultation Statement that consultation activities carried out for the NDP have been wide ranging and the NDP Working Group sought to engage with all members of the community and relevant stakeholders.

54. I am satisfied, therefore, that the NDP is compatible with the requirements of EU obligations in relation to human rights and no evidence has been submitted to me to suggest otherwise. I am satisfied, then, that the Plan does not breach the European Convention on Human Rights obligations and therefore meets the Basic Conditions.

Other Directives

55. I am not aware of any other European Directives that would apply to this NDP, and in the absence of any evidence to the contrary, I am satisfied that the plan is compatible with EU obligations.

8. Neighbourhood Plan policies

56. This section of my report considers the NDP policies against the basic conditions.

57. The Plan is clearly written and is well presented and illustrated, with a clear structure distinguished by separate sections. The plan policies are grouped by topic area and for each policy there is a short introduction, followed by relevant supporting text and then the policy which is set out in a separate text box. The plan is supported by a comprehensive evidence base which is presented as appendices to the document.

58. All of the policies relate to the development and use of land and none cover excluded development, such as minerals and waste, so the statutory requirements and guidance set out in Planning Practice Guidance¹⁰ are met.

59. As part of this examination, my report includes a series of recommended modifications to ensure that the policies are expressed concisely and precisely in order to comply with the basic conditions. Where I have suggested modifications, these are identified in **bold text**. The recommended modifications relate mainly to issues of clarity and precision and are designed to ensure that the plan fully accords with national and strategic policies. I have considered the policies in the order they

¹⁰ Planning Practice Guidance PPG para 004

appear in the Plan, by section and comment on all of the policies, whether I have suggested modifications or not. Where I consider that the supporting paragraphs need amendment to help explain and justify the plan policy, I have made comments to that effect.

Chapter 1 : Introduction and Background

60. This chapter introduces the Neighbourhood Development Plan, explains why a NDP is being prepared and presents comprehensive profiles of both parishes.

61. Reference is made in paragraph 1.1.15 to the plan needing to be in conformity with the existing Local Development Framework Core Strategy and having regard to the emerging Joint Local Plan (JLP) being prepared by Plymouth City Council, West Devon Borough Council and South Hams District Council. This statement is out of date as the JLP has now been adopted. A fuller reference is also required to the plans prepared by the Dartmoor National Park Authority.

- **Recommendation : Reword first sentence of paragraph 1.1.5 to read “The Plan covers the period from 2016 to 2034 and we are required to ensure that it is in general conformity with the adopted Joint Local Plan prepared by Plymouth City Council, West Devon Borough Council and South Hams District Council.” Amend final sentence of para 1.1.5 to read “Also the plan must not conflict with the adopted Dartmoor National Park Authority’s Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Development Plan Document. It also needs to comply with the policies in the emerging Dartmoor Local Plan.”**

62. Similar updating is required to para 1.5.17 and para 1.5.21, to make reference to the emerging Dartmoor Local Plan.

- **Recommendation : In a para 1.5.17, delete “and the” before “Dartmoor National Park” and add “and the emerging Dartmoor Local Plan” at the end of the paragraph. Delete first sentence of para 1.5.21 and replace with “ In the emerging Dartmoor Local Plan 2018-2036, Sourton is in the category of Villages and Hamlets, which are the National Park’s smallest, most sensitive and isolated settlements, but which still have small- scale housing and business needs which need to be supported. These settlements have no settlement boundaries and more limited development opportunities.”**

63. In para 1.5.22 the reference to the emerging Local Plan should be updated as the JLP is now adopted.

- **Recommendation : In para 1.5.22, delete “existing LA Plan and the emerging one” and replace with “adopted Joint Local Plan”**

Chapter 2: Planning Policy Context

64. This chapter outlines the national and local planning policy context under which the NDP has been prepared and a summary of the NDP preparation process.

65. The quote from the NPPF given in paragraphs 2.3.1, 2.3.2 and 2.2.1 on pages 14/15 is to the 2012 version of the NPPF so is now out of date. The updated text in paras 28-30 of the 2019 version of the NPPF therefore needs to be substituted. I also suggest that the NPPF quote is presented as one paragraph, rather than as separate numbered paragraphs.

