



Payhembury Neighbourhood Development Plan

Consultation Statement

Introduction

Consultation Statement Purpose

- 1.1 This Consultation Statement has been prepared to fulfil 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:
 - (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
 - (b) explains how they were consulted;
 - (c) summarises the main issues and concerns raised by the persons consulted;
 - (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- 1.2 A greater level of consultation has been undertaken than the legislation requires, and this is set out in detail here and within the reports that are submitted in support of this Consultation Statement as appendices. It is not the intention of this Consultation Statement to replicate what is in these detailed reports but to summarise the content and show how this consultation has influenced the formation of Payhembury's Neighbourhood Plan.

Steering Group

- 1.3 The Steering Group was formed in April 2016 and comprised members of Payhembury Parish Council and members of the local community.
- 1.4 This steering group has led the Neighbourhood Plan process on behalf of Payhembury Parish Council.

Consultation Aims

- 1.5 The value of strong community engagement was recognised at an initial steering group meeting as an essential component to ensure meaningful consultation and generate a well-supported Neighbourhood Plan document.

Community and Stakeholder Engagement

- 2.1 This section outlines the key engagement activities that took place to confirm the scope and content of the Neighbourhood Plan for Payhembury, identifying the vision and objectives of the plan. As the policies that would deliver the identified objectives of the plan were developed, additional opportunities for engagement took place. A schedule of the stakeholder and community engagement process including details of the issues raised is set out below. In summary, the process comprised the following:
 - Presentations made at various community events held in the village of Payhembury at which issues of interest were identified and recorded and, later in the process, draft

versions of the Neighbourhood Plan and draft policies were advertised, with comment sought;

- Organisation of a workshop with local businesses to explore and record issues of interest to them;
- Circulation of a questionnaire to all residents of the parish with this also being made available in an on-line format. A copy of the questionnaire is provided at **Appendix 1**. The results of the survey were then analysed by Devon Communities Together, the Steering Groups' planning consultant with the results provided in the form of a report which was used to identify issues of interest (see **Appendix 2**);
- Public consultation on the initial draft Neighbourhood Plan;
- Formal consultation with statutory consultees on the draft Neighbourhood Plan.

2.2 These activities were advertised in a number of ways including letter drops to every household in the Parish, signs placed in the Payhembury village shop and notice board, via the parish website and in the monthly newsletter which is circulated to every household in the Parish. The feedback provided was then used to develop the content and policies in the draft Neighbourhood Plan.

Date	Type	Description	Key Messages from Engagement	Impact on the Neighbourhood Plan
23 rd April 2016		Initial consultation event	<p>Peaceful and family character of the village was important.</p> <p>Some additional housing was needed especially for smaller households.</p> <p>Desire was expressed to avoid any significant growth on edge of Payhembury.</p> <p>Highways safety issues were of a concern.</p> <p>A desire to see improvements to pedestrian and cycle facilities in the area.</p> <p>A desire to protect and enhance existing community facilities especially play/recreation facilities.</p>	<p>Used to inform the Vision.</p> <p>Used to identify the range and content of individual policies to be included.</p> <p>Used to inform the decision to identify a settlement boundary.</p>
December 2016	Parish news letter,	Questionnaire (155 responses received)	<p>Improvements to public transport are desired, particularly connections to Feniton railway station.</p> <p>Residents generally felt safe travelling around the parish. But reducing the speed of vehicles, better road maintenance and improving pavements within the village would be helpful.</p> <p>Broadband speed and mobile signal were considered poor or non-existent</p>	<p>Used to inform the Vision.</p> <p>Used to identify the range of policies to be included in the draft plan.</p>

Date	Type	Description	Key Messages from Engagement	Impact on the Neighbourhood Plan
			<p>for a majority of residents.</p> <p>Teenagers were the only 'grouping' within the community for whom community facilities and needs were considered 'poor' by more than 50% of respondents.</p> <p>Walking is the most popular recreational activity and improvements to footpaths were desired.</p> <p>Residents would like Payhembury to be known as a friendly, safe, welcoming and caring community.</p> <p>The main reason residents intend to move away from the parish was to be near more public transport/shops/amenities.</p> <p>A majority of residents thought it was important to provide some additional housing, especially 'affordable' housing.</p> <p>There is sufficient interest to form a Renewable Energy working group.</p>	
7 th May		Renewables consultation event	Identified significant community	Used to inform wording of relevant

