



Agenda for Cabinet Wednesday, 2nd April, 2025, 6.00 pm

Members of Cabinet

Councillors: M Rixson, G Jung, D Ledger, S Jackson, J Loudoun, N Hookway, P Arnott (Chair), P Hayward (Vice-Chair), S Hawkins and T Olive

Venue: Council Chamber, Blackdown House, Honiton

Contact: Amanda Coombes, Democratic Services Officer;
01395 517543 email acoombes@eastdevon.gov.uk
(or group number 01395 517546)
Tuesday, 25 March 2025

East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

DX 48808 HONITON

Tel: 01404 515616

www.eastdevon.gov.uk

This meeting is being recorded for subsequent publication on the Council's website and will be streamed live to the [East Devon District Council Youtube Channel](#)

- 1 Minutes of the previous meeting (Pages 3 - 11)
- 2 Apologies
- 3 Declarations of interest
Guidance is available online to Councillors and co-opted members on making [declarations of interest](#)
- 4 Public speaking
Information on [public speaking is available online](#)
- 5 Matters of urgency
Information on [matters of urgency](#) is available online
- 6 Confidential/exempt item(s)
To agree any items to be dealt with after the public (including the Press) have been excluded. There are three items which officers recommend should be dealt with in this way.
- 7 Minutes of Strata Joint Scrutiny Committee held on 17 February 2025 (Pages 12 - 15)
- 8 Minutes of Asset Management Forum held on 3 March 2025 (Pages 16 - 19)
- 9 Minutes of Poverty Working Panel held on 24 February 2025 (Pages 20 - 22)
- 10 Minutes of Cranbrook Placemaking Group held on 20 January 2025 (Pages 23 - 29)

Key Matters for Decision

- 11 Proposed National Lottery Heritage Fund Bid (Pages 30 - 39)

Matters for Decision

- 12 **Equality, Diversity and Inclusion (EDI) Action Plan** (Pages 40 - 50)
- 13 **Response to the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan Modification Proposal** (Pages 51 - 78)
- 14 **Local Government (Access to Information) Act 1985 - Exclusion of Press and Public**

The Vice-Chair to move the following:

“that under Section 100(A) (4) of the Local Government Act 1972 the public (including the press) be excluded from the meeting as exempt information, of the description set out on the agenda, is likely to be disclosed and on balance the public interest is in discussing this item in private session (Part B)”.

Part B Key Matters for Decision

- 15 Clyst Meadows Countryside Park - Tender and Appointment of Main Contractor (Pages 79 - 83)
- 16 Seaton Coast Protection Scheme Funding Request and BNG location choice (Pages 84 - 90)
- 17 Homes for Ukraine support update (Pages 91 - 93)

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Members of the public exercising their right to speak during Public Speaking will be recorded.

[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of Cabinet held at Council Chamber, Blackdown House, Honiton on 5 March 2025

Attendance list at end of document

The meeting started at 6.03 pm and ended at 9.26 pm

154 Minutes of the previous meetings

The minutes of the previous meetings of Cabinet held on 5 February and 17 February 2025 were agreed.

155 Declarations of interest

Min 165. River Axe SAC Local Nutrient Mitigation Fund governance.
Councillor Paul Hayward, Affects Non-registerable Interest, Employee of Axminster Town Council.

Min 165. River Axe SAC Local Nutrient Mitigation Fund governance.
Councillor Sarah Jackson, Affects Non-registerable Interest, the nature of which I am not required to disclose under section 32 of the Localism act 2011.

Min 168. Discretionary Planning Fees Review.
Councillor Paul Hayward, Affects Non-registerable Interest, Employee of Axminster Town Council.

Min 168. Discretionary Planning Fees Review.
Councillor Sarah Jackson, Affects Non-registerable Interest, the nature of which I am not required to disclose under section 32 of the Localism act 2011.

Min 173. Minutes of Placemaking in Exmouth Town and Seafront Group held on 10 February 2025.
Councillor Aurora Bailey, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 173. Minutes of Placemaking in Exmouth Town and Seafront Group held on 10 February 2025.
Councillor Brian Bailey, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 173. Minutes of Placemaking in Exmouth Town and Seafront Group held on 10 February 2025.
Councillor Nick Hookway, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 173. Minutes of Placemaking in Exmouth Town and Seafront Group held on 10 February 2025.
Councillor Steve Gazzard, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 174. Investment / Placemaking opportunity in Exmouth.
Councillor Aurora Bailey, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 174. Investment / Placemaking opportunity in Exmouth.
Councillor Brian Bailey, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 174. Investment / Placemaking opportunity in Exmouth.
Councillor Nick Hookway, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 174. Investment / Placemaking opportunity in Exmouth.
Councillor Steve Gazzard, Affects Non-registerable Interest, is an Exmouth Town Councillor.

Min 176. Cranbox Modular Space Delivery in Cranbrook Town Centre.
Councillor Kevin Blakey, Affects Non-registerable Interest, is a Cranbrook Town Councillor (changed from previous declaration of Other Registerable Interest).

Min 176. Cranbox Modular Space Delivery in Cranbrook Town Centre.
Councillor Kim Bloxham, Affects Non-registerable Interest, is a Cranbrook Town Councillor (changed from previous declaration of Other Registerable Interest).

Min 176. Cranbox Modular Space Delivery in Cranbrook Town Centre.
Councillor Sam Hawkins, Affects Non-registerable Interest, is a Cranbrook Town Councillor (changed from previous declaration of Other Registerable Interest).

156 **Public speaking**

Councillor Mike Goodman asked the question to when the public would be given access to the results of the Housing Stock Condition Survey? His next question concerned the provision of leisure facilities and why had adult football and rugby pitches increased by 50%? The Chair stated that his questions would be passed onto the relevant officers for their response.

157 **Matters of urgency**

There were two late items which officers recommended should be dealt with in this way recorded at Minutes 163 and 176.

158 **Confidential/exempt item(s)**

There were four items which officers recommended should be dealt with in this way recorded at Minutes 173 – 176.

159 **Minutes of Strata Joint Executive Committee held on 28 January 2025**

Members noted the Minutes of the Strata Joint Executive Committee held on 28 January 2025.

160 **Minutes of Recycling and Waste Partnership Board held on 29 January 2025**

Members noted the Minutes of the Recycling and Waste Partnership Board held on 29 January 2025.

161 **Minutes of Housing Review Board held on 30 January 2025**

Members noted the Minutes and recommendations of the Housing Review Board held on 30 January 2025.

Minute 36 Housing finance report

that Cabinet approve the draft revenue and capital estimates and the financial modelling element presented is noted, subject to suitable key performance indicators being introduced for the Housing Review Board to be able to monitor major capital repair expenditure.

Minute 37 Electrical compliance audit

that Cabinet approve that the Housing Review Board receive a progress report on the nine actions referred to in the SWAP housing electrical safety report at the July meeting Housing Review Board.

162 **Minutes of Scrutiny Committee held on 30 January 2025**

Members noted the Minutes of the Scrutiny Committee held on 30 January 2025.

163 **Minutes of Overview Committee held on 20 February 2025**

Members noted the Minutes and recommendations of the Overview Committee held on 20 February 2025.

Minute 21 Revisions to Street Naming and Numbering Policy

To approve the proposed revisions to the Council's Street Naming and Numbering Policy.

Minute 22 Wildlife Improvement Policy

To adopt the Wildlife Improvement Policy as an official EDDC policy.

Minute 23 Coach Tourism in East Devon

That EDDC fund 50% of the costs of signage required for East Devon towns to satisfy the criteria for Confederation of Passenger Transport (CPT) Coach Friendly accreditation as identified through the formal CPT audit process, up to £1,500 per town and an overall maximum for the district of £12,000, subject to individual towns and parish councils meeting the remaining 50% of the costs.

The Chair expressed his thanks to Cllr Haggerty for working closely with officers to get the council to this stage.

164 **UK Shared Prosperity Fund Plan 2025-26**

The report updated Members that an additional year of the UK Shared Prosperity Fund (UKSPF) had been announced by the government, with management of the fund in Devon transferring from district and unitary councils to the new Combined County Authority (CCA). EDDC had been allocated £465,588 from the CCA to continue funding

UKSPF projects linked to communities, business and skills. An indicative Project Plan for 2025/26 was endorsed by the UKSPF Panel and submitted to the CCA.

Members thanked Tom Winters and his team for their successful efforts in securing this funding.

RESOLVED that Cabinet:

1. Approves and adopts the 2025/26 UKSPF Programme Plan, including the indicative budgets and target outputs and outcomes as shown in Appendix 1 of the report, and grants delegated authority to the Director of Place in consultation with the Portfolio Holder Economy and Assets to agree any necessary changes to the Programme.
2. Approves the updated terms of reference for the UKSPF Programme Management Panel as shown in Appendix 2 of the report and delegates authority to the Director of Place in agreement with the Panel to:
 - a. Authorise and approve the grant awards for all competitive grant schemes funded through the UKSPF and any top-up funds in accordance with the provisions of the Programme.
 - b. Approve any adjustments to or the cancellation of any projects programmes and activities identified in the 2025/26 UKSPF Programme Plan including grant schemes and discretionary grant payments, and any internal UKSPF budget transfers above £10,000.
 - c. Approve any new projects, programmes and activities, including new grant schemes and discretionary grant payments, funded through the UKSPF and any top-up funds.
 - d. Approve any changes necessary to the terms of reference during the life of the Programme which may be necessary.
3. Delegates authority to the Director of Place in consultation with Director of Finance and Director of Governance to agree terms and conditions for any grant funding agreements with the CCA, or any body acting on its behalf, to unlock UKSPF funding, including any top-up funds.
4. Delegates authority to the Assistant Director for Planning Strategy and Development Management to:
 - a. Sign off all grant funding agreements related to any activity funded through the UKSPF and any top-up funds in consultation with the Director of Governance, up to £200,000.
 - b. Authorise procurement activity and approve any new or amended contracts and terms and conditions for procured goods and services funded through the UKSPF and any top-up funds in consultation with EDDC's Legal team, up to £200,000.
 - c. Authorise amendments to any policy documents for grant schemes funded through the UKSPF and any top-up funds in consultation with the UKSPF Panel.
 - d. Authorise any internal UKSPF budget transfers at or below £10,000.

REASON:

The reason for recommendations 1 and 3 was to ensure EDDC had a clear and achievable plan to draw down further funding through the UKSPF in a timely and transparent manner. Recommendations 2 and 4 were designed to ensure flexibility was maintained in the delivery of the fund and clear roles and responsibilities were set out in the drafting and signing of contracts and grant funding agreements.

The water quality of the River Axe Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) had been a concern for a long time. The River Axe SAC was in unfavourable and declining status owing to nutrient enrichment and sediment pollution. East Devon District Council (EDDC), as the Competent Authority under the Habitat Regulations 2017, was required to consider the implications of these matters on the River Axe SAC before permitting any further development which had the potential to result in additional phosphate loads entering the catchment. This applied to all development of any scale and for any purpose if it potentially increased phosphate loading.

The allocation of £4.3 million by Government to EDDC to address these issues required the creation of an agreed governance framework that could provide advice, monitoring, and support to enable the delivery of the programme scheme.

RESOLVED that Cabinet agreed:

1. To approve the proposed governance arrangement to provide the formal reporting framework and oversight for the administration of the River Axe Local Nutrient Mitigation Fund and grants delegated authority to the Director of Place in consultation with the Section 151 Officer and Monitoring Officer to agree terms and to enter into such agreements as are necessary for the good governance of the project.
2. To commit to spend the Local Nutrient Mitigation Fund on the delivery of nutrient mitigation with the indicative programme of spend as detailed in Appendix 2 to this Cabinet report and grants delegated authority to the Director of Place in consultation with the Section 151 Officer, the Monitoring Officer and the Portfolio Holders for Coast, Country and Environment, Strategic Planning, and Communications and Democracy to agree terms and vary the indicative programme of spend and arrangement as is needed to ensure the delivery of the project.
3. That authority be delegated to the Director for Place, in consultation with the Section 151 Officer, the Monitoring Officer and the Portfolio Holders for Coast, Country and Environment, Strategic Planning, and Communications and Democracy, to agree terms to secure and deliver strategic mitigations including the purchase of land for the purposes of creating a nature-based solution where such purchase falls within the funding obtained from Local Nutrient Mitigation Fund. Where this involves asset acquisition, endorsement from the Assistant Director for Place, Assets and Commercialisation shall also be obtained.
4. That delegated authority is granted to the Director of Place in consultation with S151 Officer and Monitoring Officer to make any variations or alterations to the project, to make any decisions and carry out any actions to ensure that the aims of the project are delivered within the required timescales.
5. That the Leader agrees the democratic input with the Director of Place in consultation with the Portfolio Holders for Coast, Country and Environment, Strategic Planning, and Communications and Democracy.

REASON:

To enable the setting up of the appropriate governance and oversight arrangements by EDDC to facilitate the delivery of the River Axe SAC Local Nutrient Mitigation Fund programme. To formally commit to spend the Local Nutrient Mitigation Fund on nutrient mitigation measures in the River Axe SAC catchment.

The Tree, Hedgerow & Woodland Strategy (THaWS) for EDDC was approved for development by Overview Committee in March 2024 and following the Devon Procurement process. Treeconomics Ltd were appointed in July 2024 to start the process of leading the consultation and shaping of an EDDC THaWs.

The Strategy had ensured it was closely aligned with the recently published Devon Tree & Woodland Strategy 2024 as well as other core Council Strategies on climate change, health and wellbeing and our existing Local Plan to ensure there was synergy

RESOLVED that Cabinet approves:

The adoption of the Tree, Hedgerow & Woodland Strategy for East Devon 2024 -2034 which reflects the ambitions and opportunities to protect East Devon's trees, hedges and woodland and create new opportunities for tree planting working in partnership with key stakeholders.

REASON:

To enable the draft Strategy to be presented to Cabinet for approval as its formal Tree, Hedgerow and Woodland Strategy for EDDC.

167 Biodiversity Net Gain (BNG) – Habitat banks, monitoring, and fees

The report informed members that all relevant developments must achieve at least 10% Biodiversity Net Gain (BNG) mandated by the Environment Act 2021. New habitats created or enhanced through BNG must be maintained for at least 30 years.

RESOLVED that Cabinet:

1. Delegate authority to the Assistant Director Planning Strategy and Development Management to enter into S106 legal agreements with landowners, habitat bank providers, and other persons with an interest in the land to secure a habitat bank based on the outlined framework.
2. Approves the principle and proposed method fee structure for BNG monitoring and reporting based on full cost recovery subject to the Portfolio Holders for Coast, Country and Environment and Strategic Planning being included as consultees on all applications for habitat banks prior to Phase 3 assessment.
3. Notes that the fees will be reviewed at least annually in relation to inflation, pay awards, and considering emerging data and/or policy or guidance.

REASON:

Facilitating habitat banks would contribute to the Council's statutory duty regarding biodiversity and demonstrate its commitments in the Nature Recovery Declaration, facilitate the delivery of the Local Plan, and the Council Plan. The Council must establish a transparent process and consistent approach to determine the appropriateness of third-party proposals, prioritise them, and decide why it was willing to enter into legal agreements. It required a transparent framework to recover reasonable fees with the council's costs associated with BNG.

168 Discretionary Planning Fees Review

The report explained the reasons for reviewing and increasing discretionary planning fees, focusing on enhancing service delivery, covering rising operational costs, and ensuring the sustainability of the Planning Service. The fee review aimed to enhance the Planning Service's capacity, efficiency, and sustainability. Aligning fees with operational costs and regional benchmarks ensured competitiveness and met community needs.

RECOMMENDED to Council;

that the revised schedule of fees for discretionary planning fees be adopted.

RESOLVED that Cabinet;

Endorses the schedule of discretionary planning fees being reviewed on an annual basis as part of the wider review of fees and charges in principle.

REASON:

The recommendation to revise discretionary planning fees and the level of service offered was driven by several key factors, including the need to enhance service delivery, cover rising operational costs, and ensure the sustainability of the Planning Service.

169 **Council Plan delivery plan update**

The report provided with an overview of the progress made on the Council Plan delivery plan up to the end of the third quarter of 2024/25.

RESOLVED that Cabinet;

Receive the progress report of the delivery plan and note the progress of the actions to date.

REASON:

To ensure that the objectives from the Council Plan were being actioned and delivered appropriately.

170 **Strata Business Plan 2025/2026**

The report set out the Strata Joint Executive recommendation to EDDC arising from their consideration of a report on the Strata Business Plan for 2025/2026 at their meeting on 28 January 2025.

RECOMMENDED to Council;

That the Strata Business Plan for 2025/2026 be approved.

REASON:

The business plan for 2025/26 was a vital framework, guiding both financial allocations and strategic initiatives essential to achieving the council's objectives which align with those set out by East Devon, Exeter City and Teignbridge Councils in their ambitious plans detailed in their digital strategies which formed the bedrock of the 2024/25 plan.

171 **Clyst Honiton Neighbourhood Plan ('the Plan') to be formally 'made'**

The Clyst Honiton Neighbourhood Plan had successfully passed referendum and must be formally 'made' (adopted) by EDDC in order to form part of the development plan.

RESOLVED that Cabinet;

1. Agree that the Clyst Honiton Neighbourhood Plan be 'made'.
2. Note that once made the Plan will carry full weight in the planning decision making process as part of the statutory development plan for this Neighbourhood Plan Area (the majority of the parish of Clyst Honiton).

3. Congratulate Clyst Honiton Parish Council and their Neighbourhood Plan Steering Group on this culmination of their hard work in developing the Plan.

REASON:

The Plan received a majority 'yes' vote in the neighbourhood area referendum, as required by the Regulations, and there was no substantive reason not to make the Plan. In addition, to recognise the significant work over several years by Clyst Honiton Parish Council and dedicated volunteers to prepare the Plan.

172 Local Government (Access to Information) Act 1985 - Exclusion of Press and Public

RESOLVED that Cabinet:

That under Section 100(A) (4) of the Local Government Act 1972 the public (including the press) be excluded from the meeting as exempt information, of the description set out on the agenda, is likely to be disclosed and on balance the public interest is in discussing this item in private session (Part B).

173 Minutes of Placemaking in Exmouth Town and Seafront Group held on 10 February 2025

Members noted the Minutes and amended recommendations of the Placemaking in Exmouth Town and Seafront Group held on 10 February 2025.

174 Investment / Placemaking opportunity in Exmouth

RESOLVED:

The recommendations were agreed.

175 Review of Leisure Subsidy for 2025/26

RESOLVED:

The recommendations as set out in the report were agreed.

The Chair express his thanks to the LED Monitoring Forum (now the Leisure Delivery Forum) and officers for their dedicated hard work in getting EDDC to this worthwhile position.

176 Cranbox Modular Space Delivery in Cranbrook Town Centre

RESOLVED:

The amended recommendations were agreed.