- **Replace paragraphs 2.3.1, 2.3.2 and 2.2.1 on pages 14/15 with paras 28-30 of the 2019 version of the NPPF and present as a single paragraph.**

66. Paragraph numbers seem to be missing from the text below para 2.3.1. The bullet points under para 2.1.2 should also refer to the other relevant plans of the Dartmoor National Park Authority.

- **Recommendation : Add paragraph numbers to text below paragraph 2.3.1 on page 15 and renumber subsequent paragraphs accordingly. Amend the end of the first bullet point under para 2.1.2 after “together” to read “with the Dartmoor National Park Authority’s adopted Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Plan as well as the emerging Dartmoor Local Plan 2018-2036”**

Chapter 3 : Issues and Proposals raised by People in the Local Community

67. This chapter provides a summary of the issues that were raised by the community in the early stages of preparing the plan and the background evidence that was commissioned as a result. It also introduces the five main themes of the plan – housing; employment; transport and traffic; young people, sport and recreation and the environment and amenities.

68. In the housing section which starts at the top of page 19, some of the references to planning policy documents need to be updated. A paragraph number also needs to be added to the opening paragraph.

- **Recommendation : Add a paragraph number to the opening paragraph to section 3.2 Housing at the top of page 19. In this paragraph, delete “Joint Strategic core-planning**

document (prepared jointly with Plymouth City Council and South Hams District Council) and replace with “ Joint Plymouth and South West Devon Local Plan”. In the third last line change “NPPF 1018 version (para 60)” to “para 60 of the NPPF (2019)”

69. The second sentence of para 3.2.3 is rather misleading and I suggest it is replaced with a factual statement about the status of Sourton in the emerging Dartmoor Local Plan .

- **Recommendation : Delete second sentence of para 3.2.3 and replace with “ Sourton is identified as one on the National Park’s villages and hamlets, which are the Park’s smallest, most sensitive and isolated settlements, but which still have small-scale housing and business needs which need to be supported. These settlements have no settlement boundaries and more limited development opportunities.”**

70. There are various references in the rest of the section to the now superseded Core Strategy and these need to be updated with the relevant reference from the adopted Joint Local Plan.

- **Recommendation : Update references to the Joint Core Strategy in paragraphs 3.2.11, 3.3.6 and 3.4.4 to the relevant reference in the adopted Joint Local Plan (2019)**

Chapter 4 : Vision and Objectives

71. This chapter draws on the issues set out in Chapter 3 and sets out the overall vision for the NDP and detailed aims and objectives for each topic area. This is a very comprehensive and easy to understand approach and the NDP Planning Group are to be congratulated for the thoroughness with which they have approached this part of the plan making process.

Chapter 5 : Our Policies and General Development Principles

72. This chapter sets out the NDP policies, grouped by topic area.

Section 1 Settlement boundaries and Housing allocation

73. In the adopted Joint Local Plan, the settlement of Bridestowe is categorised as a sustainable village where development of around 30 dwellings that meets the identified local needs of local communities over the plan period is supported. Sourton is not designated as a sustainable village in the JLP, so the general policies applying to development in the open countryside apply. In the adopted Dartmoor National Park Core Strategy, it is identified as a rural settlement and in the emerging Dartmoor National Park Local Plan it falls into the category of Villages and Hamlets, which

are the National Park's smallest, most sensitive and isolated settlements, but which still have small-scale housing and business needs which need to be supported. These settlements have no settlement boundaries and more limited development opportunities.

74. In para 5.1.10 the reference to the adopted Core Strategy, in the housing policies section is out of date and need to be replaced by a reference to the adopted Joint Local Plan.

- **Recommendation : In para 5.1.10, replace “West Devon Borough Council’s Core Strategy and emerging Local Plan” with “the adopted Joint Local Plan for Plymouth and South West Devon”**

Policy H1 Sustainable Housing Development

75. This is a high level policy which deals with sustainable housing development, but requires some fine tuning to ensure that it is a standalone land use planning policy.

