

Beer Neighbourhood Plan 2014-2031

Consultation Statement



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Beer Parish Council

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Context

1. Introduction

Our Neighbourhood Plan has been produced by Beer Parish Council, as the “qualifying body” with overall responsibility for the preparation, consultation and submission of the Neighbourhood Plan. Material relating to the production of the plan is available on the neighbourhood plan pages of the parish council website at

http://www.beerparishcouncil.org.uk/BeerParish/beer_neighbourhood_plan-20304.aspx.

The development of the plan and management of the process has been marshalled by a Neighbourhood Plan Steering Group comprised of members of our community and Parish Councillors.

This Consultation Statement has been prepared by the Beer Neighbourhood Plan Steering Group to conform to the legal obligations of the Neighbourhood Planning Regulations 2012.

Section 15(2) of Part 5 of the Regulations sets out what a Consultation Statement should:

- Contain details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- Explain how they were consulted;
- Summarise the main issues and concerns raised by the persons consulted; and,
- Describe how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

The first part of this Consultation Statement summarises all statutory and non-statutory consultation undertaken with the community in developing the Beer Neighbourhood Development Plan. The second part summarises all statutory and non-statutory consultation undertaken with strategic and statutory consultees.

The aims of the Beer Neighbourhood Plan consultation process were to:

- ‘front-load’ the consultation, so that the Plan could be informed by the views of local people and other stakeholders from the earliest stage;
- ensure that consultation events and drop-in sessions enabled people ‘have their say’ and get feedback on the emerging plan at key points in the process and when decisions were required;
- engage with as wide a range of people as possible, using a variety of events and communication techniques; and,
- ensure that the results of consultation and updates on the neighbourhood plan were provided for local people as soon as possible after consultation events through the most appropriate and widely read media.

This Consultation Statement and the supporting appendices are considered to comply with Section 15(2) of part 5 of the 2012 Neighbourhood Planning Regulations.

2. Background to Consultation on the Neighbourhood Plan

Beer Parish Council agreed to undertake a Neighbourhood Plan in the summer of 2013, after which the application to designate the Neighbourhood Area was submitted to East Devon District Council (EDDC). A steering group was established in the weeks and months that followed by recruiting willing members of the Parish Council and from the community at large. The Neighbourhood Area was designated by EDDC on 3rd October 2013 following consultation¹.

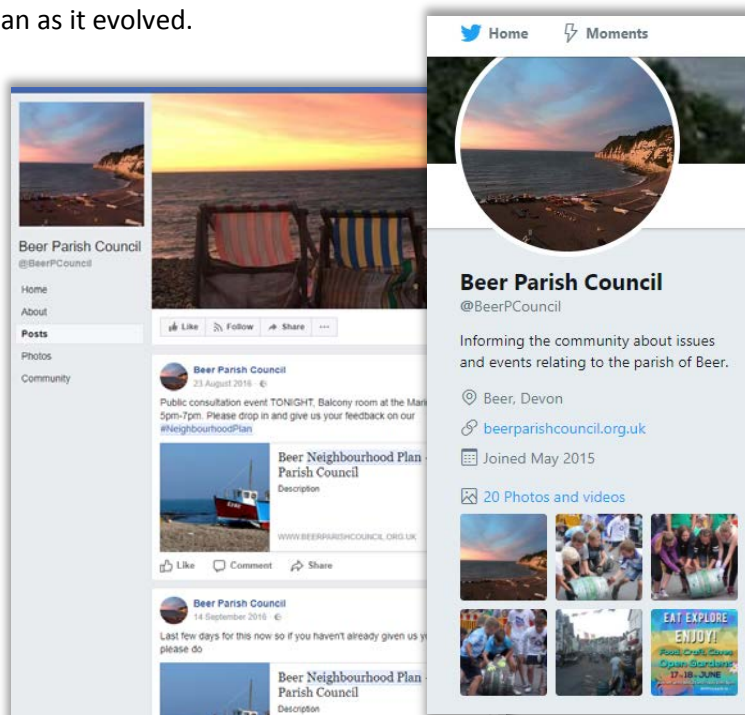
The level of consultation that has been undertaken for the Neighbourhood Plan goes beyond that required by legislation as the Parish Council and its Steering Group has continuously sought to work with the local community to make the Plan, as much as possible, reflect their views and wishes.



In preparing the Beer Neighbourhood Plan the Steering Group has tried to ensure that residents and other stakeholders including local authorities, interest groups, land owners, businesses (some individually and some via the Coastal Communities project) and statutory bodies have been consulted and that their comments have been noted and where appropriate incorporated into the Plan as it evolved.

In order to make available information and notices and update residents and stakeholders on the progress of the Plan an early decision was taken to develop Neighbourhood Plan pages on the Parish Council website² so that as much information as possible could be made easily accessible online.

The Parish Council Facebook and Twitter pages were also used to post notices about the neighbourhood plan's development to try to reach as many members of the community which use social



¹ The application and EDDC Cabinet meeting decision are appended to this Statement.

² See http://www.beerparishcouncil.org.uk/BeerParish/beer_neighbourhood_plan-20304.aspx

media as possible³.

Figure 1 below sets out a summary timeline for the key elements of consultation.

Figure 1: Timeline of Key Elements of Consultation



³ See <https://www.facebook.com/BeerPCouncil/> and <https://twitter.com/BeerPCouncil>

Community Consultation

3. Overview and Summary of Main Community Consultation Elements

Beer Parish Council was keen to ensure that the Neighbourhood Plan was a community-led document. The Beer Neighbourhood Plan Steering Group was established from community volunteers with Parish Council representation and we have tried to engage the widest range of people and groups possible during the process.

At the start of the Plan process the Parish Council had already engaged the community in various planning matters including the East Devon District Council (EDDC) Strategic Housing Land Availability Assessment (SHLAA) local open day in 2012, the formation of a Community Land Trust (CLT) in 2013 (leading to successful delivery of affordable housing in 2015)⁴ and commissioning a housing needs survey in July 2013⁵. It is therefore with a good understanding of some of the planning challenges that the parish faces that we entered into neighbourhood planning.

We considered how best to approach consultation with the community at the start of the process, producing a Communications Strategy⁶ and Community Engagement Programme⁷ to guide us during the process with some guidance from our planning consultants Stuart Todd Associates Ltd.

Regular updates about the Plan's development and progress were given at parish council meetings by parish councillors sitting on the neighbourhood plan steering group.

Consultation took place at the following stages in the neighbourhood planning process. These are set out with more detail later in this Statement alongside other key parts of the ongoing consultation and communication process as the plan was developed.

Beer Neighbourhood Plan – Main Consultation Elements		
Element	Dates	Purpose
Preliminary email consultation with community and strategic consultees	Autumn 2014	To notify consultees that work on the plan has commenced and request initial views on planning and land-use related matters of importance in the parish
Neighbourhood Plan Community Questionnaire (Survey)	November 2014	Gather opinions from residents in the Parish on a range of planning related issues
Public Consultation on draft Vision, Aims and Objectives of Neighbourhood Plan (drop-in events)	6 th and 7 th March 2015	Consult on draft vision, aims and objectives and share survey results and written evidence base research
Public consultation on first draft of Plan and on housing site	June to September 2016	To get initial views on the first draft of the neighbourhood plan and on potential housing

⁴ See <http://www.beerclt.org/>

⁵ See <http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/Documents/HN%20report%20Beer%20Final.pdf>

⁶ See <http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/np/Beer%20Communications%20Strategy%20bpc.pdf> and appendix to this report.

⁷ See <http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/np/Beer%20NP%20community%20engagement%20proposalbpc.pdf> and appendix to this report.

Beer Neighbourhood Plan – Main Consultation Elements		
Element	Dates	Purpose
options (via events, survey and newsletter)		sites for inclusion in the plan (particularly from the community).
Pre-submission Draft Plan consultation (Regulation 14) (principally via online and hardcopy availability of the Plan)	20 th October to 1 st December 2017	Pre-submission (Regulation 14) consultation

4. Summary of Consultation Approach to Engage the Community

A number of key community consultation stages were identified at the outset in our Communications Strategy and Community Engagement Programme. These were used as a guide and timings reviewed during the process by the steering group. This was done to enable each consultation stage to be properly planned for and to ensure that the community at large understood when and why they were being consulted.

There was a desire by the steering group for the process' outputs to remain proportionate to the tasks while meeting requirements set out in the Regulations and following good practice. It was also keen to avoid consultation fatigue amongst the community and to make key stages of consultation worthwhile to help move the process forward.

The basis of our approach to consultation with the community was to follow a number of important principles:

- Publicising as widely as possible
- Utilising a variety of methods
- Applying the right method to the task and the required outcomes
- Providing appropriate levels of assistance, explanation and interpretation
- Maximising access and opportunity
- Encouraging reaction and feedback
- Reporting back on what was said and how it has been interpreted

Aside from programmed and organised consultation 'events' during key stages of the process, the Steering Group has been keen to facilitate a continuous two-way dialogue with the community at large. This has been achieved by:

Communication Methods:	Brief Description:
Website	Regular updates and documents made available on the Parish Council Neighbourhood Plan website pages
Reporting in person	Face to face meetings with local stakeholders
Social Media	Regular posts on the Beer Twitter and Facebook pages
Email stakeholder contact list	We built up a contact list of key stakeholders which we used to distribute updates of consultation during the process.
Parish Newsletter	Residents and businesses given regular updates in the Parish newsletter ⁸
Noticeboards	Notices and bulletins on Parish Council and other public

⁸ Examples of which are appended to this report for info.

Communication Methods:	Brief Description:
	noticeboards
Posters	In local shops, pubs, cafes, beach huts, school newsletter, Councillors' homes etc.
Parish Council Meetings	Regular reports of progress to parish councillors
Annual Parish Meetings	Report of progress to the annual parish meetings during the plan's development.

5. Equality and Inclusivity

We recognise that the foundation of a good neighbourhood plan is an effective and inclusive programme of consultation and engagement. Our aim was to reach everyone with a stake in the future of the area including people living, working or doing business here, those who deliver services to the local communities and people who have influence over the future of the area. We wanted to communicate and listen to everybody with a view; regardless of gender, ethnicity, colour, disability, religion, family responsibility, age, occupation, marital status, or sexual orientation.

6. Details of Consultation Approach to Engage the Community

6.1 Preliminary email consultation with community consultees

How and who did we consult?

We contacted local community groups and organisations via email to introduce the neighbourhood plan process, to ask a series of questions and to also give the opportunity for other issues to be raised. We asked:

- What is good and not so good about the parish today?
- What could be done to make the parish a better place to live and work?
- What, if anything is preventing your organisation from functioning as it would wish?
- Your organisation's needs for different or better accommodation or more space in future?
- What you hope we might tackle through the Neighbourhood Plan?

A list of the consultees contacted is appended to this Statement.

What did they say?

We received two replies (from the East Devon Ramblers and the Beer Arts group), copies of which are available on the website⁹. However, in summary, some of the key issues identified include:

- More employment and housing attractive to young adults.
- Better transport.
- Greater occupancy of the housing stock year round.
- Reversing the trend of changing business premises to holiday lets.

⁹ See http://www.beerparishcouncil.org.uk/BeerParish/beer_neighbourhood_plan-20304.aspx

- An affordable village hall.
- Parking provision and pricing aimed at helping businesses.
- Better signage to prevent visitors driving around the village and ending up in the same place wasting fuel and adding to the pollution.
- Maintain and improve the rights of way network as a part of the 'Green Infrastructure' and for the importance for health and wellbeing of open spaces and exercise.
- Walking should be encouraged, and could be considered within the Neighbourhood Plan as an integral part of any proposals, including those for creating local work opportunities and additional tourism outlets.

How were the issues and concerns responded to?

These issues were considered by the steering group as it developed aims and objectives for the plan.

6.2 Community Questionnaire (Survey)

How did we consult?

We developed a community questionnaire which was distributed to all households in the parish¹⁰. The questionnaire comprised in total some 36 questions. It was approved for printing by the Neighbourhood Plan Steering Group on the 23rd October 2014. The purpose of the community questionnaire was to:

- Fill gaps in our knowledge and understanding of community issues, particularly as they may affect neighbourhood planning – as identified by the Neighbourhood Plan Local Evidence Report¹¹;
- Increase comprehension and measure community opinion on key local and neighbourhood planning matters;
- Test community support and reaction to recent planning and development proposals; and,
- Establish a broader base of community interest and engagement in neighbourhood planning.

Beer Neighbourhood Plan: Neighbourhood Plan Questionnaire	
Date(s)	November – December 2014
Delivery Method(s)	By hand (volunteers)
No. of questionnaires delivered	c.800
No. of completed questionnaires returned	242
Return Options	Parishioners were asked to drop the completed questionnaire off at Beer Post Office. For ease of completion and analysis they were also encouraged, as an alternative, to use the internet to complete the questionnaire on-line.

¹⁰ Available to see (together with the survey report) here

<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/np/Beer%20NP%20Community%20Survey%20Report%2031dec14.pdf>

¹¹ See

<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/np/Beer%20Neighbourhood%20Plan%20Local%20Evidence%20Report%20-%20November%202014.pdf>

Who was consulted?

Everybody who lived, worked or visited the parish was given the opportunity to complete the Community Questionnaire. It was delivered to every dwelling in the parish and additional copies were provided to households if required.

What did they say?

Responses to the questionnaire were compiled in a report of the event and a breakdown of the questionnaire responses¹².