Attendance List

Present:

Portfolio Holders

M Rixson
G Jung

Portfolio Holder Climate Action & Emergency Response
Portfolio Holder Coast, Country and Environment
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S Jackson	Portfolio Holder Communications and Democracy
N Hookway	Portfolio Holder Culture, Leisure, Sport and Tourism
P Arnott	Leader of the Council
P Hayward	Deputy Leader and Portfolio Holder Economy and Assets
S Hawkins	Portfolio Holder Finance
T Olive	Portfolio Holder Strategic Planning

Cabinet apologies:

D Ledger	Portfolio Holder Sustainable Homes & Communities
J Loudoun	Portfolio Holder Council and Corporate Co-ordination

Also present (for some or all the meeting)

Councillor Aurora Bailey
Councillor Brian Bailey
Councillor Ian Barlow
Councillor Kevin Blakey
Councillor Kim Bloxham
Councillor Colin Brown
Councillor Jenny Brown
Councillor Roy Collins
Councillor Peter Faithfull
Councillor Steve Gazzard
Councillor Mike Goodman
Councillor Richard Jefferies

Also present:

Officers:

Jo Avery, Management Information Officer
Tim Child, Assistant Director Place, Assets & Commercialisation
Amanda Coombes, Democratic Services Officer
Will Dommett, District Ecologist
Ed Freeman, Assistant Director Planning Strategy and Development Management
Naomi Harnett, Corporate Lead (Interim) – Major Projects & Programmes
Tracy Hendren, Chief Executive
Alistair Jeans, Arboricultural Team Manager
Mike O'Mahony, Senior Leisure Officer
Charles Plowden, Assistant Director Countryside and Leisure
Zoe Smith, Economy Projects Assistant
Doug Stanton, Project Manager Estates
Catrin Stark, Director of Housing and Health
John Symes, Finance Manager
Frances Wadsley, Project Manager, Planning, Growth, Development & Prosperity
Anita Williams, Principal Solicitor (Deputy Monitoring Officer)
Tom Winters, Interim Economic Development Manager
Andrew Wood, Director of Place

Chair

Date:

STRATA - JOINT SCRUTINY COMMITTEE

MONDAY, 17 FEBRUARY 2025

Present:

Councillors Olive, Levine, Westerman, Knott, Mitchell, Radford (Chair), Smith and Swain

Apologies:

Councillors Patrick

Officers in Attendance:

David Sercombe, Head of Business Systems & Business Intelligence

Suzanne Edwards, Strata Finance Manager

Neil Blaney, Director of Place

Steve Mawn, Director of IT and Digital Transformation

Christopher Morgan, Trainee Democratic Services Officer

**These decisions will take effect from 10.00 a.m. on Tuesday 24 February
unless called-in or identified as urgent in the minute**

35. MINUTES

It was proposed by Councillor Knott and seconded by Councillor Mitchell that the minutes of the previous meeting be agreed as a correct record and signed by the Chair.

A vote was taken. All were in favour.

Resolved

That the minutes of the previous meeting be agreed as a correct record and signed by the Chair.

36. DECLARATIONS OF INTEREST

None.

37. QUESTIONS FROM THE PUBLIC UNDER PROCEDURAL RULES

None.

38. QUESTION FROM MEMBERS OF THE COUNCILS UNDER PROCEDURE

RULES

The questions and answers are attached to the agenda. There were no supplementary questions.

39. STRATA BUSINESS PLAN 2025-26

The Director of IT and Digital Transformation introduced the item to the Committee. He highlighted the continuing improvements to IT and systems across the partner councils that were identified in the previously adopted business plan. Improvements in 2025/26 would include enabling a move to the cloud-based systems, which would replace the need for physical server rooms across the council estate. The Business Plan also included the Customer Relationship Management system which would provide significant savings, upgraded laptops for Officers, and the telephony replacement for Skype and contact centre.

In response to Members' comments, the Director of IT and Digital Transformation confirmed that the Business Plan was effectively split between the core demands of the Councils and optional extras. The optional projects would only be implemented if the Councils request them, and funding was secured. He also spoke on the move of over 300 servers to the cloud, which would be a massive undertaking and require significant resources.

In response to a question about the audit of Strata, the Director of IT and Digital Transformation informed the Committee that the audit considered how the Councils would be affected if the IT failed and how business would continue. During discussion of this item it was noted that the new laptops and move to the cloud would improve business continuity and that in the case of Wi-Fi failure, Officers would still be able to work from the laptops.

In response to other questions the Director of IT and Digital Transformation advised the following

- While there would be downtime during the digital transformation, this would be limited where possible and there would be significant cost to do this work outside of the working week.
- Councils have 3 choices of devices: iPads, laptops, and 'super laptops'.
- The CEF essentials framework set out how to combat cybersecurity threats
- The copper wire running underneath Exeter would be replaced with new fibre wire controlled and maintained by the Council only, and this would be an improvement.
- The Waste and Recycling phone application had been a success and Strata would look to implement it in the other authorities. The ECC Councillors endorsed the app.
- The Architecture Board was made up of representatives from all three Councils.

It was proposed by Councillor Olive and seconded by Councillor Mitchell that the Strata Business Plan be noted.

A vote was taken. All were in favour.

Resolved

that the Strata Business Plan be noted.

40. STRATA BUDGET MONITORING AND PERFORMANCE OCTOBER 2024-25

The Strata Finance Manager introduced the item to the Committee. It was highlighted that an underspend of £305,000 was forecast for the year and that these funds would be used to resource the partner councils' move to a cloud-based system.

It was noted that Strata had limited control over its spending of the budget, instead the partner councils decided where the money should be used. Impact of inflation had been limited to 3.5 percent which was below the national level.

It was also noted that the agreed Service Level Agreement performance had dropped from 96 percent to 92.5 percent, however this was above the target of 85% and it was considered that the drop can be explained by the amount of change currently being undertaken to implement new ways of working such as the new End User Computing model, new telephony system and several other major projects. If the partner councils sought to raise performance, a discussion on pausing projects would be available. The missed deadline peaks on the graph in the agenda report were when projects occurred, and so resources were focused elsewhere.

The Director for IT and Digital Transformation advised that the security team was strong and remained on alert, recounting that Exeter City Council had been targeted by a DDOS attack. Access to the partner councils' websites had been restricted abroad to help prevent against attacks. Other threats to security were user errors and phishing attempts.

It was proposed by Councillor Knott and seconded by Councillor Levine that the Strata Budget Monitoring and Performance report be noted.

A vote was taken. All were in favour.

Resolved

That the report be noted.

The meeting started at 3.00 pm and finished at 4.11 pm.

Chair
Cllr John Radford

EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of Asset Management Forum held at online on 3 March 2025

Attendance list at end of document

The meeting started at 9.30 am and ended at 10.41 am

18 Notes from the previous meeting held on 2 December 2024

The notes of the previous meeting held on 2 December 2024 were agreed.

19 Declarations of interest

Minute 23

Cllr I Barlow: ANRI, Sidmouth Town Council member

Minute 24

Cllr O Davey, ANRI Exmouth Town Council member

Minute 26

Cllr J Brown: ANRI Honiton Town Council member

20 Public speaking

None.

21 Matters of urgency

None.

22 Confidential/exempt item(s)

There was one item which officers recommended should be dealt with in this way.

23 Major Projects and Programmes Team Update

The Corporate Lead Major Projects and Programmes' report provided a summary of the more high profile projects that the Major Projects and Programmes Team were currently involved in delivering. The projects were wide ranging, supporting the delivery of a range of Council Plan objectives. The update report included:

- Depots review
- Public toilets, Esplanade and Drill Hall, Sidmouth
- UKSPF feasibility studies, Exmouth Placemaking Plan
 - Exmouth Placemaking Plan
 - UKSPF feasibility study for Queens Drive Space and Beach Gardens
- Stalled employment sites
 - Cloakham Lawn, Axminster
 - Seaton and other sites
- Seaton Moridunum
- Clyst Meadows Country Park
- Cranbox, Cranbrook

Discussion covered:

- The initial Depots Review report was received from consultants in summer 2024 and was reported to the Recycling and Waste Future Service Member Working Group, supported by consultants, lesa. A value engineering exercise is currently underway and following a review of this, an outline business case will be prepared and reported to Cabinet. A timeline for this work will be shared with Asset Management Forum members shortly.

The Forum noted the report

24 **Estates Team Update**

The Senior Estate Surveyor's report provided an update on the areas of work the Estates Team were involved in:

- An initial expression of interest in the Community Asset Transfer had been received in respect of the Norman Lockyer Observatory and consultation had begun.
- Changes to discounts available to tenants under the Right to Buy scheme had led to a significant number of requests for valuations within a three week period – the equivalent to what was usually undertaken in two years. The team had worked hard to balance this additional work with the ongoing workload in order to provide valuations to allow housing colleagues to process the applications.
- The team had successfully agreed terms for a new letting of a unit at Manstone Workshops, Sidmouth, ensuring the site remained fully let.
- Disposal of Category B & C public toilets continued to progress with transfers to Town and Parish Councils close to completion. Two sites were to be sold at auction in April 2025 and work continued to progress lease arrangements for sites where a commercial operator had been identified.
- The overall general fund portfolio continued to perform well with very limited voids and rental growth in most areas. In the financial year to date the increase in rental income due to lease renewals, new lettings and rent reviews was £52,154.
- The team had assisted the housing service in agreeing terms for access rights and easements in respect of sewage treatment and drainage works.
- The team were in the process of undertaking a revaluation of a portion of the Council's land and building assets. The assets being revalued had a combined value of £65m - £70m and this significant piece of work was being undertaken for inclusion in the Council's financial reporting.

Discussion included:

- The business units on Salterton Road, Exmouth were nearing completion, and the team had an extensive list of those who had expressed an interest in the units. Members would have an opportunity to visit the site once the works were finished.
- Two toilet sites were due to be auctioned; Marsh Road, Seaton, and Sidford Cross. Both were non-controversial and had been closed for some years. There had been reports of antisocial behaviour and it was appropriate to dispose of them.
- The Chief Executive would liaise with the Monitoring Officer and Communications Manager to explore whether it was appropriate to delay the auction of the aforementioned toilet sites until after the 1st May County Elections due to the potential for social media commentary on the matter.
- The reported increase in rental income of £52,154 was an increase on £1.2 million, representing the asset value rather than rental value.

The Forum noted the report.

25 **Community Asset Transfer request**

The Asset Management Forum were consulted on a Community Asset Transfer (CAT) application received in respect of the public toilet building in School Lane car park, Newton Poppleford. Consultation had been undertaken with relevant council officers and the local ward member. Following consultation, a decision on whether to go to Stage 2, where Newton Poppleford Parish Council would prepare a detailed business case, would then be made by the Portfolio Holder for Economy and Assets on the basis of a report from the Assistant Director – Place, Assets and Commercialisation.

The report considered by the AMF included the:

- Council's procedure for Community Asset Transfers.
- Site detail.
- Consultation with relevant council services and ward member.

The Senior Estates Surveyor shared with the Forum the expression of interest form which had been submitted to the Council from Newton Poppleford Parish Council.

Discussion included:

- Members were supportive of disposing of the free car park at the site of the public toilet building, and officers were asked to liaise with the parish council to explore if there was interest in the car park via CAT or an extension to the current CAT.
- The Senior Estates Surveyor was asked to provide details of how many other car parks the Council had which were free, and how many toilet buildings were leased to parish councils; this information to be provided by email to Cllr Geoff Jung and the Chair.

RESOLVED: that Asset Management Forum

1. notes the report and offers its thoughts on the application, as part of the consultation process.
2. notes that following completion of this consultation, that in accordance with the Procedure, Officers will make a recommendation to the Portfolio Holder for Economy and Assets on whether the applicant should be invited to submit a business case for the site
3. notes that should the recommendation be that this application does not progress to the Business Case stage, officers will contact the Parish Council to discuss their proposals and identify whether there is scope for a collaborative approach to achieve some of their objectives set out in the EOI.

The meeting went into private session.

26 **Employment Site, Honiton**

The Development Delivery Project Manager and the Interim Project Manager's report provided the Asset Management Forum with an update on progress in regard to an allocated employment site in Honiton.

Members discussed the report at length, and asked direct questions.

The Forum noted the update and next steps.

Attendance List **Councillors present:**

T Olive
P Arnott
P Hayward (Chair)

G Jung

Councillors also present (for some or all the meeting)

I Barlow
C Brown
J Brown
O Davey
M Hall
N Hookway

Officers in attendance:

Andrew Champion, Development Delivery Project Manager
Tim Child, Assistant Director Place, Assets & Commercialisation
Naomi Harnett, Corporate Lead (Interim) – Major Projects & Programmes
Rob Harrison, Senior Estates Surveyor
Alison Hayward, Project Manager Place & Prosperity
Tracy Hendren, Chief Executive
Sarah James, Democratic Services Officer
Sarah Jenkins, Democratic Services Officer
Anne Mountjoy, Growth Point Communications Officer

Councillor apologies:

S Hawkins

Chair:

Date:

EAST DEVON DISTRICT COUNCIL**Minutes of the meeting of Poverty Working Panel held at Online via the Zoom app on 24 February 2025****Attendance list at end of document**

The meeting started at 10.01 am and ended at 11.00 am

17 Minutes of the previous meeting held on 18 November 2024

The minutes of the previous meeting held on 18 November 2024 were noted as a true and accurate record.

18 Declarations of interest

There were no declarations of interest.

19 Public speaking

One member of the public had registered to speak at the meeting.

Mr Jack Rowland commented that the draft Housing Strategy was a fantastic document and very ambitious. He observed from the Strategy that in October 2023, a total of 312 homes had been empty for more than 6 months. He asked if more recent data were available and whether data from previous years could be included, for comparison. He went on to suggest that the objectives set out within the Strategy should be revised to ensure they were SMART (Specific, Measurable, Achievable, Relevant and Timebound). Finally, he asked whether the Housing Investment and Delivery Plan would incorporate the possibility of using Public Works Loans to build council houses on Council owned land.

The Housing Projects Officer thanked Mr Rowland for his comments and responded that more recent statistics on empty homes would be provided for the final Strategy document, along with previous years' data. He agreed with Mr Rowland's point concerning SMART objectives and confirmed that an action plan setting out how progress would be measured, along with timescales, would sit underneath the Strategy document. He added that he would liaise with colleagues to obtain an answer regarding development on council-owned land, and provide a response outside of the meeting.

20 VCSE Anti-Poverty Event - verbal update

The Chair provided a verbal update on the Voluntary, Community and Social Enterprise Anti-Poverty event which had taken place at the Council's offices earlier in the month. The event had been well attended and very well received, and the Chair congratulated officers on their good work.

Discussion included the following points:

- The event had facilitated networking but also provided a valuable opportunity for interaction with statutory teams.
- Officers had taken away a lot of learning and would be providing some feedback to attendees imminently. Many action points would be reflected in the new Poverty Strategy and others would be addressed more immediately.

21 **Celebrating and contributing to the work of Open Door Exmouth: Environmental Health's support in response to the cost of living crisis - verbal update by Helen Wharam, Public Health Project Officer**

The Public Health Project Officer introduced this item, outlining how COMF (Contain Outbreak Management Fund) covid-recovery funding had contributed to Open Door Exmouth's activities during 2024. The grant had enabled Open Door too:

- Extend Community Café opening on Saturdays throughout 2024
- Furnish the Community Café
- Support Parent Hub running costs for 2024
- Support Community Craft Room running costs for 2024.

A report had been received from Open Door noting outcomes, reflecting on issues arising and offering very positive and welcome feedback.

22 **Planning beyond Planning - presentation by Naomi Harnett, Corporate Lead - Major Projects and Programmes**

The Corporate Lead – Major Projects and Programmes delivered a presentation which illustrated how the Major Projects and Programmes team use their connections across the authority and with stakeholders to address poverty within the district and the wider area.

Discussion included the following points:

- The anti-poverty agenda is interwoven into the work of the Major Projects and Programmes team as part of its commitment to equality in the district, and with consideration for how a project is going to live after the authority's involvement in it is over.
- The Corporate Lead – Major Projects and Programmes regular engages with the Planning team to ensure there is an understanding of the wider anti-poverty objectives that the Major Projects and Programmes team are looking to achieve.
- The district has a high level of micro-enterprises with fewer than nine employees, and such businesses can be more vulnerable than larger businesses to financial shocks. However, the impact on the district's economy in the event of the demise of a smaller business is lesser than if a major business fails, therefore micro-enterprises can make the economy more resilient.

23 **Draft Housing Strategy**

The Housing Projects Officer delivered a presentation which provided an overview of the draft Housing Strategy 2025-2030, its key objectives, and next steps.

Discussion included the following points:

- Currently the highest need in the district's rental sector is for 1 and 2 bed homes.
- Affordable housing is considered 80% of market rent value, and social rent is 60% of market rent value. Some properties are let at the Local Housing Allowance Rate, this being the amount which the government contributes towards the cost of rent through Housing Benefit or Universal Credit.
- Advice for tenants regarding prevention of damp and mould is published in the Housing Matters magazine and on the council's website.
- The Homeless team work with private landlords regarding rent deposits and some behavioural issues, and loans and grants are available to landlords to improve property standards.

Attendance List

Councillors present:

P Arnott
C Brown
J Heath
D Ledger (Chair)
M Martin
M Rixson
S Smith

Councillors also present (for some or all the meeting)

R Collins
P Faithfull
E Rylance

Officers in attendance:

Naomi Harnett, Corporate Lead (Interim) – Major Projects & Programmes
Sarah James, Democratic Services Officer
Libby Jarrett, Assistant Director Revenues, Benefits, Corporate Customer Access, Fraud & Compliance
Sarah Jenkins, Democratic Services Officer
Tim Laurence-Othen, Housing Projects Officer
Helen Wharam, Public Health Project Officer

Councillor apologies:

B Collins
M Goodman

Chair:

Date:

EAST DEVON DISTRICT COUNCIL

Minutes of the meeting of Cranbrook Placemaking Group held at Conference Room, Younghayes Centre, Cranbrook on 20 January 2025

Attendance list at end of document

The meeting started at 9.35 am and ended at 11.57 am

32 Minutes of the previous meeting held on 18 November 2024

The minutes of the previous meeting of the Cranbrook Placemaking Group held on 18 November 2024 were agreed.

33 Declarations of Interest

There were no declarations of interest.

34 Public speaking

There were two members of the public present. Sarah Thorne from Inspiring Connections South West CIC and Vicky Harris from Wellbeing Exeter & Cranbrook wished to speak at Minute 38 – Move More Cranbrook and Sports England Placemaking Partnership.

35 Matters of urgency

There were no matters of urgency.

36 Confidential/exempt items

There was one matter dealt with in this way recorded at Minute 43.

37 Discussion with Cranbrook New Community Partners

The Chair welcomed everyone to the meeting and invited Fran Walker, Associate Director at Brookbanks (Project Managers for the Cranbrook New Community Partners) to address the following issues that had been raised by the Group.

Landscaping for the Ingram Sports Pitches

The Consortium have now appointed a contractor to undertake the planting which will include planting at the south west boundary of the road up to the pitches and also the centre of the car park island. Cranbrook Town Council will be advised when the date has been confirmed which is hoped to be in March 2025.

The Town Council Clerk sought clarification on the outstanding legal costs for the sports pitches. The Associate Director advised that communications were still ongoing with Groundfix about seeking the retention payments.

Playparks

All the locations that needed connections for water and electricity have now been located with several connections needing road crossings. Water drawings were still being chased from South West Water.

Councillor Bloxham raised concerns about the location plans that did not identify the specific locations and made a request for a more precise zoomed out map that clearly identified each location. The Associate Director confirmed this would be provided tomorrow.

Councillor Bloxham also raised concerns about the continued lack of communication at the monthly partners meetings held by the Town Council and emphasised the need for the right level of people to attend to actually get things done. The Associate Director confirmed that she would be attending the next partners meeting and would also ensure that a Director or equivalent from each of the Consortium developers would attend as well.

Skatepark

Conversations were still ongoing with South West Water over the confusion to where their water main is located in the footpath. A survey has been completed which did show a water main and a further meeting has been arranged to discuss its connection.

The electricity plan has been received from GTC which would be shared with the group after the meeting. The rights to enter the footpath will be confirmed after the payment has been received.

Basin 2c

The contractor tenders have now been received and a preferred contractor has been suggested to the Consortium. The works should commence the second week of April but this will be dependant on the water levels. If they are too high the work will not be able to start. The work programme and the appointment of the contractor would be provided after the meeting.

Councillor Bloxham raised concerns about disruption to the parcel of land in Stone Barton as well as the school traffic. The Associate Director advised that the works access to Basin 2c would go over the town centre parcel to avoid construction traffic going past the school.

Damage to Country Park

The Associate Director apologised for the damage caused by Terra Firma when they entered onto the land. A site visit had taken place last Friday to rectify this damage. The Group noted that further damage to the same area had been caused by LiveWest who had ignored an email advising not to enter the site. The Associate Director at Brookbanks confirmed that the damage would be sorted before the transfer of TC1.

Land Transfers

It was confirmed that Clark Willmott was progressing four transfers of public open spaces. These were Littlemead, Rush Meadow Road junction, Yonder Acre Way and the Tillhouse Farm location boundary.

