

Ian Holland
Upmead
Kersbrook
Budleigh Salterton
EX9 7AA

Mr. Tim Spurway,
EDDC
Planning Policy Dept,
The Knowle,
Sidmouth,
Devon
EX10 8HL

EAST DEVON DISTRICT COUNCIL ECONOMY			
19 SEP 2016			
ACK	CIRC	SEEN	FILE

16 September 2016

Dear Mr. Spurway,

NEIGHBOURHOOD PLAN - EAST BUDLEIGH & BICTON

Please find attached my completed Representation Form in respect to the East Budleigh with Bicton Neighbourhood Plan. The original signed hard copy will be sent by post.

The move towards the formulation of Neighbourhood Plans is a great leap forward for local communities and a healthy development for consultative local democracy.

As a native and resident to the area for large parts of my life I greatly appreciated reading the plan. Though currently temporarily away from the beauty of East Devon for work – with the United Nations in the capacity as an Advisor to Governments for the 2030 Sustainable Development Agenda (most recently Laos, Jordan and India) - it is fascinating to see the grounding of local planning policies at the neighbourhood level that seek to place this universally adopted agenda at their heart. The neighbourhood planning approach being taken, both in methodology and content, is a model for other communities around the world. It is really great to see.

There was only one aspect to the Neighbourhood Plan that jarred a little with me, which I have attempted to set out in the representation attached. I think it has wider implications for the District Plan too as to how development proposals outside of the Built up Area 'boundaries' (BUABs) should be considered in light of the National Planning Framework which is now based on these Sustainable Development objectives. Suffice to say, I do not believe the in the blanket ban approach to development outside of only the larger settlement's boundaries. I think there are now better policy options and considerations based on a robust and mature understanding and application of the sustainable development principles and national planning framework. You are better placed to make that judgement at the local level.

However, there does appear to be an evolving case made mention of in the East Devon villages statement, which very sensitively weighs up the need to protect the quality and characteristics of an unspoilt natural environment with a balanced sustainable development approach. The progressive approach would be one founded on a rigorous test that fully utilizes the sustainable development criteria adopted by EDDC, and based on the national planning framework, rather than the casting of a rather simplistic 'NO DEVELOPMENT' cloak across the entire countryside, which seems unbecoming to our human capacity to reason.

I would have liked very much to have attended one of the recent consultations on the Neighbourhood Plan, but alas work overseas has prevented from doing so. My loss. Though I trust in the meantime that the suggestions made in the attached representation will contribute to advancing the dialogue further. I look forward with interest in the eventual outcome and would be grateful to remain informed.


Ian Holland

copies :

East Budleigh Parish Council

Mr. Freeman, EDDC Planning Policy

Accession	Ref No
For Council Use Only	For Council Use Only

East Budleigh Neighbourhood Plan – Submission Version Representation Form



EAST DEVON DISTRICT COUNCIL ECONOMY			
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The East Budleigh Neighbourhood Plan has been produced by East Budleigh Parish Council. It has now been formally submitted to East Devon District Council who are legally required to undertake public consultation.

Please return this form to East Devon District Council by Monday 17 October 2016. Representations received after this time will not be accepted.

Part A – Personal Details Please note we cannot accept anonymous responses.

Personal Details	
Title	Mr.
First Name	Ian
Last Name	Holland
Job Title (where relevant)	SDG Advisor
Organisation (where relevant)	United Nations
Address	Upmead Kersbrook, Budleigh Salterton
Postcode	EX9 7AA
Tel. No.	[REDACTED]
Email Address	[REDACTED]

Agent's Details (if applicable)*	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address	
Postcode	
Tel. No.	
Email Address	

*if an agent is appointed, please fill in your title, name and organisation and the full contact details of the agent. Where an agent is used the agent will be the point of contact for correspondence.

Name/Organisation	Ian Holland
Please complete for each sheet	

Please indicate whether you wish to be notified of any of the following:

- The publication of the recommendations of any person appointed to carry out an independent examination of the East Budleigh Neighbourhood Plan
- The adoption of the East Budleigh Neighbourhood Plan.
- Other planning policy issues.

Representation details

Please use a separate form for each representation

1. To which section of the Neighbourhood Plan does this representation relate?

(Please note that a separate form must be completed for each representation)

Policy Number	N1 (b)
(include policy, paragraph or other reference no. if appropriate)	

2. Please use the box below to set out why you are supporting or objecting to this part of the plan. If your comment relates to a specific area of land or site if possible please identify it on a map. Continue on a separate sheet if necessary

The East Budleigh & Bickton Neighbourhood Plan is an excellent, thorough and comprehensive plan that the community can be proud of. The Parish Council and its Task Force should be commended for its formulation and for the extensive consultations that have been hosted. After reading the entire document there is only one policy area that is a cause for concern. Proposed policy N1 (b) seems unnecessarily prescriptive and negative such that development proposals shall ONLY be permitted within the East Budleigh Village, excepting a few specifically identified sites.

Whilst appreciating the need to protect the AONB, policy N1 (b) appears to be out of line and conformity with the guidance contained in the National Planning Framework in general, and in particular for National Parks and ANOB, and other locations of special designation. Nor does policy N1 (b) fit well in spirit or application with the underlying principles of sustainable development which have now been adopted at the heart of the National Development Planning Agenda and Framework. To its great credit the Neighbourhood Plan does otherwise state "Sustainable development is the golden thread", however, it now needs to take the next step and translate the essence of that sentiment into an applicable policy approach to form the basis upon which all development proposals should be considered.