Responses are not set out in detail here (please see the report itself for detail) but some of the key issues raised at events and in the questionnaire that were relevant to land-use planning are set out below:

- A large majority of respondents are in favour of new housing that is affordable to local people whether it be for sale or rent. Only 12% of respondents are in favour of more open market new houses being developed.
- Just over a quarter of respondents see the need for homes that are more suitable for the elderly.
- Most local people (77% of respondents) still feel that it is important to keep a green wedge that maintains separation between Beer and Seaton.
- Solar panels on the roofs of buildings is acceptable to almost two-thirds of people (63%). All other forms of renewable energy generation do not find favour with a majority.
- Tourism is very important to Beer, according to the community, with 99.6% of respondents saying it is. Significantly, 85% of people are satisfied with the type of tourist and visitor destination the village and parish is at present. However, 71% of respondents do support the proposition that we should try to increase further the number of visitors and extend the tourist season.
- Local opinion as to whether the beach at Beer needs additional facilities is split. Amongst the 51.5% of people that think more is required, the most popular suggestion by far is for beach level toilets and showers. A number of people also suggest we should make access to the sea easier.
- As regards the current community facilities and services in the Parish, schooling is rated most highly by the respondents – 88% of respondents rate it as good or very good. The Community Rooms also receive a good or better rating by a two-thirds majority of people (67%).
- Opinion is divided about local retail outlets and whether they meet daily shopping needs.
- The local services that are rated poorest by local people are banking and financial services and other business and professional services. The lack of a local bank and an outdoor ATM are by far most cited “missing” service.
- Only 7% of respondents say that they wish to work from home but cannot do so at present because of local circumstances. Broadband speed and reliability is the most often mentioned constraint.
- Opinion is divided on whether we need any more designated parking areas. A small majority believe that we do.
- The leisure and recreation facilities and opportunities in the Parish have received mix reviews. Approaching three-quarters of people rate clubs and societies as good or better. Just under 70%

¹² Available to see (together with the survey report) here

<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/np/Beer%20NP%20Community%20Survey%20Report%2031dec14.pdf>

of people give our parks and open spaces a positive rating. What ranks low are indoor facilities, which are thought to be poor by over 50% of people; and facilities for young people, which almost two-thirds of people rate as poor. Play facilities for younger children are rated as only adequate or poor by over 50% of people. 76% of respondents believe there should be more or better leisure facilities for young people.

How were the issues and concerns responded to?

The results of the feedback from the questionnaire was discussed by the NP Steering Group who, from the responses, identified the initial key planning issues appropriate for inclusion in the Neighbourhood Plan.

The 'messages' from the community that came out of the survey and accompanying comments were a key aspect of the process to develop a set of draft aims and objectives for the Neighbourhood Plan. To do this the Steering Group took part in an Aims and Objectives Workshop in February 2015. The resultant set of draft aims and objectives (and overarching vision for the plan), we believe, reflected fairly what local people told us through the questionnaire.

6.3 Vision, Aims and Objectives Consultation

How and who did we consult?

With guidance from our consultants, Stuart Todd Associates Ltd., the Beer Neighbourhood Plan Steering Group interpreted the information gathered through the questionnaire, written evidence research and other comments received during the above processes.

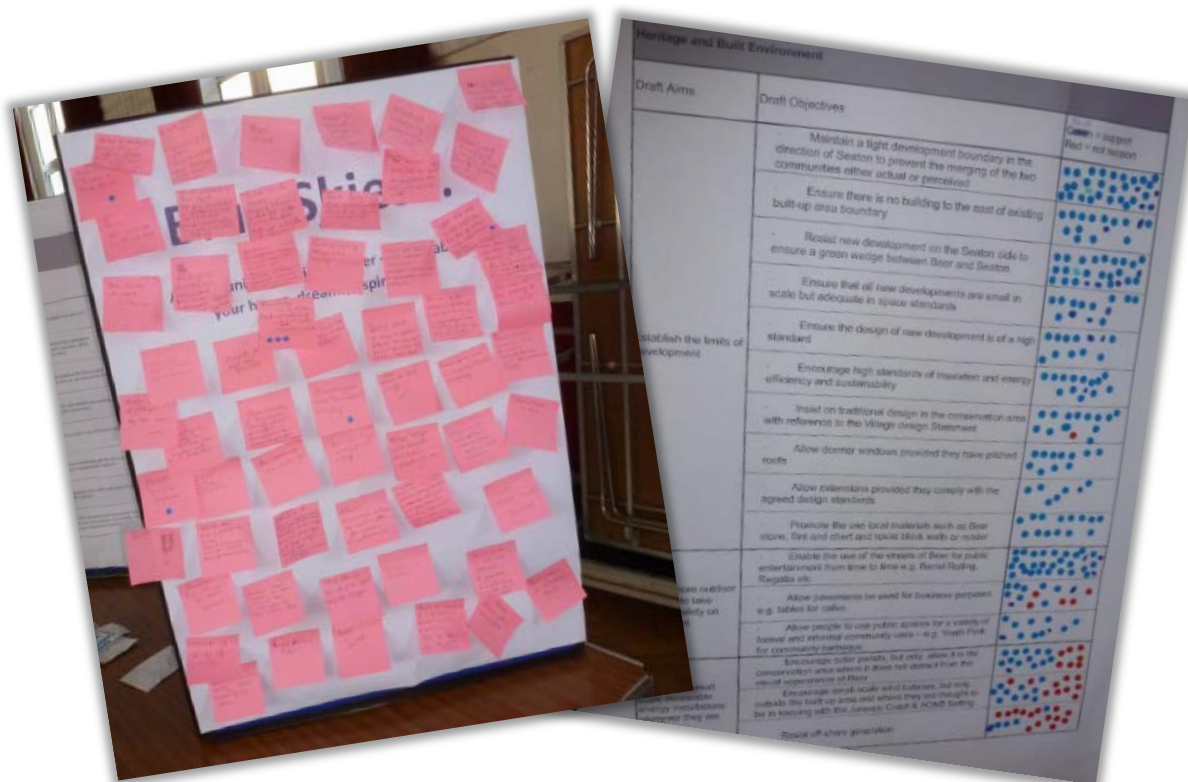
We used all of this 'evidence' to prepare a set of draft aims, vision and objectives for the Plan. We wanted to test these draft aims and objectives with the community for their comments to determine if we had missed anything important or produced aims and objectives which did not fit the evidence and feedback we had been given to date.



Beer Neighbourhood Plan Vision, Aims and Objectives Consultation	
Date(s)	6 th and 7 th March 2015
Location(s)	Mariners' Hall, Beer
Attendance (Nos.)	c.100

We held a community consultation which presented our findings and set out, for the public to consider, the key neighbourhood planning and development issues and opportunities presented to us to date, encapsulated by the draft aims, vision and objectives. We asked the community if these set the right agenda and 'direction of travel' for the Plan. Our purpose was to be able to leave this phase of consultation with a good idea and some certainty of the sorts of policies and proposals that the Plan should contain and, importantly, which the community support. From the consultation we also wanted to be in a position to draw-up a range of policies and proposals that might be in the Plan. We also took the opportunity to report back on what had been done to date.

The consultation took place in the Mariners' Hall over two days. The consultation was advertised through the usual media; the website, social media, posters (for example, in shops, Councillors' house front windows, pubs, beach huts, cafes and school newsletters) and a notice in the parish newsletter.



We encouraged those who attended to leave their comments on post-it notes and also to indicate their support or not for the draft aims and objectives using blue and red dots. We set out some key words from the aims and objectives to help facilitate people's thinking and asked them to select words and phrases which were important to them.

What did they say?

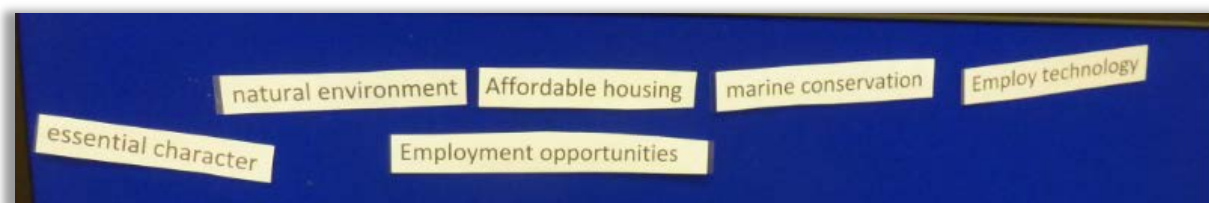
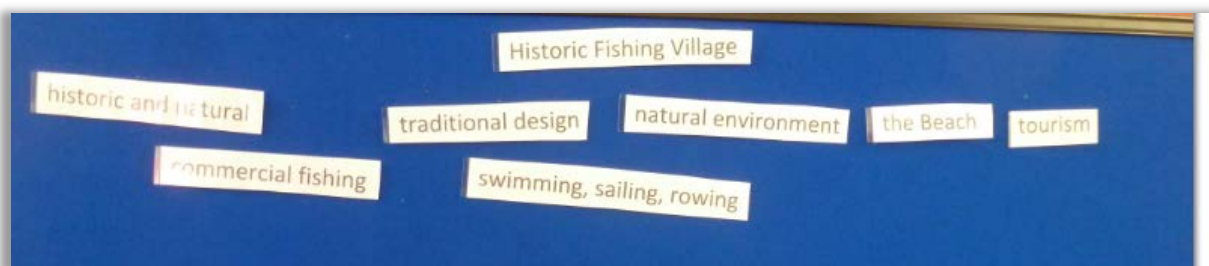
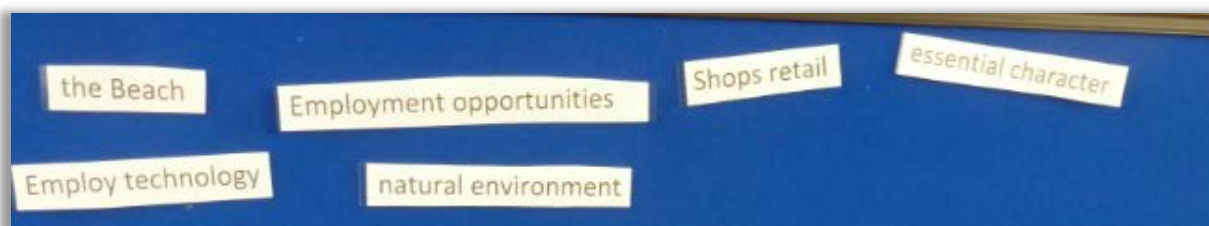
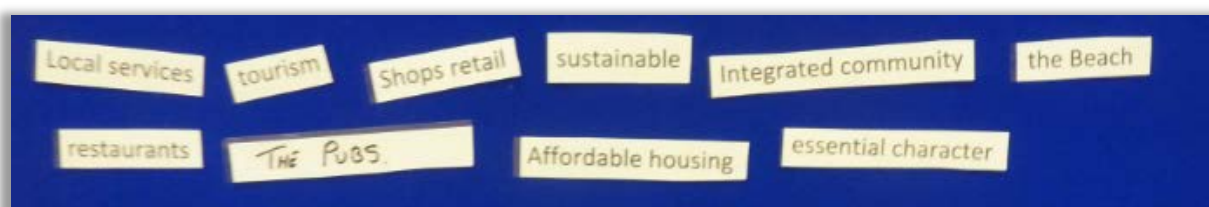
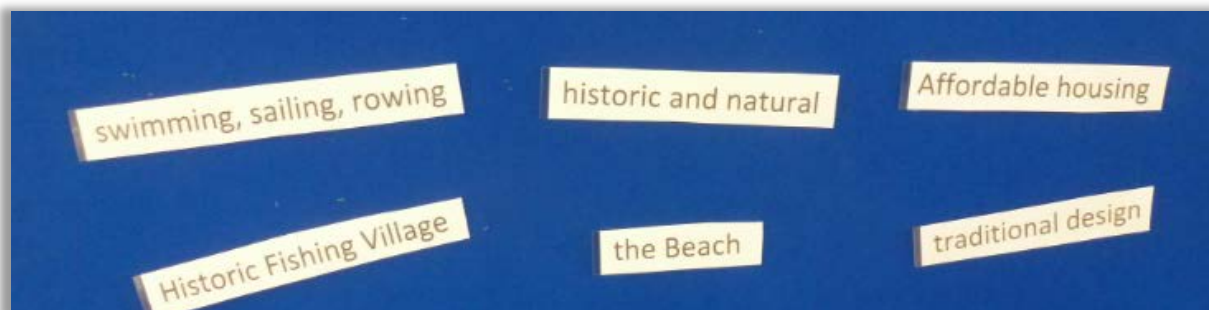
Overall, people seemed very positive about what was shown. The feedback we received was generally consistent with the answers provided to the community questionnaire. The results of the dots exercise and the comments left are available on our website¹³.

¹³ See

<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/Documents/beer%20aims%20and%20objectives%20rev1.>

In summary, some 60 post-it notes with comments were left and the dots exercise revealed that some draft aims and objectives received as many as 30 – 40 blue and red dots. The number of dots left for each aim and objective varied and we took the overall number left for each as an indication of the degree of priority of or value attached to each.

From the key words we provided from the aims and objectives, some examples of people's selections are set out below. There were common themes which emerged from this exercise.



The result of the consultation was that we gained overall support for the draft aims and objectives and received comments and an indication of those which required minor amendment to reflect better indicative priorities, intent or the degree of support given.

How were the issues and concerns responded to?

The results of the consultation exercises were discussed by the Steering Group and some minor amendments made to the draft aims and objectives as a result, as indicated by the document on our website¹⁴. We gained a good understanding from those who attended the event of what issues, aims and objectives were a higher priority than others.

After this stage we also removed from the neighbourhood plan process any aims or objectives that planning policies cannot deliver or respond to but that are better carried forward by the parish council through community actions. The resulting aims and objectives were then used to develop the draft policies for the plan.



6.4 Public Consultation on First Draft Plan and Housing Site Options

How did we consult?

We held a 3 month consultation period during the summer of 2016 on our first draft of the full neighbourhood plan. The plan was made available on the website and its availability and our consultation events were advertised through the usual media; posters, social media, newsletter articles / notices and so on. We had an extended consultation period because we wanted to try to capture the views of second home owners who may only be resident in the parish over the summer months and also because we were asking views on additional housing sites which might be appropriate for allocation in the plan, due to changing planning circumstances in the parish¹⁵.

Consultation forms were made available to be able to gathered structured responses. 81 of these were received. We held a consultation event in August to encourage comments and answer questions about the draft plan and site options.

¹⁴ See

<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/Documents/beer%20aims%20and%20objectives%20rev1.xlsx>

¹⁵ At the time that the first draft plan was drafted, there appeared to be no need to allocate a site or sites in the plan (and so no sites were allocated in it), which changed over the course of time with an application for a site which would have accommodated the residual amount of development for the remainder of the Local Plan period being dismissed at an appeal.