The Town Council Clerk raised concerns that there were still large areas of land that still needed to be transferred. In response the Associate Director at Brookbanks advised that meetings were taking place but it was difficult to obtain the information. To help understand what has been transferred it was agreed that both Fran and the Town Council would compile a spreadsheet of what has been done so far to see if information matched.

Build return data

The New Community Manager acknowledged receipt of the completion data but highlighted the lack of starts data. A request was made for the starts of the outstanding Taylor Wimpey and Persimmon plots.

MLR uplift works

The Consortium have advised that a start date cannot be given until planning permissions have been granted for the town centre housing as money is required beforehand to do these works.

In response the New Community Manager advised that the reason previously given for the delay in commencement was due to the uncertainty of the technology for the supply of heating and hot water to the additional town centre housing meaning that electrical capacity has now been confirmed so the inference is that this different reason means they do not want to spend the money. These works were consented in 2022/23 and the programme of works showed that it would start in Summer 2023 and completed in September 2024. It still has not happened.

The Associate Director advised that about changes to TC1 and TC2 and the need for drop services and waiting for technical approval from Highways which were also the reason the delays.

The New Community Manager expressed her disappointment and concerns with the delay as there were still no safe crossing for school children. She also raised concerns about the pavement that did not go to the edge of the boundary of TC2 which was not acceptable especially as the Council was about to take transfer of TC2 and the impending delivery of Cranbox and highlighted the pavement does not go to the edge of the boundary which was not acceptable.

Although the Chair sympathised that it was the Associate Director first meeting with the group he expressed disappointment with her colleagues that this had not been done even though they have known about this since 2021 and urged the Associate Director to speak to her colleagues for a commitment.

The Associate Director advised she would speak to the Consortium at their meeting on Wednesday.

The Group noted the summary of delays with Cranbrook Town Centre S106 obligations and the Principal Planning Officer (DCC) emphasised the need to transfer the Extra Care Land to Devon County Council as soon as possible. The Associate Director acknowledged this and explained about the issues with the transfer plan. The Associate Director confirmed she would follow up with their solicitor after the meeting.

38 **Move More Cranbrook and Sport England Place Partnership**

The Partnership Programme Manager gave a brief overview of the report explaining about a national programme run by Sport England to provide funding to help tackle physical inactivity across Exeter and Cranbrook which brought together strategy organisations to form the Move More Cranbrook Group.

Representation of the Move More Cranbrook includes:

- Live & Move (Place Partnership Team for Exeter & Cranbrook)
- East Devon District Council
- Cranbrook Town Council

- LED Leisure
- Cranbrook Education Campus
- Livewest
- Wellbeing Cranbrook
- Public Health Devon
- Active Devon

The latest Sport England bid to extend the funding to 2028 and become a Place Partner had been successful which secures £2.3m over the next three years with Cranbrook expecting to receive circa £200k up to March 2028 to help continue to tackle physical inactivity and improve active lifestyles in Cranbrook.

The Group were advised from 1 April 2025 there was a need to look for a new local delivery partner to continue the delivery of the Move More Cranbrook and it was suggested that in order to strengthen the governance East Devon District Council should take the lead to maintain the long-term sustainability of the steering group.

The Group noted that although there was funding available there was a need for additional funding to help sustain two part-time Cranbrook posts. These posts were previously hosted by Exeter Community Initiatives.

Public speaker, Sharon Thorne from Inspiring Connections South West CIC and Vicky Harris, Wellbeing Exeter & Cranbrook explained to the Group the reason for their attendance was to flag the urgency for the need to consider funding for the part-time funded Wellbeing Cranbrook post and the funded part-time Cranbrook Community Builder post that were ending at the end of March 2025 which were both essential for the wellbeing of Cranbrook residents.

The Director of Place highlighted that a workshop was needed to agree how these roles would be hosted and to understand the funding for this year and next year.

Questions raised by the Group included:

- How much out of the £6m - £7m funding received from the original Local Delivery Pilot programme was directly spent on Cranbrook. The Partnership Programme Manager advised circa £300k was spent.
- What qualifications did the Wellbeing Cranbrook host require? The advice received included key elements such as being local, have its own governance, connection with the charity commission or body and have experience in community development and health and wellbeing.
- There was a need for a tendering exercise as local groups may be interested and should be explored.
- It was noted that Broadclyst Parish Council had taken on a Community Connector
- It was confirmed that the financial contribution that the future host was expected to fund was to be £200k with an expectation for local resources to support the Sport England funding.

The Chair proposed that Officers should arrange a meeting at the earliest opportunity with core members of the steering group.

RESOLVED:

Officers to set up a meeting at the earliest opportunity with core members of the steering group to:

- set out the position of the funding shortfall for this financial year and for the next three years;
- consider the options on how the roles should be hosted and,
- accelerate any procurement requirements.

39 **Public Transport and London Road**

The Group received a report on the present position to Cranbrook's public transport which was served primarily by Stagecoach Service 4 operating 7 days a week providing a direct link from Cranbrook to Honiton Road, Heavitree, Exeter City Centre, Exeter St Davids Station and Exeter University. The report also included the Railway Service operating on an hourly service with aspirations to increase this to half hourly services but this would be dependent on significant national Government investment to deliver a passing loop between Honiton and Exeter.

As part of Devon County Council's plans for future development of public transport the Group noted that they would be installing intelligent traffic control through Heavitree and an extended peak bus lane operation system to improve bus journey time reliability. Cranbrook would also benefit from the introduction of electric buses later this year.

The Group noted that as development grows in Cranbrook DCC's present vision would see the bus service frequency increase to every 10 minutes which would allow alternate journeys to operate via Bluehayes and operate a loop around Cobdens and the Grange developments.

Questions included:

- Clarification was sought about public transport connectivity and it was questioned why the bus service did not go to the railway station even when there is a bus stop there. In response the Deputy Director - Planning advised it would require an additional bus as the rail service is hourly.
- Concerns raised about train delays and having a bus stop would allow an alternative mode of travel to avoid being stranded. In response it was suggested that the proposed plan was to split the bus service when Bluehayes is developed which would allow the bus route to the railway station.
- A suggestion was made to have a less frequent bus route that will also service the station.

RESOLVED:

DCC to consider the impact of the bus service to allow it to deviate to the railway station and to update at the next meeting.

Further questions included:

- Clarification was sought on the timescale for the 30 minutes rail service. The Group discussed the two options that SWR & GWR were considering:
 - Whimple Rail Loop which would be extremely costly, or
 - a single loop offering a shuttle option between Cranbrook and Whimple which would be the cheaper option.
- The existing bus service does not give encouragement to people to use public transport as there is no direct route to Sidmouth, Exmouth and other areas. People prefer to use their cars for these journeys.
- Clarification was sought on whether there was enough demand in Cranbrook to provide a direct bus route to Marsh Barton. Although a direct answer could not be given the advice received pointed to the demand not being adequate at present.

40 **Implementation Plan**

The Group received the Implementation Plan which set out the progress and noted the updates taking into account the out-of-date town council items.

Councillor Kim Bloxham, Cranbrook Ward Member suggested there was a requirement to commence discussions on the delivery of the town council offices as the current offices were now at full capacity. The Principal Planning Officer (DCC) acknowledged the request and advised contact would be made with the Cranbrook Town Clerk to discuss further.

The Town Clerk requested an update on the Community Governance Review. The Chair advised he would write to the Chief Executive on behalf of the Cranbrook Ward Members and Cranbrook Town Council to express its urgency.

RESOLVED:

1. The Community Governance Review to become a standard item on the agenda.
2. The Chair to write to the Chief Executive on behalf of Cranbrook Town Council about the urgency of the Community Governance Review.

41 **Forward Plan**

The Group received the Forward Plan that set out covering the period up to September 2025.

RESOLVED:

That the Forward Plan was noted and to include the Community Governance Review and serving the railway station as additional items.

42 **Local Government (Access to Information) Act 1985 - Exclusion of Press and Public**

That under Section 100(A) (4) of the Local Government Act 1972 the public (including the press) be excluded from the meeting as exempt information, of the description set out on the agenda, is likely to be disclosed and on balance the public interest is in discussing this item in private session (Part B).

43 **Cranbox**

The Group received a report on the Cranbox project which had been developed by East Devon District Council in partnership with Cranbrook Town Council to deliver new commercial floorspace within Cranbrook Town Centre by using grant funding from the Devon & Torbay Net Zero Capital Programme.

The Corporate Lead – Major Projects and Programmes updated the Group on the issues that had arisen and asked the Group to consider the proposed approach to enable the scheme to move forward.

RESOLVED:

That the issues with the Cranbox project was noted and the proposed approach to move forward with the scheme be supported.

Attendance List

Councillors present:

K Blakey (EDDC)
K Bloxham (EDDC)
T Olive (EDDC)
H Gent (DCC)
L Bayliss (CTC)

Also present (for some or all the meeting)

Fran Walker, Associate Director at Brookbanks (Project Managers for the East Devon New Community Partners)
James Bogue, Partnership Programme Manager, Exeter City Council

Officers in attendance:

Thea Billeter, Cranbrook New Community Manager (EDDC)
Naomi Harnett, Corporate Lead (Interim) – Major Projects & Programmes (EDDC)
Wendy Harris, Democratic Services Officer (EDDC)
Andrew Wood, Director of Place (EDDC)
Nicola Wilson Principal Planning Officer (DCC)
Jamie Hulland, Deputy Director – Planning (DCC)

Councillor apologies:

S Hawkins
E Freeman
S Ratnage

Chair

Date:

Report to: Cabinet

Date of Meeting 2 April 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Proposed National Lottery Heritage Fund Bid

Naturally Connected - Connecting Communities with the Heritage of the Clyst Valley

Report summary:

Following the successful delivery of two National Lottery Heritage Fund (NLHF) projects ('Great Trees in the Clyst Valley' and 'Routes for Roots', in the Clyst Valley the Delivery Team have been developing proposals for a third NLHF project 'Naturally Connected - Connecting Communities with the Heritage of the Clyst Valley', focused around nature and community connections in Cranbrook and Mosshayne/Tithebarn – the new communities in the west of East Devon. (A summary of the previous NLHF Projects is provided at Appendix C.)

With support from NLHF enabler Phil Collins we have undertaken a Stakeholder Workshop (including Cranbrook Town Council, Broadclyst Parish Council, National Trust Killerton, Devon Wildlife Trust and others) to develop the scope of the potential project. We have also had initial meetings with the NLHF to ensure that the proposed project aligns with the Lottery's Investment Principles and is likely to be supported. Following submission of a Project Enquiry in December 2024 we have received positive feedback from the NLHF, who support the principle of the proposed lottery funding project (subject to submission of a detailed bid) and provided with guidance on development of our proposed bid.

This project aims to enable new residents within these new communities to explore, understand and value their heritage (including the recent heritage of the development of the new communities themselves) and connect with the landscape and natural heritage of the Clyst Valley; whilst creating space and opportunities for residents to strengthen connections with each other.

The proposed project would run from Autumn 2025 to Autumn/Winter 2027, and work with partners to engage with hard to reach groups including Young People (teenagers/young adults) and residents born outside the UK, including Ukrainian refugees, to develop opportunities for them to develop a connection to the landscape of Clyst Valley through art and access projects, and develop opportunities to share this and increase engagement with the wider community. The project will also refresh the Clyst Valley Regional Park website and utilise information to make it more accessible to all users and incorporate outputs from the previous NLHF projects, and new information generated by the project.

Our estimated budget for the project is £315,000 of which £195,000 would be funded by NLHF and the remainder funded through officer time (Green Infrastructure Project Manager 1 day/week, and Wild East Devon Community Ranger ½ day/week), without additional budgetary commitments, and c£40,000 from s106 contributions. We will also seek additional arts funding to support this element of the project. A breakdown of the proposed costs and funding (subject to further development) is at Appendix A.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

That Cabinet:

1. Supports the submission of a bid to National Lottery Heritage Fund NLHF in relation to the Naturally Connected - Connecting Communities with the Heritage of the Clyst Valley project.
2. Delegates authority to the Director of Place in consultation with the Director of Finance and Portfolio Holder – Coast, Country and Environment to approve the bid for submission to the NLHF
3. Subject to securing NHLF funding; delegates authority to the Director of Place to enter into a legal agreement with the NLHF and Partner Organisations (summer 2025) allocate resources to progress the project, and advertise and appoint a Project Officer with the aim of the project commencing in autumn 2025

Reason for recommendation:

The proposed lottery project will support access to nature & health and wellbeing in our new communities in the western part of the district, and aligns with a number of themes in the Council Plan 2024-28, including:

- Supporting the Council's Vision to promote wellbeing and a fairer/equal society,
- Alignment with and delivery of the Climate Change Strategy, Nature Recovery Plan, Tourism and Cultural Strategies,
- Achieving objectives to increase grant funding to support projects across the district and collaboration/engagement with Town/Parish Councils.

Officer: Paul Osborne – Green Infrastructure Project Manager, Paul.Osborne@eastdevon.gov.uk
07745 667146

Portfolio(s) (check which apply):

- ☒ Climate Action and Emergency Response
- ☒ Coast, Country and Environment
- ☐ Council and Corporate Co-ordination
- ☐ Communications and Democracy
- ☒ Economy and Assets
- ☐ Finance
- ☐ Strategic Planning
- ☒ Sustainable Homes and Communities
- ☒ Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

The proposed lottery project will be focused on engaging with young people and residents born outside the UK (including the refugee community) in Cranbrook, Mosshayne/Tithebarn and West Clyst with the landscape, nature and heritage of the Clyst Valley – providing opportunities for these groups (and the wider community) to benefit from connecting with nature and greenspace and the health, wellbeing and opportunities for social connectivity.

Climate change Low Impact

Risk: Low Risk; Contingency required as part of cost plan to meet NLHF requirements, and to ensure that expenditure doesn't exceed agreed funding.

Links to background information NLHF Heritage Grants (£10,000 - £250,000) - [National Lottery Heritage Grants £10,000 to £250,000 | The National Lottery Heritage Fund](#), Clyst Valley Regional Park Website - [Home | Clyst Valley Regional Park \(clystvalleypark.org.uk\)](#)

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
 - ☒ Carbon neutrality and ecological recovery
 - ☐ Resilient economy that supports local business
 - ☐ Financially secure and improving quality of services
-

Report in full

Following the successful delivery of two National Lottery Heritage Fund (NLHF) projects ('Great Trees in the Clyst Valley' and 'Routes for Roots', in the Clyst Valley the Delivery Team have been developing proposals for a third NLHF project 'Naturally Connected - Connecting Communities with the Heritage of the Clyst Valley', which focuses on nature and community connections in Cranbrook and Mosshayne/Tithebarn. (A summary of the previous NLHF Projects is provided at Appendix C.)

The Need for the Naturally Connected Project

Cranbrook, Mosshayne & Tithebarn and West Clyst are new, rapidly growing communities bordering the Clyst Valley in East Devon. New residents are all recent arrivals; both from within Devon, elsewhere in the UK, and from overseas.

The resident population in the area is increasing rapidly, with over 12,000 new residents since 2011 and a further 16,000 residents when Cranbrook is completed. The demographic mix is also different to most of East Devon, with many more young families, a predicted significant growth in number of teenagers over the next 5-10 years, and a number of residents born outside the UK – notably from Eastern Europe, Ukraine, Africa and Hong Kong (all of whom bring their own cultural perspectives).

With such rapid change and a new, dynamically changing community, there is a risk that much of the recent heritage of the formation of these communities will be lost, especially the experiences of the first residents, as well as a lack of a sense of belonging and connection to their unique heritage and landscape of the Clyst Valley.

This project aims to enable the new residents within these communities to explore, understand and value their heritage (including the recent heritage of the development of the new communities themselves) and connect with the landscape heritage of the Clyst Valley; whilst creating opportunities for residents to strengthen connections with each other.

Scope of the Project

With support from NLHF enabler Phil Collins we have undertaken a Stakeholder Workshop to develop the scope of the potential project, and held conversations with the NLHF to ensure that the proposed project aligns with the Lottery's Investment Principles and is likely to be supported.

The project will explore the heritage of these new communities; capturing memories, life experiences and connections of people to each other and to the heritage of the Clyst Valley. Approaches to this are proposed to include:

- Working with identified groups using a range of media (through co-creation - potentially including photography, maps, art/sculpture, music, dance and theatre). Building on Youth Arts and Health Trust's 'Frame of Mind' project and including input from arts therapists to support development of confidence and relationships.

- Development of physical artworks and shelters which relate to the heritage of the Clyst Valley within Cranbrook, Station Road and Minerva Country Parks which run through the communities
- Outputs will be collated into a community exhibition (travelling) and web-exhibition which will engage with the whole community.
- Curate a community led 'Digital Museum' and Gazetteer which captures the heritage of the Clyst Valley Landscape (focus on 3 settlements including Cranbrook and Mosshayne/Tithebarn & West Clyst). This will build upon information collected in Clyst Great Trees and Routes for Roots projects – drawing out the heritage aspects of these, and focus on new communities' lived heritage and experiences, and connections with their landscape heritage (including experiential connections to the landscape through walking, cycling etc.)
- Provide a greater community focus in relation to other projects in the Clyst Valley – and response to the significant change in the landscape and climate change.

The project will include scoping and enabling work to investigate potential for a larger heritage focused project which supports nature recovery, connecting Clyst Valley communities with their natural, landscape and built heritage and opportunities for enhanced social connectivity.

The proposed project would run from Autumn 2025 to Autumn/Winter 2027, and work with partners to engage with hard to reach groups including young people (teenagers/young adults) and residents born outside the UK, including Ukrainian, Afghan and Syrian refugees, to develop opportunities for them to develop a connection to the landscape of Clyst Valley through art and access projects, and develop opportunities to share this and increase engagement with the wider community. The project will also refresh the Clyst Valley Regional Park website to make it more accessible to users and incorporate outputs from the previous NLHF projects, and new information generated by the project.

Proposed Project Timeline

2025

March-April	Preparation of Lottery Bid
May-July	Submission Review by NLHF
August	NLHF Decision, if successful the project would then comprise:
Sept-Oct	Project Inception Liaison with Partnership Organisations, Advertise for Project Officer
Nov-Dec	Public Launch Initial engagement with partners and community groups Refresh Website (enable community interface)

2026

Jan-March	Community Group Meetings and Workshops Publicise website and invite community inputs
April-Oct	Outdoor activities and Events within Clyst Valley Regional Park
Nov-Dec	Exhibition Review and Reporting to NLHF Planning for 2027.

2027

Jan-March	Community Group Meetings and Workshops
April-Sept	Outdoor activities and Events within Clyst Valley Regional Park
Oct-Dec	Final Exhibition and Review and reporting to NLHF

Following submission of a Project Enquiry in December 2024 we have received positive feedback from the NLHF, who support the principle of the proposed lottery funding project (subject to submission of a detailed bid) and provided with guidance on development of our proposed bid.

Partnership Working

We would seek to partner with Youth Arts & Health Trust and EX5 Alive, who are already working in the area, to deliver the arts and engagement elements of the project. We will identify opportunities to work with existing organisations and projects in the area.

- Local Community Groups
- Cranbrook Town Council & Broadclyst Parish Council
- National Trust
- Devon Biodiversity Records Centre
- Devon Wildlife Trust – Saving Devon’s Treescapes
- Bat Conservation Trust – Connecting People and Landscapes

Budget

Our estimated budget for the project is £315,000 of which £195,000 would be funded by NLHF and the remainder funded through officer time (from existing posts, notably the Green Infrastructure Project Manager 1 day/week, and Wild East Devon Community Ranger ½ day/week) and £40,000 from s106 contributions. A summary breakdown of the proposed budget is provided at Appendix A.

We also seek additional arts funding to support this element of the project, as well as contributions from local businesses, notably housing developers in the new communities. (LiveWest have already made an in principle commitment to contribute £5,000 to the project).