Date	Type	Description	Key Messages from Engagement	Impact on the Neighbourhood Plan
2017			interest in developing both community and individual renewable schemes.	policies in the draft plan.
9 th May 2017		Business consultation workshop	Identified a desire to provide additional space and support facilities for small businesses in the parish.	Used to inform wording of relevant policies in the draft plan.
20 th May 2017		Further consultation event	Similar issues as those identified at the initial consultation event were highlighted.	Used to confirm merits of initial policy proposals and to refine wording. Proposed policies were drawn up to allow self build dwellings adjacent to the village and parish hamlets using settlement boundaries.
2 nd June 2018		Q&A event during consultation period	Most parishioners aware that the consultation was underway and were intending to read the draft plan ahead of the deadline. Feedback from those who had read it was positive.	

Pre-Submission Consultation

- 3.1 As required by Regulation 14 of the Neighbourhood Planning Regulation 2012, Payhembury Neighbourhood Plan was required to undertake a pre-submission consultation of the proposed Neighbourhood Plan document. The regulation states:

14. Before submitting a plan proposal to the local planning authority, a qualifying body must—

(a) publicise, 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—

(i) details of the proposals for a neighbourhood development plan;

(ii) details of where and when the proposals for a neighbourhood development plan may be inspected;

(iii) details of how to make representations; and

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised;

(b) 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

(c) send a copy of the proposals for a neighbourhood development plan to the local planning authority.

- 3.2 To comply with this Regulation, the proposed Payhembury Neighbourhood Development Plan was consulted on from 29th April until 9th June 2018. The draft Neighbourhood Plan was available on the parish website, with hard copies available for viewing at the village shop, Payhembury Provisions.
- 3.3 Articles to promote the consultation appeared in the April, May and June editions of the Parish Paper which was distributed to all properties in the parish. In addition, reminder posters were placed in prominent positions and a community engagement event was held on June 2nd during which the Neighbourhood Plan steering group were available to answer questions.
- 3.4 The consultation draft Neighbourhood Plan was sent via email directly to community, strategic and statutory organisations. A complete list of those contacted is provided in **Appendix 3**.

Statutory Responses

- 3.5 In total six responses were received from statutory bodies. These were:
- Amec Foster Wheeler (National Grid)
 - East Devon District Council
 - The Environment Agency
 - Highways England
 - Natural England
 - South West Water
- 3.6 These responses were considered by the Steering Group (along with the community responses) and where appropriate amendments made to the Neighbourhood Plan document.
- 3.7 **Appendix 4** contains a table summarising the key points raised by the statutory consultees, how these have been considered, and if necessary responded to with changes within the submission document.

Statutory Responses Summary

- 3.8 Five of the statutory responses made no significant suggestions for amendments to the document. The Environment Agency and Natural England made minor suggestions to improve the specific details. East Devon District Council made significant responses to the document.
- 3.9 East Devon District Council's response was the most substantial. They identified a range of concerns relating to the methodology used to inform the settlement boundaries, the sustainability credentials and likely efficacy of the proposed self build housing policy. They indicated that a significant amount of additional work would be required including the completion of a Strategic Environmental Assessment in order to overcome their concerns.
- 3.10 In the light of these comments and further engagement with East Devon District Council officers the steering group decided to remove PNP2 from the submission document.

Community Responses

- 3.11 In total three residents responded to the consultation.
- 3.12 These responses were considered by the Steering Group and where appropriate amendments made to the Neighbourhood Plan document.
- 3.13 **Appendix 5** contains a table summarising the key points raised by the community consultees and how these have been considered, and if necessary responded to with changes within the submission document.

Summary

- 3.14 The Regulation 14 consultation has provided the Payhembury Neighbourhood Plan Steering group with a broad range of feedback. The revisions made in the light of this feedback have

informed the policies and community actions within the document and ensured that the intentions of these are clearly articulated.

