

EDDC – Proposed Post-Publication Changes – Representation Form August 2013

Accession No.	Rep No.
For Council Use Only	For Council Use Only

East Devon Local Plan – Proposed Post-Publication Changes Representation Form



This form and the accompanying Guidance Note have been designed to help you comment on the Proposed Post-Publication Changes to the East Devon Local Plan (2006-2026).

Please return this form to East Devon District Council by 12 noon on Monday 7 October 2013. Representations received after this time will not be accepted.

Part A – Personal Details

Please note we cannot accept anonymous responses.

Personal Details		Agent's Details (if applicable)*	
Title	Ms	Title	Mr
First Name	Charlotte	First Name	Ed
Last Name	Robinson	Last Name	Heynes
Job Title (where relevant)	Strategic Planning Manager	Job Title (where relevant)	Director
Organisation (where relevant)	Welbeck Strategic Land LLP	Organisation (where relevant)	Heynes Planning Ltd
Address	13 Woodstock Street London	Address	Two Acres Under Lane Newmills Launceston Cornwall
Postcode	W1C 2AG	Postcode	PL15 8SN
Tel. No.		Tel. No.	01566 775307
Email Address		Email Address	ed@heynesplanning.co.uk
		Client reference number	

*if an agent is appointed, please fill in your title, name and organisation but the full contact details of the agent must be completed. Please note that where an agent is used the agent will be the point of contact for correspondence.

Name/Organisation Please complete for each sheet	Welbeck Strategic Land and the Combe Estate
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Please indicate whether you wish to be notified of any of the following:

- That the East Devon Local Plan has been submitted for independent examination.
- The publication of the recommendations of any person appointed to carry out an independent examination of the East Devon Local Plan.
- The adoption of the East Devon Local Plan.
- Other planning policy issues.

Name/Organisation Please complete for each sheet	Welbeck Strategic Land and the Combe Estate
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Part B – Representation details

Please use a separate form for each representation

1. To which Proposed Post-Publication Change to the Local Plan does this representation relate? Include policy, paragraph or other reference number if appropriate.

(Please note that a separate form must be completed for each representation)

Proposed Change Number	Change 30 and 31
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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.

Object - See letter dated 4th October 2013.

Continue on separate sheet if necessary

Name/Organisation Please complete for each sheet	Welbeck Strategic Land and the Combe Estate
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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.

See letter dated 4th October 2013. The levels of windfall development proposed appears to have been based on statistical analysis of past trends only rather than any overall objective assessment including future supply.

Continue on a separate sheet if necessary

4. The Plan is designed to meet the following tests. If you believe it fails any of them, please tick the box(es) and give your reason(s).

The Plan should be...

Positively prepared – meeting local needs where possible?

The plan fails this test because:

The reliance on windfall figures that may be inappropriate in terms of the level of future provision fails to create certainty in terms of the correct amount of housing required to meet future needs. A more positive approach would be to rely on strategic allocated sites which have a greater chance of being delivered.

Justified – when compared to other options?

The plan fails this test because:

See attached letter dated 4th October 2013. The Council has not provided sufficient evidence to support the windfall allowance figure as identified in the New Local Plan.

Name/Organisation Please complete for each sheet	Welbeck Strategic Land and the Combe Estate
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Effective – so that development needed can be delivered?

The plan fails this test because:

Over reliance on windfall sites could lead to a situation where the housing needs of the District are not being met.

Consistent with national policy?

The plan fails this test because:

See attached letter dated 4th October 2013. The NPPF makes it clear in para. 48 that while Council's may make an allowance for windfall sites they should only do so where they have compelling evidence that such sites have consistently become available in the local area. That evidence does not exist in this instance.

Legally compliant (following proper procedures)?

The plan fails this test because:

N/A

5. if your representation is seeking a change, do you consider it necessary to speak at the examination in public? (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 in public:

Yes, I wish to speak at the examination in public:

Name/Organisation Please complete for each sheet	Welbeck Strategic Land and the Combe Estate
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6. if you wish to speak at the examination in public, please outline why you consider this to be necessary:

Given the nature and content of the representation and our representations made on the Plan as a whole it is important to be able to discuss/examine the matters raised with other parties, including the Inspector(s) at the Examination.
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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.

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	4th October 2013
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Please e-mail the completed form(s) and any additional information to localplan@eastdevon.gov.uk or send to Planning Policy at East Devon District Council, The Knowle, Sidmouth, EX10 8HL.