Natural Lottery Heritage Grants

The National Lottery Heritage Fund funds projects that connect people and communities to the national, regional and local heritage of the UK. Project bids must demonstrate how they accord with one or more of the NLHF’s four [investment principles](#), which are set out in their 10-year strategy, Heritage 2033:

- saving heritage
- protecting the environment
- inclusion, access and participation
- organisational sustainability

A summary of how the project would align with the NLHF Investment principles is provided at Appendix B (links below).

Alignment with Council Plan 2024-28

The project would align with a number of themes in the Council Plan 2024-28, including:

- Supporting the Council’s Vision to promote wellbeing and a fairer/equal society,
- Alignment with and delivery of the Climate Change Strategy, Nature Recovery Plan, Tourism and Cultural Strategies,
- Achieving objectives to increase grant funding to support projects across the district and collaboration/engagement with Town/Parish Councils.

Next stage

Subject to Cabinet approval Officers will finalise and submit the NLHF Bid asap.

If we are successful we can then proceed with the delivery of the project, working with the Thelma Hubert Gallery and Countryside Team to ensure our bid aligns with other projects and objectives.

At this stage we are also likely to need to prepare a Partnership Agreement with other bodies which may include:

- Youth Arts & Health Trust
 - EX5 Alive
-

Financial implications:

If successful the NLHF funding will support the appointment of a Project Officer (2 year fixed term) and a number of consultant roles (interpreter, artists, NLHF enabler).

Match funding for the bid is proposed to be met by time allocation from existing officers (Green Infrastructure Project Manager – 1 day/week and input from Clyst Meadows Countryside Ranger).

The maintenance of any artworks located in Clyst Meadows will be part of the future management of the site by our Countryside Services team and funded through the in perpetuity management of the site. Any artworks or shelters located in Cranbrook Country Park would need to be agreed with and maintained by Cranbrook Town Council.

Legal implications:

If we are successful in securing lottery funding we will need to enter into a legal agreement with NLHF, and a Partnership Agreement will be required (to accompany the final funding application) with project partners.

Appendix A – Summary Budget Breakdown

Staff Costs	NLHF Funded	Match Funding	Other Contributions	Notes
Lead Project Officer (1.5 days/week)		£40,000		GI Project Manager
Project/Community Enabling Officer (FT)	£70,000		£20,000	Developer Contributions
Community Facilitator/Interpreter (1 day/week)	£10,000	£2,000		
Ranger/Ecologist (av 1 day/week)	£6,000	£6,000		Countryside Ranger
Lead Artist (1-2 days/week - 80 days)	£20,000			
Artists (Photographers, Sculptors, Musician/Sound, Theatre - 150 days)	£30,000			
Art Therapist (Youth Sessions) - sound therapy?	£6,000			
NLHF Enabler	£12,000			
Videographer	£6,000			
Sub-Total	£160,000	£48,000	£20,000	
Other Project Costs/Disbursements				
Website Update (Mapping, Community Interface)	£10,000			
Consolidation and Update of Existing Data (Intern)		£2,000		Exeter Uni Intern?
Community Events Set up and Venue Hire (inc refreshments)	£6,000			
Translation	£2,000			
Exhibition (Younghayes, EX5 Alive, THG, RAMM)	£2,000			
Celebratory Event	£1,000			
Transport (for groups/attendees) - train, mini-bus, bike hire	£3,000			
Printing Costs	£1,000			
Artworks/Furniture - art trail, shelters? (Clyst Meadows)	£10,000	£40,000	£10,000	(CIL/s106)
Sub-Total	£35,000	£42,000	£10,000	
Total	£195,000	£90,000	£30,000	
% contribution	62%	29%	10%	
Project Total			£315,000	

Appendix B – Alignment with NLHF Investment Principles

- **Saving heritage:** conserving and valuing heritage, for now and the future.
 - Collect, share and value heritage of Cranbrook, Mosshayne/Tithebarn and West Clyst – new communities in the Clyst Valley
 - Support residents and groups to explore, understand and value the heritage of the natural environment, built environment, social history, art of Country Parks and the Clyst Valley
 - Support residents and groups to create heritage projects that help community to explore and understand the heritage of the Clyst Valley
 - Website resource to map and record heritage through a range of media – community led maps, photography, art, performance, oral history (first residents), stories (fables/myth), nature
 - Exhibition (physical, and web based) – Younghayes Centre/EX5 Alive, and then tour venues
 - Creation of a series of artworks/shelters that are a focus in each of the Country Parks (Pinn Brook, Station Road and Cranbrook) and provide a place of shelter and meeting
- **Protecting the environment:** supporting nature recovery and environmental sustainability.
 - Work with groups to support access to nature - making connections and increasing understanding and appreciation of value of their natural environment and landscape heritage
 - Encourage understanding and value of natural environment of the Clyst Valley and connect communities with nature recovery projects (work with partners that are focusing on nature recovery and biodiversity (Cranbrook Country Park Ranger, Wild East Devon, National Trust Killerton, Devon Wildlife Trust, Bat Conservation Trust) to link to and enhance input to their projects)
 - Support community engagement work to develop a larger project to support direct connections with the heritage of the Clyst Valley – through active transport, water quality and/or nature recovery and art
- **Inclusion, access and participation:** supporting greater inclusion, diversity, access and participation in heritage.
 - Bring together different groups within community through engagement with their heritage
 - Young People – work together to build confidence, connections and support to access natural environment and the heritage of the Clyst Valley
 - Residents not born in UK – work to develop connections with landscape heritage and understand their cultural responses, and share these with wider community through stories, artworks, events and exhibition
 - Through website, artworks and events support connection with and integration of people born outside UK
 - Create meeting points (artworks/shelters) within Country Parks – for all, but focused on teenagers. A place for them that encourages a sense of ownership and pride in their environment – value landscape heritage
 - Project will support creation of a legacy for the community – website, art, shelters – which will provide long-term community benefits.
- **Organisational sustainability:** strengthening heritage to be adaptive and financially resilient, contributing to communities and economies.
 - Support the development of community and sense of place in Cranbrook, Mosshayne/Tithebarn and West Clyst, which is connected to and values the heritage of the Clyst Valley
 - Change in demographics – lots of teenagers, making sure they are engaged and value heritage

Appendix C – Summary of Clyst Great Trees and Routes for Roots

Great Trees in the Clyst Valley

The Great Trees in the Clyst Valley project, supported by a £52,000 'Our Heritage' Lottery grant, encouraged local people to explore, record and restore the heritage landscape of trees in fields, hedges, parks and orchards across the Clyst Valley.

The project involved 52 public events and restored 4.6 hectares of historic parkland, delivered a new woodland, with 2,200 trees planted, 234m of new hedgerow, 2 new orchards and recorded 325 ancient veteran and notable trees within the Clyst Valley. The ancient trees have been recorded on the [Woodland Trusts' Ancient Tree Inventory](#). The project also **supported** 27 local businesses ranging from web designers, ecologists, nurseries, food & drink suppliers, farm shops, artists and arboriculturalists.



Tree Planting Volunteers – Broadclyst Primary School

Routes for Roots

Building on the success of 'Great Trees' a larger lottery funded project - 'Routes for Roots' – was developed to encourage people to walk and cycle in the Clyst Valley and explore its nature, history and folklore.

The project secured funding of £98,800 from the National Lottery Heritage Fund and partners. It aimed to encourage local communities and organisations to better understand their environment and to take action to protect, conserve and enhance its wildlife. The project aimed to enhance peoples' wellbeing by encouraging people to walk and cycle to enjoy their local environment and heritage – utilising the network of green lanes, hollow-ways, footpaths, bridleways, byways, carriageways and the physical boundaries that often define these: hedgerows, hedgebanks, leats, and streams and their associated trees.

Outcomes saw the planting of 600 trees (including locally distinctive Black Poplar trees) by 130 volunteers at West Clyst Farm, with school groups from Broadclyst and West Clyst Primary School.

Improvements have been made to more than 5km of trails and permissive footpaths have been enhanced with the replacement of stiles with gates, enabling people with health conditions or impairments to enjoy more of the countryside.

The team supported guided walks and rides encouraging people to use active transport modes to visit key destinations in the Clyst Valley. A series of short films were produced including three 'virtual guides' to

walks in the Clyst Valley, each of which includes commentary on history, archaeology and natural heritage. These are available at www.clystvalleypark.org.uk/trails.

Activities included talks, art activities, family fun days and sound walks, which despite pandemic restrictions reached a wide variety of audiences – including harder to reach and new groups. These included the ‘Cranbrook Archer’ project that brought to life the story of a prehistoric archer whose remains were found during the archaeological investigations at Cranbrook.

We are currently working with partners and stakeholders to develop a brief for a further lottery bid to delivery the next stage of engagement with the local community – and hope to include funding to develop a more significant project to deliver landscape and nature recovery within the Clyst Valley.



Routes for Roots Community Tree Planting, Clyst Valley Regional Park

Report to: **Cabinet**

Date of Meeting 2 April 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A

Equality, Diversity and Inclusion (EDI) Action Plan

Report summary:

This report outlines East Devon District Council's (EDDC) progress in achieving equality objectives from 2021-2025 and introduces a forward-looking Equality, Diversity, and Inclusion (EDI) Action Plan for 2025-2028. It also proposes key recommendations to enhance EDI at member level by ensuring it is actively championed, integrated into decision-making processes, and supported through training to equip members with the knowledge and awareness needed to address key EDI issues effectively.

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐Policy Framework Yes ☒ No ☐

Recommendation:

1. Note progress made on previous equality objectives (2021-25)
2. Note the comprehensive EDI Action Plan for 2025-2028 (Appendix 1), which outlines five main objectives and corresponding actions. This plan includes specific timelines and activities for each objective, demonstrating a structured approach to advancing EDI within the council and the communities it serves.
3. Appointment of an EDI Member Champion, to work alongside the current Armed Forces Member Champion. It is recommended that the Council take steps to appoint an EDI Member Champion during the upcoming May Council meeting. The appointment of an EDI Member Champion aligns with best practices in local government and demonstrates the Council's commitment to fostering an inclusive environment. This role will play a vital part in ensuring that EDI remains a priority across all Council activities and decision-making processes.
4. Approval of EDI Awareness Training Sessions, initially for members. To foster a culture of inclusivity and understanding among members, it is proposed that the Council approves the EDI awareness training sessions. This initiative aims to equip members with the necessary knowledge and skills to engage effectively with EDI issues, thereby enhancing our collective ability to create a more inclusive environment.

Reason for recommendation:

To note progress on existing Equalities objectives, note the new EDI Action Plan (2025-28), ensure commitment to EDI at member level and enhance members' awareness of EDI.

Portfolio(s) (check which apply):

- ☐ Climate Action and Emergency Response
- ☐ Coast, Country and Environment
- ☒ Council and Corporate Co-ordination
- ☒ Communications and Democracy
- ☐ Economy and Assets
- ☐ Finance
- ☐ Strategic Planning
- ☐ Sustainable Homes and Communities
- ☐ Culture, Leisure, Sport and Tourism

Equalities impact High Impact

The impact has been assessed as high relevance with positive impacts. The EDI action plan aims to reduce inequalities and promote inclusivity, benefiting both the organisation and the wider community. This approach addresses the weakness of inadequate mitigation of corporate risks related to equality duties.

Climate change Low Impact

Risk: Low Risk;

Links to background information

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☐ Carbon neutrality and ecological recovery
- ☐ Resilient economy that supports local business
- ☒ Financially secure and improving quality of services

Report in full

1. Where we are now - Progress Report on Equality Objectives (2021-2025)

1.1. The Council's current policy and equality objectives are on the [internet](#). Below is a summary of the progress we have made to date, for the period 2021-2025. It is important as we move on to the next phase of our Equality, Diversity and Inclusion (EDI) maturity journey, looking forward to the next 3 years, that we reflect on what we have accomplished over the last 4 years. While specific measurable outcomes are limited in the available information, the report highlights key achievements, ongoing initiatives, and challenges encountered.

1.2. Equality Objective 1: Know our communities

- EDDC has implemented a comprehensive programme of external reviews, demonstrating a commitment to continuous improvement and gaining a deeper understanding of the

communities it serves, as highlighted in the 2024 Local Government Association (LGA) Corporate Peer Challenge for EDDC.

- The council has developed better data and information about its towns, as evidenced by the ongoing development of Cranbrook, a new community in East Devon.
- The council's approach to EDI is described as a "work in progress" in our peer challenge report, indicating that there are areas that require further development, which will include knowing our communities better.
- We are committed to continuing our engagement with Town and Parish Councils to serve our communities better.

1.3. Equality Objective 2: Serve our communities

- EDDC has officially signed the Armed Forces Community Covenant, with a signing ceremony held on 6th June 2024 to show support for local servicemen and women, veterans, and their families. While there is still much work to be done, this is a positive step and the current Armed Forces Member Champion has been liaising with the Corporate Lead – Human Resources on next steps, which forms part of the EDI action plan.
- The council has developed and is actioning a new Poverty Strategy to support all communities. Between April 1 and September 27, 2024, EDDC distributed nearly £285,000 of UK Government Household Support Funding to over 1,400 low-income households in East Devon.
- Last year, we approved our Public Health (PH) Strategy for 2024-2027, which outlines our commitment to promoting equality and diversity in East Devon. We aim to ensure everyone has an equal opportunity for a long, healthy life, supporting individuals in healthy environments. Our first priority addresses the cost of living crisis. You can see details here: [Public Health Strategic Plan - East Devon](#).
- EDDC has shown good levels of engagement with local businesses and has supported regional growth sites within the Exeter and East Devon Enterprise Zone (EEDZ). The council has worked collaboratively with partners to enable growth ambitions and drive clean growth, creating jobs and a skilled workforce for the future.
- It is important to note that the council has undergone significant operational changes, including the retirement of a long-serving chief executive. Also, in the past 18 months, we have recruited four new Directors, including the creation of a new Director of Place.

1.4. Equality Objective 3: Include equalities in all decision-making.

- A part time EDI Advisor has been appointed to provide advice and support.
- EDDC has implemented an equality review requirement for all committee papers via a reporting template and will be including it in the policy review template.
- Efforts are being made to ensure that equality impact assessments (EQIAs) are completed using an updated EQIA template and Guidance Document, which was made available on the intranet in March 2024. This resource is intended for staff to utilise when making key decisions, implementing service changes, and developing policies. However, we recognise that training is needed for staff on the EQIA process. Additionally, we aim to establish a more robust EQIA process to guarantee effective implementation, as reflected in the new EDI Action Plan.
- Efforts are being made to improve monitoring of the workforce profile to identify trends and challenge inequalities. To help us achieve we are implementing a new iTrent system and PowerBI to support robust data collecting and reporting for Equalities.
- The council is producing equal pay data in accordance with legislation and gender pay gap reporting requirements.
- The peer challenge report recommended creating an action plan. This plan has been developed and supported by both the Executive Leadership Team (ELT) and the Senior Leadership Team (SLT).

- We introduced a Transgender Equality Policy in July 2023, which includes guidance for line managers to support employees undergoing a transition effectively.
2. In conclusion, EDDC has made progress in addressing its equality objectives, but there is still work to be done to fully achieve its goals and effectively measure and communicate its progress. The new EDI Action Plan addresses these issues, providing a comprehensive strategy that will advance EDDC in its journey towards greater equality, diversity, and inclusion maturity.

3. Where we want to be – EDI Action Plan for 2025-28

3.1. The EDI action plan comprises several key areas that have been worked on further to produce five strategic objectives with related EDI actions and key activities. The development phase included ensuring alignment with the current EDI objectives (2021-2025), Council Plan priorities, and insights gained from a comprehensive SWOT analysis (see appendix 2).

3.2. The operational aspects of the action plan will require additional time for thorough development. We intend to develop a comprehensive programme of works for these EDI actions and key activities and to seek the support of the EDI steering group, once established, to ensure effective oversight and implementation of the action plan. Below are the five strategic Equality objectives and EDI Actions and related activities for 2025-28. Further information is available in the high-level action plan at Appendix 1.

4. Equalities Objective 1: Cultivate an inclusive workplace culture.

4.1. EDI action: We will develop and implement a comprehensive EDI training programme, including psychological safety, deaf awareness and trauma-informed practice, to enhance awareness, skills, and cultural competence across all levels of the organisation. Training would be put in place to support staff and suitable training for members would be introduced.

4.2. Key activities include:

- Enhance officer onboarding EDI training.
- Implement comprehensive officer EDI training programme.
- Deliver tailored EDI training for council members.
- Raise awareness of EDI issues for example through officer and member communications.

5. Equalities Objective 2: Embed and promote EDI principles into organisational policies and processes, fostering accountability.

5.1. EDI action: We will embed EDI into the organisation by establishing accountability for EDI at senior and member levels, and integrate EDI principles into decision-making, policies, processes, and programme/services.

5.2. Key activities include:

- Develop greater robustness into the Equality Impact Assessment (EQIA) process – The process helps identify and evaluate how policies, practices, or decisions affect different groups, especially those protected by equality laws. It involves collecting evidence, engaging with stakeholders, analysing risks and benefits, and making adjustments to promote fairness and prevent discrimination. Undertaking robust EQIA ensures we are meeting the Public Sector Equality Duty and promotes inclusive outcomes. A new template, training and specific advice will support in ensuring a robust process moving forward.
- Align council policies with EDI legislation.
- Update EDI Policy.
- Establish EDI Steering Group and Director Sponsor.
- Appoint council member as EDI Champion
- Integrate EDI principles into corporate vision.
- Enhance EDI accountability in risk management.

- Collaborate on Cultural and Housing strategies
6. Equalities Objective 3: Promote diverse representation and inclusive practices.
- 6.1. EDI actions:
- 6.1.1. We will increase diverse representation in our workforce at all levels of the organisation to reflect the communities we serve and create an inclusive environment where all individuals feel valued and empowered.
 - 6.1.2. We will develop a targeted programme and support mechanisms to address the specific needs of vulnerable and underrepresented groups within the organisation and community.
- 6.2. Key activities include:
- Implement workforce diversity initiatives.
 - Establish EDI officer champions.
 - Maintain disability-confident employer status.
 - Develop initiatives for marginalised groups.
 - Work towards Armed Forces Covenant Gold Award
 - Develop policy for vulnerable residents.
 - Collect accessibility data during registration.
7. Equalities Objective 4: Strengthen external partnerships and engagement to better support the needs of the communities we serve.
- 7.1. EDI action: We will foster meaningful partnerships and engagement with diverse communities, stakeholders, and employee resource groups to inform and enhance EDI initiatives.
- 7.2. Key activities include:
- Implement access panels.
 - Build external EDI partnerships.
 - Enhance tenant satisfaction further through EDI principles.
 - Collaborate with voluntary sector.
 - Continue to develop Armed Forces network.
 - Support Devon County Council's Local Offer for care experienced young people.
 - Create inclusive communication guide.
8. Equalities Objective 5: Data-driven EDI measurement and improvements.
- 8.1. EDI action: We will implement a systematic approach to monitor EDI progress, evaluate the effectiveness of initiatives, and continuously refine strategies to drive ongoing improvement in equality, diversity, and inclusion outcomes.
- 8.2. Key activities include:
- Improve EDI data collection.
 - Implement EDI benchmarking.
 - Publish gender, ethnicity, and disability pay gap data and action plans.
 - Develop system to track EDI goals.
 - Update leadership and publish annual report.

Financial implications:

Implementing the EDI action plan will require investment in training programmes and other potential costs related to EDI initiatives. Also, once established, the EDI champions may wish to implement additional initiatives within the organisation which may have a cost implication. Currently, there is no specific budget allocated for EDI apart from the funds for the EDI Advisor position. A budget proposal has been drafted. It details Year 1 costs, with initial consideration given to the funding coming from Corporate Training budget. Some training, such as Equality Impact Assessment training, is urgently needed, so funding from the Corporate training budget will

be needed to progress at pace. For Year 2 and beyond, further funding will be sought through a budget bid, current budget proposals estimate cost to be £6,645 (excluding VAT). We would ask that consideration is given to this coming from the transformational fund.

