

Plan reference	Page (by plan page numbering)	EDDC Comment
Para 2.2	5	6 th line typo – ‘dos’
Para 2.5	5	‘It has continued to age. 25% of the 136 households in the Parish in 2011, 25% were single person ones.’ Suggest this needs attention.
Para 3.2	6	Suggest an update of copy - ‘The NPPF goes on to say that “ <i>strategic policies</i> [in the Local Plan] <i>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</i> [in the Local Plan] <i>should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies</i> ” – ie. 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.
Para 3.6	7	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.
Para 3.9	7	‘ <i>because of its outstand natural beauty.</i> ’ Should read ‘outstanding’.
Policy Farr1	15	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 ‘(a) avoid development on or adjacent to...’
Para 7.9	13	‘ <i>Our community consultations and interviews with the farming community has served to confirm...</i> ’ – Suggest ‘have’.
Policy Farr2	17	Suggest a revision to ‘ <i>New development should be compatible with, and where possible enhance, the character...</i> ’

Policy Farr3	18	<p>Consider breaking up the paragraph with bullet points and key criteria, difficult to digest as written.</p> <p>Policy is a good example of local specificity providing parish specific mapping and focus.</p> <p>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.</p>
		<p>What is lacking is a robust evidence base to support the replacement of trees – see:</p> <p>Woodland Trust’s manual for planners: http://www.woodlandtrust.org.uk/publications/2017/09/planning-for-ancient-woodland/</p> <p>Woodland Trust’s neighbourhood planning microsite: https://www.woodlandtrust.org.uk/campaigning/neighbourhood-planning/</p>
Para 8.8	21	<p><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.</p>

Policy Farr4	21	<p>This policy is contrary to the current strategic approach outlined in the Local Plan.</p> <p>Is the group attempting to deliver affordable homes and selfbuild 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> <ul style="list-style-type: none"> 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. 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. c) Given the dispersed nature of the settlement, we think the NP definition of '<i>well related to existing development</i>' means two neighbouring dwellings, whereas the Local Plan definition is a range of facilities and services to meet basic day-to-day needs. <p>The remaining criteria do not address the fundamental conflict in the first 3 criteria.</p>
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		<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>
Para 8.10 – 8.11	22	<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 '<i>schemes of just one or two dwellings</i>'. Once adopted it would be</p>

		difficult to control the rate at which development comes forward.
Policy Farr6	23	<p>This doesn't comply with the Local Plan 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 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. Whilst most parishioners are more than content with their individual living environment within the countryside, community consultation in 2018 did identify a shared desire to see the emergence of a stronger sense of community and identity for Farringdon in the years ahead."</i></p> <p>The justification for the policy addresses matters of detail but not our fundamental strategic objections.</p>
Para 8.15	23	'area without causing harming the character ' – Suggest revision of copy '...causing significant harm to the character...'
Farr7	24	Needs strengthening to prevent open market development in the countryside being justified on the basis of supporting community facilities.

Farr8	28	<p><i>'provided it is in keeping with those uses and business activity already on the site'</i> – Suggest defining the acceptable use classes.</p> <p>Suggest revision of criterion - <i>c) not adversely affect any listed building heritage asset or setting;</i></p>
Farr10	30	<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> <p>c) <i>'landscape setting of site is conserved...'</i> - requires a 'the'</p> <p>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)</p> <p>Public transport provision? If the site intensifies should it be required to be more 'sustainable' (there is a bus stop nearby) eg should there be a particular frequency of buses, specific provision for cyclists.</p>

		<p>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?</p> <p>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.</p>
Map 8	P37	The map would benefit from the inclusion of a key and a clear parish boundary.