

Accession	Rep No.
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Budleigh Salterton Neighbourhood Plan – Submission Version Representation Form



The Budleigh Salterton Neighbourhood Plan has been prepared by Budleigh Salterton Town 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 20 March 2017. Representations received after this time will not be accepted.

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

Personal Details	
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	Clinton Devon Estates
Address	Bicken Arena East Budleigh Devon
Postcode	EK9 7BL
Tel. No.	
Email Address	

Agent's Details (if applicable)*	
Title	Mr
First Name	Iestyn
Last Name	John
Job Title (where relevant)	Partner
Organisation (where relevant)	Bell Cornwall LLP
Address	Sowton Technology Centre Capital Court Buttern Road Exeter
Postcode	EX2 7FW
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 Please complete for each sheet	<i>Chita Deva EStates</i>
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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 Budleigh Salterton Neighbourhood Plan.
- The adoption of the Budleigh Salterton Neighbourhood Plan.

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 (Include policy, paragraph or other reference no. if appropriate)	<i>Policy B3</i>
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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

<i>Please see attached sheets.</i>

Name/Organisation

Please complete for each sheet

Chita Deva Estates

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.

Please see the attached representation form.

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.

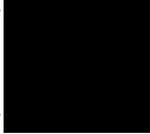
Name/Organisation Please complete for each sheet	Clinta Deva Estate
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5. If you wish to speak at the examination, please outline why you consider this to be necessary:

We will wish to articulate and expand upon each of the brief points made in these representations

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 th February 2017
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Please e-mail the completed form(s) and any additional information to planningpolicy@eastdevon.gov.uk or send to Tim Spurway, Planning Policy Section, East Devon District Council, The Knowle, Sidmouth, EX10 8HL

Policy B3: Heritage Assets

This draft policy seeks to prevent development which adversely affects heritage assets and their settings. The policy notes that heritage assets includes both designated and non-designated assets. It states that inappropriate development affecting heritage assets will not be supported.

Whilst the overall ambition of this policy - to provide protection to the town's historic features is welcome, Clinton Devon OBJECT to this draft policy as currently worded. In its current form, it seeks to apply an equal weight to designated and non-designated assets alike and to apply an equal degree of presumption against harm to these without regard to their relative importance.

Such an absolute approach is contrary to that set out in both national policy (see for example paragraphs 133 and 135 of the NPPF) and local policy (see Policies EN8 and EN9 of the Local Plan). It is also contrary to best practice such as that set out by Historic England (see for example paragraphs 10 to 12 of *'The Setting of Heritage Assets'*). In essence, these make it clear that a level of judgement needs to be applied to proposals which might affect heritage assets and that any assessment of harm needs to balance the importance of the affected asset against the benefits likely to accrue from the proposal. Crudely, the lower the level of significance, the lower the sensitivity of change to either the asset itself and/or to its setting.

As currently worded, draft Policy B3 does not allow for such a measured approach as set out above to be taken. For these reasons, we would suggest that draft Policy B3 be reworded along the following lines:

"Heritage assets and their setting: The special architectural and historic interest of the heritage assets of the town will be a primary development consideration. Proposals which have the potential to affect a heritage asset should identify their likely impact relative to its significance. Any harm will be weighed against the merits of the proposed development."