Legal implications:

The EDI action plan ensures compliance with the Public Sector Equality Duty under the Equality Act 2010. This includes eliminating unlawful discrimination, advancing equality of opportunity, and fostering good relations between people who share a protected characteristic and those who do not. The plan also mitigates legal and compliance risks identified in the SWOT analysis.

Appendix 1

Equality, Diversity and Inclusion (EDI) Action plan (2025-28)

EDI Actions	Key Activities	Who	When
EDI Objective 1: Cultivate an inclusive workplace culture.			
We will develop and implement a comprehensive EDI training programme, including psychological safety, deaf awareness and trauma-informed practice, to enhance awareness, skills, and cultural competence across all levels of the organisation.	<ul style="list-style-type: none"> Enhance onboarding EDI training for new starters (Dec-24 - Mar-25) Implement a comprehensive EDI training programme that includes deaf awareness, basic sign language for frontline staff, and training on reasonable adjustments and psychological safety to ensure safe environments for all employees and trauma-informed practices. (Apr-25 - Dec-25) - Link in with cultural and transformation strategy Develop and deliver tailored EDI training for council members to improve awareness and understanding. (Apr-25 - Dec-25) Raise awareness of EDI issues using internal and external communication channels to regularly highlight key EDI topics, issues, and initiatives. (Dec-24 - Mar-25) 	HR	2025
EDI Objective 2: Embed and promote EDI principles into organisational policies and processes, fostering accountability.			
We will embed EDI into the organisation by establishing accountability for EDI at senior and member levels, and integrate EDI principles into decision-making, policies, processes, and programme/services.	<ul style="list-style-type: none"> Develop and implement a robust EQIA process to assess the equality impacts of decisions, strategies, projects, organisational changes, and budgets affecting public services. (Apr-25 - Dec-25) Ensure council policies align with the latest EDI legislation and mandates, providing staff training as needed. (Apr-25 - Dec-25) Update the EDI Policy to incorporate the latest thinking and best practices. (Dec-24 - Mar-25) Establish a dedicated EDI Steering Group and a Director Sponsor with clear terms of reference to oversee and guide EDI initiatives. Part of the Cultural strategy workstreams (Dec-24 - Mar-25) Appoint a council member as EDI Sponsor to champion equality and inclusion at the decision-making level. (May-25 - Dec-25) 	HR/SLT/ELT	2025-28

	<ul style="list-style-type: none"> • Integrate EDI principles into the corporate vision to drive broader cultural change. Feeding into value and behaviours (Dec-24 - Mar-25) • Enhance EDI accountability in risk management by including the implementation of EQIAs on the corporate risk register and ensuring responsibility for their completion. (Dec-24 - Mar-25) • Collaborate with countryside & leisure teams on Cultural strategy and Housing strategy. 		
EDI Objective 3: Promote diverse representation and inclusive practices.			
<p>1. We will increase diverse representation in our workforce at all levels of the organisation to reflect the communities we serve, and create an inclusive environment where all individuals feel valued and empowered.</p> <p>2. We will develop targeted programme and support mechanisms to address the specific needs of vulnerable and underrepresented groups within the organisation and community.</p>	<ul style="list-style-type: none"> • Implement initiatives to improve workforce diversity, ensuring representation at all levels. • Establish EDI champions throughout the organisation, providing relevant training for their roles. (Apr-25 - Dec-25) • Continue and expand efforts to maintain disability-confident employer status, working towards higher accreditation. (Apr-25 - Dec-25) • Work to address and develop target initiative to support the diverse needs of marginalised groups and communities, making necessary provisions to support them. (2026) • Work towards earning the Armed Forces Covenant Gold Award, demonstrating a commitment to supporting military veterans. (Apr-25 - Dec-25) • Develop a policy for vulnerable residents that addresses the specific needs of at-risk individuals within our resident communities. • Collect accessibility data during registration to ensure that accessibility needs are identified for all relevant services, thereby improving overall accessibility. 	HR/SLT	2025-26
EDI Objective 4: Strengthen external partnerships and engagement to better support the needs of the communities we serve.			
We will foster meaningful partnerships and engagement with diverse communities, stakeholders, and employee resource groups to inform and enhance EDI initiatives.	<ul style="list-style-type: none"> • Support the development and implementation of access panels that improve stakeholder engagement with our communities, particularly targeting 'hard-to-reach' groups. This will ensure their perspectives are included in decision-making and that all voices are heard. (Jan - Dec-25) - dependent on communities team timeline 	HR COMMUNITY ENGAGEMENT HOUSING COMMS	2025-26

	<ul style="list-style-type: none"> • Build strong external partnerships focused on EDI by strengthening relationships with organisations that support EDI initiatives and sharing best practices and resources. (Ongoing) • Enhance tenant satisfaction by addressing the diverse needs of residents. (Apr-25 - Dec-25) • Collaborate with voluntary and community sector organisations to further EDI efforts. (Apr-25 - Dec-25) • Support Devon CC's care leaver Local Offer. (Apr-25 – onwards) • Create a reference guide for inclusive communication to promote accessible interactions, ensuring that language and practices are easy to understand for everyone. (Apr-25 - Dec-25) 		
EDI Objective 5: Data-driven EDI measurement and improvements			
We will implement a systematic approach to monitor EDI progress, evaluate the effectiveness of initiatives, and continuously refine strategies to drive ongoing improvement in equality, diversity, and inclusion outcomes.	<ul style="list-style-type: none"> • Improve the collection of EDI data to better understand needs and outcomes. (Apr-25 - Dec-25) • Implement EDI benchmarking, measuring EDI indices and tracking progress on psychological safety across the organisation. (Apr-25 - Dec-25) • Publish data and action plans for gender, ethnicity, and disability pay gaps and take steps to resolve disparities. (Apr-25 - Dec-25) • Develop a systematic approach to track EDI goals and ensure any agreed targets are met. (Apr-25 - Dec-25) • Regularly update leadership on EDI progress and publish an annual report.(Q3 2025) 	HR	2025

SWOT Analysis for Equality, Diversity, and Inclusion (EDI)

This SWOT analysis provides a comprehensive overview of the current state of EDI, highlighting areas of strength, potential weaknesses, opportunities for growth, and potential threats to be mindful of when implementing and expanding EDI programs.

INTERNAL FACTORS

STRENGTHS +	WEAKNESSES –
<ul style="list-style-type: none"> - Senior leadership buy-in and commitment. - Updated EIA form and guidance documents - Revenue and Benefits department/Teams comprehensively carries out EIAs. - Equality Policy and Objectives 2021-2025 - Decreased absenteeism over the years - We are a Disability Confident Employer - Ensure compliance with legal requirements and transparency in pay equity, aiming to reduce and close the mean (average) pay gap between women and men. - No recent discrimination/harassment employee relations cases – par recent alleged discrimination on our part from a member of the public that has mental ill-health and autism. - Joint Declaration for Equality - Devon Strategic Partnership - Recent armed forces convent 	<ul style="list-style-type: none"> - Insufficient and non-comprehensive EDI training programs - Lack of integration of EDI training into existing processes - Limited EDI awareness and understanding among staff. - Inadequate promotion of a psychologically safe work environment - Insufficient support for vulnerable and marginalised groups - Celebration of diversity and promotion of inclusivity - Lack of quality people data for data-driven decisions - Measurable insights into EDI progress and psychological safety - Consideration of diverse community voices in decision-making - Limited knowledge sharing and collaborative efforts on EDI initiatives. - Relationships with community organisations to help promote EDI in our communities. - Non-inclusive communication practices - Policies and practices that promote EDI across the organisation. - Alignment of organisational culture with EDI principles - EDI consideration in key projects and activities significantly impacting public and service users. - Inadequate mitigation of corporate risks related to equality duties.

- Resource allocation considering protected groups.
- Insufficient support and representation for diverse employee groups
- Reactive rather than proactive addressing of accessibility requirements in service delivery
- There are potential gaps in our approach to recruiting, retaining, and developing disabled employees despite Disability Confident employer status.
- A trauma-informed approach to service users is insufficient.
- Potential gaps in staff capabilities regarding current policies
- Underrepresentation in the workforce
- Monitoring improvement in EDI outcomes

EXTERNAL FACTORS

OPPORTUNITIES +	THREATS –
<ul style="list-style-type: none"> - Enhanced innovation and problem-solving through diverse perspectives - Improved brand perception and competitive advantage - Better talent acquisition and retention - Increased employee engagement and productivity - Fulfilment of legislative duty and risk mitigation - Strengthened community engagement and representation. - Improved service delivery for vulnerable community members - Enhanced accountability and visibility of EDI initiatives at the highest levels - Comprehensive overview of EDI progress for stakeholders 	<ul style="list-style-type: none"> - Resistance to change and lack of buy-in from employees. - Risk of ineffective implementation leading to tokenism or reverse discrimination - Legal and compliance risks, if not properly managed - Potential backlash or negative perception if initiatives are seen as forced or insincere

Report to: Cabinet

Date of Meeting 2 April 2025

Document classification: Part A Public Document

Exemption applied: None

Review date for release N/A



Response to the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan Modification Proposal

Report summary:

The purpose of the report is to formally agree the response by this Council to the submission of the proposed first revision (modification) of the Bishops Clyst (Clyst St Mary and Sowton) Neighbourhood Plan. Bishops Clyst Parish Council has formally submitted their modified Neighbourhood Plan to the District Council. The Neighbourhood Planning (General) Regulations 2012 (Regulation 16) require the District Council to formally consult on the Plan for a minimum of 6 weeks. At this stage the District Council has the opportunity to comment on the Neighbourhood Plan and must also prepare a Modification Statement to be submitted to the Examiner.

Officer observations on the proposals and a draft Modification Statement are set out at the end of this report and members are asked to endorse these as the formal response of this Council to the proposal. These together with all other comments received during the consultation will be submitted to an independent Examiner who will inspect the Plan against a series of conditions that must be met in order for it to proceed.

Because this is a modification of an existing 'made' (adopted) neighbourhood plan, the Examiner will first consider our Modification Statement alongside that submitted by the Parish Council to decide whether the modifications proposed are material and 'change the nature of the plan'. If this is the case, the Plan will be subject to both examination and a referendum before coming back to this Council for to be 'made' (adopted).

Is the proposed decision in accordance with:

Budget Yes ☒ No ☐

Policy Framework Yes ☒ No ☐

Recommendation:

(1) That Cabinet note the formal submission of this first revision to the Bishops Clyst (Clyst St Mary and Sowton) Neighbourhood Plan and congratulate the producers of the plan on their dedicated hard work and commitment throughout the process.

(2) That Cabinet agree that the proposed representation set out at paragraph 1.21 and Annex 2 and 3 in this report is made in response to the consultation and agree to the Modification Statement in Annex 1.

Reason for recommendation:

To ensure that the view of the District Council is formally recorded and informs the consideration of the Neighbourhood Plan by the independent Examiner.

Officer: Angela King Neighbourhood Planning Officer. Email: Angela.King@eastdevon.gov.uk,
Phone: 01395 571740

Portfolio(s) (check which apply):

- ☐ Climate Action and Emergency Response
- ☒ Coast, Country and Environment
- ☐ Council and Corporate Co-ordination
- ☐ Communications and Democracy
- ☒ Economy and Assets
- ☐ Finance
- ☒ Strategic Planning
- ☒ Sustainable Homes and Communities
- ☒ Culture, Leisure, Sport and Tourism

Equalities impact Low Impact

Neighbourhood Planning is designed to be inclusive and extensive consultation is a fundamental requirement. The proposed revision to the Clyst St Mary and Sowton (Bishops Clyst) Parish Neighbourhood Plan has been the subject of significant consultation and engagement with the community, set out in a detailed Consultation Statement. All persons living in the parish have had the opportunity to be engaged in the Plan's production and, should the changes to the existing 'made' plan (which has been endorsed in a local referendum) be considered to be changing the nature of the Plan, all persons registered to vote in the area will again be invited to vote on it in a referendum.

Climate change Low Impact

Risk: Low Risk; There is a risk that the Neighbourhood Plan could fail the examination if it is considered to conflict with the Basic Conditions to which all plans must comply.

Links to background information [The Localism Act](#); [Plain English Guide to the Localism Act](#); [National Planning Policy Framework \(2024\)](#); [Neighbourhood Planning Regulations](#); [Neighbourhood Planning Roadmap Guide](#); [East Devon Neighbourhood Planning webpages](#); [Clyst St Mary and Sowton \(Bishops Clyst\) Parish Neighbourhood Plan webpage](#); [Bishops Clyst Neighbourhood Plan \(Made, 2017\)](#); [Proposed Modified Clyst St Mary and Sowton \(Bishops Clyst\) Neighbourhood Plan](#); [Consultation Statement](#); [Basic Conditions Statement](#); [Parish Council Modification Statement](#)

Link to [Council Plan](#)

Priorities (check which apply)

- ☒ A supported and engaged community
- ☒ Carbon neutrality and ecological recovery
- ☒ Resilient economy that supports local business
- ☐ Financially secure and improving quality of services

Report in full

1.0 Background to the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan Proposal

- 1.1 Bishops Clyst Parish Council commenced work on their revised Neighbourhood Plan in 2022, following a review of their existing plan. The existing Neighbourhood Plan was 'made' (adopted) in March 2017. The Neighbourhood Area comprises the combined area of the whole of the civil parishes of Clyst St Mary and Sowton, known collectively as Bishops Clyst and equating to the administrative area of the Parish Council. The Neighbourhood Area was originally designated in 2014 and remains the same for the revised plan. The review of the plan and the proposed modifications to it have sought to

respond to the emergence of proposals under our draft new Local Plan and also some dissatisfaction with the implementation/influence of the existing neighbourhood plan policies on development decisions.

- 1.2 The Parish Council and volunteers from the local community, with the aid of a consultant and technical support from Locality, have spent considerable time and effort consulting with residents of the parish and other stakeholders to produce a plan which endeavours to both reflect the wishes of the community, and respond to the changing context.
- 1.3 The draft revised Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan includes policies designed to address locally identified needs and to protect and enhance local assets and facilities, whilst responding to/taking account of the strategy and policies of the emerging new Local Plan. In particular, that which identifies Clyst St Mary village as a location for some growth relative to its identification in Tier 4 of the proposed new 'settlement hierarchy' as a 'Service Village'. The revised neighbourhood plan policies relate to: the natural environment and countryside; built environment; housing development; community facilities; business and jobs; travel & transport, and; sport & recreation. This time the Plan proposes land for a housing allocation for at least 72 homes on land between the Sidmouth Road and Bishops Court Lane, and the addition of a Design Code, as well as some changes to areas designated as Local Green Space and a variety of merged, modified and some new policies.
- 1.4 Prior to submitting the Plan to East Devon District Council, Bishops Clyst Parish Council have held their own public consultation on a draft version of the revised plan; a step which is also required by the Neighbourhood Planning (General) Regulations 2012 (Regulation 14). This ran for an extended period of 8 weeks from 1 July 2024 to 26 August 2024. The comments made during this consultation, including informal comments by District Council officers, have been considered and the plan updated prior to formal submission to East Devon District Council. Significantly, in the light of the Regulation 14 version of the Plan, Strategic Planning Committee agreed to support the community to pursue allocations for housing at Clyst St Mary village through the neighbourhood plan and accordingly, removed proposed allocations from the emerging Local Plan. Instead, the emerging Local Plan (currently at Regulation 19 consultation) includes policy seeking that the neighbourhood plan make provision for a minimum of 72 homes. This requirement aligns to the proposals in the current Submission Version of the neighbourhood plan.

Submission of the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan Modification

- 1.5 The District Council accepted formal submission of the Neighbourhood Plan Modification Proposal from Bishops Clyst Parish Council as legally compliant in January 2025. The Plan and its supporting documents are available to view on the [planning pages](#) of the District Council website.
- 1.6 This is the first adopted ('made') neighbourhood plan in East Devon to be the subject of a modification proposal in the district. It is brought under the provision for modifications of neighbourhood plans introduced through the Neighbourhood Planning Act 2017, as inserted into the Planning and Compensation Act 2004 and Neighbourhood Planning Regulations 2012 (as amended). The Parish Council has received in-kind Officer support from the District Council and financial and additional funded technical support from the Ministry for Housing, Communities and Local Government neighbourhood planning support programme to prepare the Modification Proposal.

- 1.7 Akin to the prescribed process for a new neighbourhood plan, the statutory regulations require that the District Council organise and undertake a minimum 6-week consultation on a modified plan when a compliant Submission is received. This is commonly referred to as the submission or 'formal' consultation. The public consultation period is running for just over 6 weeks from 29 January 2025 to 17 March 2025. Due to Committee cycles, comments from EDDC have been provided to the Examiner as informal Officer views, subject to the outcome of Cabinet, following which a final formal response will be supplied.
- 1.8 The Plan proposal has been publicised widely through a press release; EDDC e-news bulletins; notice on the District Council website; emails sent to all Members, adjoining authorities and statutory consultees, including Devon County Council, Natural England, Historic England and the Environment Agency. In liaison with the Parish Council, it has also been promoted in the local area to those who responded at the previous stage and generally to raise awareness of this further and final opportunity to comment. Hard copies of the Plan have also been available on request and to view at EDDC Honiton office, Exeter library, and the Parish Council office at Clyst St Mary village hall.
- 1.9 One of the statutory roles of the District Council is to consider whether the Plan meets the legislative requirements, in production process terms. Cabinet has previously endorsed a protocol for District Council involvement into neighbourhood plans and in accordance with this protocol an officer review has been completed. Officer assessment is that legislative requirements are met, and a Legal Compliance statement published. Legal advice was sought in making this assessment in view of this being the first modification proposal to be received in east Devon. The neighbourhood planning protocol is being revised and refreshed and will be brought back to a Cabinet meeting for approval in the near future.
- 1.10 Anyone may comment on a neighbourhood plan. It is particularly important that the District Council comments. This is because the plan will eventually (if adopted) form part of the statutory Development Plan for East Devon, replacing the existing adopted version of the neighbourhood plan, and must generally conform to the strategic policies of the Local Plan. It will also have increased weight as a material consideration in planning decisions, the more advanced it is through the stages of plan preparation. This report provides the recommended representation on the Plan for formal submission to the Examiner, together with a statement, as required by the legislation, setting out our assessment of the impact and significance of modifications to the existing plan.

Neighbourhood Plan Modification Process Post-Submission

- 1.11 The next step following acceptance of a legally compliant submission and consulting on it, is independent examination of the proposal. In preparation for this, the District Council has now selected Deborah McCann as the 'appropriately qualified and independent examiner'. This appointment has been made in consultation with Bishops Clyst Parish Council.
- 1.12 All responses from the consultation (including any made by this Council) are forwarded to the Examiner who will consider them, by either written representations or at an oral hearing (if the Examiner decides one is necessary). The District Council is responsible for paying the costs of the examination but can recoup these expenses by claiming funding from

Central Government. In respect of Modification Proposals, after a successful examination, £10,000 can be claimed when revised plans come into force without the need for referendum, rising to £20,000 if requiring a local referendum before being 'made'.

- 1.13 In the case of the examination of a Modification Proposal, the Examiner must first determine, under Schedule A2 to the Planning and Compulsory Purchase Act 2004 (as amended), whether the modifications contained in the draft Plan "are so significant or substantial as to change the nature of the neighbourhood development plan which the draft plan would replace". In making his / her judgement, the examiner will consider a Modification Statement submitted with the Plan by the Qualifying Body (the lead town/parish council) setting out a summary of the proposals, the reasons why the Plan should be modified, and whether they consider that the modifications are: minor (non-material); material but not such that it would change the nature of the plan, or; material and are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify', giving reasons for why they are of this opinion. The Examiner will also consider the Modification Statement made by the Local Planning Authority on its reasoned assessment of the nature of the modifications.
- 1.14 The examiner must first notify the Qualifying Body and the LPA, with reasons, of their decision on how the modifications should be considered. If the Examiner considers the modifications do not change the nature of the Plan, Modifications Proposal would proceed to be examined under Schedule A2 and would not require a referendum before being made. However, should the examiner take the view that the modifications would change the nature of the made Plan, the examination will proceed under Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('Schedule 4B'), which will in turn require a referendum prior to the revised Plan being made. In this instance, the Examiner will ask for decision of the Qualifying Body as to whether it wishes to proceed with the proposal on this basis or withdraw it.
- 1.15 Once the basis for the examination is agreed, the examination will proceed to specifically test whether the plan meets prescribed 'Basic Conditions' for a neighbourhood plan and other relevant legal requirements. Unlike a Local Plan examination, they are not testing the 'soundness' of the plan or looking at other material considerations. The Examiner will be considering whether the plan:
- has appropriate regard to national policy and advice contained in guidance issued by the Secretary of State;
 - contributes to the achievement of sustainable development;
 - is in general conformity with the strategic policies in the development plan for the local area (in this case, this remains the adopted East Devon Local Plan 2013-2031);
 - is compatible with human rights requirements;
 - is compatible with any retained EU obligations.
- 1.16 As part of the Development Plan used in future planning decisions, it is in the interests of the District, Town and Parish Councils to produce high quality neighbourhood development plans, and the examination process helps to ensure this is achieved.