There is a need for a consistent and coherent alignment between the national and local planning frameworks. However, with policy N1 (b) in its current form, it is a concern that this has not yet been fully achieved, and should be respectfully reconsidered to bring about a more appropriate harmonization between the national and local policy frameworks.

For example, the national planning framework relating to National Parks and ANOBs etc. states that MAJOR development should be avoided, unless exceptional circumstances prevail. Nowhere does it state that no development should ever take place there and that everything within them is effectively to be 'frozen'. However, this is what the Neighbourhood Plan is currently saying. There is no need or justification for an absolute ban on all forms of development. Especially where in any case proposals would have to pass the extremely high and strict standards set down under the sustainable development criteria and only be granted where they were of such high quality, low impact, enrich bio-diversity, enhance the environment and be based on demonstrable need.

The Parish Council is thereby encouraged to adopt locally appropriate and very strict sustainable development criteria against which ALL DEVELOPMENT proposals, within or outwith the established settlement boundaries, shall be assessed. This adjustment would bring the neighbourhood plan into full alignment and conformity with the national planning framework. It would enable the consistent application of the planning guidance by sustainable development means, which is highly preferable to having a blanket ban on development throughout practically the entire area of the plan. This would also prevent ambiguity or technical challenge at a later date. But most importantly of all, the adoption of a sustainable development criteria based approach would better serve the purpose intended by policy N1 (b) since it would still preserve and safeguard the natural beauty and integrity of the ANOB of this precious part of East Devon whilst giving some oxygen to the notion that the community and its citizens will consider very small scale development that does make a positive contribution should it manage to attain the very highest standards of sustainable development criteria imposed upon it as expressed so comprehensively throughout the remainder of the neighbourhood plan.

Name/Organisation Please complete for each sheet	Ian Holland
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3. What changes would you suggest should be made to the plan?

It will be helpful if you are able to put forward your suggested revised wording of any policy or text or suggested alternative policy boundary. Please be as precise as possible.

Two minor adjustments are suggested below to bring the Neighbourhood Plan into accordance and alignment with the National Planning Framework. This would still serve to advance the vision statement of the Parish by protecting and enhancing the environment, retaining its unique and intimate character and at the same time adopting the East Devon District Council Sustainability Objectives.

1. Policy N1.
Adjustment of paragraph 2 of the policy from:
"Development proposals (excluding minor development) within the Parish will not be supported unless it is demonstrated that each of the following landscape design principles shall be met:"
to read:
Development proposals within the Parish will not be supported unless it is demonstrated that each of the following landscape design principles shall be met:"
Thereby omitting the words in brackets: "(excluding minor development)"
AND

2. Policy N1 (b).
Adjustment of the (b) section of the policy from:
"b) Development shall be sited within the defined Built-up Area Boundary (except the site allocation in Policy D2) and shall be of a scale to complement the traditional character and historic core of East Budleigh unless allowed through a specific policy in the Neighbourhood or Local Plan"
to read:
"b) Development sited within the defined Built-up Area Boundary (except the site allocation in Policy D2) shall be of a scale to complement the traditional character and historic core of East Budleigh unless allowed through a specific policy in the Neighbourhood or Local Plan"
Thereby omitting the words "shall be". And omit the word 'and'.
The remainder of the plan would need to be carefully proof read to ensure all cross-references to the outgoing policies proposed by this policy adjustment if agreeable, are made.
These two adjustments however minor they appear would significantly advance the basis of a consistent, coherent and sound approach to protecting the environment and to enhancing the unique characteristics of the East Budleigh and Bicton area based on the universally applicable integration of sustainable development objectives, indicators and criteria.

Continue on a separate sheet if necessary

4. If your representation is seeking a change, do you consider it necessary to speak at the examination? (please tick one box only)

Please note this will not be regarded as a binding decision but will help us in our planning.

If you select No your representation(s) will still be fully considered by the independent Planning Inspector by way of written representations.

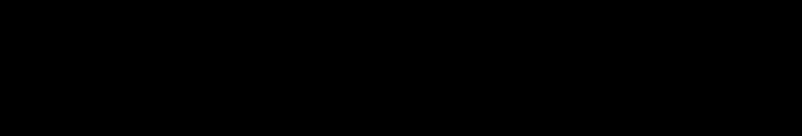
- No, I do not wish to speak at the examination:
 Yes, I wish to speak at the examination:

Name/Organisation Please complete for each sheet	Ian Holland
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5. If you wish to speak at the examination, please outline why you consider this to be necessary:

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the examination. If the Inspector does not consider it necessary to hold a public examination consideration will be given by way of written representations.

Please note that your comments and your contact details will be publically available, although your signature, private e-mail address and telephone number will not be visible on our web site.

Signed	
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A signature is required by the Planning Inspectorate. If filling in the form electronically it can be an 'electronic signature' by typing in your name in the box. If you provide a handwritten signature we will ensure that it is not published on-line but it will be visible on the paper copies available at our offices and sent to the Inspector.

Date	16 September 2016
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Please e-mail the completed form(s) and any additional information to localplan@eastdevon.gov.uk or send to Tim Spurway, Planning Policy Section, East Devon District Council, The Knowle, Sidmouth, EX10 8HL