Conclusion

- 3.15 From the outset of creating a Neighbourhood Plan for Payhembury the steering group have been clear that this will be a community led document.
- 3.16 The support from local residents for the pre-submission plan throughout the Regulation 14 consultation suggests this has been achieved. Ensuring the document complies with the East Devon Local Plan and National Planning Policy Framework whilst reflecting the community's wishes is a delicate balancing act, and the communication of feedback to participants following the Regulation 14 consultation helps to achieve this. Other stakeholders with an interest in the Payhembury Neighbourhood Plan have been consulted and their feedback has been incorporated into the final document.
- 3.17 This document, which summarises the processes leading up to the submission version of the Payhembury Neighbourhood Development Plan and the supporting Appendices are considered to comply with Section 15(2) of Part 5 of the 2012 Neighbourhood Planning Regulations.

Appendices

Appendix 1 – Copy of Consultation Questionnaire

SEE DOCUMENT PROVIDED SEPERATELY

Appendix 2 – Copy of Consultation Questionnaire Report

SEE DOCUMENT PROVIDED SEPERATELY

Appendix 3 – List of Statutory Bodies Consulted

Statutory bodies consulted on the draft Neighbourhood Plan:

Broadhembury Parish Council (PC)

Awliscombe PC

Buckerell PC

Feniton PC

Talaton PC

Clyst Hydon PC

Plymtree PC

Voneus

BT

EE

Three

Western Power

East Devon District Council

Devon County Council

Coal Authority

Homes and Communities Agency

Environment Agency

Highways England

English Heritage

Natural England

Network Rail

National Grid

NHS

Southwest Water

Historic England

Appendix 4 – Comments Received From Statutory Bodies Consulted

Date	Name	Comments	Response/Action
02/05/18	Highways England	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 specific comments to make. However, in general terms we welcome your objectives to improve footpaths, bus services and connectivity with Feniton station and thereby reduce reliance on the private car.	N/A
08/05/18	South West Water	Plan noted. No comments.	N/A
15/05/18	National Grid	[The identified high voltage] overhead powerline does not interact with any of the proposed development sites.	N/A

25/05/18	Environment Agency	<p>We welcome the inclusion of a local green space policy (PNP6). Paragraph 3.45 acknowledges the recreational, amenity and wildlife benefits provided by green infrastructure. It should also be noted that these areas and networks also provide benefits in terms of flood risk management and protecting water quality. It would be good if the plan acknowledged this. We also welcome the plan's commitment to encourage environmentally friendly technologies. However, other than this the plan contains no objectives or policies relating to the natural environment. It should be noted that some parts of the parish, including parts of Payhembury village are at risk of flooding both from rivers and surface waters. In addition the watercourses in the parish are presently only considered to meet Moderate Ecological Status. The failing elements relate to phosphate and macrophytes/phytobenthos, both of which indicate high nutrient levels in the water which are derived agriculture but also foul drainage discharges. Nonetheless, we recognise that the policies contained within the adopted East Devon Local Plan may be sufficient to address these issue within the Payhembury parish.</p>	<p>Paragraph 3.45 (now 3.37) is a direct quote from NPPF about Local Green Space and is therefore not ammended. Paragraph 3.38 added to reflect comments about flooding.</p>
06/06/18	Natural England	<p>Welcome the Payhembury Neighbourhood Plan and we have no comments to make.</p>	N/A
08/06/18	<p>East Devon District Council (See attached file for full feedback)</p>	<p>P3.13 reference to the Lympstone NP setting a precedent for the reintroduction of BUAB's is not strong justification for the same approach at Payhembury. Lympstone was included as a 'Strategy 27' settlement at the time due to offering a range of accessible services and facilities. This justification for a BUAB does not apply to Payhembury.</p>	<p>The Lympstone NP is not the only piece of evidence to justify marking a boundary. Paragraph reworded to address the comment.</p>
EDDC cont.	<p>P3.15 District, rather than County Council</p>	<p>Corrected as suggested</p>	