Beer Neighbourhood Plan Public Consultation on First Draft Plan and Housing Site Options	
Date(s)	June – September 2016 (consultation period) 4 th August, 6 th August, 23 rd August 2016, 7 th September (consultation events)
Location(s)	Mariners' Hall and Sailing Club, Beer
Approx. attendance (nos.)	c.100


Who was consulted?

The focus for this consultation was to engage the local community, although the consultation document and comments questionnaire and forms were all made available on the website for wider stakeholder comments. It was important for us to get the views of the community first on the draft plan. This was the first opportunity to see the plan “proper” and we wanted to get comments and a level of endorsement for the draft from the community first (given that it is their plan) prior to moving forward to the formal consultation (Regulation 14) stage during which statutory and strategic consultees would be contacted. It was also important to have this stage as we were introducing the opportunity to allocate a site or sites in the plan which was previously not something that we considered necessary.

What did they say?

A report was produced setting out the responses received to the development sites questionnaire and the comments made in response to the policies in the draft plan. From these we also set out the steering group response to the comments on policies and on sites. All reports of this consultation are available on our website¹⁶.

YOUR VILLAGE NEEDS YOU!



**HAVE YOUR SAY, MAKE YOUR
OPINIONS COUNT, DON'T ACCEPT
WHAT YOU DON'T WANT!**

**NEIGHBOURHOOD PLAN
CONSULTATION FORMS AVAILABLE**

**HELP GUIDE DEVELOPMENT THAT
WILL BENEFIT THE VILLAGE**

FORMS FROM ANY PARISH COUNCILLOR, DROP IN SESSIONS AS LISTED BELOW OR VISIT BPC WEBSITE AND FOLLOW NEIGHBOURHOOD PLAN LINKS www.beerparishcouncil.org.uk

4 Aug Mariners' Hall Flower Show 2:30; 6 Aug Mariners' Hall Coffee Morning; 23 Aug Mariners' Hall 5:00 to 7:00
7 Sept Sailing Club Coffee Morning. There will be members of the PC to discuss issues at these events.

¹⁶ See

<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/Documents/BPCSiteallocationConsultationReportDRAFTv2.docx>,
<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/np/BeerNPsiteallocationconsultationwithresponses2016P ART2GP.docx> and
<http://www.beerparishcouncil.org.uk/BeerParish/UserFiles/Files/np/BeerNPsiteallocationconsultationwithresponses2016P ART3GP.docx>

How were the issues and concerns responded to?

In summary, we received some valuable comments which helped to shape the policies further and overall endorsement of the direction of travel of the policies. Our responses also had to provide explanation in reply to some comments made with regard to the limitations of our policies and the planning system in dealing with some of the issues highlighted and suggestions made, many of which were valid but outside the remit of a neighbourhood plan to solve.

The comments received on site options were also helpful. Alongside the written evidence and research relating to the merits and constraints of each site and the Strategic Environmental Assessment and Habitats Regulation Assessment they have informed our preferred option for development identified in the submission neighbourhood plan.

As noted above, all reports of the consultation are available on our website.

6.5 Regulation 14 (Pre-submission Stage) Consultation

How did we consult?

Neighbourhood Plan regulations require that a statutory consultation period of 6 weeks is undertaken by the qualifying body (the Parish Council) on the final draft plan prior to its submission to the Local Planning Authority in advance of their statutory Regulation 16 consultation.

In addition to following the requirements set out in the Regulations, we contacted all of those on our email consultee list (which includes a list of local businesses and community contacts), and advertised the consultation through the usual media; the parish newsletter, website, social media and posters in the parish. We also made the plan available at our regular parish council surgeries.

The full Plan, together with a response form, was made available on the website. Weblinks were sent to consultees and included on any publicity material.

Who was consulted?

The Regulation 14 consultation is specific about organisations and stakeholders that should be consulted. The legislation requires that prior to submitting the Plan to the local planning authority the qualifying body (the Parish Council) must:

- publicise it in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area;
- consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and,
- send a copy of the proposals for a neighbourhood development plan to the local planning authority.

All of the residents and businesses within the parish were consulted together with the required statutory and strategic bodies (see the second part of this Statement). A copy of the plan was also sent to the Local Planning Authority, East Devon District Council, although its officers had previously provided comments to help shape the policies of the Plan as they were drafted and to provide guidance throughout its development.

What did the Consultees say?

A total of 16 written responses were received, 3 from individuals and 13 returns from strategic or statutory stakeholders and consultees (see the second part of this Statement), 1 of which was from a land owners' representative. A summary of the responses is appended to this Statement.

How were the issues and concerns responded to?

We set out the responses received and responded to them in terms of our reaction and whether or not they lead to any changes to the plan and its policies. We discussed these responses with EDDC to draw on their knowledge and expertise and the interface between the neighbourhood plan and the Local Plan. Our report of the responses and our suggested changes to the plan as a result is appended to this Statement.

7. Conclusions

The level of community consultation and engagement undertaken during the production of the Beer Neighbourhood Plan has been varied and extensive. It has reached a wide range of the local population through a variety of methods and mediums. A wide variety of groups and different sections of the community have participated or commented on the emerging draft Neighbourhood Plan during the process.

The comments received at each stage of the Neighbourhood Plan's development have been fully considered and have helped to guide and shape the form of the Plan so that it is truly reflective of what local people wish to see happen in the parish.

Statutory and Strategic Consultees

8. Overview and Summary of Main Community Consultation Elements

The following part of the Statement sets out how and at what stages we consulted strategic and statutory consultees. Our approach to consulting statutory and strategic consultees mirrored the principles we set for community consultation.

As all consultation was public (with material posted on social media and our website), statutory and strategic consultees had the same opportunities to engage with the process as the community. However, we paid particular attention to inviting statutory and strategic consultees to comment at key parts of the process.

Consultation with strategic and statutory consultees took place specifically at the following stages in the neighbourhood planning process.

Beer Neighbourhood Plan – Main Consultation Elements		
Element	Dates	Purpose
Preliminary email consultation with community and strategic consultees	November 2014	To notify consultees that work on the plan has commenced and request initial views on planning and land-use related matters of importance in the parish
Pre-submission Draft Plan consultation (Regulation 14) (principally via online and hardcopy availability of the Plan)	20 th October to 1 st December 2017	Pre-submission (Regulation 14) consultation

9. Summary of Consultation Approach to Engage Statutory and Strategic Consultees

We prepared a contact list of all bodies and organisations that serve or provide services to the parish for use during the development of the Plan and during the later stage of pre-submission (Regulation 14) consultation.

As set out earlier in this Statement, the aims of the Beer Neighbourhood Plan consultation process were to:

- ‘front-load’ the consultation, so that the Plan could be informed by the views of those with an interest in the parish from the earliest stage;
- to ensure the neighbourhood planning process was informed by the views and intentions of statutory bodies and stakeholders;
- to take fully into account those views and intentions; and,
- meet the requirements of Regulation 14.

All communication with statutory and strategic consultees was undertaken via email and we are not aware of any such consultees attending our public consultation events.

10. Details of Consultation Approach to Engage Statutory and Strategic Consultees

10.1 Preliminary email consultation with community consultees

How did we consult?

The intention to prepare the Beer Neighbourhood Plan was first publicised by the local planning authority, East Devon District Council, following the Parish Council's application to have the parish area designated as a Neighbourhood Area in the autumn of 2013.

In addition to fulfilling the requirements to formally consult with statutory and strategic consultees at the pre-submission stage of the Plan's development, it was decided to make the early contact with several bodies and organisations (where we knew there to be issues to discuss raised by the community or which the Parish Council was already aware of) that are defined as a consultation body under the terms of schedule 1 of the Neighbourhood Plan Regulations 2012.

Who was consulted?

A list of all the statutory and strategic consultees we wrote to during the development of the Plan is appended.

What did they say?

We received 15 responses from: DECC; DEFRA; CPRE East Devon; Devon County Council Historic Environment Team; Sport England; Road Haulage Association; South West Water; Highways Agency; Marine Management Organisation; Devon Partnership NHS Trust; East Devon AONB; Environment Agency; Devon Countryside Access Forum; Devon & Cornwall Police; Forestry Commission SW. All of these responses were standard letters/generic information, offering no comments at that early stage or signposting to strategy documents.

How were the issues and concerns responded to?

Responses were fed into the continuing thinking and evidence behind the developing plan and evidence base at that stage.

10.2 Regulation 14 (Pre-submission stage) Consultation

How did we consult?

Neighbourhood Plan regulations require that a statutory consultation period of 6 weeks is undertaken by the qualifying body on the final draft plan prior to its submission to the Local

Authority in advance of their statutory Regulation 16 consultation. We contacted all required statutory consultees, informed by EDDC's guide on the pre-submission stage¹⁷.

A weblink to the Neighbourhood Plan was sent by email to all of these bodies and organisations on our consultation list with explanation of what was required for the consultation and the date when responses were required by.

Who was consulted?

The Regulation 14 (pre-submission) consultation is specific about statutory and strategic stakeholders that should be consulted. The legislation requires that prior to submitting the plan to the local planning authority the qualifying body must:

- publicise it in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area;
- consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan; and,
- send a copy of the proposals for a neighbourhood development plan to the local planning authority.

All of the statutory and strategic bodies listed in an appendix to this statement were consulted on the draft Neighbourhood Plan for Beer thus ensuring we adhered to the requirements of Schedule 1 of the 2012 Regulations.

What did the Consultees say?

A total of 16 written responses were received, 3 from individuals and 13 returns from strategic or statutory stakeholders and consultees (see the second part of this Statement), 1 of which was from a land owners' representative. A summary of the responses is appended to this Statement.

How were the issues and concerns responded to?

We set out the responses received and responded to them in terms of our reaction and whether or not they lead to any changes to the plan and its policies. We discussed some of these responses with EDDC to draw on their knowledge and expertise and the interface between the neighbourhood plan and the Local Plan. Our report of the responses and our suggested changes to the plan as a result is appended to this Statement.

¹⁷ See <http://eastdevon.gov.uk/media/1831793/who-are-the-statutory-consultees.pdf>

11. East Devon District Council

As the local planning authority, East Devon District Council (EDDC) were engaged early in the process to provide guidance on the plan's development and process, policy wording, interface with the Local Plan and planning system and seeking formal opinions for SEA and HRA.

Following communication with regard to the neighbourhood area application, the steering group maintained a dialogue with planning policy team officers at EDDC at key points during the plan's development including:

- During policy development to request advice on the local authority view of policy wording, plan content and alignment with Local Plan policies;
- To request base maps for use in developing evidence base studies;
- To request a formal screening opinion with regard to the need or not to undertake a Strategic Environmental Assessment (SEA) and / or Habitats Regulation Assessment (HRA) of the plan (see above); and,
- To discuss consultation responses received during the process, particularly at the pre-submission stage.

12. Sustainability

East Devon District Council was initially sent a formal request for a screening opinion with regard to the need or not for a Strategic Environmental Assessment (SEA) and / or Habitats Regulation Assessment (HRA) to be undertaken on the draft Plan as soon as the aims, objectives and Vision were agreed and a set of initial policies, agreed by the steering group, were available, in the summer of 2016. These screening exercises were undertaken to help determine whether the emerging plan would or would not have significant environmental impacts or likely significant effects on the parish (the Plan area). Following this request, in turn, East Devon District Council consulted the statutory environmental agencies (Natural England, Environment Agency and Historic England) on the need or not for SEA / HRA and provided a screening opinion.

However, as it became clear that the plan was to include an allocation site for housing, following our summer 2016 consultation, EDDC re-screened the plan on the basis that it would be likely to include a housing site.

A revised screening opinion for SEA and HRA was issued by EDDC in March 2017 (which is appended to the Basic Conditions Statement).

We then commissioned consultants to carry-out the SEA and HRA, after which EDDC commissioned their own independent consultants to review our HRA report. On the basis of the EDDC review of our HRA, some amendments were made to our HRA report to ensure rigour. Our SEA and HRA reports are submitted alongside our plan and this Consultation Statement and are available on our website¹⁸.

¹⁸ See http://www.beerparishcouncil.org.uk/BeerParish/beer_neighbourhood_plan-20304.aspx

13. Conclusions

In preparing the Beer Neighbourhood Plan we have sought to establish and maintain a dialogue with those bodies and organisations covered by Schedule 1 of the Regulations and those other bodies and organisations we have identified as having an interest in our parish. We contacted strategic and statutory consultees at the start of the process in addition to adhering to the requirements in the Regulations.

The views, comments and suggestions received at each stage of the Neighbourhood Plan have been fully considered and have helped to guide and shape the form of the Plan so that it not only reflects what local people wish to see happen for their area but takes account of how we can share future planning and delivery with outside bodies and organisations so as to realise our aims and objectives.

APPENDICES

Appendix 1

Neighbourhood Area Application

(N.B. The reproduced application which follows is also available to view here –
<http://eastdevon.gov.uk/planning/neighbourhood-and-community-plans/neighbourhood-plans/neighbourhood-plans-being-produced-in-east-devon/beer/#article-content>)

Application for Designation of a Neighbourhood Area



This information is intended to assist the Local Planning Authority in making a decision but please note that further information may be required.

Which Town or Parish Council is applying to designate a neighbourhood area?

BEER PARISH COUNCIL

If more than one Town or Parish Council are working in partnership, please give details of all parties

contact details –

contact details –

contact details –

contact details –

☐ Please confirm that all the parishes listed above agree to the application

☒ Please confirm that the organisation/s or body/ies making the area application is a relevant body for the purposes of section 61G of the 1990 Act.

Please advise what, if any, discussion has taken place with neighbouring Parishes with a view to partnership working? Where applications include sites in adjoining Parishes their agreement should be sought.

N/A

Please append a map identifying the area to which the area application relates.

Please explain why this area is considered appropriate to be designated as a neighbourhood area

We would like the whole parish of Beer to be designated as a Neighbourhood Area to ensure that our plan is fully inclusive and the whole community is represented.

Signed

[Redacted Signature]

Date

18 July 2013

Position

Parish Clerk

Organisation

Beer Parish Council

The Neighbourhood Planning Regulations can be downloaded at:
<http://www.legislation.gov.uk/uksi/2012/637/made>

A summary of the next steps is provided below

Publicising an area application

Once we have received your neighbourhood area application we must, as local planning authority, publicise the following on our website and in any other manner that we consider is likely to bring the application to the attention of people who live, work or carry out business in the area to which it relates -

- (a) a copy of the area application;
- (b) details of how to make representations; and
- (c) the date by which those representations must be received, being not less than 6 weeks from the date on which the area application is first publicised.