- **Recommendation : Delete “that meets the strategic objective” and “Appendix IV” from Policy H1**

76. In response to my query, the Parish Council has confirmed that paragraphs 5.2.3 to 5.2.5 should be renumbered. The first sentence of para 5.2.5 relates to sites, rather than the settlement boundary, so can be deleted.

- **Recommendation : Renumber paras 5.2.3 to 5.2.5 as paras 5.1.3, 5.1.4 and 5.1.5 respectively. Delete first sentence of para 5.2.5**

77. Sourton is unusual in that part of the village lies within the West Devon Borough Council area and part lies within the Dartmoor National Park, meaning that different strategic policies apply to different parts of the village. The planning policies of both authorities state that the village is not a suitable location for unrestricted development. Nonetheless, it has seen pressures for further growth and there is a consented scheme for 8 dwellings in the centre of the village which is now under construction. The NDP Working Group's response to this has been to draw up a settlement boundary to restrict any further expansion. This has been subject to public consultation and is supported by the community and local planning authorities so in these particular circumstances it is appropriate to designate a settlement boundary in the NDP.

78. Figures 5.1 and 5.2 show the settlement boundaries for Bridestowe and Sourton. To ensure that the status of the Sourton boundary is clear, I suggest that the wording “Draft Sourton Settlement

Boundary” is removed from the body of Figure 5.2. and the word “new” is removed from the title of Fig 5.1. Both figures need keys added.

- **Recommendation : Delete “new” from title of Figure 5.1. Remove “Draft Sourton Settlement Boundary “ from the body of Figure 5.2. Add keys to Figures 5.1 and 5.2**

Policy H2 :Development Boundary for Sustainable housing development

79. This policy deals with the two settlement boundaries in the NDP and requires tightening up to ensure that there is clarity for future users of the plan.

- **Recommendation : Change title of policy H2 to “Settlement boundaries for Bridestowe and Sourton”. In first sentence of Policy H2 change “the proposals maps on following page” to “Fig 5.1 and Fig 5.2”. In the third sentence of Policy H2, add “relevant policies of the adopted Local Plan” after “National Planning Policy Framework”**

80. On my site visit, I noted that at the northern edge of Bridestowe the Village Hall and Site 4 are included within the settlement boundary, but the cemetery was not. It comprises a large car parking and well-maintained lawn and its boundaries are well defined by metal railings, hedging and fencing. It also has a number of of seats for public use. In response to my query, the Parish Council confirmed that it lies within the more urban fabric of Bridestowe and would be better included within the settlement boundary.

- **Recommendation : Amend Settlement Boundary for Bridestowe (Figure 5.1) to include the cemetery**

Policy H3 Allocated sites

81. The background to the housing issues facing the Neighbourhood Development Plan is set out in Section 3.2 and it is clear that there has been considerable discussion about how many and which sites to allocate to meet the requirement for 30 additional dwellings to be provided over the period 2014 - 2034. This leads to the conclusion, in para 5.7, that two sites should be allocated, in addition to the two housing sites which already have planning consent.

82. To assist future users of the plan and to ensure clarity, there needs to be a much clearer explanation of the housing numbers involved and how these fit with the strategic guidance in the adopted JLP. I therefore suggest a further paragraph is added after 5.1.6 to summarise this.

- **Recommendation : Add new paragraph under the heading “Housing Allocation in Bridestowe” , after para 5.1.6, to read “ The JLP sets a housing requirement for Bridestowe of 30 additional dwellings to be provided over the period 2014-2034. This level of growth can be accommodated by a combination of development coming forward on existing sites which already have planning permission and allocating new housing sites. Site 1 and Site 3, shown in Figure 5.3, already have planning consent and can accommodate 24 and 4 dwellings respectively. Sites 4 and 5 are allocated in the NDP for further housing development and can accommodate up to 35 and 20 dwellings respectively, although Site 5 is identified as being suitable for sheltered housing for the elderly, rather than mainstream housing, given its location adjacent to the existing Springfield Residential Home. In total, therefore, the NDP provides land for up to 83 new dwellings which is a more than an adequate supply of land to meet Bridestowe’s needs up to 2034.” Renumber subsequent paragraphs accordingly**

83. Policy 3 allocates the two new housing sites. To ensure it is expressed in land use policy terms, it requires some fine tuning, in particular to state the number of dwellings each site can accommodate, that Site 5 is intended for sheltered housing and to remove the grid references which are superfluous.

