

STRATEGIC LAND PARTNERSHIPS

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SSP/MRP/SW/SLP
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East Devon District Council
Knowle
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Dear Sirs

A VILLAGE BUILT UP AREA BOUNDARY CONSULTATION

Please find set out below our response to the Consultation on Proposed Criteria for Reviewing Built Up Area Boundaries.

This Consultation is premature. The Local Plan EiP Inspector has raised a number of questions relating to the overall housing requirement for the District, the spatial distribution and specifically the Policies relating to development in the rural areas. Before those questions have been properly addressed any progress in relation to the Built Up Area Boundaries is premature and inappropriate. Furthermore, we have previously suggested (copy attached) that the Local Plan should (as required by the NPPF) be a Local Plan and should include all settlements and relevant policy in relating to Built Up Area Boundaries. There is no reason to separate the two.

The Built Up Area Boundaries for the seven main towns should also be reviewed to take into account recent planning permissions and development that has actually commenced and in some cases has been completed since the Built Up Area Boundaries were first drafted well over 10 years ago. (This would be consistent with the criteria in Table 2 Ref B1 and B3).

We have seen no evidence for limiting Built Up Area Boundaries to the 17 Settlements identified in Table 1. Removing the Built Up Area Boundaries from other settlements will inevitably have the consequential effects of increasing house prices, reducing affordability, decline in local services and overall reductions in sustainability of those settlements, a policy that fails to accord with the NPPF.

Comments in relation to the criteria in Table 2

Ref 1A

The criteria stating that the Boundaries "should not seek expansion to facilitate additional development" illustrates the prematurity of this Plan and also conflicts with the objectives of the NPPF.

What harm is there in accommodating or allowing for some growth over the rest of the Plan Period?

Ref C2

Recreational amenity space at the edge of settlements is excluded by implication. Such space within settlements or largely surrounded by built form should therefore be included.

Ref C4

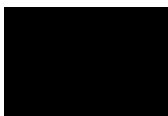
Parts of settlements that are separated by fields or open space from the main core of the village, are to be excluded; it is quite wrong to exclude this. A number of the Built Up Area Boundaries in the adopted Local Plan include outliers. There is no reason to change this position.

Whilst we recognise that this document itself is not the route for promoting specific sites or in more general terms growth in the rural areas it is worth highlighting the statement underlined and in bold that the Council have included on top of Page 5 which states “We do not want to increase levels of development in our rural settlements and are not seeking additional sites for housing”. This is an accurate representation of the Council’s position but clearly illustrates how wrong it must be to make zero provision for any further development in rural settlements for the rest of the Plan Period until 2033.

The Villages Plan remains in the early stages of preparation. We previously objected to the sustainability appraisal which purports to support that Plan. The assessments in relation to the different settlements are flawed and could not be said to be a robust and properly justified approach.

The document also assumes that there is no requirement to allocate land for new development other than residential development. This is quite wrong. There is an acknowledged shortfall in employment, education and recreational (in some cases) opportunities in many rural areas and provision needs to be made.

Yours faithfully



SIMON STEELE-PERKINS
STRATEGIC LAND PARTNERSHIPS

c’c’ Mr A Thickett, Local Plan Inspector, East Devon District Council