

Date: 26<sup>th</sup> September 2017

Our Ref: AKS/GH/DPS

Mr I Kemp  
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By email to: [REDACTED]

Dear Mr Kemp

**Re: Expression of Interest to Participate in the East Devon Villages Plan (EDVP) Hearing Session**

Further to our representations at both previous consultation stages, we write to submit an expression of interest in participating at the EDVP Hearing session on Tuesday 7<sup>th</sup> November 2017.

The Council is in part relying on Neighbourhood Plans (NP) for identifying sites and delivering the homes that they are expected to provide. However, in the case of Feniton, the Draft NP has not allocated any sites and therefore, there is currently little allowance for new homes within the village or even any guarantee that an NP will be adopted.

Included in our previous representations and briefly discussed in this letter, we believe that the proposed BUAB does not comply with the criteria proposed by the Council and the East Devon Development Plan and therefore is not considered to be sound. As such, we have suggested an amendment to the BUAB which includes land at Burlands Mead (see attached plan). The proposed change is considered to be consistent with the criteria set out in the Feniton Site by Site Assessment and therefore there is no reason for it to be excluded.

The site is bounded by development on three sides and the public highway on the fourth and when viewed in plan form it is clear how illogical it is to exclude it from within the BUAB. Furthermore, the site is already characterised by built development due to the fact that it is occupied by a dwelling and some redundant glass buildings. As such, the site is deemed to form part of the natural settlement of Feniton and does not constitute expansion and therefore fully complies with criteria A1. The fact that the site is bounded on all sides by permanent, readily recognisable physical features means that development on it would represent infill. Therefore, its inclusion within the BUAB is deemed to fully comply with criteria C1 and its exclusion cannot be justified. The proposed amendment to include the site is not deemed to conflict with the objectives of the Development Plan as the Site by Site Assessment would appear to infer.

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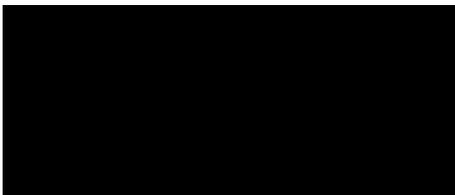
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The proposed BUAB is not *effective* because it does not deliver the objectives of the development plan. Furthermore, NPs cannot be relied on to deliver the growth required over the plan period due to their sporadic development. The site clearly forms part of the natural settlement of Feniton and therefore the proposed BUAB of Feniton is not *justified* as it is not the most appropriate strategy when considered against the evidence or criteria set out.

As the representative of the land owner, we are perhaps amongst the most informed on the site and therefore believe that we have an important contribution to make with regard to discussion on the BUAB of Feniton. We are also very aware of the implications of the Council not following their own criteria and the NP failing to allocate any sites. In light of the above we would like to request the opportunity to participate in the hearing.

Yours sincerely



Alister King-Smith BA (Hons) PGDip MRICS  
Planning Consultant – Head of Planning Services

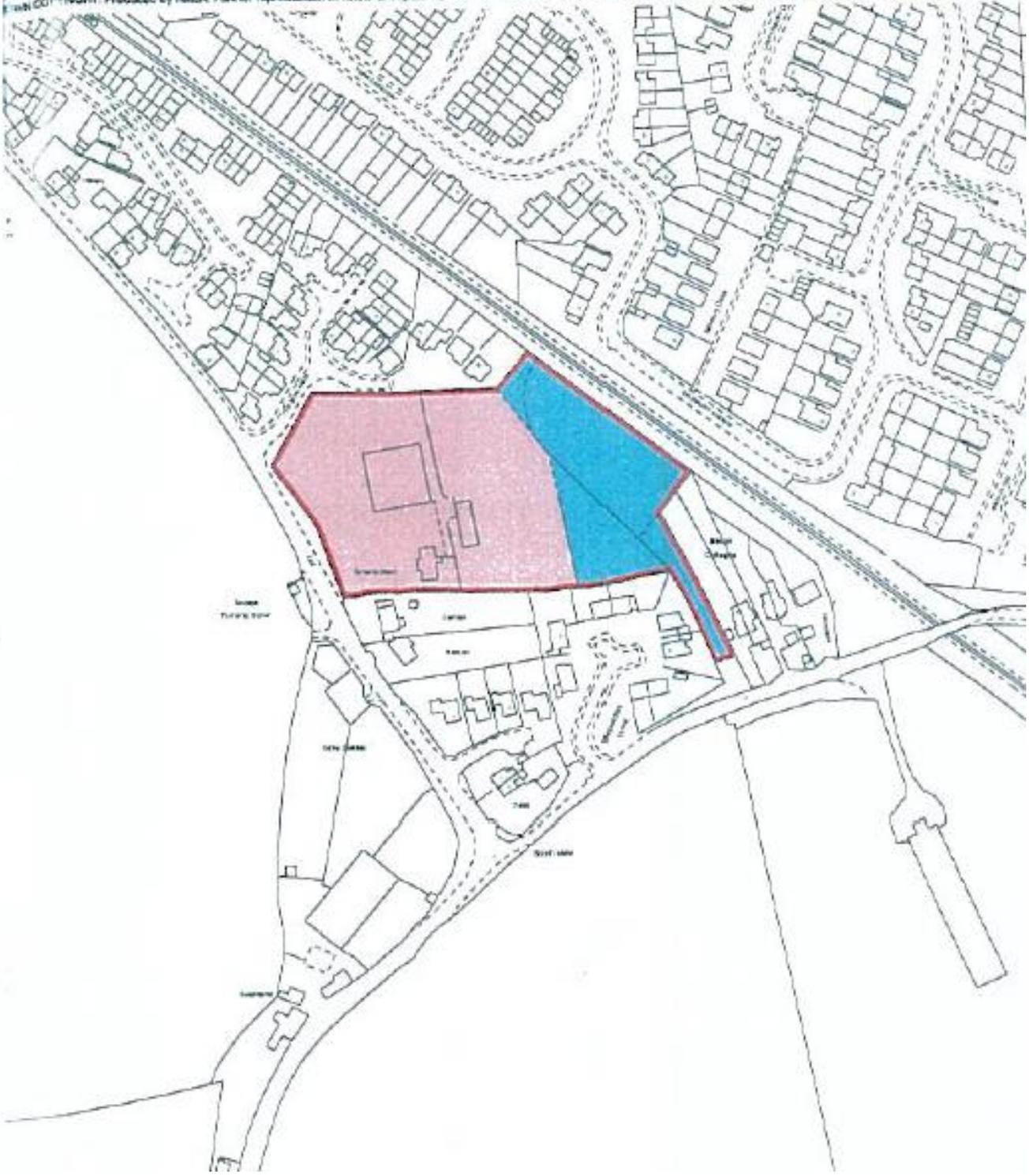
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for.