To help us meet these requirements:

Are we able to publicise the application in any widely available local newsletters/magazines? If so, please give contact details and advise how often the newsletter/magazine is published.

PARISH MAGAZINE (MONTHLY) henryjaggers@btinternet.com

Do you have Parish Noticeboards? If so, please give contact details of the person responsible for their content.

PARISH CLERK

Are there any other means of communication which could be used to advertise the proposals eg local website, social media, local interest groups? Please provide contact details.

WEBSITE (VIA PARISH CLERK)

Publicising designation of a neighbourhood area

As soon as possible **after designating a neighbourhood area**, we must publish the following on our website and in any other manner that we consider is likely to bring the application to the attention of people who live, work or carry out business in the area:

- (a) the name of the neighbourhood area;
- (b) a map which identifies the area; and
- (c) the name of the relevant body who applied for the designation.

If we **refuse to designate a neighbourhood area**, we must publish the following on our website and in any other manner that we consider is likely to bring the application to the attention of people who live, work or carry out business in the area

- (a) a document setting out the decision and a statement of our reasons for making that decision ("the decision document"); and
- (b) details of where and when the decision document may be inspected.

Further information is available from:

Planning Policy, Economy Directorate

East Devon District Council

Knowle, Station Road, Sidmouth, Devon, EX10 8HL

01395 571533

The Neighbourhood Planning (General) Regulations
2012

Application for Designation of a Neighbourhood Area



We have received an application from Beer Parish Council for the designation of the Parish of Beer as a Neighbourhood Area.



You can view the proposal on our website at: www.eastdevon.gov.uk/planning-neighbourhood_plans
or by appointment with Beer Parish Council

You can also view or make comments on this proposal by writing to us at Planning Policy, East Devon District Council, Knowle, Station Road, Sidmouth, Devon, EX10 8HL (8.30-5pm Mon-Fri). If you write to us your comments will be kept on a public file and they may be reproduced in writing or on our website.

THE CLOSING DATE FOR COMMENTS IS 6th September 2013



ENGLISH HERITAGE

South West

Planning Policy
East Devon District Council
Knowle
Station Road
Sidmouth
Devon
EX10 8HL

Our ref: 1252
Your ref:

Telephone
Email

3rd September 2013

Dear Sir/Madam

NEIGHBOURHOOD AREA CONSULTATION – BEER

Thank you for giving notice that Beer Parish Council has applied to designate Beer as a Neighbourhood Area under Part 2 of the Neighbourhood Planning (General) Regulations 2012.

English Heritage has no objection to this proposal.

We would like to take the opportunity of the consultation to outline the range of support English Heritage is able to offer in relation to Neighbourhood Plans. It would be helpful if this response can be copied to the Parish Council for their information.

Research has clearly demonstrated that local people value their heritage¹ and Neighbourhood Plans are a positive way to help communities care for and enjoy the historic environment.

English Heritage is expecting that as Neighbourhood Planning Forums come to you to seek advice on preparing Neighbourhood Plans they will value guidance on how best to understand what heritage they have, as well as assistance on preparing appropriate policies to secure the conservation and enhancement of this local heritage resource.

Information held by the Council and used in the preparation of your Core Strategy/Local Plan is often the starting point for Neighbourhood Plans. Other

¹ English Heritage, *Heritage Counts*, 2008



29 Queen Square, Bristol, BS1 4ND
0117 975 0706 Facsimile 0117 975 0701
www.english-heritage.org.uk

useful information may be available from the Historic Environment Record Centre or local environmental and amenity groups. English Heritage also publishes a wide range of relevant guidance. Links to these can be found in the appendix to this letter.

Plan preparation also offers the opportunity to harness a community's interest in the historic environment by getting them to help add to the evidence base, perhaps by creating and or reviewing a local heritage list, inputting to the preparation of conservation area appraisals and undertaking or further deepening historic characterisation studies.

English Heritage has a statutory role in the development plan process and there is a duty on either you as the Local Planning Authority or the Neighbourhood Planning Forum to consult English Heritage on any Neighbourhood Plan where our interests are considered to be affected as well as a duty to consult us on all Neighbourhood Development Orders and Community Right to Build Orders.

English Heritage will target its limited resources efficiently. We will directly advise on proposals with the potential for major change to significant, nationally important heritage assets and their settings. Our local offices may also advise communities where they wish to engage directly with us, subject to local priorities and capacity.

English Heritage fully recognises that the neighbourhood planning process is a locally-led initiative and communities will shape their own neighbourhood plan as informed by the issues and opportunities they are most concerned about and relevant to the local area. As a national organisation we are able to draw upon our experiences of neighbourhood planning across the country and information on our website might be of initial assistance <http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/>. It is envisaged that the website will be progressively updated to share good practice in the management of the historic environment through neighbourhood planning.

Should you wish to discuss any points within this letter, or if there are issues about this Neighbourhood Plan Area where the historic environment is likely to be of particular interest, please do not hesitate to contact me.

Yours faithfully



David Stuart
Historic Places Adviser



29 Queen Square, Bristol, BS1 4ND
0117 975 0706 Facsimile 0117 975 0701
www.english-heritage.org.uk

Appendix

The National Heritage List for England: a full list with descriptions of England's listed buildings: <http://list.english-heritage.org.uk>

Heritage Gateway: includes local records of historic buildings and features www.heritagegateway.org.uk

English Heritage's Advice by topic: you can search for advice on a range of issues relating to the historic environment in the Advice section of our website

Heritage Counts: facts and figures on the historic environment <http://hc.english-heritage.org.uk>

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment. www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <http://www.english-heritage.org.uk/caring/heritage-at-risk>

Placecheck provides a method of taking the first steps in deciding how to improve an area. <http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing. <http://www.english-heritage.org.uk/publications/known-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information. <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by English Heritage uses good practice to support the creation and management of local



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0117 975 0706 Facsimile 0117 975 0701
www.english-heritage.org.uk

heritage lists. <http://www.english-heritage.org.uk/caring/listing/local/local-designations/local-list/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies
<http://www.helm.org.uk/server/show/nav.19604>



29 Queen Square, Bristol, BS1 4ND
0117 975 0706 Facsimile 0117 975 0701
www.english-heritage.org.uk

Appendix 2

Neighbourhood Area Decision Notice

*80 **Proposed designation of Axmouth, Beer and Axminster Neighbourhood Areas**

Members considered the report of the Senior Planning Officer in respect of proposals received to designate Axmouth, Beer and Axminster Parishes as Neighbourhood Areas. The proposals had been subject to the requisite six week consultation period; no comments or objections had been received.

Following designation, the Parish Councils intend to produce a Neighbourhood Plan for the whole of each Parish, setting out local planning policies and potentially identifying sites for development.

RESOLVED that each of the following Parishes be designated as a separate Neighbourhood Area:

- Axmouth
- Beer
- Axminster

REASON The three applications met the requirements for an application for designation of a Neighbourhood Area as set out in legislation. No reason to amend the area applied for has been put forward and all three proposals are sensible in planning policy terms.

Source: East Devon District Council Cabinet Meeting Minutes, 2nd October 2013,
<http://eastdevon.gov.uk/media/1183332/cabinet-mins-021013.pdf>

Appendix 3

Beer Neighbourhood Plan Communications Strategy

Beer Neighbourhood Development Plan Communications Strategy

Introduction

A Neighbourhood Development Plan¹ (NP) is a community-led framework for guiding the future development, regeneration and conservation of an area. The foundation of a good neighbourhood plan is a robust programme of consultation and engagement. Effective community involvement is essential right from the beginning of the process. It will create a well informed plan and a sense of ownership. Getting the recognition, views, assistance and support of a whole range of other, interested bodies and parties is also essential if the plan is to have authority and credibility. A successful Communication Strategy is a prerequisite.

Aims

The aims of the Communications Strategy are to achieve:-

- Better communication, leading to better feedback and decision-making
- Improved two-way information flow
- Better information and communication channels to enable community participation
- Increased awareness and understanding of the Neighbourhood Plan, its purpose and relevance

Principles

Our Communications Strategy is based on four key principles:-

- *the right information,*
- *to the right people,*
- *in the right medium,*
- *at the right time*

These principles include a number of key factors:

- Communication must be meaningful and appropriate
- Information must be accessible
- Quality mediums and methods must be used whenever possible
- Communication channels must allow information to, through and across all levels
- Information must be relevant and in plain English
- Consideration needs to be given to the needs of people with disabilities and those whose first language is not English
- The process must be transparent

Target Audiences

We want to reach everyone with a stake in the future of the area including people living, working or doing business here, those who deliver services to the local communities and people who have influence over the future of the area. We want to continue the dialogue with communities based on where they live and people in communities based on common interests. We want to communicate and listen to people who others have traditionally found hard to reach and hard to hear.

¹ As introduced by the Localism Act 2011

Messages

It is important that all our communications have as much impact as possible. To avoid dilution of the message or contradiction, the following will be the main messages that we will attempt to relay in our communications:

- The Neighbourhood Plan reflects community opinion
- The Neighbourhood Plan is a framework for the development of our area
- We want to hear your opinion
- We need the participation and support of the community and partners

The messages we send out should be:

- Short and to the point
- Not conflicting
- In plain English
- Focussing on involvement

Tools and Activities

We shall use a variety of methods based on what reaches people most effectively and has most credibility. These include:

Consultation events
Direct mail
Council newspaper/magazine
Email lists
Events
Exhibition
Leaflets & flyers
Local radio
Minutes of meetings
Networking
Newsletter
Parish Council newsletters
Posters
Press releases
Social media
Stakeholders' and partners' outlets
Website

The messages will be relayed using different methods for different groups. A communications matrix has been developed as an integral part of our communications strategy.

Resources

We shall make best use of the resources we have and strive to increase resources commensurate with the task. Our current resources, those that we have access to and can be applied to the task, are:

List of Available Local Resources:
Group members
Local councillors
Parish Council notice board
Community notice boards
Community networks
Parish newsletters
Local newspaper
Website
Facebook

Timescales

Preparing a neighbourhood plan is a sequential process based upon an agreed project plan. The project plan identifies the following key communication points and the dates in which they should be carried out:

Key Communication Point:	Target Date(s)
Launching the NP	Aug – Sep 2014
Seeking information	Oct 2014
Establishing a shared Vision	Feb 2015
Sharing the draft plan	May – Jun 2015
Seeking approval (through referendum)	to be determined by EDDC

Evaluation and Amendment

After the first 6 months the NP Group will carry out a communications audit to assess the effectiveness of the strategy with both 'internal' and 'external' audiences. We shall consider in particular, who has not responded or reacted to our communications? We shall discuss the evidence/results carefully and use them to amend and improve the Strategy going forward.

Neighbourhood Planning - Communications Strategy Matrix

How We Will Communicate:

Parish councillors in NP area	Meeting mins/reports and presentations
Other elected members (DC & MP)	Direct e/mail/reports and presentations
Parish Council	Meeting mins/reports and presentations
NP sub (thematic or task) groups	Meeting mins/reports and presentations
All residents in NP area	Consultation events/parish newsletter/website/local press/posters/letter
Young people in NP area	Consultation events – targeted
Community & voluntary groups active in NP area	Consultation events/parish newsletter/website/local press/posters/ Letter/ email
Elderly persons in NP area	Consultation events/parish newsletter/website/local press/posters
Persons with disabilities and special needs	Consultation events/parish newsletter/website/local press/posters
Schools and colleges serving NP area	Consultation events - targeted
All businesses/employers in NP area	Consultation events/parish newsletter/website/local press/posters/ Letter/ email
Retailers in NP area	Consultation events/parish newsletter/website/local press/posters/ Letter/ email
Service providers	Letter/ email /meeting
Statutory undertakers	Letter/ email /meeting
Major landowners	Letter/ email /meeting
Developers with interest in NP area	Letter/ email /meeting
District Council	Letter/ email /meeting
Neighbouring parish/town councils	Letter/ email

Appendix 4

Beer Neighbourhood Plan Community Engagement Programme

Beer Neighbourhood Plan

Community Engagement Programme

Background

The neighbourhood planning legislation places an obligation on the body responsible for preparing the Neighbourhood Plan to carry out an extensive and inclusive programme of community engagement and to prepare a report, as a supporting document to the Plan itself, to show how, when and where local people and businesses were 'engaged' in the neighbourhood planning process and what the outcome was.

The Project Plan has earmarked four main consultation points during the plan-making period that are the responsibility of the Parish Council and Neighbourhood Plan Steering Group to deliver:

- C1** – *publicise intention, recruit helpers* – from August 2014
- C2** – *'survey' of local needs & demands* – October 2014
- C3** – *consult on vision & objectives* – February 2015
- C4** – *consult on draft plan* – May 2015

Outline Proposal

C1 – Publicise intentions & Recruit Help

Its purpose is to:

- launch the neighbourhood plan to the community at large
- show the plan-making timetable and explain the process in simple form
- confirm that the planning process is to be community-owned and led
- explain the role of the Steering Group, who is on it and why
- emphasise the need to consult at key stages in the process
- give details of how to find out information, make contact, keep in touch with progress
- recruit support from existing community organisations and the community at large
- make a call for volunteers

Method

It is intended to use:

- posters for display on notice boards and local shops
- articles in newsletter
- local newspaper
- word of mouth
- letter to all local voluntary and community groups

Timetable:

A programme of awareness-raising will be carried out during August and September 2014 prior to the community survey.

Cost:

Parish Clerk – hours tbc

Postage & printing (email to keep costs low)

Who will be doing what?