- 1.17 Following the examination, the Examiner's Final Report will set out the extent to which the draft plan proposal meets the Basic Conditions and what modifications (if any) are needed to ensure it does so. Depending on whether the examiner agrees that a referendum is also required for the plan to proceed to be 'made', the Examiner has essentially 3 options for recommendation:
- A. That the Plan meets the Basic Conditions and proceeds **as submitted** to be either 'made' by the LPA or on to referendum
 - B. The Plan is **modified** by the District Council to meet the Basic Conditions and then the modified version proceeds to either 'made' by the LPA or on to referendum
 - C. That the Plan does not meet the Basic Conditions and therefore cannot proceed.
- 1.18 If the Examiner chooses A or B above and a referendum is required, they must also consider whether the referendum area should be extended beyond the boundaries of the Plan area (this could be applicable if plan proposals could impact on a larger area). The report must give reasons for each recommendation and contain a summary of its findings. It is the responsibility of the District Council to decide what action to take in response to the recommendations of the Examiner.
- 1.19 Once the Modified Plan has been finalised, it will either be made directly by decision of East Devon District Council and be brought into legal force, or it will first be subject to a referendum where everyone on the electoral roll (for the defined neighbourhood area) will have a right to vote for or against it. If at least half of votes cast support the Plan, then it can be brought into legal force. The modified plan will form part of the statutory development plan and will update and replace the current 2017 version.

Response to the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan Modification Proposal

- 1.20 Officers have reviewed the Neighbourhood Plan contents and the proposed changes to the 'made' version and recommend that the following Modification Statement and representation of East Devon District Council be formally submitted to the examiner. It should be noted that in terms of comments on the modified plan itself, the representation at this stage in the plan making process is primarily concerned with planning policy matters rather than other content of the Plan, including supporting text or community actions, and is made on the basis of addressing the following questions:
- Do Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan policies comply with strategic policies in our adopted Local Plan and have appropriate regard to National Planning Policy?
 - Do we have concerns about policy given the wider objectives of the Council?
 - Are the policies workable and enforceable - could they be reasonably applied through the Development Management process? and
 - Are they otherwise appropriate or desirable?
- 1.21 East Devon District Council comments on the Regulation 16 Submission Version of the Plan are proposed as:

General Observations

Overall, EDDC welcome the clear and concise documentation submitted and acknowledge the efforts of the neighbourhood plan group to engage with Officers of this Council and other key stakeholders during the development of the proposal. It is notable that Officer comments made on draft policies at the previous Regulation 14 consultation in particular, have been given detailed consideration by the Parish Council and numerous amendments made to the Plan as a result, as well as revision to the SEA that make this more robust.

We would observe that whilst the majority of the policies are already in the Made Plan in some form and are non-controversial, in many instances EDDC would still question if the NP is adding anything to national/strategic policy. As stressed at Regulation 14, whilst including a policy on any given topic helps to articulate a community priority, there is no need to duplicate or repeat policy contained elsewhere in the development plan or NPPF and there may be risks in seeking to do so and merits in a more focused approach.

Conversely, we note there are some objectives that are not translated into specific policy or policy clauses e.g. to promote self-build initiatives – and unless added, this will limit the ability of the plan to influence in those areas. Similarly, there are instances of requirements stated in supporting text that are not in the policy, and it would be preferable to include these in policy if it is intended that they be insisted upon. Specific comments are made in the attached Annex 2.

Relationship with the Emerging New Local Plan

Whilst the legal test will be concerned with general conformity with our adopted Local Plan, now that the emerging new Local Plan is at Regulation 19 stage and this neighbourhood plan proposal seeks to align to its housing policies and plan period, comment on the relationship with this plan is also relevant. In this regard, we would suggest that:

- the Plan period be aligned to that of the emerging new Local Plan as it stands at Regulation 19 i.e. to 2042 (rather than 2040 as the submitted neighbourhood plan states). This will better align the neighbourhood plan to the incoming Local Plan and avoid any confusion.
- Chapter 2 of the submitted Strategic Environmental Assessment (SEA) be updated as it refers to the Regulation 18 draft Local Plan allocations. This is now out-of-date as the published Reg. 19 Local Plan no longer includes allocations at Clyst St Mary and this could give rise to confusion.
- We would also flag that since subsequent submission of this Plan in December 2024 with its own Habitat Regulations Assessment (HRA), EDDC has now published a Habitat Regulations Assessment for the new Local Plan, and preparation is advancing on a draft new South East Devon Mitigation Strategy. Whilst Officers do not consider these changes the conclusions of our HRA Screening Opinion, the Neighbourhood Plan HRA could be updated to reflect the existence and findings of the new Local Plan HRA.
- making reference to the policy stance in both the adopted and emerging Local Plans where relevant, and ensure it is clear in all references to 'Local Plan' which document is being referred to.

Policy-specific Comments:

Policy by policy comments are set out in Annex 1.

The most significant change from the 'Made' Plan is the addition of the housing allocation policy. We are pleased to support the NP in making an allocation for housing in line with discussions that have taken place with the NP Group and with Members over the last few years as the relationship between the emerging new Local Plan and the revised neighbourhood plan have been considered. It is however of note that a response has been received from the Highways Authority which expresses significant concern regarding the integral proposal for the delivery of a new road link from the A3052 to Bishops Court Lane. The Qualifying Body have been provided with this response for consideration in advance of the examination.

Non-policy comments

In addition to policy specific comments, we would make the following observations on plan content that we would wish to see addressed in the final document for accuracy and clarity:

- a) **Objectives** - suggest (i) encouraging smaller homes and (ii) ensuring the retention of existing facilities and services and supporting new / additional community facilities/services (in general or specific terms) appears to be missing from Plan objectives. Rephrase objective to "require developers to set out sustainability measures of development" for clarity in meaning.
- b) **Maps** – suggest (i) addition of a new map to show the pedestrian / cycle connectivity within and to/from the allocation site under Policy BisC12; (ii) new map showing the location of all community and sporting facilities to support the interpretation of Policy BisC13 and Policy BisC21; (iii) revised map 6 to show listed buildings within the Conservation Area; (iv) revised Map 1 to add place names for orientation and; (v) expand key to Map 3 to indicate what 0.1% and 1% mean. All maps should ideally be at least half a page in size for legibility. EDDC can offer to provide any new and updated maps.
- c) **Section 2** – we disagree with the premise that there is no justification for any extensions of current business areas in the Parish on the basis there is a clear evidence of a district need for further employment land, some of which could be and indeed will be met in the parish through the new Local Plan, with a 1ha modest extension proposed to Langdon's Business Park. It would be prudent to acknowledge this and say that this is sufficient to meet local needs rather than dismissing any employment need.
- d) **Section 4** on Plan context should be refreshed and in particular amendments made to:
 - i. Paragraph 4.5 – Suggest delete the last sentence referring to the Reg 19 local plan as the final version was not published when the NP was submitted.
 - ii. Paragraph 4.8 – whilst we appreciate that the quote, "that the 'Designated Neighbourhood Area Housing Requirement figure' be amended by an additional 72 homes" is the resolution in our Committee minutes, it would be a fuller and clearer explanation to replace this to say "Following discussions with the neighbourhood planning group, the district council agreed to allow this neighbourhood plan to determine which sites should be allocated for housing in the parish but set a requirement figure equivalent to the number of homes proposed for allocation in the reg 18 Local Plan to ensure that the parish took its fair share of the district housing need. As agreed by EDDC at Strategic Planning Committee on 1st October 2024 this figure was set on this basis at a minimum of 72 homes."

- iii. Paragraphs 4.8, 8.4 and 8.5 - if making reference to a lack of local need then the text needs to acknowledge the wider district needs that exist and the role that the village plays in meeting these, but in the absence of a local Housing Needs Survey, we would suggest the plan refrains from saying that there is no local need as it just begs the question - where is the evidence? Furthermore, it undermines the allocation of housing in the plan.
- e) Section 9 – as a key section in the Plan, including the allocation, we would suggest the following amendments:
 - i. Paragraph 9.10 - Add “by 2042 to align to the strategy of the emerging Local Plan” to the end of the penultimate sentence
 - ii. Paragraph 9.11 - Remove use of the word ‘target’ as these housing requirement figures are minimums and replace with ‘number’
 - iii. Paragraph 9.12 - Add reference the Site Assessment report by Aecom which was a key part of the underpinning evidence
 - iv. Paragraph 9.15 - Add “for an acceptable scheme” at the end of the first sentence
- f) Clyst Valley Regional Park references:
 - i. Paragraph 7.30 - The CVRP has its own value as a landscape buffer between Exeter and the new communities/existing villages, and as vital Green Infrastructure providing multi-functional landscape connections, but it is incorrect to state that it is designating land ‘on the basis of its landscape quality and value’. Suggest the second part of this paragraph by rewording according to say, “...remained rural in character. This forms part of the Clyst Valley Regional Park which envisages the Clyst Valley as a tranquil haven for people and wildlife, and includes the objective to restore landscape character and promote local distinctiveness.’
 - ii. Paragraph 9.18 - The objectives of the Clyst Valley Regional Park in terms of the achievement of the Clyst Valley Trail (which is also covered in the LCWIP) should be referred to. Suggest revision in the wording to read, ‘The allocated land is within Clyst Valley Regional Park. Development should comply with the Regional Park’s Objectives and Delivery Plan, including the establishment of high-quality landscape that will mitigate the landscape and visual impact of the development on the Clyst Valley and provision of the Clyst Valley Trail pedestrian and cycle route.
- g) NPPF - Ensure all references throughout relate to the same version of the NPPF as the Basic Conditions Statement uses the December 2024 NPPF and this is referred to in the introductory section 4 of the Plan itself, but references elsewhere within the Plan have been noted that refer to the previous version.
- h) CIL – It would be advisable if there is a (preferably prioritised) list of potential projects for CIL spend that this be appended or linked to in the Plan to aid guiding the spending of funds.
- i) Minor wording amendments for clarity and accuracy as set out in Annex 2 that we would request the Examiner support be made with agreement between the Qualifying Body and the Local Planning Authority in the creation of the final plan document.
- j) Any typographical and grammatical errors are corrected, and any instances where quotations are used, the source of the reference is cited.

Modification Statement

EDDC notes that in their Modification Statement, Bishops Clyst Parish Council conclude that, “taken as a whole, the modifications proposed are not minor. Moreover, they are of a nature which do change the nature of the Plan” and in their view, “will require both examination and a referendum”. As Local Planning Authority, we must also consider the

same and supply our own statement to the Examiner for their consideration and final determination.

Whilst there are some areas where we would take a different view as to whether changes in policy can be classified as minor or material, or material 'changing the nature of the plan' (as set out in Annex 2), overall EDDC agrees with the Parish Council's assessment that in combination the changes proposed to the made plan are material to the extent that they do change the nature of the plan and that in our view will require both examination and referendum. A Modification Statement setting this out in more detail and to fulfil our legal requirement in this regard can be found in Annex 1.

2.0 Next Steps and Conclusion

- 2.1 In conclusion, Members are asked to approve the comments and Modification Statement for submission to the examination, which will form the next formal step in the consideration of this neighbourhood plan proposal.

Financial implications:

There are no direct financial implications identified in this report.

Legal implications:

The legal implications are fully set out within the report. It is important that EDDC formally agrees a response to the submission of the proposed first revision (modification) of the Bishops Clyst (Clyst St Mary and Sowton) Neighbourhood Plan (given that it will form part of the Development Plan and therefore help guide decision making on planning applications) so that it may be submitted to an independent Examiner within the prescribed timeframes (002545/5 March 2025/DH).

Annex 1 – Regulation 17 Modification Statement – Bishops Clyst Neighbourhood Plan (1st Revision)

This Modification Statement is made under Regulation 17(e)(ii) of the Neighbourhood Planning (General) Regulations 2012 (as amended) in respect of the Clyst St Mary and Sowton (Bishops Clyst) Neighbourhood Plan Modification Proposal submitted 16 December 2024.

Background

The Bishops Clyst Neighbourhood Development Plan passed its referendum with a 90% vote in favour on a turnout of 25% on 26 January 2017. The plan was officially made on 8 March 2017.

Bishops Clyst Parish Council, as the qualifying body, has undertaken a review, starting in 2022, which has been proactive in engaging residents. The proposed modifications are intended to help improve the plan's effectiveness and to respond to the emerging proposals of the new Local Plan.

National Planning Guidance on Neighbourhood Planning (Para 106) sets out that there are three types of modification options which can be made to a neighbourhood plan and affect the process by which the modifications are determined, summarised as:

1. **Minor (non-material) modifications** - which would not materially affect the policies in the plan. These include correcting errors and references and would not require examination or a referendum.
2. **Material modifications** - which do not change the nature of the plan. These would require examination but not a referendum, and include, for instance, the addition of a design code that builds on a pre-existing design policy, or the addition of a site or sites which are not so significant or substantial as to change the nature of the plan.
3. **Material modifications** - which are so significant or substantial as to change the nature of the plan. These may include the allocation of significant new sites for development, for instance, and would require both examination and a referendum.

The Modification Statement prepared and submitted by Bishops Clyst Parish Council sets out the modifications proposed, why they are proposed and which type of modification they are considered to constitute. Overall and in combination, the Parish Council Statement concludes that the modifications comprise type 3 above, requiring both examination and referendum.

Nature of the Modifications - Council Assessment

Regulation 17(e)(ii) of the Neighbourhood Planning (General) Regulations 2012 (as amended) requires the relevant local planning authority to submit to the examiner 'a statement setting out whether or not the authority consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the authority is of this opinion.' This statement fulfils that purpose.

The Council has considered the Parish Council statement and notes that there is only limited guidance available on the criteria for determining the answer to this question and that ultimately, the matter is a decision for the Independent Examiner.

The changes to the plan are set out on pages 2-7 of the submitted [modifications statement](#).

In summary the modifications comprise:

- The addition of a significant allocation for 72 or more homes, linked to the delivery of a range of infrastructure improvements
- The addition of new policy coverage related to the protection of the Green Wedge; protection of heritage assets; infrastructure provision; enhancement of primary school provision; updated settlement boundary for Clyst St Mary; and support for alternative vehicular access to Sowton Village.
- Changes to all other policies through amendment/extension to take account of new legislation, best practice, new standard and/or our new emerging Local Plan policies and/or to rationalise and amalgamate policies. These adjustments relating to policies on habitats, trees/woodlands, business development, farm diversification, flood risk, sport and recreation, footpaths & cycle routes, parking, various aspects of sustainable development, local character/design, community facilities, Local Green Spaces. These range from minor revision to the more substantive addition of a Design Code and reduction in the number of areas designated as LGS and instead protected in policy for the current sporting use).
- Changes to a number of the objectives, change to the plan title and to the plan period.
- Consequential changes and updates throughout the document to supporting text.

With reference to the addition of the major housing allocation alone (Policy BisC12), East Devon District Council concurs with the conclusion of the Parish Council that this is a significant and substantial modification having the effect of changing the nature of the Plan. EDDC would make the same assessment based on our interpretation of the new policy on infrastructure (BisC10) and in combination, the two policies relating to new business development (BisC16 and BisC17) that replace Made Policy BiC13, as the approach taken is considered to differ to the extent the nature of the plan is changed. Many of the other policy changes are also considered to be material but not changing the nature of the plan, including for the addition of any entirely new policy which by definition were not previously the subject of examination under the Made neighbourhood plan. Few changes in policy are considered to be minor modifications, with reference to the limited guidance which suggests these changes are reserved primarily for factual updates and corrections.

Conclusion

In conclusion, East Devon District Council consider that the overall modifications proposed fall into the category of material modifications that change the nature of the plan, requiring both examination and referendum.

Annex 2 – Summary Policy Schedule with EDDC Comments – see separate PDF.

Annex 3: Minor Wording Amends for Accuracy and Clarity (non-policy comments)

Submission Plan Paragraph/ Reference	East Devon District Council comment
Contents	Add policies to the Contents or including a separate (hyperlinked) Policy Index
3.5	Suggest replace 'Clyst St Mary and Sowton NP' with 'the revised NP'
4.18	For accuracy in respect of EDDC's role on preparing the Design Code replace 'in collaboration with' with 'inputted to by'
5.3	Replace 'over the next 10 years' with 'over the Plan period'
7.5 and 7.6	Rationalise/merge wording for clarity/brevity re. references to the Old Sandpit geological site.
7.16 and 7.18	Swap the order of these 2 paragraphs for flow and replace 'We are advised' in the current 7.18 with "However,"
7.19	Switch the order of the last 2 sentences to go from the general to the specific.
7.19 and 7.21	Address repetition of description of flooding in Clyst St Mary
8.5	Remove reference to "and nearby" as the defined Settlement Area is specifically Clyst St Mary village. Name the 'busy road' for clarity (i.e. the A376 to Exmouth).
8.7	Whilst there is no doubt that development at Winslade Park impacts on infrastructure, the use of the word "worsened" implies that it is causing problems and yet there is no evidence cited. The NPs' own allocation will equally impact these issues. Suggest the specific reference to Winslade Park is therefore replaced with "many of which are impacted by new development".
8.8	Replace 'blend in with' with respect and complement
8.9	Remove or update last sentence as this presumably relates to the position at the earlier Regulation 14 stage.
8.16	Suggest given the heritage interest at Sowton, this statement is made less Clyst St Mary centric, and simply reads that "Each settlement has its own" 'distinct character etc, etc.'
8.20	This should be area not areas as there is only one Conservation Area. Suggest this requirement may be better within the heritage policy itself.
9.2	Suggest avoiding using term settlement and instead use built up area (or community) in view of the use or implications of 'settlement' in strategic policy
9.3	"Neighbourhood Area" rather than 'area'
9.3 and 9.5	Suggest some of the Census data & house price data and the Devon Home Choice data could be presented more clearly in a table or bullet points.
9.8	(To be aware that based on latest evidence, the new Local Plan is proposing a lower affordable housing requirement of 30% which will apply upon plan adoption)
9.20	Replace 'local households' with persons/households with a local connection for accuracy

Submission Plan Paragraph/ Reference	East Devon District Council comment
9.21	Suggesting referring at first use here to Devon County Council as Highways Authority – rather than one reference to HA and one to DCC
10.1	Suggest ‘served’ rather than ‘well served’ would be more accurate
11.1	Whilst it may be true, can the statement “unemployment is not a local problem” be qualified/putting in context e.g. with reference to census data.
11.4	Suggest “nearer to/at home” to better reflect the point being made
12.1	Suggest the comparison to other areas is removed unless substantiated e.g. by comment from DCC
12.6	Suggest adding to this to encourage and give better options for more use of sustainable modes of travel.
12.11	Unless there is data that can be cited, suggest this should refer to ‘perceptions’ of speed and perhaps feelings of safety if that has come out of the community consultation
12.20	Clarify over what period the road was closed, and in view of this being a one-off incident, is there anything else that can be said e.g. flooding is mentioned elsewhere
13.3	Make it clear for the reader if the facilities named in the 2 nd and 3 rd sentence are one and the same
Design Code	Page 5 - Replace out of date references to NPPF 2021 reference on page 5 from 2021 to latest version; correct typos on page 25 (‘hatched’ roofs presumably ‘thatched roofs’; and Page 28 Lychgate’ not ‘lynch gate’; and correct reference to ‘Historic England’ from ‘English Heritage’ and correct grammar/syntax in sentence on page 57 which reads, “Materials should be specified that are ensure longevity”

