

Main Modifications Consultation, 2020
 Forward Planning
 Mid-Devon District Council
 Planning Services
 Phoenix House, Phoenix Lane
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16 February 2020

For the attention of the Planning Inspector

Main Modifications 01, 42, 43, 44 and 45

Please note the use of Mr Byrom's name below is used with his permission. Please do not redact.

The following comments are provided by Mr & Mrs Dumble at the above address.

Comments relate to the proposed Main Modifications MM01, 42, 43, 44 and 45 and associated documents relating to Policy SP2.

1. To save duplication of comments, we would like to state our full support for Mr Jamie Byrom's more detailed representations.
2. The new evidence presented by Mr Byrom (*and which MDDC officers have chosen not to bring to the attention of MDDC Councillors or the Inspector*), significantly challenges the sustainability of the site. In the light of this evidence we ask that the Inspector revisits the sustainability of the site and recommends **Policy SP2 is removed from the Draft Local Plan.**
3. **MM01 is unsound, unjustified and ineffective** in relation to the delivery of housing arising from Policy SP2 and consequently is **non compliant with NPPF 47, footnote 11.**
 - a. MM01 moves delivery of the 60 houses to be provided under Policy SP2 to within the first 5 years of the draft Local Plan (i.e. by the end of March 2023).
 - b. The full build-out of 60 houses at SP2 cannot possibly meet the time schedule for development set out in the HELAA model used by the LPA. This means **the site is undeliverable in the time frame shown by MM01.** Further detail is in Mr Byrom's submission.
4. **MM42** provides no statement to justify the removal of the tie between J27 and Policy SP2.
5. The need for removal of any improvements to the A361 **in MM43 has unjustifiably** led to the removal of text in paragraph 3.224c of Policy SP2 making the policy **unsound, unjustified and ineffective.**
 - a. **The following sentence should be retained** as paragraph 3.224c: *"The site is required to meet additional housing need arising from allocation at Junction 27 of the M5 motorway"*.
 - b. **The retention of this sentence is justifiable** as it accurately reflects the intention of MDDC Councillors when approving the inclusion of Policy SP2.

6. **MM44 is inconsistent with NPPF 32 and with other MMs being proposed.**
 - a. **The new criterion should be reworded to require:**
“provision of safe access to the village for pedestrians and cyclists”
 - b. The rewording above incorporates the need for “safe access” which brings this policy in line with MMs 24, 38 and 48.
7. **MM45** requires that the Green Infrastructure (GI) area remain undeveloped to ensure policy SP2 is **sound, justified and effective.**
 - a. As has already been demonstrated in a refused planning application for this site both applicants and planning officers seem more than willing to breach this policy **making it ineffective as presented.**
 - b. As currently shown on the proposed policy map, the position of the settlement boundary would confuse decision makers rather than help them. In this way **the policy is inconsistent with NPPF 154.**

To ensure MM45 remains effective we request that the Inspector recommends **the settlement boundary is re-drawn** so that all the Green Infrastructure on the policy map for SP2 remains in the countryside.

If moving the settlement boundary is not considered by the Inspector to be a MM issue in itself, we ask the Inspector to indicate to MDDC his approval of the idea to move the settlement boundary if it is beyond his brief to recommend such a change.

Yours sincerely

Peter and Elaine Dumble