Letter to community and voluntary groups (email where possible) – Parish Clerk

Letter to statutory bodies (email where possible) – Parish Clerk

Poster – Parish Clerk

Set up web page – Parish Clerk

Parish newsletter – Parish Council/Cllr Pook

Press release – Parish Clerk/Cllr Pook

C2 – Survey of Local Needs & Aspirations

The purpose of this major consultation is:

- To share the main findings and conclusions from the evidence base
- To canvass community opinion on the bigger issues and main themes
- To carry out specific consultations with interest groups to fill in the gaps in our knowledge and understanding
- To encourage and facilitate debate where it is need

Method

We want to involve the whole neighbourhood and engage with as many people as possible. To make it as effective as possible, we propose to hold a range of events/activities and devise a number of ways to encourage people to provide additional information and respond to what they see and hear. This will include:

- Community questionnaire
- Business survey
- Social media activities
- School and youth-based activities - targeted consultation/survey

Timetable : survey design for September 2014 for delivery during October 2014 and analysis during November 2014.

Cost:

Parish Clerk – hours tbc

Questionnaires/publicity materials – production/printing/ postage (email to keep costs low)

Who will be doing what?

Community questionnaire production and distribution – Cllr Cozens/Cllr Green/Cllr Pook/Parish Clerk

Business survey – Cllr Pook

Consultation event/survey with school/local youth groups – Cllrs tbc/Parish Clerk

C3 – Consult on Vision & Objectives

Its purpose is to:

- report back on response and conclusions from the C2 consultation programme
- share a draft vision and objectives for the Beer Neighbourhood Plan
- set out the themes and priorities for neighbourhood planning policies
- seek reaction/endorsement of the vision and objectives
- invite suggestions for specific planning policies
- encourage community action and enterprise to realise the vision

Method

Exhibition in Mariners' Hall to be widely advertised by press, parish magazine, website and posters/flyers. Contact EDDC for appropriate plans/maps.

A4 DS flyer setting out vision and objectives – limited print run.

Timetable: February 2015

Cost:

Parish clerk – hours tbc

Flyer – production & printing

Who will be doing what?

Consultation event – consult on vision and objectives – all Cllrs/Parish Clerk

Promotion and Flyer (production and printing) – Parish Clerk

Book hall – Parish Clerk

C4 – Consult on Draft Plan

The Parish Council has a statutory duty to ensure that consultation on the draft Neighbourhood Plan takes place for at least 6 weeks and everybody has an opportunity to see and/or hear what it contains, and to comment on it.

Method

- A number of hard copies of the draft Plan should be placed on deposit for public viewing in suitable locations in the area
- A summary leaflet is distributed to every household
- A pdf of the draft Plan is placed on the website
- Draft plan/summary leaflet (as appropriate) is sent to stakeholders/statutory consultees

Timetable: May – July 2015

Cost:

Parish Clerk – hours tbc

Draft NP – production/printing costs

Summary leaflet – production/printing/postage costs

Who will be doing what?

Production/printing/organise distribution of draft NP and summary leaflet as appropriate to community, stakeholders and statutory consultees – Parish Clerk

Appendix 5

Consultees: Local Community Groups and Organisations

COMMUNITY

Beer Albion Football Club

Beer Arts Group

Beer Badminton Club

Beer BAG project

Beer Best Years Club

Beer Bowls Club

Beer branch Royal British Legion

Beer Congregational Church

Beer Film Society

Beer Friends Group of Cancer Research UK

Beer Horticultural Society

Beer Lacemakers

Beer Luggers Club

Beer Mariners' Hall

Beer Parish News

Beer Primary School

Beer Puffins Pre-school

Beer Quilters

Beer Rainbows, Brownies & Guides

Beer Regatta Committee

Beer RNLI

Beer Sailing Club

Beer Scout & Cub group

Beer Seriously Occasional Singers

Beer Tiddlers

Beer Village Heritage

Beer WI

Friends of Beerwurly

St Michael's Church

BUSINESS

Bayview Guest House

Beer Fish & Chips

Beer Fish Shed

Beer Fishermen

Beer Head Bistro

Beer Head Caravan Park

Beer Quarry Caves

Beer Village Stores

Beer Youth Hostel

Belmont House B&B

Chapple's beach concessions

Colebrooke House B&B

Dolphin Hotel

Ducky's

Durham House B&B

Folletts at Beer

Jimmy Green

Kenno's

Marine House & Steam Gallery

Moonstone Solutions

Osbournes

Pecorama

Richard Scott Photos

Rock Villa Post Office

Self-drive boats

Steamers Restaurant

Village Hair Shoppe

Woozies Deli

Appendix 6

Consultees: Statutory and Strategic

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box.landandacquisitions@nationalgrid.com
lisa.turner@devon.gov.uk
customer.services@canalrivertrust.org.uk
airspace.policy@caa.co.uk
infoservices@caa.co.uk
cst-dcc@btinternet.com
ForceAloTeam@devonandcornwall.pnn.police.uk
comments@dsfire.gov.uk
jmillier@dsfire.gov.uk
barnaby.grubb@devon.gov.uk
dave.black@devon.gov.uk
ddn@livingoptions.org
healthandwellbeing@devon.gov.uk
nature@devon.gov.uk
contactus@devonwildlifetrust.org
r.c.dodson@dorsetcc.gov.uk
b.talbott@dorsetcc.gov.uk
chris.woodruff@eastdevonaonb.org.uk
swanstandg@btinternet.com
david.stuart@historicengland.org.uk
enquiries@environment-agency.gov.uk
hannah.jones@exeter-airport.co.uk
jill.day@exeter.gov.uk
Chris.Sorensen@forestry.gsi.gov.uk
bhl2000@btinternet.com
Andy.Roberts@highwaysengland.co.uk
info@hbf.co.uk
mail@homesandcommunities.co.uk
plymouth@marinemanagement.org.uk
DPD@middevon.gov.uk
andrew.butler@nfu.org.uk
damien.holdstock@amec.com
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consultations@naturalengland.org.uk
townplanningwestern@networkrail.co.uk
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gavin.bloomfield@rspb.org.uk
PVBrowning@somerset.gov.uk
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mdunn@southwestwater.co.uk
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planning.south@sportengland.org
planningreception@tauntondeane.gov.uk
forwardplanning@teignbridge.gov.uk
planningconsultation@coal.gov.uk
stuart.liddington@pins.gsi.gov.uk
local.policy@westdorset-dc.gov.uk
justinmilward@woodlandtrust.org.uk

Appendix 7

Examples of Parish Council Newsletter

Beer Parish Council Newsletter June 2016

Defibrillator

The Parish Council has now installed a defibrillator on the wall of the fisherman's sheds next to the car park on the beach. This was made possible by a private memorial donation made to the Parish Council. The defibrillator is registered with the ambulance service – in the event of an incident, members of the public are advised to dial 999 to request urgent medical assistance. The ambulance service will then provide the key code to enable access to the defibrillator. A Community Awareness session will be organised in due course.

Britain in Bloom Judging,

The Horticultural Society has been hard at work re planting the village flower displays and getting ready for the **Britain in Bloom and the RHS competitions**. The judges will be visiting the village on 6th July and the 1st of August.

Volunteer Group,

The **Beer Volunteer Group** is steadily growing with 12 people signed up now - if you are interested in sparing a few hours now and then please get in touch with Cllr Mandy Graham 01297 20369 or Cllr Mo Westlake 01297 23850 .

A big thank you to Nigel, Fiona, Sam and Beer Scouts for the fantastic job they did clearing paths and weeds and varnishing benches etc on the Jubilee. Thanks also to Beer Beavers for clearing the brook.

Award Ceremony

The Chairman of EDDC held a garden party and awards ceremony in honour of the Queen's 90th birthday. Beer Parish Council won a **Special Award for the Community Land Trust** - judges appreciated that Beer Parish Council had identified the provision of affordable housing as a priority for community development. Judges also praised the way this project had been delivered and recognised the achievement of enabling more young couples and families to live in the village.

Neighbourhood Plan

The first full draft of **BEER NEIGHBOURHOOD PLAN** is now available. A Neighbourhood Plan is a **community-led** framework for guiding the future development, regeneration and conservation of an area.

A copy of the document is available on Beer Parish Council website
http://www.beerparishcouncil.org.uk/BeerParish/beer_neighbourhood_plan-20304.aspx

In order to make the document more accessible, an Executive Summary is also available - a condensed version of the document which details the proposed policies.

The Parish Council is seeking the views of the community on all aspects of the Neighbourhood Plan - a short consultation form and questionnaire about potential sites for new housing in the village is available on the website. Neighbourhood Plan consultation will also be taking place as part of the **Parish Council Surgeries**, which take place monthly as part of the coffee mornings in the Mariners' Hall – future dates 9th July and 6th August.

PLEASE JOIN IN THE CONSULTATION AND SHARE YOUR VIEWS!"

Beer Parish Council Newsletter Sept 2017

Casual Vacancy - congratulations to Cllr. Trevor Wood who has just been co-opted on to Beer Parish Council.

It was good to have several expressions of interest in the recent Casual Vacancy. The Parish Council always welcomes support and engagement with its projects. If you would like to know more about the Parish Council, please come along to a meeting. The next meeting is 3 October 2017, 7.15pm in the Balcony Room of the Mariners' Hall.

Dog Bins - there have been some hiccups lately with dog bins not being emptied regularly enough. The public can report full bins to EDDC directly through their mobile app, which seems to work very well.

One extra clue for the public is that during the holiday season bins are due to be emptied 3 times a week, using a colour coded bag system – bins with a black bag are due to be emptied on a Monday, those with a blue bag on a Wednesday and those with a green bag on a Friday.

Little Hemphay - the Youth Play Park in Quarry Lane by the CLT houses is to have a major clear up. This park is open to all of Beer's youth and is accessible from the pavement by the CLT houses or via the permissive path just below Short Furlong.

Beer Neighbourhood Plan – the environmental assessments have been carried out and the Plan is currently being finalised for the pre-submission stage, which involves consultation with statutory consultees.

The Beer Volunteer Group has not been active during the summer, but the Council is hoping to revitalize the group and to start to tackle some jobs around the village. As you may know, working parties are organised to help keep the Jubilee pathways clear and to cut back overgrown foliage. There is also the ongoing task of renovating and varnishing the public benches and the annual cleaning of the brook. The Parish Council would love to hear from anyone who is interested in joining the Volunteer Group, so please contact Mo Westlake at westlakemaureen@gmail.com or by telephone on 01297 23850. You would receive notification of any planned activities, but would be free to choose when you took part.

Brook cleaning last year was carried out solely by the Volunteer Group, but this year we would appreciate additional help to enable the job to be completed in less time. **Watch out for the posters announcing:**

Beer Brook Clearance Day Sat 7 Oct.

Appendix 8

Regulation 14 (Pre-submission) Consultation Comments and Responses

**BEER PARISH COUNCIL
NEIGHBOURHOOD PLAN
CONSULTATION 2017**

**COMPENDIUM OF RESPONSES RECEIVED
UNDER REGULATION 14**

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3.3 South Somerset District Council

3.4 Highways England

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3.7 Clinton Devon Estates

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4.1 Helen Scott

4.2 Richard Scott

4.3 Norah Jagers

1. KEY STATUTORY CONSULTEES

1.1 Natural England

To: Annie Dallaway, Parish Clerk, Beer Parish Council	From: Natural England, Customer Services, Hornbeam House, Crewe Business Park, Electra Way, Crewe, Cheshire CW1 6GJ T 0300 060 3900
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BY EMAIL ONLY NATURAL ENGLAND 17 Nov 2017

Dear Mrs Dallaway

Planning consultation: Beer Neighbourhood Development Plan Pre-Submission

Thank you for your consultation on the above dated 19/10/2017

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

We recognise the hard work being done in Beer Parish in developing a Neighbourhood Plan and we welcome being consulted on this pre-submission draft. Beer Parish supports a rich and diverse natural environment of national and international importance for its biodiversity, landscape and geodiversity interest, reflected in the designation of the Sidmouth to Beer Site of Special Scientific Interest (SSSI), the Sidmouth to West Bay Special Area of Conservation (SAC), Beer Quarry and Caves SSSI, Beer Quarry and Caves SAC, Lyme Bay and Torbay SAC, the East Devon Area of Outstanding Natural Beauty (AONB) and the Jurassic Coast - Dorset and East Devon Coast World Heritage Site (WHS).

Specific comments to follow:

Specific Comments

Comment	Response
<p>Policy NE1 – Development and the Natural Environment</p> <p>The justification for this policy details a number of designated sites including Beer Quarry and Caves SSSI/SAC, Sidmouth to Beer SSSI, Sidmouth to West bay SAC, the East Devon AONB and the Jurassic Coast WHS. However the Lyme bay and Torbay SAC should also be included. These designations are not mentioned within the above policy and making this link would strengthen the policy. A map showing the location of the designated sites may also be useful.</p>	Comments inserted into justification paragraph
<p>Policy NE2 – Locally Important Wildlife Sites</p> <p>Hooken Landslide is also part of the Sidmouth to Beer SSSI and the Sidmouth to West bay SAC.</p>	Wording inserted into NE2
Comment	Response
<p>Policies H1 – Meeting the Demand for Local Needs Housing in Beer Village; H2 – Community Housing and T3 – New Holiday Accommodation</p> <p>The above policies would be strengthened by adding wording to ensure that any housing development takes account of the SAC's, SSSI's, AONB, WHS and wider biodiversity and geodiversity issues where relevant.</p>	Comments inserted into justification paragraph
<p>Policy H3 – Site Allocation: Land at Short Furlong</p> <p>It is noted that the plan seeks to allocate a site for housing development adjoining the existing village of Beer at Short Furlong. The development of this site which could accommodate around 31 dwellings has the potential to have a Likely Significant Effect on Beer Quarry and Caves SAC if appropriate mitigation layout and design principles are not incorporated into the development. Policy H3 seeks to address this by requiring that proposals must be supported by an approved Bat Mitigation Strategy incorporating a range of requirements to avoid and mitigate the impacts of development on this site. The requirements proposed are considered appropriate.</p>	Comment noted
<p>Policies MS1 – Beer Beach, MS2 – Coastal Erosion and Policy MS3 – Groyne</p> <p>These policies would be strengthened by adding wording to ensure that any development takes account of the Sidmouth to Beer SSSI, the Sidmouth to West Bay SAC, the Lyme bay and Torbay SAC, the East Devon AONB, the Jurassic Coast WHS and wider biodiversity and geodiversity issues where relevant.</p>	Wording added to Justification of MS1 to cover elements of MS2 and MS3
<p>Policy SR2 - Improved, new and additional sports and recreation facilities and pitches</p> <p>Policy in this area would be strengthened by adding wording to ensure that any development takes account of the Sidmouth to Beer SSSI, the Sidmouth to West Bay SAC, the Lyme bay and Torbay SAC, the East Devon AONB, the Jurassic Coast WHS and wider biodiversity and geodiversity issues where relevant.</p>	Wording added to justification

Based on the current draft of the Neighbourhood Plan and the points summarised above regarding site specific proposals, Natural England has concluded that there are unlikely to be significant environmental effects arising from the Neighbourhood Development Plan.