- **Recommendation : In policy H3 first line, change “on Proposals Map” to “ Figures 5.3 and 5.4.” Delete heading “Location” and grid references below and substitute “Number of dwellings” in the title and up to 35 dwellings for Site 4 and 20 dwellings for site 5. Add “sheltered” between “Proposed” and “ housing” in fifth line of policy and remove brackets. Delete “LA” in final sentence of Policy H3**

84. Paragraph 5.1.10 refers to three sites being allocated, when actually only two are allocated so this needs to be corrected.

- **Recommendation : Delete “three” in third line of para 5.1.10 and substitute “ two”**

Policy H3a

85. This policy allocates the site adjacent to the cemetery for housing development. The Environment Agency has expressed concerns that the lower part of the site includes an area of land in Flood Zone 3 (high probability of flooding). To meet the requirements of the sequential test and thereby comply with national and strategic guidance, this area should be excluded from the

allocation. In view of the flood risk issues affecting the lower part of the site, a site specific flood risk assessment will be required, as advised by the Environment Agency. This needs be stated in the policy and suitable supporting explanatory text added.

86. The Parish Council, in response to my query, has also acknowledged that as the site is sloping, substantial landscaping will be required. Accordingly, they have provided an alternative reduced boundary for the allocated site, which could accommodate up to 35 dwellings. This revised site boundary should be used in the NDP.

- **Recommendation : Substitute revised site boundary, as provided by the Parish Council, for site 4 in Figure 5.3**

87. Policy 3a provides site specific guidance for the development site and, as such will assist future users of the plan. The mini brief would benefit from reference being made to the need for substantial landscaping. Some minor rewording of the introduction to the policy is also required.

- **Recommendation : Change “Land Adjacent to the Cemetery” to red font in the title of policy H3a. Change “ would” to “should” in first sentence of policy. Add a new bullet point to the first set of bullet points in Policy H3a to read “A site specific Flood Risk Assessment to identify the true extent of the area of flood risk, to ensure that all development including new buildings and land raising will avoid encroachment into the flood plain at the southern edge of the site”. In para 5.1.8 , change “some 44” to “up to 35” . Add new paragraph 5.1.9 to read “The lower part of the site lies adjacent to the flood plain of the River Lew and before any development commences, it is important that a full site specific flood risk assessment is undertaken to establish the true extent of the flood plain and thereby ensure that all development avoids encroaching into the flood plain. Consideration could also be given to creating a green floodplain corridor along the River Lew to minimise flood risk and to bring amenity, health, recreation and biodiversity benefits to the community”. Renumber subsequent policies accordingly. Add a new bullet point to the end of Policy 3a to read “Include substantial landscaping to screen the site”**

Policy H3b

88. Policy H3b allocates the site at Springfield Residential Home for housing development. Similar fine tuning to that suggested for Policy 3a, above, is required.

- **Recommendation : Change “Land at Springfield Residential Home” to red font in the title of policy H3a. Change “would” to “should” in first sentence of policy H3b**

89. Figures 5.3 and 5.4 are small scale plans which show the rejected, approved and allocated housing sites, as well as the settlement boundaries for both settlements and provide useful context for the NDP. However, there is no composite Proposals Map to accompany the NDP. To ensure clarity for future users of the plan and meet the requirements of strategic guidance and the NPPF, two Proposals Maps should be added to the document - one for each settlement. These should show the committed/approved housing sites and the allocated housing sites (as amended in para 80 above) with consistent annotation for each category; the settlement boundary; the areas designated as Local Green Space under Policy EH3 and the all-weather pitch allocation identified in Policy CW3.

