

# Farringdon Neighbourhood Plan – Meeting with EDDC Briefing Note

## Purpose of Meeting

To provide members of the Farringdon Neighbourhood Plan Steering Group and representatives of EDDC with a background and up-date, in advance of a joint meeting to be held on 4<sup>th</sup> April 2019.

## Background

A first draft of the Farringdon Neighbourhood Plan was shared with the local planning authority at the end of February 2019. EDDC was very helpful in letting the Steering Group have its initial comments on the initial version of the Plan and its draft policies in good time for them to be considered at a NP Steering Group meeting on 12<sup>th</sup> March 2019.

At its meeting on the 12<sup>th</sup> March 2019, the Steering Group agreed to making several amendments to the Plan in the light of the observations made by EDDC. A schedule of comments with Steering Group decisions can be found at the end of this briefing note. Most of the proposed changes were common-sense, straight-forward and easy for the Steering Group to agree to.

The Steering Group did, however, have difficulty in reaching a conclusion on how best to respond to EDDC's comments numbered 13 and 18 on the schedule overleaf. It was agreed that a meeting with representatives of EDDC could be valuable in helping to determine the best way to address the matter of limiting, and controlling, new housing and industrial development in the rural Parish of Farringdon.

## The Issues

**Draft Policy Farr4** was an attempt to accommodate a very limited amount of new housing development in recognition of a discernible demand from parishioners for homes within the Parish that are more suitable to meeting changing needs and lifestyles, such as starter homes and single-level housing appropriate for elderly households. The Steering Group accepted the points made by EDDC relating to policy Farr4 and recognises that inherent dangers in the first draft of the policy. However, it would prefer to retain a revised policy Farr4 in the Neighbourhood Plan rather than delete it "*in its entirety*" as suggested by EDDC. Representatives of the Steering Group wish to explore an alternative policy for the Parish of Farringdon with EDDC, which would facilitate limited growth and some diversification of the housing stock in the interests of serving local needs and ensuring that a shortage of suitable dwellings does not operate against the interests of those with a genuine reason for wanting to live in Farringdon. It should be noted that the Steering Group has indicated a willingness to reduce the scope of policy Farr6 to a garden development policy only.

**Draft Policy Farr8** was an attempt to constrain further business development on the major industrial estates to minimise additional nuisance, disturbance to parishioners and harm to the natural environment. EDDC has suggested that "*defining the acceptable use classes*", might be appropriate for the policy. The Steering Group found the idea appealing in principle but wishes to discuss with EDDC how a generic policy could be re-drafted to reflect the different types of established business operations and the varying character and functions of the business estates concerned.