Additional comments

We refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For clarification of any points in this letter, please contact me on 020 802 67568. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

S.Panks

Steve Panks Lead Adviser – Exe, Exeter and East Devon Team Tel: 020 802 67568 Email: stephen.panks@naturalengland.org.uk

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic⁵ website and also from the LandIS website⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework⁷ sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

1 <http://magic.defra.gov.uk/>

2 <http://www.nbn-nfbr.org.uk/nfbr.php>

3 <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

4 <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

5 <http://magic.defra.gov.uk/>

6 <http://www.landis.org.uk/index.cfm>

7 <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

8 <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here⁹), such as Sites of Special Scientific Interest or Ancient woodland¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here¹¹) or protected species. To help you do this, Natural England has produced advice here¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication *Agricultural Land Classification: protecting the best and most versatile agricultural land*¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

9<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

10 <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

11<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

12 <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

13 <http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this 14).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

14 <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-ofway-and-local-green-space/local-green-space-designation/>

1.2 Environment Agency

To: Annie Dallaway, Parish Clerk, Beer Parish Council	From: Environment Agency – Devon, Cornwall & Isles of Scilly Area ✉ Manley House, Kestrel Way, Exeter, EX2 7LQ ☎ 02084746289 (Internal 46289)
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BY EMAIL 1 DEC 2017

Thank you for the opportunity to provide comments on the pre-submission draft of the Beer Neighbourhood Plan.

In general we are supportive of the draft neighbourhood plan. The plan contains a good summary of the existing key environmental issues in the parish.

We support the vision set out in the draft plan, especially for community led development which protects the parish's high quality natural environment. With regard to the natural environment section of the draft plan we welcome the stated aims, objectives and policies such as NE1, NE2, NE3 and NE4.

Comment	Response
We also support the marine and shoreline policy MS2 (coastal erosion) and we're pleased to see reference to the Shoreline Management Plan's policy for the area. We would, however, recommend that the policy also includes reference to flooding from coastal storms not just erosion.	Inserted in MS2
Policy MS4 (marine conservation) is also welcomed. Notwithstanding our comments above, we note that there is no reference in the plan to the need to protect the parish's designated bathing waters which are a key asset for Beer. Accordingly we recommend that this matter is addressed in the subsequent submission draft of the plan.	Inserted in justification

Kind regards

Marcus Salmon

Sustainable Places Planning Specialist

1.3 Historic England

To: Annie Dallaway, Parish Clerk, Beer Parish Council	David Stuart Historic Places Adviser South West Direct Line: 0117 975 0680 Mobile: 0797 924 0316 Historic England 29 Queen Square Bristol BS1 4ND https://historicengland.org.uk/southwest
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BY EMAIL 4 DEC 2017

Dear Mrs Dallaway

Thank you for your Regulation 14 consultation on the Beer Neighbourhood Plan. Our apologies for not submitting this response before now.

The focus of our attention is the allocation of land for housing in Policy H3. The SEA Screening exercise identified this allocation as the basis of need for full SEA and we have previously advised the community of the associated need to ensure that the significance of relevant designated heritage assets is taken account of in the methodology to determine the suitability of the eventual site. Previous correspondence is attached here again for information.

While the proposed site may indeed have “Negligible” impact on the historic environment as Table 5 (p27) in the SEA Environmental Report asserts it is important to be able to demonstrate this with evidence. Section 5 of the Report (p20-) details the constraints and issues which have been identified and investigated in determining the suitability of the site but there is no reference to the historic environment (whose constituent elements such as Listed Buildings form a separate statutory matter to the AONB).

Consequently, it is impossible to know what methodology, if any, has been employed in arriving at the Report’s conclusion, and this despite the statement in Section 3.2, B (p8) of the Report that our comments on the Scoping Report were taken on board in producing the Environmental Report.

We appreciate that the modest number of designated heritage assets in the Plan area and the nature of their distribution could well mean that the effects upon them from the site allocation would be negligible and we do not necessarily dispute this conclusion. But there needs to be sufficient evidence – and no more than this – to substantiate such a view, and having looked at the Plan’s website we can find no additional reports which might address this requirement. The work in question may of course have been undertaken but not been made available, and the process of identifying relevant designated heritage assets, setting out their relationship with the site and illustrating why there would not be any harmful effects upon them, if not yet undertaken, can probably be accomplished very simply.

We would therefore urge you to address this point before formally submitting the Plan to East Devon District Council.

Otherwise, we would congratulate your community on the scope and depth of its Plan.

Kind regards

David Stuart

David Stuart | Historic Places Adviser

Comment	Response
Whilst it was appreciated that the impact would probably be minimal a report identifying impact on the historic environment is required	This to be prepared and attached to the final submission

1.4 Devon County Council

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Andy Hill, Principal Planning Officer - Minerals & Waste Planning, Transportation & Environment Devon County Council Tel: 01392 383510
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BY EMAIL 3 NOV 2017

Dear Ms Dallaway,

I attach the comments on the Beer Neighbourhood Plan of Devon County Council in its role of mineral planning authority.

Kind regards

Andy Hill

Principal Planning Officer - Minerals & Waste

Comment	Response
In the box on page 11, it would be useful to state that, although not currently operational, Beer Quarry retains planning permission for surface and underground working	Wording added to section
Policy HBE2 After the first paragraph on page 41, it would be helpful to state that Beer Stone, together with other building stones derived from the Upper Greensand that outcrops in the area, are defined as 'key buildings stones' in the Devon Minerals Plan, which encourages the small-scale extraction of these stones to support local character.	Wording added to section
Policy HBE2 Add Devon Minerals Plan Policy M15 – Supply of Building Stone to the box of 'Related national, district and AONB policies'	Wording added to section

2. EAST DEVON DISTRICT COUNCIL

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Miss Claire Rodway Senior Planning Officer 01395 516551 extn 2218 Planning Policy Section, East Devon District Council, Knowle, Station Road, Sidmouth, EX10 8HL
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BY EMAIL 29 NOV 2017

Hi Annie

Please find attached the EDDC comments in response to your pre-submission consultation. The HRA is being assessed by consultants (so that it is unbiased and 'expert') and we should be able to forward our comments in this respect before Christmas. I apologise for this not being possible before your deadline but we needed to find and appoint a firm with suitable experience in the field.

With regard to the attached response, it incorporates comments from various internal Officers, including our Housing Enabling Officer and Landscape Architect. The main concerns related to Policy H3 and the additional housing at Short Furlong. Subject to the HRA, there is no in-principle objection to the development but the Plan does need to be clear about exactly what type of housing is being proposed and why as we explain in our comments.

I hope this all makes sense, if you have any queries please do come back to me.

Best wishes

Claire

Miss Claire Rodway
Senior Planning Officer

COMMENTS TO FOLLOW:

Comment	Response
<p>Page 9- Our Landscape Officer has suggested that the Natural Environment chapter should besides Devon County Council Landscape character assessment also consider the East Devon and Blackdown Hills Areas of Outstanding Natural Beauty and East Devon District Landscape Character Assessment & Management Guidelines 2008, which can be found here: http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/</p> <p>And a guide on how to use this document can be found here: http://eastdevon.gov.uk/media/1226222/guide-to-landscape-character.pdf</p>	Wording inserted in supporting evidence
Page 28- add the Hedgerow Regulations, 1997 to the list of supporting evidence.	Wording inserted in supporting evidence
Pages 32,33 and 34- Policies MS2, MS3 and MS6 add ' provided they do not negatively impact upon the Jurassic Coast World Heritage Site and the landscape character and setting of the area ' after 'support...'	Wording inserted in policy block
<p>Page 51 (Meeting the demand for local needs/affordable housing): The first sentence talks about strategy 34 and district wide target for 70% rented and 30% intermediate. This is a bit confusing/misleading as it doesn't first state how much affordable is required on the development i.e. 50% within BUAB. It could be reworded to clarify this:</p> <p>Strategy 34 of the Local Plan "District-wide Affordable Housing Provision Targets" states that 50% of new dwellings within the Built-up Area (of Beer) should be affordable. The Strategy then suggests that the affordable housing be provided, based on a district-wide target, as 70% social or affordable rented housing and 30% intermediate or other affordable housing. Affordable housing provision will be subject to viability considerations.</p>	Text and policy wording changed following consultation with EDDC Planning Policy team
<p>Page 52 (4th Para, 1st sentence) could be reworded to clarify the thresholds and what exactly is required. Perhaps:</p> <p>There are few opportunities in Beer for development within the BUAB and these are restricted mainly to one or two-unit infill plots. This is fewer than the 6 dwelling threshold at which affordable housing contributions are required (between 6-10 dwellings a contribution towards off-site affordable housing will be expected but this can be used District-wide) and schemes of 11 or more dwellings, which should provide 50% affordable housing on-site, are unlikely to come forward within the Built-up area Boundary.</p>	Text and policy wording changed following consultation with EDDC Planning Policy team
<p>Page 56, Policy H1 could be amended to clarify the Policy and make it compliant with the Local Plan. Exception sites are very rarely viable and we do not accept viability arguments, see link below from our website about viability and exception sites</p> <p>https://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/viability-guidance-note-5-viability-and-exception-sites/</p>	Text and policy wording changed following consultation with EDDC Planning Policy team
<p>Policy H1:</p> <p>i) a) should also say social rent</p>	Text and policy wording changed

<p>Proposals within the built-up area boundary will should deliver at least 50% affordable housing, in line with Strategy 34 of the Local Plan.</p> <p>Proposals outside the built-up area boundary will aim for should provide at least 66% affordable housing, in line with Strategy 35 of the Local Plan, accepting that this percentage may be reduced due to viability issues.</p> <p>Proposals which deliver less than 40% affordable housing sites of 6 houses or more will not be supported.</p> <p>Proposers of development should engage with the local community and Parish Council to help ensure that proposals take into account both this plan's aims and objectives and the views of the local community.</p>	<p>following consultation with EDDC Planning Policy team</p>
<p>Page 57 - <u>Allocation of Short Furlong site</u></p> <p>The HRA is going to be assessed by a consultant as it requires specialist expertise due to the complex issues it addresses. The comments on this site are made on the assumption that the site is found to be acceptable in HRA terms.</p> <p>It isn't clear from Policy H3 how much affordable housing is to be provided on the site so this should be clarified. Reading the supporting text, it appears that the reason/justification for allocating 31 houses is that 20 affordable houses are required and, if Strategy 35 is applied (a 1/3 - 2/3 split) then 10 market houses are required to deliver this. The justification for the extra 31st house isn't clear. At 31 dwellings it exceeds the exceptions site definition of 'around 15' in Strategy 35, but, as the local community have demonstrated an affordable need I feel that the allocation can be justified as long as you explain your reasoning in the text. This approach does not take account of viability, so there is no mechanism to negotiate the affordable housing percentage downwards if the scheme genuinely isn't viable, for instance due to gradient, soil type or habitat mitigation measures, so in that circumstance it may not go ahead. Having said that, existing affordable housing has been built very close by and similar considerations applied but the scheme was still considered viable so I'm sure the NP group have taken this into account.</p> <p>If our interpretation that the need for affordable housing is driving the allocation is wrong, the text needs to justify your reasons for the allocation. In this case, you could approach the development differently and expand the BUAB to include it. As your Plan would be 'made' after the Villages Plan is adopted the BUAB in the NP would supercede the Villages Plan. The assumption would then be that 50% affordable housing (subject to viability) would be provided on the site in line with Local Plan policy for sites within BUAB's. With this approach there is a danger that the developer may make a case that the site is not viable (as land value will be taken into account even though it wasn't bought with development in mind or at development value) and the level of affordable housing is significantly reduced so that the allocation is primarily delivering unrestricted open-market housing.</p>	<p>Text and policy wording changed following consultation with EDDC Planning Policy team</p>
<p>To strengthen policy H3 in relation to Landscape and Visual Impacts, I would revise the wording of the policy to state the following:</p> <p>‘... Proposals should be informed by detailed Landscape and Visual Impact Assessment (noting the sensitivity of the site and Beer in general) in line with current best practice guidance and demonstrate that they will minimise any</p>	<p>Text and policy wording changed following consultation with EDDC</p>

adverse impacts on the landscape character and visual amenity of the area and skyline or, where this is not feasible satisfactorily mitigate adverse impact...'	Planning Policy team
<p>To strengthen policy H3 in relation to drainage and to promote the use of Sustainable Drainage Systems (SuDS) I would suggest referencing the following documents in the key supporting evidence section, which set out current industry standard best practice:</p> <ul style="list-style-type: none"> - Sustainable Drainage Systems: Guidance for Devon, which can be found here: https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/ - The CIRIA SuDS Manual, which can be downloaded for free from this manual: https://www.ciria.org//Memberships/The_SuDs_Manual_C753_Chapters.aspx <p>The above is supported by EDDC Local Plan Policies:</p> <ul style="list-style-type: none"> - Strategy 38 - Sustainable Design and Construction - EN22 - Surface Run-Off Implications of New Development 	Text and policy wording changed following consultation with EDDC Planning Policy team
Page 58- the East Devon Draft Villages DPD is now with the Local Plan inspector and is due to be adopted in the Spring. Replace the reference with 'East Devon Villages Plan'.	Wording amended
<p>P60 Policy H4</p> <p>Revised wording for the Beer Village Centre Vitality Policy in the Villages Plan has been discussed with the Planning Inspector and will be going out to consultation imminently as a main modification to the Villages Plan. To avoid conflict/confusion it would be sensible for the wording to be as similar as possible. The Villages Plan says:</p> <p>" <i>Policy VP02 Beer - Village Centre Vitality</i></p> <p><i>Within the Beer vitality and shopping area defined on the Beer inset map, proposals for main town centre uses (as defined in the National Planning Policy Framework) will be permitted provided the use would:</i></p> <ol style="list-style-type: none"> <i>1. maintain or enhance the character and diversity of such uses in the village centre; and</i> <i>2. maintain or enhance the vitality and viability of the village centre.</i> <p><i>Proposals for other uses will not be permitted unless it has been clearly demonstrated that the site has been marketed without interest for all appropriate main town centre uses at a realistic price for at least 12 months (and up to two years depending on market conditions) and offered to the local community for their acquisition/operation.</i></p> <p><i>Permission will be subject to the retention of the shopfront.</i></p> <p><i>The establishment of new main town centre uses which are outside of the defined vitality and shopping area, or which would extend the vitality and shopping area will not be permitted if they would harm the convenience, vitality or viability of the centre."</i></p>	Following discussion with EDDC officers it was agreed that wording of policy supports Local Plan policy

3. OTHER ORGANISATIONS

3.1 National Grid

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Amec Foster Wheeler on behalf of National Grid Planning & Design E&I UK Amec Foster Wheeler Gables House, Kenilworth Road, Leamington Spa, CV32 6JX Tel +44 (0)1926 439000
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BY EMAIL 25 OCT 2017

20 October 2017 Dear Sir / Madam

Beer Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID

National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.