- **Recommendation : Add two new Proposals Maps to the NDP to show the committed/approved housing sites and the allocated housing sites (as amended in para 89 above) with consistent annotation for each category; the settlement boundary; the areas designated as Local Green Space under Policy EH3 and the all-weather pitch allocation identified in Policy CW3.**

Policy H4 : Rural Exception Sites for Local Allocation

90. This policy deals with rural exception sites, but the title of the policy is confusing as, by their very nature, rural exceptions sites are not allocated. The title of the policy therefore needs to be amended.

- **Recommendation : Change the title of policy H4 to “Rural Exception Sites”**

91. To ensure clarity, clause H4b should refer specifically to affordable housing.

- **Recommendation : Add “housing” after “affordable” in H4b**

Policy H5 : Design and Quality of New Development

92. This policy deals with the design and quality of new development. My only comment is that paragraph numbers seem to be missing from the separate paragraphs within para 5.1.17.

- **Recommendation : Add paragraph numbers to the separate paragraphs within para 5.1.17. Renumber subsequent paragraphs accordingly**

Policy H6 : Conversion of Buildings in the Countryside

93. This policy provides guidance for the conversion of buildings in the countryside, outside the National Park. However, it is unclear what guidance applies within the National Park – a simple reference to the relevant policies in the adopted and emerging Dartmoor Local Plan would address this. The asterisk referring to “excluding permitted development rights” is superfluous and should be deleted.

- **Recommendation : Delete the asterisk in the first line of Policy H6 and the supporting footnote to the policy. Add a new sentence at the end of policy H6 to read “Within the National Park the relevant planning policies in the adopted Dartmoor National Park Authority’s Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Development Plan Document and the policies in the emerging Dartmoor Local Plan will apply.”**

Policy H7: Transport and Accessibility

94. My only comment on this policy is that the last clause, relating to consistency with the Development Plan is superfluous and should be deleted.

- **Recommendation : Delete clause H7d “be consistent with the Development Plan”**

Policy H8: Flood Risk

95. This policy deals with flood risk and requires some minor rewording to improve clarity.

- **Recommendation : Replace “are” with “should be” in first line of policy H8**

Section 2 Environment and Heritage

Policy EH1 General Landscape

96. This policy seeks to protect the landscape character of the area; however, the reference to “within the areas of Bridestowe and Sourton” is limiting as the policy should apply across the whole NDP area. The National Park Authority has also commented that the reference should be to the landscape character of the area, rather than landscape quality in order to align with the landscape Character Assessment work carried out by the relevant local authorities.

- **Recommendation : In Policy EH1 delete “within the areas of Bridestowe and Sourton” and substitute “landscape character” for “landscape quality”**

Policy EH2: Farm Diversification

97. As in Policy H6, it needs to be made clear what policies apply in the National Park.

- **Recommendation : Add a new sentence at the end of policy EH1 to read “Within the National Park the relevant planning policies in the adopted Dartmoor National Park Authority’s Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Development Plan Document and the policies in the emerging Dartmoor Local Plan will apply.”**

Policy EH3: Local Green Space Designations

98. This policy identifies four sites in Bridestowe for designation as Local Green Spaces and their characteristics and green space value are assessed in Table 1. They are mapped in Appendix XII.

99. I could see from my site visit that all four sites were well defined and well used by the community and therefore appropriate to designate as Local Green Spaces. However, they are statutory designations and should be mapped both separately in the main document of the NDP and on the NDP Proposals Map, as referred to in para 89 above.

- **Recommendation: Add plans of each of the designated LGS sites to the NDP document and plot each on the composite NDP Proposals Map for Bridestowe**

100. On a point of detail, the word “proposed “ in the first line of the policy is superfluous as the NDP is the planning document which designates the sites as LGS.

