



Ref: MM MM-47 (For official use only)
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Consultation on Draft Main Modifications to the Local Plan Review 2013 - 2033

Form for representations

Please return by 17 February 2020 (5pm).

When making a representation you must include your name and full postal address, otherwise your comments cannot be registered. Addresses will only be used to inform people about the new plan and other planning matters.

This form has two parts –

Part A – Your Details

Part B – Your representation(s). Please fill in a separate Part B for each representation.

Data Protection Act. Please note that this information on this form will be entered onto a database and the paper copies retained on file. The information will be used for the purposes of Town and Country Planning and may be viewed by any person for such purposes. To find out more on how we use your personal information, please see our Privacy Notice <https://www.middevon.gov.uk/PNRepresentations>

The Local Plan Review Main Modifications and associated information can be seen on the Council's website at www.middevon.gov.uk/LPRMainMods

If you require this information in another language or format, please contact us on 01884 255255 or email customerfirst@middevon.gov.uk

Part A

	1. Personal Details*	2. Agent Details (if applicable)
Title	Mr	
First Name	Geoffrey	
Last Name	Bass	
Job Title (where relevant)		
Organisation (where relevant)		
Address 1	Cadbury House	
Line 2	Fore Street	
Line 3	Culmstock	
Line 4	Devon	
Post Code	EX15 3JD	
Telephone	██████████	
E-mail Address	████████████████████	

** If an agent is appointed, please complete only The Title, Name and Organisation boxes below but complete the full contact details of the agent in 2*

Part B – Please use a separate sheet for each representation

3. Name or organisation:

4. To which Main Modification consultation document does this representation relate? Please tick one box only (please use a separate sheet for each document you are commenting on)

Schedule of Proposed Main Modifications	X
Sustainability Appraisal Addendum	
Habitats Regulations Assessment (HRA) Addendum	
Equality Impact Assessment (EqIA) Addendum	
Schedule of Additional Modifications	

5. Please indicate the schedule reference (e.g. MM01) in the above document and the Policy number (e.g. DM1) to which your representation relates (please use a separate sheet for each schedule reference you are commenting on):

Reference Code

Policy

Please note that this consultation invites comments on modifications only, and not the wider unchanged content of the Local Plan Review.

The Local Plan Review 2013 – 2033 is required to be assessed against the tests set out in paragraph 182 of the 2012 version of the National Planning Policy Framework to establish whether it is ‘sound’ and complies with legal requirements:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities, where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

6. Do you consider the Local Plan Review to be:

6.(1) Legally compliant Yes No

- 6.(2) Sound

6 (2.1) Positively Prepared	Yes	<input type="text" value="X"/>	No	<input type="text"/>
6 (2.2) Justified	Yes	<input type="text" value="X"/>	No	<input type="text"/>
6 (2.3) Effective	Yes	<input type="text" value="X"/>	No	<input type="text"/>
6 (2.4) Consistent with national policy	Yes	<input type="text" value="X"/>	No	<input type="text"/>

7. Please provide your comments below

Carbon Footprint

Under section 4.6 there is a strange omission of the September 2019 decision by MDDC to become Carbon Neutral by the year 2030.

It was understood that this would be an over-riding priority for consideration in planning matters. Since the proposed Local plan expires in 2033, it seems evident that that this policy should be enshrined in this Local Plan.

There are further ramifications of this new MDDC policy in so far as it affects house design, traffic emission, farming management, energy wastage, and waste disposal, quite apart from the matters described in section 4.7 about energy generation.

In summary I believe that it would be correct to insert a paragraph (or even an action plan) about eliminating carbon by 2030 within the management of all aspects of the MDDC plan. Without this, the Plan is incomplete!

END

(Continue on a separate sheet if necessary)

Please complete the form online at www.middevon.gov.uk/LPRMainMods, or return completed forms to:

Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton EX16 6PP

or email to planningconsultations@middevon.gov.uk

Guidance Notes to accompany Representations Form

1. Introduction

- 1.1 The Local Plan Review 2013 – 2033 was submitted, together with all supporting documentation, to the Secretary of State in March 2017 for independent examination. The Plan is being examined by an Independent Inspector to test whether the plan is ‘sound’ and in accordance with legal requirements.
- 1.2 The Inspector has asked that consultation be carried out on draft Main Modifications which may be necessary in order for the Plan to be ‘sound’, although this does not imply that the Inspector has come to any firm conclusions on the soundness of the Plan with or without these modifications. The Inspector’s final conclusions will be provided as a report at the end of the examination process.

2. What can I comment on?

- 2.1 This consultation relates specifically to the proposed Main Modifications to the Mid Devon Local Plan Review 2013 – 2033 that are considered necessary to ensure that the Plan can be found ‘sound’. Comments can also be made on the associated documents Addendum to the Sustainability Appraisal, Addendum to the Habitat Regulations Assessment and Addendum to the Equality Impact Assessment.
- 2.2 This consultation does not repeat the consultation already undertaken on the plan. The Inspector is therefore not inviting further comments on issues addressed in earlier consultation, or on the Local Plan Review as a whole.
- 2.3 The Council is also consulting on a Schedule of Additional (Minor) Modifications to the Mid Devon Local Plan Review at the same time which provides minor updates and clarifications. Comments can be made on these additional changes as part of the consultation to be considered by the Council but will not be submitted to the Planning Inspector.

3. Soundness

- 3.1 Soundness is explained in the National Planning Policy Framework, paragraph 182. The Inspector has to be satisfied that the Local Plan Review is positively prepared, justified, effective and consistent with national policy.

Positively prepared

The plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified

The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective

The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy

The plan should enable the delivery of sustainable development in accordance with the policies in the National Planning Policy Framework.

- 3.2 If you are objecting to a Main Modification the response form asks you to identify which of the Tests of Soundness you consider the modification fails to address, to aid the Inspector examining the Plan.