Farringdon NP 1 <sup>st</sup> Draft EDDC Comments and Reaction			
		EDDC Observations	NPSG Decisions 12 Mar 19
1	Para 2.2	6th line typo – ‘dos’	Amend to read “does”
2	Para 2.5	<i>‘It has continued to age. 25% of the 136 households in the Parish in 2011, 25% were single person ones.’</i> Suggest this needs attention.	Amend to read “25% of the 136 households in the Parish in 2011 were pensioner households....”
3	Para 3.2	Suggest an update of copy - ‘The NPPF goes on to say that <i>“strategic policies [in the Local Plan] should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans”</i> This may be misleading as it cuts short the full quote: <i>“strategic policies [in the Local Plan] should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies”</i> – i.e. in ‘non-strategic policies in the Local Plan We request the quote is used in full to avoid potential misinterpretation of the NPPF as a basis of your consultation	Include extended quote in 3.2 as requested i.e. <i>“strategic policies [in the Local Plan] should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies”</i> .
4	Para 3.6	Edit suggested – <i>‘Farringdon Parish is a very special and precious piece of Devon countryside; or it is to the community that has the privilege to live here.’</i> Suggest deleting the bold section or rephrasing to provide a positive supporting statement.	Delete emboldened text
5	Para 3.9	<i>‘because of its outstand natural beauty.’</i> Should read <i>‘outstanding’</i> .	Delete “its”
6	Policy Farr1	This policy doesn’t appear to add any further consideration for development management beyond the Local Plan. Policy could be deleted. If the group wish to maintain the policy: a) <i>respect local wildlife...</i> Suggest revision to <i>‘(a) avoid development on or adjacent to...’</i>	Re-phrase criterion (a) as suggested
7	Para 7.9	<i>‘Our community consultations and interviews with the farming community has served to confirm...’</i> – Suggest <i>‘have’</i>	Amend to read “have”
8	Policy Farr2	Suggest a revision to <i>‘New development should be compatible with, and where possible enhance, the character...’</i>	Amend policy wording as suggested
9	Policy Farr3	Consider breaking up the paragraph with bullet points and key criteria, difficult to digest as written. Policy is a good example of local specificity providing parish specific mapping and focus.	Introduce bullet points
10	Farr3 map	However, the map needs to exclude those highlighted woodlands outside of the parish and include a key. I can provide if you confirm by email.	Request EDDC to produce relevant map
11	7.16-7.19	What is lacking is a robust evidence base to support the replacement of trees – see: Woodland Trust’s manual for planners: Woodland Trust’s neighbourhood planning microsite:	Include reference to manual and include additional guidance about the acceptable types of replacement trees
12	Para 8.8	<i>‘It has planning permission for three pitches that can accommodate up to 11 mobile-type homes.’</i> We suggest keeping the supporting text in line with the planning permission. The reference to 11 suggests a more intensive use might be possible.	Re-word to reflect planning permission: <i>“It has planning permission for three pitches that can accommodate no more than 11 mobile-type homes.”</i>

13	Policy Farr4	<p>This policy is <b>contrary to the current strategic approach</b> outlined in the Local Plan.</p> <p>Is the group attempting to deliver affordable homes and self-build opportunities for local people? Strategy 35 of the Local Plan deals with affordable housing for areas without BUABs. Farr4 removes the majority of strategy 35 restrictions and provides no local specificity beyond the Farringdon Design Statement.</p> <p>This policy should be deleted in its entirety to meet the basic conditions.</p> <p>Specific concerns:</p> <p>a) Suggests meeting a local demonstrable need (which is usually taken to mean a need for affordable housing, although that isn't specified here). The supporting text says that there is little to no local need.</p> <p>b) 'Adjacent to other dwellings' would allow development wherever there is existing housing. Given that the supporting text recognises the parish is dispersed and there is no recognisable centre, this will lead to housing throughout the countryside. Looking at the map, there are very few single houses in the countryside, even farms are clusters of houses and residential barn conversions.</p> <p>c) Given the dispersed nature of the settlement, we think the NP definition of 'well related to existing development' means two neighbouring dwellings, whereas the Local Plan definition is a range of facilities and services to meet basic day-to-day needs.</p> <p>The remaining criteria do not address the fundamental conflict in the first 3 criteria</p> <p>The self-build caveat would seem to be more restrictive to local self-builders than other people wishing to develop in the Parish (including 'developers' living elsewhere)</p>	Consider a revised policy approach <b>after discussions with representative of the Local Planning Authority</b>
14	Para 8.10 – 8.11	<p>The supporting text recognises that the Parish is unsustainable (8.10), and then proceeds to justify unsustainable development (8.11). 8.11 requires an improved local definition.</p> <p>Policy Farr4 would allow far higher numbers than 'schemes of just one or two dwellings'. Once adopted it would be difficult to control the rate at which development comes forward.</p>	Will be revised in accordance with any new policy
15	Policy Farr6	<p>This <b>doesn't comply with the Local Plan</b> or Policy Farr4. There is no justification for the sustainability of this approach, therefore the NPPF and Local Plan policies referred to are not applicable as both the NPPF and the Local Plan presume the general acceptability of the location for additional development.</p> <p>Farr6 doesn't require a local need to be demonstrated and potentially allows multiple dwellings as infill (as an alternative to the housing between dwellings allowed by Farr4, but without a local need?) and on back-land and gardens. The social impact of development without appropriate facilities was cited at the major Feniton appeal a couple of years ago. Farr6 this has the potential to allow unsustainable development at a significant scale. There is also no reference to protecting interests of acknowledged importance, such as listed buildings.</p> <p>This Policy is also contrary to the Neighbourhood Plan's own supporting text: 8.17 - <i>"It is sometimes questioned whether Farringdon is actually a village. So dispersed and</i></p>	Reduce scope of policy to a garden development policy <i>"Proposals to intensify existing residential plots will only be supported where this can be achieved through good design and without harming local character and amenity. Where garden development is proposed, special regard must be paid to:.....etc"</i>