- **Recommendation : Delete “proposed” from the first line of Policy EH3 and add “as” after “designated”**

Policy EH4 : Wildlife Protection

101. The reference to the LA Development Plan in this policy is imprecise and requires fine tuning, as the Dartmoor National Park Authority is not a local authority, yet its policies are a material consideration. The reference to a biodiversity enhancement plan is similarly imprecise and it is

suggested that it is replaced with the wording along the lines of Policy H6(d) regarding seeking to achieve net gains in biodiversity.

- **Recommendation: Delete “the LA Development Plan” in second line of Policy EH4 and replace with “the planning policies of the local planning authority”. Delete second sentence of Policy EH4 and replace with “Developments should retain any nature conservation interest associated with the site or building and provide net gains in biodiversity where possible.”**

Policy EH5 : Trees and Hedgerows

102. The Dartmoor National Park Authority has suggested some fine tuning of this policy so that it refers to all development, not only housing and business development, and that biodiversity is added to the list of criteria.

- **Recommendation : In policy EH5 delete “new housing and business” and substitute “all new” and add “biodiversity,” after “amenity”**

Policy EH6 : Heritage Assets

103. This policy deals with heritage assets. Paragraph 5.2.9 mentions the concrete base of the former army camp used by American soldiers being identified as a potential brownfield site for new business development. In response to my query, the NDP Group has confirmed that there has been no pre-application or planning application submitted for this site. In view of this situation, the sentence in para 5.2.9 is rather misleading so I suggest it is deleted .

- **Recommendation : Delete first sentence of para 5.2.9**

104. On a point of detail, the reference to the Appendix at the end of the policy should be to Appendix IX not Appendix X. Also, in Appendix IX, under the heading Non Designated Heritage Assets, “Local Planning authorities” should be replaced by “plan-making authorities”.

- **Recommendation : Renumber Appendix IX as Appendix X at end of Policy EH6. In Appendix IX, under the heading Non Designated Heritage Assets, replace “Local Planning authorities” by “plan-making authorities”.**

Section 3 : Employment and the Local Economy

Policy E1 : General Business Development Guidelines

105. This policy deals with general business development. In the heading to the policy, the word “guidelines” is superfluous and should be deleted. The fifth bullet point requires some fine tuning to improve clarity.

- **Recommendation : In Policy E1, delete “Guidelines” from the policy title. Delete “the use of” at the start of the fifth bullet point and add “are used, wherever practicable” after “renewable energy”**

Policy E2: Small scale expansions

106. The title of this policy is rather unclear and I suggest it is reworded.

- **Recommendation : Reword title of Policy E2 to read “Small Scale Business Expansion”**

Policy E3 : Protection of employment sites

107. As with other policies, it should be made clear which policies apply within the National Park.

- **Recommendation : Add a new sentence at the end of policy E3 to read “Within the National Park the relevant planning policies in the adopted Dartmoor National Park Authority’s Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Development Plan Document and the policies in the emerging Dartmoor Local Plan will apply.”**

Policy E4 : Communications infrastructure

108. As with other policies, it should be made clear which policies apply within the National Park.

- **Recommendation : Add a new sentence at the end of policy E4 to read “Within the National Park the relevant planning policies in the adopted Dartmoor National Park Authority’s Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Development Plan Document and the policies in the emerging Dartmoor Local Plan will apply.”**

Policy E5 : Tourism development

109. This policy deals with tourism related development. The supporting text in Para 5.3.11 states that “In this Plan redundant farm buildings have already been proposed as potential residential units....” which suggests the plan contains site specific proposals. As this is not the case, a more generic reference to the plan area would be more appropriate.

- **Recommendation : In the ninth line of para 5.3.11 amend “In this Plan” to read “In the neighbourhood plan area”**

110. As with other policies, it should be made clear which policies apply within the National Park.

- **Recommendation : Add a new sentence at the end of policy E5 to read “Within the National Park the relevant planning policies in the adopted Dartmoor National Park Authority’s Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Development Plan Document and the policies in the emerging Dartmoor Local Plan will apply.”**

Section 4 : Delivering Low Carbon Development

Policy LC1 : Microgeneration energy development

111. The format of this policy should be amended so that it is consistent with other policies in the NDP in the way that it provides guidance to development proposals outside and within the National Park.