Annex 2 Policy Schedule Clyst St Mary & Sowton (Bishops Clyst) Neighbourhood Plan (First Review, Modification Proposal)

Submission Version Policy Extract with EDDC Comments

Theme / Policy	Policy Wording	Change from existing Made Neighbourhood Plan Policy (with reference to 2017 Made Plan and submitted Modification Statement)	EDDC Policy Comments
Policy BisC01: Protecting and Enhancing Geodiversity, Biodiversity and Wildlife	<ol style="list-style-type: none"> Development proposals should: <ol style="list-style-type: none"> avoid development on local wildlife sites, and habitats of principal importance, unless exceptional circumstances can be demonstrated, and appropriate mitigation measures provided; protect and enhance where possible the network of habitats, species, sites of importance and wildlife corridors; minimise impacts on biodiversity; and unless exempt, deliver a net gain in biodiversity in compliance with national legislation and the requirements of the LPA. Development proposals that would result in the loss of, or which would create significant harm to, wildlife sites and other areas of ecological or geological significance, will not be supported. 	<p>Revision and update of all clauses to made Policy BiC01, particularly intended to recognise legislative changes regarding biodiversity net gain.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Minor (non-material) EDDC – Material but does not change nature of Plan, given the extent of changes 	<p>The requirements in this policy are largely provided for in national/strategic policy and statute. However, this is also largely true of the existing Made policy. Notwithstanding this, to strengthen the modified policy, suggest:</p> <ul style="list-style-type: none"> Clause a) – removing the caveat, so this simply protects these areas from development Making the whole policy a 'must' not a 'should' Clause b) – notwithstanding this reflects comment made by EDDC at Reg 14, rephrase or insert punctuation so that enhance is 'where possible' but protect is mandated. Clause b) – clarifying in supporting text what is meant by/defined as 'sites of importance' and adding this to the glossary or removing/replacing the term. Clause d) - given supporting text (paragraphs 7.13 and 7.14) refer to wanting mitigation to be on site wherever possible, adding this to this part of the policy. <p>Clarity is also needed to aid implementation on whether all the areas sought to be protected by the policy are then shown on Maps 3a and 3b in the supporting text, and if not, to direct to where this information can be found.</p>
Policy BisC02: Protecting Trees and Woodlands	<ol style="list-style-type: none"> Areas of predominantly native woodland (including, but not limited to, the woodlands shown on map 4) are regarded as important natural features. Any development proposals that would result in the loss, damage or deterioration of these woodlands will be resisted, unless there are exceptional reasons, and a suitable compensation strategy exists. Development proposals that will cause the loss of or damage to trees, woodland, or species rich hedgerows that contribute positively to the character and amenity of the area must provide for appropriate replacement planting together with a method statement for the ongoing care and maintenance of that planting where deemed necessary by the Local Planning Authority. New development within the proximity of existing mature trees will be expected to have a tree protection plan in place before any development commences, prepared in accordance with British Standard 5837:2012. 	<p>Amended and extended made Policy BiC02 to align with similar policies in other nearby NPs and in response to suggestions from consultees at earlier stages. Adds requirements re. tree protection during in works and more detail on replacement / compensation for loss.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Material, but does not change nature of Plan 	<p>Generally supportive, however, suggest:</p> <ul style="list-style-type: none"> Clause 2 – the starting point should be retained first, moving on to then deal with 'unavoidable loss'. To some extent suggest this could be addressed by amalgamating clauses 2 and 4 which are in part repetition. In addition, notwithstanding this relates to an EDDC Officer comment at the previous stage, suggest change 'species rich hedgerow' to 'native species hedgerow'. Clause 4 – update references to the tree replacement methodology to reflects that in emerging new policy PB08 in the Reg 19 new local plan, which is considered a non-contentious proposal of the new Local Plan, underpinned by latest good practice. Also, as currently worded, 'local' should read, 'locally'.

Theme / Policy	Policy Wording	Change from existing Made Neighbourhood Plan Policy (with reference to 2017 Made Plan and submitted Modification Statement)	EDDC Policy Comments
	<p>This will detail tree protection strategies to be employed during construction. An arboriculture method statement will also be required to cover any proposed works to trees or other works within their root protection areas.</p> <p>4. Where development results in the unavoidable loss of trees or hedgerows, proposals must provide for appropriate replacement planting on the site, or as close as possible to it, together with a management plan for the ongoing care and maintenance of that planting. Such replacement planting should use native and or local appropriate species with an expected mature size similar to those removed and be in the ratio of three trees for the loss of a large tree, two for a medium sized tree and one for a small tree. (See the Glossary for a definition of tree sizes.)</p>	<ul style="list-style-type: none"> EDDC view – Agree due to additional requirements 	
Policy BisC03: Minimising Flood Risk	<ol style="list-style-type: none"> Wherever practical and appropriate, development proposals for the Clyst St Mary and Sowton Neighbourhood Plan Area should show how they will incorporate Sustainable Drainage System (SUDS) principles to minimise flood risk and, in particular, reduce the need for runoff into the surface water drainage system in Clyst St Mary village and at the bottom of Winslade Park Avenue. Proposals to improve the management of the river and other water courses and construct new defences in the neighbourhood area to reduce flooding will be supported. In improving flood defences, opportunities must be taken to enhance biodiversity and aid local delivery of biodiversity net gain. 	<p>Result of amalgamation of 2 Made policies (BiC03 Improving Flood Defences and BiC04 Minimising Flood Risk).</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Minor (non-material) EDDC – Agree – little change to Made policy 	Note suggested amendments made by EDDC at Reg 14 have largely been incorporated. In addition, we would encourage inclusion of a reference to supporting and encouraging natural flood management, and also, suggest deletion of, “for the Clyst St Mary and Sowton Neighbourhood Plan Area”, as this is the case by default and therefore superfluous.
Policy BisC04: Development Outside the Clyst St Mary Settlement Boundary	<ol style="list-style-type: none"> Other than where proposed through strategic allocations or provided for by strategic policies of the Local Plan, development proposals on land outside the confines of the Clyst St Mary settlement area (as defined on Map 8) will be supported if they are necessary for the purposes of agriculture, or outdoor recreation, or farm diversification without harming the countryside, or conform to other policies in the Neighbourhood Plan. Where planning permission is required, farm diversification schemes will be supported where: <ol style="list-style-type: none"> existing buildings are reused wherever possible but without substantial rebuilding or disproportionate extension new buildings are sensitively sited amongst or adjacent to existing farm buildings, unless operationally necessary to be sited elsewhere the design of any new building reflects the scale of existing buildings and respect landscape features. 	<p>Incorporates, revises and replaces Made Policy BiC12 Farm Diversification. Broadens policy seeking to reinforce the settlement boundary and protection of the countryside.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Material, but does not change nature of Plan EDDC view – Agree. 	<p>Overall support the policy intent and the indicative link to the proposals in the emerging new Local Plan. However, have some concern that the policy is trying to do too many things and there may be some confusion in its interpretation and risk of unintended consequences.</p> <p>Suggest:</p> <ul style="list-style-type: none"> Clause 1 – suggest this clause be deleted on the basis it would appear to need a lot more clarification about what is necessary and what they mean by farm diversification and outdoor recreation. Outdoor recreation risks broad interpretation – the NP Group may well mean walking, cycling, football etc but it could equally mean a kart track or other likely inappropriate development. This is all considered to be more clearly defined and set out in the local plan. Clause 2b) – delete 'unless operationally necessary to be sited elsewhere' to avoid instances of new agricultural buildings being

Theme / Policy	Policy Wording	Change from existing Made Neighbourhood Plan Policy (with reference to 2017 Made Plan and submitted Modification Statement)	EDDC Policy Comments
	<p>3. Development proposals should demonstrate no significant adverse impact, or that any adverse impacts are satisfactorily mitigated, on the following:</p> <ul style="list-style-type: none"> a) landscape, geodiversity, biodiversity, habitats, and wildlife corridors b) existing agriculture and other land-based activities; c) the rural character of the area and its setting; d) local transport network and road safety; e) heritage assets; and f) residential amenity. 		<p>deliberately located away from the main farm to facilitate future residential conversion under the new 10 year permitted development rules, in favour of leaving this for an applicant to justify on an individual case basis.</p> <ul style="list-style-type: none"> ○ Suggest amendment to the allocation diagram (or inclusion of a separate diagram) to show the cycle and pedestrian connectivity. EDDC can provide.
Policy BisC05 Green Wedge	Development proposals in the designated Green Wedge area (shown on map 5), within the neighbourhood area, will not be supported unless it can be demonstrated that no harm to the character or purpose of this area will occur.	<p>New policy intended to recognise the concept of the green wedge and the Local Plan designated area.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC view – Minor (non-material) • EDDC – Material but does not change nature of Plan on the basis this a new policy and was therefore not previously subject to examination on the made Plan. 	<p>No need for this policy to be included as it is duplication of the Local Plan. However, no objection as whilst it is a slight variation on the Local Plan policy (both adopted and emerging), it is not significantly different to be considered in conflict with the strategic policy, and we understand the desire to emphasise the designation given the development pressure in this location.</p>
Policy BisC06: Heritage Assets	Development proposals affecting designated and non-designated heritage assets should be accompanied by an appropriate assessment which sets out the significance of the asset(s) (including setting) and the impact of the proposal upon significance and experience of the asset(s). Applications will be determined strictly in accordance with national policy and guidance and the development plan.	<p>New policy intended to ensure value of heritage assets is recognised and safeguarded appropriately.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC view – Material, but does not change nature of Plan • EDDC view – Agree, on the basis this a new policy and was therefore not previously subject to examination on the made Plan. 	<p>Noted this is a new policy. Whilst other made neighbourhood plans in east Devon contain similar policies, we do not consider there is a need for this policy which effectively duplicates national policy, without the identification of non-designated heritage assets which would add local specificity. However, we appreciate the community desire for the policy, the development pressures in the area and the wealth of heritage assets, particularly at Sowton Village.</p> <p>Whilst we do not therefore object to its inclusion and note amendments to wording suggested by our Conservation Officer have been fully incorporated, should this policy be retained, it would be helpful to add locally specificity by reference to the Sowton Conservation Area and the Grade I Bishops Court and add '(including any identified on the Local List)' after 'non-designated heritage assets', to reflect the intent set out in the supporting text to identify assets to put forward for local listing.</p>

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			In addition, suggest a reference to the Prayerbook Rebellion, as the setting of Clyst St Mary was key to this event, as well as Bishop's Court should be included in the supporting text to aid the consideration of 'experience'.
Policy BisC07: Maintaining Local Character	<p>Development should be well designed to fit in with the local area and contribute to creating a strong sense of place.</p> <p>New development will be required to demonstrate a high quality of design, use of materials and detail that are appropriate for the area and have regard to the prevailing scale, massing, density and plan form in the locality.</p> <p>Extensions and alterations to buildings will be supported so long as they complement and enhance the main building and its setting.</p> <p>Replacement of any building will only be supported if the proposed development makes an enhanced positive architectural contribution to the location.</p> <p>Boundary treatments for new and amended curtilages should reflect that prevailing in the surrounding area.</p> <p>Development proposals should accord with the Clyst St Mary and Sowton Design Codes.</p>	<p>Extension of made Policy BiC05 (also 'Maintaining Local Character') to emphasise design and refer to newly produced Design Code, in place of the previously referred to Design Statement document.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Material, but does not change nature of Plan EDDC view – Agree 	<p>Support the modifications and the addition of a new Design Code and note that the amendments to the policy previously suggested by our Conservation Officer have been fully incorporated.</p> <p>We generally welcome the Design Code document, but we feel there is an opportunity missed for greater use of images of good design / details and annotated plans, in place of text and to illustrate e.g. related to content on pages 30-34, and there would be benefit to clarifying some vague statements such as how extensions being 'in proportion' would be defined, with examples (p.28). We also observe that the example depicted as good design on page 55 appears to include aspects we would question such as lack of pavement, timber cladding (which is not vernacular) and some blank facades fronting the highway.</p>
Policy BisC08: Local Green Space	<p>The following area is designated as a Local Green Space:</p> <ul style="list-style-type: none"> Queen Elizabeth Field <p>Inappropriate development on any designated Local Green Space named in this policy will only be supported in very special circumstances.</p>	<p>Replaces Made Policy BiC19 (Local Green Space) and removes LGS designation from 2 sites in that policy in favour of making them subject to policy protection under Policy BisC21 Sports & Recreation Facilities.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Material, but does not change nature of Plan EDDC view – Agree 	<p>Note there were two more areas of LGS designated in the existing made plan, and that this policy would remove that designation, in favour of giving them a (lesser) degree of protection through the Sports and Recreation policy (BisC21). Also, that the NPPF expects LGS designation to "be capable of enduring beyond the end of the plan period". Whilst ultimately, we do not object and will respect the wishes of the community, we are surprised by the removal of the LGS designation from those areas and would welcome clarity on why this was the outcome of the review as this does not appear to form part of the submission.</p>
Policy BisC09:	New development will be supported where it meets relevant policies in this plan and provided:	Incorporates and replaces made Policy BiC07 (Providing	Understand the desire for a policy dedicated to Sustainable Development, however, these aspects are partly covered by more detailed policy

Theme / Policy	Policy Wording	Change from existing Made Neighbourhood Plan Policy (with reference to 2017 Made Plan and submitted Modification Statement)	EDDC Policy Comments
Sustainable Development	<p>a) sustainable construction and drainage techniques and energy conservation measures are incorporated within the development proposals;</p> <p>b) provision is made wherever possible for connection to the latest high-speed broadband and other communication networks;</p> <p>c) opportunities to further safe and secure pedestrian and cycle links are incorporated wherever possible;</p> <p>d) it does not result in the loss of land of local amenity or recreational importance, unless an alternative space of equal or greater size, quality and convenience is included as part of the proposal;</p> <p>e) natural habitats are protected during construction, and measures to improve biodiversity are incorporated including, but not limited to, bee bricks, bat and bird boxes and hedgehog highways; and</p> <p>f) the need to design out crime, disorder, and anti-social behaviour to ensure ongoing community safety and cohesion, has been taken into account.</p>	<p>Space for New Dwellings), Policy BiC09 (Increasing Connectivity) and broadens scope to address wider sustainability (in its broadest sense) including areas not currently specifically within any part of the made Plan policies or not in this form (sustainable construction methods, designing out crime, protection of outdoor public spaces, sustainable travel.)</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Various ranging from ‘Minor (non-material)’ re. connectivity to ‘Material, but does not change nature of Plan’. EDDC view – Agree introduction of this policy considered a Material Modification, but not to the extent it changes the nature of the Plan. 	<p>elsewhere in the Plan and may be better served within the topic-based policy e.g. on biodiversity, flood risk, design, footpaths and cycleways.</p> <p>In addition, we would advise against the use of the term “Land of Local Amenity Importance” as this is used in both the adopted and emerging Local Plan to relate to specific designated areas of LLIA, none of which are located in this neighbourhood area, which may therefore cause confusion. Suggest this could be rephrased as land of local amenity or recreational ‘value’. However, more generally, without identification on plan or any criteria, we would query how this is to be defined and whether it gives sufficient guidance / certainty for developers/decision makers. For this reason, we would suggest in order to be retained in the policy, these areas need to be identified otherwise if developers come forward with development on an area that the community consider to be LLIA and it is not obvious this is the case, we will not be able to defend it.</p>
Policy BisC10: Infrastructure	<p>All proposals for new development must deliver the necessary provision for physical and social infrastructure to offset its impacts. Applications for residential development will be required to demonstrate how the infrastructure needs of the development are addressed.</p> <p>Proposals for new development that cannot demonstrate adequate measures to deliver appropriate infrastructure provision to offset its impacts will not be supported.</p>	<p>New policy intended to emphasise the importance of adequate local infrastructure provision to this community.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Material, but does not change nature of Plan EDDC view – Material changing the nature of the plan, if the intent is that all new developments meet 	<p>Understand the motivation for including this policy and whilst we do not disagree with the principle that the impacts of new development on physical and social infrastructure need to be addressed it is not always down to the development itself to deliver this. Residential developments will pay Community Infrastructure Levy (CIL) which addresses the costs of delivering elements of infrastructure particularly where these are to be delivered off-site. Responsibility for delivering infrastructure in these cases will rest with other bodies utilising CIL and other funds and so it is not appropriate to require new development to deliver this. To address this, we would suggest that the first sentence is amended to read “All proposals for new development must make provision for physical and social infrastructure to address its impacts.”</p>

Theme / Policy	Policy Wording	Change from existing Made Neighbourhood Plan Policy (with reference to 2017 Made Plan and submitted Modification Statement)	EDDC Policy Comments
		the physical and social infrastructure needs themselves, which would mean developers bearing the full cost as well as paying CIL.	
Policy BisC11: Clyst St Mary Settlement Boundary	<p>Development proposals on land within the defined settlement boundary of Clyst St Mary (see Map 8 (plan page 31)) will be supported where the development:</p> <ul style="list-style-type: none"> a) benefits from a safe and suitable access for all road users; b) does not impact upon the privacy of any adjoining properties; c) is consistent with the character of the locality; and d) does not increase flood risk or exacerbate existing sewage disposal problems; and e) is generally in compliance with other policies in the development plan. <p>Areas outside the built-up area boundary will be regarded as countryside and subject to 'development in the countryside' policies in the development plan.</p>	<p>New policy intended to recognise and update the development boundary for Clyst St Mary in the Villages Plan, by using the associated established criteria.</p> <p>Uses the new term 'Settlement Boundary' to reflect that in the emerging new Local Plan (previously built-up area boundary).</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC view – Material, but does not change nature of Plan • EDDC view – Agree. 	<p>It should be noted that there is a variation of a new settlement boundary for Clyst St Mary included in the current Regulation 19 Local Plan, which would supersede the boundary associated with this policy if adopted subsequently to this NP being made. If the site allocation under Policy BisC12 is retained in the final made version of this plan, it is suggested that we would endeavour to include this in our Local Plan settlement boundary to reflect this, in accordance with our new published methodology. However, we would also be likely to seek to retain the other smaller differences as they are proposed within the emerging Local Plan, including the inclusion of the recreation ground within the boundary and several garden spaces as again, this would align to our new methodology. This would not risk the development of the recreation ground as this would be protected by other policy, not least its designation as 'Local Green Space' in the Neighbourhood Plan. We would suggest it may be appropriate therefore to make reference to the emerging Local Plan in supporting text.</p> <p>In addition, for clarity in application suggest:</p> <ul style="list-style-type: none"> ○ Clause b) - inserting "adversely" before 'impact' for clarity ○ Clause c) - replacing 'consistent with' the character of the locality, which may stifle innovative design, with 'respects and complements' ○ Clause d) as stated at Reg 14, may need to be more positively worded, for example, provide information to demonstrate how the proposed development will be drained and wastewater dealt with.
Policy BisC12: Land East of Clyst St Mary	<p>Land to the east of Clyst St Mary as shown on Map 9 is allocated for residential development to provide at least 72 dwellings, which cater for local needs and demands.</p> <p>Development should be in accordance with an agreed Concept Plan, which demonstrates a fully integrated and co-ordinated housing scheme that complies with the requirements of this policy.</p> <p>Development proposals for the land shown on Map 9 will be supported, subject to the provision of:</p>	<p>New residential allocation policy intended to allocate land sufficient to meet the expected requirements of the new Local Plan.</p> <p>Policy also incorporates / replaces Made policy BiC06 re. smaller dwellings (albeit for this specific site only rather</p>	<p>Whilst this is a variation on sites that our work on the emerging Local Plan suggested were the most suitable locations for development at Clyst St Mary, we support the Qualifying Body in making this allocation which seeks to achieve certain community benefits that we were unable / unlikely to require through the Local Plan. Linked to the site selection, we note that our queries regarding the Strategic Environmental Assessment in terms of the preferred option and consideration of reasonable alternatives, have all been satisfactorily addressed.</p> <p>We do have some remaining concerns around landscape impact on the Clyst Valley but we do welcome both the potential for the development to</p>