About National Grid

National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.

Specific Comments

An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.

National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.

Key resources / contacts

National Grid has provided information in relation to electricity and transmission assets via the following internet link: <http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

The electricity distribution operator in East Devon District Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk

Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure.

I hope the above information is useful. If you require any further information please do not hesitate to contact me.

Yours faithfully

Hannah Lorna Bevins

Consultant Town Planner

cc. Spencer Jefferies, National Grid

3.2 South West Water

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Martyn Dunn Development Coordinator South West Water D: 01392 443702 Peninsula House, Rydon Lane, Exeter, EX2 7HR
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BY EMAIL 27 OCT 2017

Annie thanks for this the content of which is noted – the level of housing growth suggested would, I can confirm not cause any concerns.

Regards

Martyn Dunn Development Coordinator

3.3 South Somerset District Council

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Stephen Baimbridge Policy Planner (01935) 462497 Planning Policy, South Somerset District Council, Brympton Way, Yeovil, Somerset BA20 2HT
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BY EMAIL 6 NOV 2017

Dear Annie Dallaway,

Please find attached South Somerset's response to your consultation regarding the Pre-submission version of the Beer Neighbourhood Plan.

Please do not hesitate to contact me with any queries.

Kind regards,

Stephen

Stephen Baimbridge

Policy Planner

FORM TO FOLLOW:

Beer Neighbourhood Plan

Pre-submission Consultation

Regulation 14 of the Neighbourhood Planning (General) Regulations 2012

Comments Form for the Neighbourhood Plan

Name: Stephen Baimbridge

Organisation: South Somerset District Council

Position in Organisation: Policy Planner

Address: Planning Policy, The Council Offices, Brympton Way, Yeovil, Somerset

Postcode: BA20 2HT

Contact Details:

Email: stephen.baimbridge@southsomerset.gov.uk

Phone No: 01935 462497

<i>Page no.</i>	<i>Aim/Objective/Policy</i>	<i>Comments</i>
/	/	<p>Dear Beer Parish Council,</p> <p>Thank you for consulting South Somerset District Council regarding the Pre-submission version of your Neighbourhood Plan.</p> <p>Having duly considered the document, we wish not to comment.</p> <p>Please do not hesitate to contact me with any queries.</p> <p>Kind regards,</p> <p>Stephen</p> <p>Stephen Baimbridge Policy Planner (01935) 462497</p> <p>Planning Policy, South Somerset District Council, Brympton Way, Yeovil, Somerset BA20 2HT</p>

3.4 Highways England

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Gaynor Gallacher Performance Assurance & Business Services, South West Operations Division Highways England Ash House Falcon Road, Sowton Ind. Estate Exeter EX2 7LB Tel: +44 (0) 300 4704376
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BY EMAIL 13 NOV 2017

Dear Annie

Thank you for providing Highways England with the opportunity to comment on the pre-submission draft of the Beer Neighbourhood Plan. As you are aware, we are responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A30, A35 and M5 all of which lie some distance from the plan area.

We are therefore satisfied that the proposed plan policies are unlikely to result in development which will impact on the SRN and we therefore have no comments to make on your draft. This does not however prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time.

Kind regards

Gaynor

Gaynor Gallacher

Performance Assurance & Business Services, South West Operations Division

3.5 Somerset County Council

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Amy Shepherd Corporate Performance Officer Planning and Performance Group Somerset County Council B3 East County Hall Taunton TA1 4DY 01823 359225
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BY EMAIL 28 NOV 2017

Please find attached some comments made by the County Council Acoustics Specialist in respect of the above consultation.

If you have any queries, please contact me.

Kind regards

Amy Shepherd

Corporate Performance Officer

Comment	Response
See following letter for general issues	Issues identified in SCC response have no impact on SCC in relation to the Beer NP

Consultation response

Beer Neighbourhood Plan – Pre-Submission Consultation

Introduction

Somerset County Council welcomes the opportunity to respond to this consultation.

Please find comments from the County Council Acoustics Specialist.

Should you have any queries regarding the comments, please contact Amy Shepherd, Corporate Performance Officer on 01823 359225 or aashepherd@somerset.gov.uk

Consultation response

Looking at the plan the County Council Acoustics Specialist notes issues associated with noise impact are directly referenced in policies HBE4, B1 and B2 and are indirectly referenced, as a consideration within amenity, in Aim 4 and policies SR3, T1, MS7,

A point commonly missed in a NPs consideration of development is the new sensitivities it might introduce to existing effects from surrounding development. It is these expectations for amenity that can result in later impacts if they then conflict with other established, or potential employment land uses, a point made in paragraph 120 of the NPPF. As such there may be a desire for the authors to modify policy B1 Existing Employment Land and Buildings to consider the adverse impact that can arise should inappropriate, or poorly designed noise sensitive development arise within an area of existing employment land.

In addition the County Council Acoustics Specialist does not consider reference in B1 to 'trading hours' to be valid in the context of an adverse impact. The County Council Acoustic Specialists view is that there may be benefit to revising the wording of B1 to include these points and suggests the following:

Development proposals that result in the loss of existing employment land and buildings (which require planning permission) will only be supported where they demonstrate that:

- i) the existing use is no longer viable;
- ii) there will be no adverse effect on the amenity of nearby residential development (such as from noise, light pollution, anti-social behaviour and so on);
- iii) any noise sensitive development adopts appropriate design and standards of construction sufficient to ensure that reasonable expectations for residential amenity are met without conflict with existing, or permitted uses of adjoining land.

- iv) there will be no adverse impact on the natural environment (landscape, biodiversity and habitats) or that negative impacts will be satisfactorily mitigated.

In the view of the County Council Acoustic Specialist Policy B2 reference to 'trading hours' would seem in the wrong context as it is not an adverse impact in itself. However, the plan may wish to consider 'trading hours' in comparison with existing retail development.

Policy HBE2 considers aspects associated with the quality of design and makes reference to visual aspects but not acoustic aspects. In the view of the County Council Acoustic Specialist it may be helpful to provide further support for the consideration of noise impacts associated with policy B1 and an additional general objective could be included within HBE2. Possible wording might be:

To be considered as high-quality design, development proposals should meet the requirements set out in the Beer Village Design Statement. Particular attention should be paid to:

[..]

ensuring that it is designed in such a way to protect the amenity expectations of users and avoid potential conflict with permitted land uses.

The NP makes reference to a Green Wedge but there appears to be no reference to Local Green Space designation or the topic of tranquillity and these attributes are identified in sections 77 and 123 of the NPPF. A reference to tranquillity would in my view be helpful in Aim 1 along with ecology and bio-diversity as it is a characteristic of the natural environment worthy of protection. Tranquillity is an attribute dependant on many aural and visual features and has been identified as the most valued attribute of the countryside and one under growing threat from development.

Recent consideration of tranquillity has been provided in the Landscape Institute Technical Information Note 2017: Tranquillity – An Overview and reference to this document may help to define terms. In the view of the County Council Acoustic Specialist this NS could draw attention to the need to preserve tranquillity in key areas and minimise both unnatural visual and acoustic impacts and the County Council Acoustic Specialist would suggest the following addition to Policy NE1 - Development and the Natural Environment:

Development proposals will be supported where they:

- i) have demonstrated that there are no adverse impacts on the natural environment (landscape, tranquillity, biodiversity and habitats) or any impacts are satisfactorily mitigated;

The County Council Acoustics Specialist hopes these comments are useful.

3.6 Marine Management Organisation

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Nicole Yeomans Marine Officer (Planning) Marine Planning Marine Management Organisation Direct line: 01202 677 539 Address: The Quay, Poole, Dorset, BH15 1HP
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BY EMAIL 28 NOV 2017

Dear Annie Dallaway,

Thank you for including the MMO in your recent consultation submission of the Beer Neighbourhood Plan pre-submission consultation.

Please also consider the following information as the MMO's formal response.

Kind regards,

The Marine Management Organisation

Response to your consultation

The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.

Marine Licensing

Activities taking place below the mean high water mark may require a [marine licence](#) in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.

Marine Planning

As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers.

As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the [East Inshore and Offshore marine plans](#) were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply to East Inshore and Offshore Plans please visit our [Marine Information System](#). The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.

If you wish to contact the MMO regarding our response please email us at consultations@marinemanagement.org.uk or telephone us on 0300 123 1032.

Nicole Yeomans | Marine Officer (Planning) | Marine Planning | Marine Management Organisation

Comment	Response
<p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.</p>	<p>Reference added to national policy box</p>

3.7 Clinton Devon Estates

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Amy Roberts Principal Planner Bell Cornwall LLP (agent on behalf of Clinton Devon Estates) Sowton Business Centre, Unit 2 Capital Court, Bittern Road, Exeter EX2 7FW Direct line: 01392 357527
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BY EMAIL 30 NOV 2017

Dear Parish Clerk

Please find attached representations on behalf of Clinton Devon Estates to the Beer Neighbourhood Plan Pre-submission Consultation. I would be grateful if you could confirm receipt.

If you require any further information please do not hesitate to contact me.

Thank you.

Kind regards

Amy Roberts BSc, MSc, MRTPI

Principal Planner

FORM AND LETTERS TO FOLLOW:

Comment	Response
See attached letter,	
Primary concerns raised related to the provision of affordable housing acknowledging the need to take financial viability into consideration when determining the percentage of affordable housing delivered by the development.	Following substantive discussions with EDDC planning policy officers the explanatory and policy text has been changed. These changes address the general issues of this NP noncompliance with Local Plan policies and subsequently address the concerns raised by CDE



CHARTERED TOWN PLANNERS

01392 357515 | info@bell-cornwell.co.uk | bell-cornwell.co.uk

FAO: Annie Dallaway, Parish Clerk

Our ref: 7099

Via email

30 November 2017

Dear Madam

Beer Neighbourhood Plan Pre-submission Consultation - Regulation 14 of the Neighbourhood Planning (General) Regulations 2012
Comments Form for the Neighbourhood Plan

Please find enclosed representations on behalf of Clinton Devon Estates in response to the Beer Neighbourhood Plan Pre-Submission Draft.

By way of preamble, it will be recalled that Clinton Devon Estates own a substantial amount of land in and around Beer. Following on-going detailed discussions with the Parish Council, Clinton Devon Estates put forward an outline planning application for up to 30 dwellings (including 43.3% affordable housing). At the time, the application was strongly supported by the Parish Council but was ultimately refused by East Devon District Council – not for any technical reasons, but it was felt that a Neighbourhood Plan allocation was required first.

Despite the passing of time, Clinton Devon Estates remains extremely keen to progress the development of this site and continue to work with the Parish Council to deliver the maximum amount of affordable housing that the development of this land can bear.

The submission comprises:

- Completed comments form



- Viability Appraisal Update Note, produced by Herridge Property Consultants, dated 27th November 2017.

Aims 9 & 10 (page 48)

Clinton Devon Estates **supports** the Draft Neighbourhood Plan's aims to:

- Increase accessibility and affordability to housing for local people.
- Support a supply of smaller dwellings to meet local need.

There is a clear, on-going need for affordable dwellings in the parish of Beer, and making such housing available to local people is identified as one of the most important factors in maintaining the viability of a community.

Proposals that can achieve these aims (such as a development of up to 31 dwellings on land at Short Furlong – Draft Policy H3) must be supported by the Neighbourhood Plan, especially as it is recognised that development in Beer is challenging and that there are few opportunities in Beer for development within the BUAB.

Objectives 9.1 – 9.5 (page 48)

Clinton Devon Estates **supports** the Housing objectives of the Draft Neighbourhood Plan, especially objectives 9.1-9.54:

- 9.1: Support development where it demonstrates it is fulfilling an identifiable local housing need.
- 9.2: Ensure provision of an appropriate mix of dwelling sizes, tenures and external space.
- 9.3: Ensure new dwellings are designed to be compatible with their immediate surroundings.
- 9.4: Support the development of affordable rental and shared equity/ownership housing.

Objective 9.5 must acknowledge that, in certain circumstances, viability could reduce the percentage of affordable housing that schemes are able to deliver. Indeed, the supporting text on page 52 of the Draft Neighbourhood Plan states that:

"The possibility of the viability argument reducing the percentage of affordable houses below the policy target is acknowledged. A figure less than the Local Plan target percentage may be acceptable as we



consider that some open market housing development which enables deliver of affordable housing is better than no development and no affordable houses."

Neighbourhood Plan objectives and policies must provide sufficient flexibility to ensure that sensitive housing schemes, providing an acceptable level of affordable housing for local people, can be brought forward and to ensure that opportunities to deliver affordable housing (which it is recognised are limited in the parish) are not sterilised by unachievable affordable housing targets.

Policy H3 (page 57)

Clinton Devon Estates **supports** the site allocation: Land at Short Furlong for up to 31 dwellings.

The development would meet the Parish's key housing aims of:

- *Increasing accessibility and affordability to housing for local people* – it has been evidenced that a scheme of 30 dwellings could provide 13 affordable homes for local people.
- *Supporting a supply of smaller dwellings to meet local needs* – the development could include a mix of unit sizes, including one and two bed dwellings.