- **Reword first line on Policy LC1 to read “Outside the National Park, proposals for microgeneration renewable energy infrastructure will be supported that is compatible with....”**
- **Add a new sentence at the end of policy LC1 to read “Within the National Park the relevant planning policies in the adopted Dartmoor National Park Authority’s Local Plan, the 2008 Core Strategy and 2013 Development Management and Delivery Development Plan Document and the policies in the emerging Dartmoor Local Plan will apply.”**

Section 5 : Community wellbeing

Policy CW1 : Community assets and facilities

112. This policy lists a number of community assets and facilities. In response to my query, the Parish Council has confirmed that the small green space at Town Meadow which has limited play equipment is not included in the list of LGS sites. The presentation of the list of sites under the heading Sport and Leisure should be amended to improve clarity. I suggest the asterisk is positioned after the name of the last three sites and the words “Designated Local Green Spaces” is put in lower case lettering as a footnote.

- **Recommendation : In Policy CW1, under the CW1 Sport and Leisure heading, position the asterisk after the name of the last three sites and put the words “Designated Local Green Spaces” in lower case lettering as a footnote.**

Policy CW2 : Sporting/recreational facilities

113. I have no comments on this policy

Policy CW3 : Future sporting facility at Bridestowe Village Hall

114. Some minor rewording of this policy is required to improve clarity. The site also should be added to the Proposals Map for Bridestowe, as referred to in para 89 above.

- **Recommendation : Reword Policy CW3 to read “Proposals to provide an all-weather pitch adjacent to the village hall, as shown in Figure 5, will be supported providing they do not have an adverse impact on the character and appearance of the area.” Add the proposed all weather pitch site to the Proposals Map for Bridestowe and denote by orange shading and reference as Policy CW3**

Section 6 : Implementation and Monitoring

115. This section outlines how the plan will be implemented and refers to a comprehensive set of Community Aspirations which have evolved as a result of the NDP preparation process. This is most welcome and the Steering Group are to be congratulated for this work which should stand the community in good stead for the years to come and also set the priorities for any allocation of Community Infrastructure Levy funding.

9. Conclusions and Recommendations

116. I have examined the Bridestowe and Sourton NDP and I have concluded that, subject to the modifications set out in my report, it meets the basic conditions and other statutory requirements.

117. I am therefore pleased to recommend to West Devon Borough Council and The Dartmoor National Park Authority that, subject to the modifications set out in my report, the Bridestowe and Sourton should proceed to referendum.

118. I am also required to consider whether the referendum area should be extended beyond the Bridestowe and Sourton Parishes area. I see no reason why it would be necessary to alter or extend the plan area for the purposes of holding a referendum, nor have I received any representations to that effect. I therefore conclude that the plan should proceed to referendum based on the neighbourhood area approved by West Devon Borough Council and the Dartmoor National Park Authority in December 2014.

APPENDIX 1: Background Documents

In undertaking this examination, I have considered the following documents:

- Bridestowe and Sourton Neighbourhood Development Plan 2016-2034 (Regulation 16 version) : June 2020
- Bridestowe and Sourton Neighbourhood Development Plan Consultation Statement: June 2020
- Bridestowe and Sourton Neighbourhood Development Plan Basic Conditions Statement and Strategic Environmental Assessment Report : June 2020
- Plymouth and South West Devon Joint Local Plan 2014-2034 (JLP) : March 2019
- Dartmoor National Park Authority Local Development Framework Core Strategy Development Plan Document 2006 - 2026 : June 2008
- Dartmoor National Park Authority Development Management and Delivery Plan Document : July 2013
- Dartmoor Local Plan 2018-2036 Final Draft (Regulation 19 consultation) : September 2019
- National Planning Policy Framework (NPPF): February 2019
- Planning Practice Guidance March 2014 and subsequent updates

APPENDIX 2:

Bridestowe and Sourton Neighbourhood Development Plan Examination

Request for further information and questions from the Examiner to West Devon Borough Council, Dartmoor National Park Authority and Bridestowe and Sourton Parish Council

I have carried out a preliminary review of the Neighbourhood Development Plan and the evidence submitted in support of it and there are a few points where I need some clarification or further information. I would therefore be grateful if both Councils could assist me, as appropriate, in answering the following questions.