Theme / Policy	Policy Wording	Change from existing Made Neighbourhood Plan Policy (with reference to 2017 Made Plan and submitted Modification Statement)	EDDC Policy Comments
	<p>a) a satisfactory vehicular access from the A3052, which includes a signal-controlled crossing to the A3052 to provide a pedestrian and cycle connection to Church Lane;</p> <p>b) an estate road between the A3052 and Bishops Court Lane, constructed to an adoptable standard and a specification to be agreed with DCC Highways, and open to the public before occupation exceeds 80% of the total houses on the site;</p> <p>c) traffic management measures implemented to Bishops Court Lane and Frog Lane to minimise their appeal to and use by through-traffic;</p> <p>d) the Clyst Valley Trail cycle route being incorporated through the development to connect with Bishops Court Lane along with other relevant cycle and vital pedestrian links;</p> <p>e) the provision of safe pedestrian routes through the development which can allow connection to existing or proposed footpaths, to enable residents to walk safely to bus stops, school and village services, and other local facilities and locations;</p> <p>f) adequate play and amenity space with satisfactory arrangements to cover its future maintenance;</p> <p>g) an overall housing density, design and layout in accordance with the Bishops Clyst Design Codes and Guidance;</p> <p>h) a mix of housing sizes, types and tenures that satisfy identified local needs and meet local demand, based on up-to-date local housing needs information;</p> <p>i) affordable housing provision, which satisfies the requirements of the LPA;</p> <p>j) a layout incorporating tree planting and landscape elements which both protects the residential amenity of Greenspire and effects a gradual transition from built area to countryside to reduce landscape and visual impacts on the Clyst Valley;</p> <p>k) landscaping and peripheral boundary treatment, which retains existing trees and hedgerows, providing a minimum 10m wide woodland buffer strip to the boundary with Bishop's Court Lane to give satisfactory screening of the development in views from the Clyst Valley Regional Park, and adequately protects priority habitats in the vicinity of the site;</p> <p>l) a heritage assessment, where relevant, to demonstrate that the significance of any nearby designated or non-designated heritage asset will be satisfactorily conserved or enhanced;</p> <p>m) a water supply, drainage, and sewerage scheme for the whole site, which ensures there will not be any worsening of foul and surface water flooding to existing properties in Clyst St Mary; and</p> <p>n) the development conforming with other relevant policies in the Neighbourhood Plan.</p>	<p>than residential development sites generally).</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC View – Material changing the nature of the plan EDDC view – Agree. 	<p>secure a route for the Clyst Valley Trail and to provide a 10m screening buffer, as requested by EDDC Officers at the previous stage. As raised at Regulation 14 stage, while we understand the community desire for a link road, we remain nervous about how certainty in securing this can be achieved and whether this is viable and deliverable. On this aspect, we are also concerned that with the representation received from the Highways Authority in respect of the highways connection from the A3052 to Bishops Court Lane may impact the rationale for the allocation.</p> <p>We have the following observations on the specifics of the policy as submitted:</p> <ul style="list-style-type: none"> Reference to agreed Concept Plan - this requirement follows a similar approach taken in the Regulation 19 version of the Local Plan where adjoining parcels of land in different ownership are allocated for one co-ordinated scheme. Suggest the wording in the policy could be refined to follow this lead by stating "This allocation will need to come forward on the basis of an agreed masterplan for the whole site that clearly demonstrates how comprehensive development will be undertaken and implemented to deliver a fully integrated and co-ordinated housing scheme that complies with the requirements of this policy. The masterplan must include measures to provide fully for infrastructure requirements and appropriate mechanisms for apportionment of development costs and contributions across separately owned land parcels. Planning permission will not be granted for any individual parcel of land in the allocation in the absence of this Masterplan. The masterplan, for the land shown on Map 9, will be supported, subject to the provision of" and then to continue with the list of the specific requirements. Habitat mitigation zones - given it is a fact that the site does lie within the zone for both the Exe Estuary and East Devon Pebblebed Heaths and payments would therefore apply, suggest greater clarity/certainty is provided by replacing this paragraph with, "The site lies within the Zone of Influence for the Exe Estuary SPA and the East Devon Pebblebed Heaths SPA and SAC. All new residential development is required to accord with the requirements set out in the current South-East Devon European Site Mitigation Strategy or any successor document." Housing mix - the plan suggests smaller (1 and 2 bed homes) are needed but the policy leaves the mix open, whilst the policy in the Made plan supporting smaller dwellings is lost. <p>In supporting text, to aid interpretation and implementation of the policy:</p>

Theme / Policy	Policy Wording	Change from existing Made Neighbourhood Plan Policy (with reference to 2017 Made Plan and submitted Modification Statement)	EDDC Policy Comments
	To protect the Exe Estuary SPA / Ramsar, Dawlish Warren SAC, East Devon Pebblebed Heaths SAC and East Devon Heaths SPA from in-combination recreational pressure, all residential developments within 10km of these European sites must make adequate financial contributions to identified strategic mitigation measures, as per the latest iteration of the South-East Devon European Sites Mitigation Strategy (SEDESMS). Developers should consult the SEDESMS in determining their geographic location in relation to the mitigation zone and pay the required financial tariff as per the latest strategy guidelines.		<ul style="list-style-type: none"> ○ Suggest it is clarified that the Concept (or 'Master') Plan should be developed in liaison with / subject to agreement with Devon County Council as Highways Authority – as well as the LPA and Parish Council already stated, and ○ for clarification and to aid enforcement, the source of evidence for the requirement for the new road to be open before occupation 'exceeds 80%' is cited (if it is retained), particularly in view of the representation made at Regulation 16 by DCC.
Policy BisC13: Community Facilities	<ol style="list-style-type: none"> Proposals for the redevelopment or change of use of community facilities will only be supported where: <ol style="list-style-type: none"> there is no reasonable prospect of viable continued use of the existing building or facility which will benefit the local community; they have been subject to consultation with the local community; and, it will provide an alternative community use. Proposals for new community facilities that meet a local need will be supported provided: <ol style="list-style-type: none"> they will not result in an adverse impact on the amenity of any existing neighbours, including businesses; there are safe and satisfactory pedestrian and vehicular access arrangements; and adequate servicing and parking arrangements. 	<p>Policy incorporates, replaces and broadens Made policies BiC08 re. safeguarding community facilities and BiC10 re. provision of local health services, extends support for 'new community facilities' generally in place of the current specific and sole support for a health service facility.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC View – Material, but does not change nature of Plan • EDDC view – Agree. 	<p>Notwithstanding this applies equally to the existing Made Policy (BiC08), there appears to be a conflict in the first part of the policy between criteria a) and c), in that both could not be satisfied. Suggest this may be resolved by inserting an 'and' between criteria a and b and replacing the 'and' with an 'or' between criteria b and c. Or perhaps c) is intended to refer to provision of an alternative replacement facility – in which case the wording needs to make this clearer.</p> <p>We would observe that there is strategic and non-strategic policy along similar lines to this policy in the adopted Local Plan that already gives a high degree of protection against loss of community facilities and support for new ones. This is strengthened further in the emerging local plan and given this plan is running ahead it could seek to align more closely to this non-controversial emerging to also:</p> <ul style="list-style-type: none"> ○ guard against 'partial loss' of facilities; ○ specifically require an assessment, over at least 12 months that demonstrates that a need no longer exists, and a financial viability assessment and demonstration of active marketing that clearly shows that there is no viable community use, even in a different format, and ○ Where a facility is lost, to requires an alternative facility to be provided in a pedestrian accessible location to the local community (of equivalent or better accessibility as that to be lost) and is of equal or higher community value and is being provided as an explicit replacement for the lost facility. <p>In respect of new facilities, notwithstanding that the plan should be read as a whole, we would suggest there are other pertinent aspects that should be added to the criteria in part 2, namely, local character and heritage and a pedestrian accessible location.</p>

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Policy BisC14: Primary School Provision	<p>Development proposals to improve existing primary school facilities will be supported where it:</p> <ul style="list-style-type: none"> a) would not have an adverse impact on the character of the area's natural and built environments; b) can be safely accessible by pedestrians and cyclists; c) has appropriate vehicular access and does not adversely impact upon traffic circulation; d) would not result in a significant loss of amenity to local residents or other adjacent uses; and e) does not conflict with other policies in the development plan. 	<p>New policy intended to facilitate improvements and additions to primary school provision to cope with future demands.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC View – Material, but does not change nature of Plan • EDDC view – Agree – is an entirely new policy area as the made plan only supported retention of the school as a community facility in general terms and supported development of new health rather than educational facilities. However, whilst this is significant it is not considered be to an extent that the nature of the plan is changed. 	<p>Support, subject to any comments from the Local Education Authority.</p>
Policy BisC15: Existing Business Space	<p>Proposals for change of use of existing business premises away from employment activity will be resisted unless it can be demonstrated that the existing use is no longer economically viable, and all reasonable steps have been taken to let or sell the site or building for employment purposes for a period of at least 12 months.</p>	<p>Replaces Made policy BiC11 and adds 12-month period requirement.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC view – Minor (non-material) • EDDC – Material but does not change the nature of the Plan – on the basis that the second part of the policy relating to the 12 month marketing period 	<p>Understand the inclusion of this policy for completeness and that it features in a less robust form in the made plan. However, we consider that the Local Plan policy is more robust. The adopted Local Plan requires marketing of at least 12 months (and 2 years in some instances) and the incoming Local Plan sets out detailed marketing and viability criteria.</p> <p>Given that most business space in the Neighbourhood Area is outside the Clyst St Mary settlement boundary and there are not many non-residential alternatives to business use, we also have a concern that this policy would allow re-use for residential use in the countryside if the viability/marketing requirements show business use is no longer viable.</p>

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		adds clarification as to how the first part should be demonstrated/assessed, but this is beyond a correction or update of a reference.	Overall, we would suggest that the NP would be better leaving this matter to the more robust LP policy or at the least, explicitly stating that residential use will not acceptable.
Policy BisC16: Business Areas	<p>Development proposals on the business areas listed below (and identified on Map 10) will be supported provided they are in keeping with those uses and business activity already on the sites and do not lead to the outward expansion of the sites.</p> <ol style="list-style-type: none"> 1. Langdon Business Park 2. Little Bridge Business Park 3. Westpoint 4. Winslade Park <p>All business/commercial development should:</p> <ol style="list-style-type: none"> a) respect the character of its surroundings by way of its scale and design; b) not harm the surrounding landscape; c) not adversely affect the significance of any listed building, heritage asset or setting; d) not have an adverse effect on its neighbours; e) not have an adverse impact on the transport network and parking conditions; f) safeguard residential amenity and road safety; g) be accessible by a range of modes of sustainable transport including on foot, by bicycle, or by public transport; h) mitigate any adverse effects of noise, air pollution light pollution and water pollution; and i) ensure the development will be safe from flood risk and not increase the flood risk elsewhere. 	<p>In combination with Policy BisC17, replaces and extends Made Policy BiC13 (Business Development) and updates to reflect the new operational business use at Winslade Park.</p> <p>Removes policy coverage specific to Bishops Court Business Park and adds Winslade Park. Adds a restriction to preclude outward expansion and extends the list of requirements for business/commercial development proposals.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC View – Material, but does not change nature of Plan • EDDC view – Material changing the nature of the Plan on the basis in combination with BisC17 this is a very different approach to employment spaces overall to the Made Plan. 	<p>Given the emerging Local Plan is proposing a 1ha allocation at Langdon's Business Park, the policy should acknowledge this – by stating ‘other than where permitted elsewhere in the development plan’. There is also a likely conflict as flagged at Reg 14 with adopted policy E7 which would allow small scale expansion of sites where they are at or near full capacity. However, this is not a strategic policy.</p> <p>Suggest that adverse impacts on neighbours and the transport network should be qualified as not having “any significant adverse impact on”.</p>
Policy BisC17:	1. Proposals to provide small-scale employment opportunities on major new residential developments, or through the change of use of an existing	In combination with Policy BisC16 replaces and extends	Generally supportive. However, would raise that:

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Business Development	<p>building, or the redevelopment of a brownfield site will be supported provided that the proposals:</p> <ol style="list-style-type: none"> do not involve the loss of a dwelling; contribute positively to the character and vitality of the local area; do not impact detrimentally upon designated or non-designated heritage assets and their settings; do not significantly harm residential amenity; and do not adversely impact upon road safety. <p>2. Proposals for new development that combines living and small-scale employment space will be encouraged provided there is no significant adverse impact on residential amenity and character.</p> <p>3. Where planning consent is required, small-scale, home-based businesses will be supported provided it can be demonstrated that:</p> <ol style="list-style-type: none"> residential amenity and the character of the location will not be unacceptably harmed by virtue of noise and disturbance, smell, traffic generation, scale, design, appearance, or nature of operations; the operation of the business activity can be contained within the existing curtilage of the premises; and the operation of the business activity does not require substantial external modification of the premises. 	<p>Made Policy BiC13 (Business Development). Adds reference to supporting employment on major new residential developments, 'live-work' type proposals, and home-based businesses. Adds further / differing criteria for the consideration of proposals.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC View – Material, but does not change nature of Plan EDDC view – Material changing the nature of the Plan on the basis in combination with BisC16 this is a very different approach to employment spaces overall to the Made Plan. 	<ul style="list-style-type: none"> Criteria 1.a) - as a blanket restriction against loss of a dwelling, is considered overly restrictive/inflexible. The local employment benefits may well outweigh the harm from losing a dwelling. Suggest this criterion is deleted. Clause 2 – As advised at Reg 14, we are not generally convinced by live-work units and consider these a risk to isolated residential development in the countryside 'by the backdoor'. If retaining such support, it needs to be qualified in terms of location to ensure an appropriate degree of control i.e. limited to locations within or immediately adjacent to the built up area of the village of Clyst St Mary.
Policy BisC18: Footpaths and Cycleways	<p>Appropriate improvement and enhancement of public rights of way will be supported as long as their value as wildlife corridors is not harmed.</p> <p>The appropriate creation and improvement of footpaths and cycleways to form a coherent, connected, and safe network in and around the neighbourhood area and to onward destinations, including the Clyst Valley Trail, will be supported provided there is no negative impact on designated habitats.</p>	<p>Incorporates, replaces and extends Made Policies BiC16 (Improving Footpaths and Links) and BiC17 (Improving Cycle Routes and Facilities). Updates to include specific reference to the Clyst Valley Trail and adds consideration of impact on habitats/biodiversity.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Minor (non-material) EDDC – Agree on basis no change to the intent. 	<p>Notwithstanding this is a more specific requirement in the allocation policy (BisC12), and features in the Sustainable Development Policy (BisC09), suggest this could go further than 'will be supported' by including an expectation that new developments take the opportunity to make appropriate links to connect / further foot and cycle links.</p>

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Policy BisC19: Parking Provision	<ol style="list-style-type: none"> 1. Development proposals should provide off-road vehicle parking and servicing spaces commensurate with the level and intensity of the proposed use and the accessibility of the location, to facilitate unimpeded road access for other road users, including motor vehicles and pedestrians. 2. New residential development should provide a minimum of one off-street parking space for dwellings with 1-2 bedrooms, and a minimum of two off-street spaces for dwellings with 3 or more bedrooms. Proposals for housing developments of four or more dwellings should provide one further off-street visitor parking space per four dwellings. 3. New residential development should provide parking and storage space for cycles in accordance with the requirements of the Local Plan. 4. Proposals to provide additional off-road parking spaces in Clyst St Mary and Sowton villages will be supported where they do not have an adverse impact on: <ol style="list-style-type: none"> a) local character; b) residential amenity; c) highway safety; and, d) flood risk (including local surface water flooding) 5. Wherever practicable, permeable materials for surface parking areas shall be used and facilities for charging plugin and other ultralow emission vehicles should be incorporated into the proposal. 6. For public parking areas, as a minimum, the provision of electric vehicle charging points should be in accordance with the prevailing requirements of the development plan. 	<p>Incorporates and replaces Made Policies BiC14 (Off-road Parking Spaces for Existing Facilities), BiC15 (Off-Road Parking Spaces for New Development). Adds specific parking standards and references to cycle parking and electric vehicle charging.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC view – Minor (non-material) • EDDC – Material but does not change the nature of the Plan on the basis of the additional requirements that do not appear in the made policy. 	<p>No objection. Aware there are similar policies on parking standards in other neighbourhood plans and that the plan states that car ownership is high and there are issues related to traffic movement. However, we would observe that this would slightly at odds with the proposed incoming parking standards in the new Local Plan, which is based on latest evidence of good practice, of a flat rate of 1.7 spaces per dwelling flat rate (irrespective of bedrooms) and that this policy will in due course supersede the NP policy. It may therefore be prudent to consider making the NP standards a specific requirement within the housing allocation site policy (BiSC12).</p>
Policy BisC20: Vehicular Access to Sowton Village	Proposals for improved alternative vehicular access to Sowton Village with walking and cycling lanes will be supported.	<p>New policy intended to support improved vehicular access to Sowton village.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> • BPC View – Material, but does not change nature of Plan • EDDC view – Material changing the nature of the 	<p>The strategic Clyst Valley Regional Park is likely to improve cycling/pedestrian access in this area, but probably not vehicular access other than for occasional maintenance. Notwithstanding policy protection elsewhere, it may be prudent to include a criteria state this support would be subject to ensuring there is no harm to the historic character and significance of heritage assets. Overall, note this an aspirational policy and no objection, subject to comments of the Highways Authority.</p>

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		Plan - whilst this is a very aspirational /high level policy, improving vehicular access is quite significant and potentially controversial and therefore should be subject to local referendum.	
Policy BisC21: Sports and Recreation Facilities	<p>1. Development which would result in the loss of the following public sports facilities to a non-sports use on the following sites:</p> <p>A. Clyst Valley Football Ground</p> <p>B. Winslade Park Sports and Recreation Area</p> <p>will not be supported unless:</p> <p>a) the applicant satisfactorily demonstrates that there is no continuing demand for the facility, and it is not possible to use the facility for other sports; or</p> <p>b) alternative provision of at least an equivalent quality, size, suitability, and convenience within the Neighbourhood Plan Area is made.</p> <p>2. Development which would result in the change of use of the following private sports facility to a non-sports or recreation use on the following sites:</p> <p>C. Clifford Hill Training Ground</p> <p>D. Exeter Youth Rugby Ground at Oil Mill Lane</p> <p>will be resisted. If there is no continuing demand for sports or recreation use of the facility, the site should revert to its former use.</p> <p>3. Improvements and extensions to existing sports and recreation facilities that meet a proven need and/or increase opportunities for local people to participate in leisure, recreation, play and associated social activities will be supported provided that:</p> <p>a) they do not create unacceptable disturbance to neighbouring properties by way of noise, light spillage, and unsociable hours;</p> <p>b) the use of any floodlighting has mitigation measures in place to protect nearby residential property and areas of nature conservation; and</p> <p>c) access and sufficient off-road parking can be satisfactorily provided without harming existing residential and other uses and highway safety is maintained.</p>	<p>Incorporates / replaces Made policies BiC20 (Protecting Existing Sport Facilities), BiC21 (Increasing Sports and Recreation Opportunities) and (in part) BiC19 Local Green Space by merging policy and naming specific sites to be subject to it. Adds differentiation between the treatment of public and private spaces in the event of a lack of continued demand and addition of highway safety as a consideration of proposals for improved facilities.</p> <p><u>Modification Classification:</u></p> <ul style="list-style-type: none"> BPC view – Ranging from ‘Minor (non-material)’ re. Made Policy BiC20 to ‘Material, but does not change nature of Plan’ for BiC19 and BiC21. EDDC view – Material but does not change the nature of the Plan 	Support – no comments.

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