		<p><i>inconspicuous are most of the buildings in Farringdon that any sense of a clustered human settlement, which is normally associated with the word 'village', is quite hard to discern. Even the Church is discretely situated off the road and well screened; and the Village Hall is hidden....."</i></p> <p>The justification for the policy addresses matters of detail but not <b>our fundamental strategic objections</b>.</p>	
16	Para 8.15	'area without causing harming the character' – Suggest revision of copy '...causing significant harm to the character...	Amend supporting text in the context of the revised policy Farr6
17	Farr7	Needs strengthening to prevent open market development in the countryside being justified on the basis of supporting community facilities.	Consider re-wording of policy in the context of other policy changes Perhaps merge with policy Farr14
18	Farr8	'provided it is in keeping with those uses and business activity already on the site' – Suggest defining the acceptable use classes.	Consider relevance of defining acceptable use classes for each site <b>in discussions with EDDC</b>
19	Farr8	Suggest revision of criterion - c) not adversely affect any listed building heritage asset or setting;	Revise criterion c) to read: <i>"not adversely affect any listed building heritage asset or setting;"</i>
20	Farr10	<p>The policy as written limits future extension and business development to the confines of the existing site (criterion 'a'). We would suggest that the establishment of the Crealy development boundary requires robust justification that is currently lacking.</p> <p>Supporting text (para 9.16) states <i>'To most residents of Farringdon Parish, the Crealy Theme Park and Resort is not a nuisance. It is located away from the settlement areas and situated at a satisfactory distance back from the A3052 and well-screened.'</i> Crealy is not presented as an issue that calls for a restrictive policy.</p> <p>Policy criterion (e) states development proposals will be supported provided that <i>'development is closely related to the existing campus / developed area'</i>. Furthermore, Para 9.19 states that <i>'Any proposed expansion of the Crealy Theme Park and Resort beyond its current confines within the Parish of Farringdon will need to comply fully with the development plan...'</i>, both suggesting that expansion would be supported in some circumstances.</p> <p>Acceptable land uses that are compatible with the surrounding countryside and amenity may come forward that provide local jobs whilst meeting the NPs ambitions. Future extension of the Crealy site may be acceptable to the Parish Council, subject to meeting other Farr10 criteria. We would suggest caution, and the provision of clear evidence, in establishment of criterion (a).</p>	Delete Crealy draft policy
21	Farr10	c) 'landscape setting of site is conserved...' - requires a 'the'	Note decision at point 20 above
22	Farr10	We'd suggest additional criteria for impact on neighbouring amenity and overlooking. High rides in particular may give visitors direct views into nearby properties (and we have had complaints to this effect)	Note decision at point 20 above
23	Farr10	Public transport provision? If the site intensifies should it be required to be more 'sustainable' (there is a bus stop nearby) e.g. should there be a particular frequency of buses, specific provision for cyclists.	Note decision at point 20 above

24	Farr10	We suggest that h-j are also applicable to extra holiday accommodation and the type of accommodation is clearly spelt out. Would a hotel be acceptable for instance? The policy would be clearer if h-j applied to all accommodation (staff or visitor) and none of it should be used as permanent residential accommodation or disposed of separately. It might be appropriate to require this accommodation to be seasonal/not occupied year-round.	Note decision at point 20 above
25	Map 8	The map would benefit from the inclusion of a key and a clear parish boundary.	Request improved map from EDDC