Basic Conditions Statement

On page 19 of the Basic Conditions Statement there seems to be an additional sentence at the end of paragraph 8.8 which states:

8.2 It was determined by West Devon Borough Council that a Strategic Environmental Assessment was required. See attached report.

This seems at odds with the rest of the text. Please can the Councils confirm whether this sentence is necessary and if any amendments are required?

Housing Provision

Paragraph 1.5.22 of the DNDP refers to two housing sites having been given planning consent in Bridestowe which contribute to the overall housing provision for the plan area of 30 dwellings. Please can the Councils confirm how many dwellings were granted planning consent and have been built? Similarly, have the 9 dwellings granted in Sourton and mentioned in para 1.5.20 also been built?

Policy H3 allocates two sites for residential development – site 4 and site 5. Please can the Councils confirm how many houses each site could accommodate?

On pages 36/37 there are three paragraphs 5.2.3, 5.2.4 and 5.2.5 which seem out of sequence with the rest of the chapter, so may be in the wrong location. I would be grateful for the Councils' comments.

Bridestowe Settlement Boundary

I note that at the northern end of Bridestowe, the Village Hall and housing site 4 are included within the settlement boundary, but the cemetery is excluded. Was there a particular reason for this decision?

Thank you for your assistance with these questions. Once I have received your responses, I may need to ask for further clarification or further queries may arise as the examination progresses.

Please note that these questions and requests for information is a public document and the answers and any associated documents will also be in the public domain. Both my questions and the responses should be placed on the Councils' websites as appropriate.

Barbara Maksymiw

3 September 2020

I have further queries related to the response to the questions I set on 3 September which were sent to me by West Devon Council on 16 September. I would therefore be grateful if both Councils could assist me, as appropriate, in answering the following questions.

Site 4 Land Adjacent to Cemetery

I have been provided with a number of different capacities for the site – 35, 44 and 53 dwellings 53. I note from the site assessment work attached as Appendix V to the plan that it was suggested that the site might be developed in two phases - initially 24 houses, then 20 homes in phase 2, giving a total of 44 homes.

The Environment Agency has raised concerns about the development potential of the site, given the lower part of it lies within Flood Zone 3. I would therefore be grateful if you could provide a plan of the site, showing the extent of the area which is in Flood Zone 3. In light of this potentially reduced site area, please can you also provide a revised figure for the capacity of the site.

Local Green Spaces

Four sites are identified in the plan as Local Green Spaces in Policy EH3. These are mapped in an unnumbered appendix at the end of the sequence of appendices which accompany the plan. As these are statutory designations, their location needs to be presented more clearly. Please could I therefore be provided with copies of the Settlement Boundary Plans for Bridestowe and Sourton (Fig 5.1 and Fig 5.2) with the proposed Local Green Space designations marked in?

Heritage

Para 5.2.9 in the Heritage Section refers to “The concrete base of the army camp used by American soldiers during WWII has been identified as a potential brownfield site for premises for new development”. Could you clarify whether this is just a factual statement or whether it is intended that the site is allocated for this purpose in the NDP? If so, please provide a site location plan.

Community Assets and facilities

There seems to be some overlap between the sites listed under the Sport and Leisure heading and the list of designated Local Green Spaces identified under Policy H3, with the exception of the site listed as “Town Meadow’s small green space with limited play equipment”. Please can you confirm whether this is separate from the list of LGS sites and provide a site plan showing its location?

Thank you for your assistance with these questions. Once I have received your responses, I may need to ask for further clarification or further queries may arise as the examination progresses.

Please note that these questions and requests for information is a public document and the answers and any associated documents will also be in the public domain. Both my questions and the responses should be placed on the Councils’ websites as appropriate.

Barbara Maksymiw

21 September 2020