

Filtered Data Export

Full name: James Dunster

Organisation (where relevant): Clarke Willmott LLP

Other party name (if relevant):

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Proposal:

5. Development in the Towns and Villages

1. To which part of the Development in the Towns and Villages chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: SD06

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here.:
Sidm_06a

2. Do you consider that this part of the Development in the Towns and Villages chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not legally compliant. Please be as precise as possible.: The National Planning Policy Framework ("NPPF") provides guidance in relation to planning in National Landscapes ("NL"): Para 189 - "great weight should be given to conserving and enhancing landscape and scenic beauty in ... National Landscapes" Para 190 - "when considering applications for development within ... National Landscapes, permission should be refused for major development other than exceptional circumstances and where it can be demonstrated that the development is in the public interest." Sidm_06 was acknowledged as high landscape sensitivity to development. the site was split into two with 6b being rejected. However by including any part of Sidm_06 para 189 of NPPF is not engaged as 'great weight' clearly is not being given to enhancing the natural landscape. The Sid Valley Neighbourhood Plan was 'made' by the District Council on 30/10/2019. It thereafter formed part of the East Devon Development Plan. Policy 3 within the Neighbourhood Plan establishes a non-coalescence zone between Sidford and Sidmouth. The intention is to prevent development which impacts on the separation between Sidford and Sidmouth. Sidm_06a is within that zone and represents increased coalescence between Sidford and Sidmouth.

2(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter legally compliant, in respect of

any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

Sidm_06a should be removed from the proposed plan. It plainly does not comply with statutory restriction on development in NL and the Neighbourhood Plan non-coalescence area.

3. Do you consider that this part of the Development in the Towns and Villages chapter is sound?: No

3(b). If no, please give details of why you consider this part of the Development in the Towns and Villages chapter is not sound. Please be as precise as possible.: The District Council site selection report makes it clear that site Sidm_06 (6a and 6b) is unsuitable for development due to significant impact on the landscape. No real justification has been advanced for the inclusion of part of a site considered so problematic. there is a high heritage impact particularly in relation to 6a which is adjacent to the Sidford Conservation Area. Overall insufficient consideration and justification is evidenced in relation to the inclusion of this site. The revised wording suggests that development should be informed by detailed assessment and design work to enhance the natural beauty of the site. With respect no development would achieve this and this appears to be lip-service at best.

3(c). Please set out the modification(s) you consider necessary to make this part of the Development in the Towns and Villages chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the Development in the Towns and Villages chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Simply remove Sidm_06a from the allocation

4. Do you consider that this part of the Development in the Towns and Villages chapter complies with the duty to cooperate?: No

4(a). If yes, and you wish to support this part of the Development in the Towns and Villages chapter's compliance with the duty to co-operate, please use this box to set out your comments.: n/a - duty to co-operate no longer relevant

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)