Development of the land at Short Furlong would also meet the Neighbourhood Plan's relevant housing objectives, by:

- Helping to fulfill an identifiable local housing need.
- Providing an appropriate mix of dwelling sizes, tenures and external space.
- Providing dwellings that are compatible with their immediate surroundings.
- Providing affordable rental and shared equity/ownership housing.

There are real concerns, however, regarding the wording of the affordable housing requirement in Draft Policy H3 which seeks to require a minimum amount of affordable housing to be provided on-site in accordance with policy H1. Policy H1 requires:

"Proposals outside the built-up area boundary will aim for 66%, in line with Strategy 35 of the Local Plan, accepting that this percentage may be reduced due to viability issues. Proposals which deliver less than 40% affordable housing sites of 6 houses or more will not be supported."



It will be appreciated that, as a specific allocation within the Neighbourhood Plan, development of the land at Short Furlong would not be subject to consideration under Strategy 35 in the Local Plan which relates to 'exceptions' development i.e. to schemes which by their very nature have not come about through specific land allocations. Whilst the 66% requirement in Policy H1 may be reasonable in relation to other as-yet-unidentified schemes which may come forward, there is no need for the wording within Policy H1 to apply to the Short Furlong site or for it to be tied via Policy H1 to the possibility of meeting the 66% requirement as set out under that policy.

Whilst we note that the draft wording of Policies H1 and H3 do allow for some flexibility in terms of affordable housing provision for viability reasons, there is already enough robust and tested viability evidence available to inform the examining Inspector of the level of affordable housing that is achievable on this site (for a development of 30 dwellings) and to justify a specific, lower level of affordable housing to be set for the Short Furlong site within Policy H3.

As the Parish Council knows, Clinton Devon Estates submitted an outline planning application for up to 30 dwellings on land at Short Furlong in November 2014 (ref. 14/2621/MOUT). This application was refused, not because of any inherent unsuitability of the land but simply because it was felt that a Neighbourhood Plan allocation was required to be in place prior to the scheme progressing. As part of that application, Clinton Devon Estate's housing advisors produced a detailed viability appraisal, which was reviewed and analysed by the District Valuation Office in April 2016. It was agreed by all parties that 66% affordable housing would render the scheme unviable. As recognised in the subtext to the draft Neighbourhood Plan Policies, development in Beer is challenging with construction costs above average because of the area's topography and the AONB designation, which imposes stringent environmental and design conditions. After detailed analysis, all parties agreed that a figure of 43% affordable housing was achievable and acceptable and could be applied to that scheme.

Due to the passing of time since the viability assessment was undertaken, Clinton Devon Estates has gone back to its advisors to secure an up-to-date appraisal of the position (please refer to the letter dated 27th November 2017 produced by Herridge Consulting Ltd, enclosed). As will be noted, this confirms that a scheme proposing (as before) 13 affordable houses (i.e. 43.3% of the total) remains viable but that this remains the maximum which a viable development of the site is capable of bearing.



As a result of on-going dialogue with representatives of your parish council and neighbourhood plan team, which dates back to September 2013, we note that expectations for affordable housing provision on this site have not changed and that parish councillor representatives believe that Policies H1 and H3 afford enough flexibility for a future planning application for a 30 dwelling scheme proposing 43% affordable housing on land at Short Furlong to gain neighbourhood plan support (as this level is within the range of 40-66% that can be supported). Notwithstanding this, we are of the firm view that as there is already enough evidence to show that 66% affordable housing is not achievable on this site (the Parish Council's preferred site for housing) but 43.3% is. To avoid any ambiguity or potential resistance from parties that would be responsible for determining any subsequent planning application, Policy H3 should be revised to accept what has been agreed by the District Valuer and set out a policy requirement for 43.3% affordable housing. Clinton Devon Estates cannot be put in the position whereby they face another refusal from East Devon District Council as a result of perceived conflict with the 66% requirement currently proposed.

Therefore, paragraph 1 of draft Policy H3 should be re-worded to state that:

"Land at Short Furlong identified in Figure 11 is allocated for up to 31 dwellings with 43% affordable housing to be provided on-site."

Finally, and as a concluding point, we would highlight that one of the key objectives of the neighbourhood plan process is to provide local communities with the means to deliver on those objectives which *they* consider to be important and that neighbourhood plans give the freedom to do this without being unduly fettered by wider policy restrictions. Given the work which has been done to-date on the Short Furlong scheme and the extent of discussions between the Parish Council and Clinton Devon Estates on this, the Parish Council should not feel obliged to set the 66% affordable requirement if this is simply to reflect the Local Plan policy on exceptions housing development. As mentioned above, and as an allocation, this site would not be an exceptions scheme and so would not be subject to Strategy 35. The key point is that the land at Short Furlong provides the means for delivering the maximum possible amount of affordable housing on a site which is very close to the centre of the community. We would therefore suggest that Policy H3 does not need to reflect Strategy 35 of the Local Plan.

If you require any further information or clarification, please do not hesitate to contact Amy Roberts on the number below.

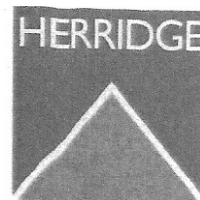


Yours faithfully
BELL CORNWELL LLP

AMY ROBERTS BSc (Hons) MSc MRTPI
Principal Planner

DD 01392 357 527
Email aroberts@bell-cornwell.co.uk

Enc.



PROPERTY

CONSULTING LTD
4 Barnfield Crescent

Exeter, EX1 1QT
Tel: 01392 494123

Mrs A Roberts
Bell Cornwell LLP
Sowton Business Centre
Unit 2, Captial Court
Bittern Road
Exeter
EX2 7FW

27 November 2017

Dear Amy

Re: Land at Short Furlong, Beer

Following our recent telephone conversation, I am pleased to enclose our updated advice in connection with the viability issues relating to the proposed redevelopment of the subject site.

As you know, we produced a viability assessment for the site on 17 February 2016, which was submitted to East Devon District Council, as part of the outline planning application reference 14/2621/MOUT for the construction of up to 30 dwellings, with all matters apart from access reserved. This application was submitted by the landowner, Clinton Devon Estates (CDE) following extensive discussions with the local Parish Council.

Our original viability assessment was sent to the District Valuer for verification and it was agreed between the parties that the proposed scheme could provide 13 units of affordable housing (43.3% of the total) comprising 9 units for affordable rent and 4 units of intermediate affordable. However the application was refused by the local authority on 11 May 2016.

We have now been asked by you on behalf of CDE to review this previous advice in light of current market conditions, to ascertain whether the conclusions remain valid.

HERRIDGE

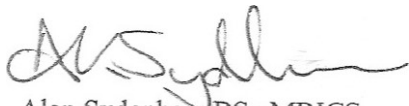
This information can then be used as part of the emerging Neighbourhood Plan process for Beer, which has identified the site as a proposed allocation for new residential development.

Having undertaken an updated market appraisal of the previous scheme for 30 dwellings, we have concluded that the potential selling price of the completed houses has increased since the original viability assessment was produced. However, it is also clear from independent indices such as BCIS that build costs have increased by a similar amount over this same period.

On that basis, we are satisfied the previous conclusions on viability, namely that a scheme of up to 30 dwellings on the subject site with 43.3% affordable housing provision is viable but that higher levels of affordable housing would not generate sufficient return to make the scheme viable to developers and therefore deliverable at the current time.

If you have any queries regarding this update advice please let me know.

Yours sincerely



Alan Sydenham BSc MRICS

For and on behalf of

HERRIDGE PROPERTY CONSULTING

3.8 East Devon AONB Team

To: Annie Dallaway, Parish Clerk, Beer Parish Council	Chris Woodruff East Devon AONB Partnership Manager East Devon AONB Team Chris.woodruff@eastdevonaonb.org.uk
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BY EMAIL 13 DEC 2017

Hi Annie

Apologies for the delays in responding on this. We have been in discussion with this in particular on the bats and potential impacts – providing advice on allocations and the assessment process.

Further to this we are directing all Parish Councils to our [planning pages](#) and suggesting clear reference is made to the AONB designation, conservation and enhancement using the information in the guides linked on these pages.

Best of luck with the plan

Regards

Chris Woodruff

East Devon AONB Partnership Manager

4. RESPONSES FROM INDIVIDUALS

4.1 Helen Scott

To: Annie Dallaway, Parish Clerk, Beer Parish Council	From: Helen Scott Follett Chief Holidaymaker The Follets at Beer <i>(Contact details supplied)</i>
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BY EMAIL 23 NOV 2017

Please find attached The Folletts at Beer comments on the Beer Neighbourhood Plan.

Kind regards.

Helen

Helen Scott Follett
Chief Holidaymaker

Comment	Response
<p>Policy NE2 – Locally important wildlife sites It is imperative that the land and coastal environment have particular protection from development. We thoroughly support this statement. The main reason our guests give for coming to Beer is that the village has kept its charm and coastal appeal. It is pleasing to see the local important wildlife sites documented. Any sites in Beer that are known to have bats should also be documented and protected.</p>	<p>Support noted Bat mitigation covered by policies</p>
<p>Policy NE5 – Rights of way and other access Improvements to the Coastal Path between Seaton and Beer are welcomed as there are year round walkers on this section. Signage is in need of improvement as many walkers miss the designated paths and walk on roads with no pavement or across fields</p>	<p>Provision of signage not NP issue although NP supports provisions</p>
<p>Policy MS6 – Access to the beach and connected public areas Unfortunately, many visitors are unable to visit the beach due to mobility reasons. Development that enables more visitors to access the beach would be welcomed by accommodation providers as it will ensure that people are able to enjoy the beach.</p>	<p>Covered by policies</p>
<p>Policy HBE1 – Local Beer Gap This is thoroughly supported. It is important to both locals and visitors that Seaton and Beer are distinct from each other.</p>	<p>Support noted covered by policies</p>
<p>Policy H2 – Community Housing. Policy H3 – Site Allocation This is supported. In addition, although not relevant for this document, it would be disappointing to lose the Beer Social Club site for private housing when it could be developed under the CLT for local housing.</p>	<p>Noted</p>
<p>Policy H4 – Change of use This is thoroughly supported. We have seen recent evidence that new businesses can flourish – Cinderella’s and The Smugglers Kitchen. It would be disappointing for both locals and visitors to lose retail premises converted to housing.</p>	<p>Noted</p>
<p>Policy TP4 - Accessibility I cannot see anywhere in the document anything to do with speed control. For the safety of locals and visitors and in</p>	<p>This is not within the remit of an NP</p>

keeping with many other villages a speed limit of 20 miles an hour to be enforced on all roads would be appreciated.	application needs to be made to DCC highways
Policy T1 – Temporary and alternative use of assets to support tourism Any projects that support tourism in the main or especially the ‘shoulder season’ are welcomed in order for local businesses to thrive. The winter months are not currently profitable for many local businesses and the focus on the shoulder season is welcome.	Noted

4.2 Richard Scott

To: Annie Dallaway, Parish Clerk, Beer Parish Council	from: Richard Scott (<i>Beer resident. Contact details supplied</i>)
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BY EMAIL 29 NOV 2017

Hi Annie,

I attach my comments on the Neighbourhood Plan .

Best wishes,

Richard Scott

Comment	Response
Valued skylines The view from West Underleys southwards to the ridge is designated as a 'valued skyline', and yet the view from Underleys to the same ridge is not so designated. The whole ridge is lined with spectacular mature trees, plus two copses, both of which are opposite Underleys. There is no qualitative difference between the view of the ridge from Underleys and that from West Underleys, and I feel strongly that the view of the whole ridge should be designated as 'valued'.	The valued skylines as detailed in Fig 4 cover the area of concern when the triangular lines are extended
Access to the beach Views on access to the beach, especially for people with disabilities, were expressed in the 2016 Beer Tourism Survey, but this Plan does not make use of the evidence provided, and does not list the survey results as 'Key supporting evidence' (see below).	Reference added in Key Supporting Evidence
Tourism The whole Plan, and in particular the section on tourism, makes no use whatever of the tourism survey conducted in the village in 2016. The tourism section refers to the 2014 Community Survey, but not to the survey of over 400 visitors to the village. Surely the most important evidence relating to the village's tourism offer is not the views of residents, but the opinions of our visitors? There must be very few communities of the size of Beer which are able to draw on the type of evidence provided by the tourism survey, and it seems extraordinary to fail to draw on the	Reference added in Key Supporting Evidence

evidence it provides.	
<p>Transport and parking Once again, the 'Key supporting evidence' omits the 2016 tourism survey in the village. In particular, there is no reference to the fact that 64% of the (over 400) visitors who took part in the survey favoured the idea of a park and ride scheme in the village. Such a scheme would make maximum use of the clifftop car park, and would serve all the stated objectives of the Neighbourhood Plan relating to transport and parking.</p>	<p>Reference added in Key Supporting Evidence</p> <p>Park and ride schemes have been considered but viability due to length of season and visitor numbers do not support one</p>

4.3 Norah Jagers

To: Annie Dallaway, Parish Clerk, Beer Parish Council	From: Norah Jagers (<i>Beer resident. Contact details supplied</i>)
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BY EMAIL 30 NOV 2017

Dear Annie,

Last minute – I forgot when the deadline was!. You'll see a theme in the comments! And it may be that the bulk of the work on the plan was done prior to the survey having been carried out.

Otherwise, it covers things well. I was pleased to see a nod towards habitat protection for bats – they and their roosts may be protected but the places where they feed etc aren't. So hedgerows with trees are so important.

Well done everyone.

Norah

Comment	Response
MS1 No reference to the Visitor Survey undertaken via the Coastal Community Forum in 2016	Reference added in Key Supporting Evidence
MS5 First line of "Justification for..." is repeated.	Corrected
Again, no mention of the Visitor survey. Our approach to visitors related to the NP by our saying "the locals have said what they think, but we need to know how you feel about the village"	Reference added in Key Supporting Evidence
Should the section on parking include something on consideration of "park and ride" as requested in Visitor survey?	Park and ride schemes have been considered but viability due to length of season and visitor numbers do not support one