EDDC cont.	P3.18 We would still be more comfortable if the [central farm buildings] were excluded. 3.18 does not accurately reflect the range of points discussed on the visit.	Boundary redrawn to exclude the farm barns and yard. However, we believe the site has the potential for the small scale development intended by PNP1 and would hope the development could proceed under the EDDC exception policy for sites adjacent to a village boundary, using the safeguards on scale and retaining employment within that.
EDDC cont.	P3.16/P3.24 We suggest a red line around Payhembury, demarcated "Payhembury Settlement Boundary" and the hamlets shown in blue are called "Hamlet Boundaries" or similar. Also, we would prefer the text to be reordered so that the Hamlet Boundaries and supporting text appear after PNP1 but before PNP2, so that they can be clearly read in context.	Reworded and text reordered as suggested.
EDDC cont.	P3.23 The BUAB criteria outlined in para.3.15 has not been applied consistently in identifying the Hamlet boundaries. None of the hamlets contain facilities and as such we do not consider that justification is provided as to how development in the identified hamlets will promote the objectives of sustainable development.	Hamlet boundaries redrawn to just include houses and domestic gardens. Given the strict criteria on PNP2, we believe there will be very few developments associated with the policy and so expansion of the hamlets would be minimal. However, following further consultation with EDDC, PNP2 has been removed.
EDDC cont.	P3.27 We suggest inclusion of a table detailing ranges as per the table included in the Nationally Described Space Standards to establish acceptable floor space for 1, 2 and 3 bedroom homes to support Policy PNP1.	Table added as suggested.

EDDC cont.	PNP1 There is no reference in this Policy to the existing employment buildings in the centre of the village. If they were marketed for a year in line with PNP4 and then redeveloped (for 30-40 houses?) there would be a very significant impact on the character of the village. Furthermore, this Plan was screened on the basis that only a very small number of infill plots were likely, a large development would have resulted in a need for HRA and SEA. The current plan structure and absence of specific policy relating to the central farm and employment areas may require a rescreening of the plan for HRA and SEA.	See response to P3.18. This central farm yard/barns has been excluded from the settlement boundary.
EDDC cont.	PNP2 We suggest the removal of the named hamlets outside of Payhembury Village for those reasons outlined in comment 5 [plus further changes to wording of the policy].	Following further discussion with EDDC the steering group have decided to remove PNP2. All other policy numbers are therefore updated in the light of this policy removal.
EDDC cont.	PNP3 (R&D) should be written in full	Now numbered PNP2, R&D expanded as suggested
EDDC cont.	We do not feel that this provides enough protection to the existing employment uses in the centre of Payhembury Village, particularly the farm.	This comment is no longer relevant following exclusion of the farm building from the boundary.
EDDC cont.	P3.41 Mentions 'small-scale' but not defined or repeated in the policy.	'Small-scale' removed for consistency with the policy
EDDC cont.	General SHLAA - [correct to reference Villages Plan]	SHLAA references changes to Villages Plan as suggested.

Appendix 5 – Comments Received from those living/working within the parish

Date	Name	Comments	Response/Action
29/04/18	Parishioner	I think the plan is great. I particularly like the focus on affordable family housing, parking restrictions, renewables, improved pathways and protecting the playground.	N/A
30/05/18	Parishioner	The Colestocks settlement boundary includes the paddock/field attached to the Granary, part of Colestocks Farm conversion. This was agricultural field prior to the conversion and has remained so designated. I feel the boundary should be the edge of the garden area.	Boundaries to all the hamlets redrawn to only include houses and domestic gardens. However following further consultation with EDDC it has been decided to remove PNP2.
06/06/18	Parishioner/Small business	Suggestion to the neighbourhood plan is on advice given at a meeting this morning with a planning officer. POLICY PNP2 - Single plot exceptions schemes for locally-tied affordable self-build homes will be supported on sites , Upton (Fig 7), and renovations or extension to existing unused buildings outside of the settlements , where each of the supporting policy criteria are met... . This offers an alternative to Qb permitted development, which tends to be developer led and thus outside the reach of many locals in need.	Following further consultation with EDDC, PNP2 has been removed.