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From: Adrian Gray
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To: DPD
Subject: MID DEVON LOCAL PLAN REVIEW - OPTIONS CONSULTATIONS: SILVERTON



MID DEVON LOCAL PLAN REVIEW

OPTIONS CONSULTATIONS: SILVERTON

Myself, Adrian Gray and my wife, Sarah Gray of Orchard House, The Bury, Church Road, Silverton, Exeter EX5 4PD object to the proposals to allocate large scale sites for development outside of the current settlement limits of Silverton village as they plainly and demonstrably are contrary to the principles of the planning system and policy guidance notes.

Our objections to the proposals are set out in Part 1 attached hereto.

We also object specifically to the proposal to allocate the land area known as 'The Glebe' to the south of the church for the reasons stated in Part 1 and for the reasons contained in Part 2 attached hereto.

We support Option 2b (new settlement east of M5 Junction 28) which identifies that such a development will be essential in the longer term, but appreciating also the benefits that it will bring to the Cullompton area and its residents both in terms of new employment, services, facilities, and regenerations as recognized by the Cullompton Town Council who support this proposal. The consequences of its adoption would also reduce the pressure on existing settlements and the environmental impact upon the village areas.

**PART 1:
COMMENTS AND OBJECTION TO DEVELOPMENT AS PROPOSED IN SILVERTON**

1. The current adopted Local Plan has a clear and logical boundary for Silverton (last confirmed as late as 2011)
2. Policy COR 17 within that Plan states that development in the relevant villages will be limited to MINOR PROPOSALS within defined settlement limits and to allow affordable housing to meet local need.
3. Silverton was, in 2007, confirmed as one of 21 villages identified as a settlement suitable for VERY LIMITED DEVELOPMENT.
4. Since 2007, MDDC has more than met its annual target year on year within these rules for development within the nominated villages.
5. Silverton, in particular, has remained proactive in delivery of affordable housing.
6. The need, where established, can be adequately met as before by sensitive and sensible infilling of existing land within the current settlement limit and small scale development which does not adversely impact upon the character, heritage and setting of the village.
7. Policy S14 within the new proposals states that development is to be limited to proposals within defined settlement limits and to allocations for 'SMALL SCALE HOUSING' or other limited development which enhances community vitality or meets a local or economic need. The Forward Planning Officer in the public meeting held on 25/02/14 conceded that proposed sites of 35 houses (The Glebe), 45 houses (2 sites at Old Butterleigh Rd of 30 and 15 houses if taken together), and 60 houses (east of Hederman Close) are neither 'small scale' as defined, nor 'other limited development' and thus these proposals are in breach of current and proposed policy. There is no evidence produced of a 'local need'

within Silverton to justify development of this proposed size. There are no employment benefits established, a consequence of which would be an increase in commuting and further traffic congestion on the already narrow village roads. Development of what amount to large scale sites in Silverton is unwelcome and will be resisted as the level of proposed development is too large to be integrated into the village community.

8. The current proposals for Silverton only include sites which have been put forward by landowners and/or developers, rather than being properly evaluated upon the basis of planning merit. This was confirmed at the public meeting. This methodology is flawed and results in a focus on sites which may be unacceptable in terms of their environmental impact, and wrongly centres thinking on those sites only. Development is being forced onto land which otherwise may be inappropriate in planning and environmental terms and upon a scale which is unacceptable and in breach of policy.

VILLAGES POLICY: The proposals breach the relevant policy which emphasizes the need for the environmental protection of our villages. Silverton is said to be the third oldest village in Devon, and over many years has largely retained its character and historic core.

1. The proposals for what is large scale/significant development are contrary to existing long established policies designed to protect the CHARACTER, HERTIAGE and SETTING of the village (Policy S10)
2. They will damage Silverton's ENVIRONMENTAL ASSESTS.
3. They will contradict the development strategy designed to PROTECT AND ENHANCE THE BUILT AND HISTORIC ENVIRONMENT.
4. They will contravene the Council's own ENVIRONMENTAL SUSTAINABILITY PRINCIPLES (Policy S2). Consequences include: Increased traffic to and through the village on unsuitable lanes and roads as Silverton becomes effectively a dormitory town with significantly increased commuting to and from work and schools elsewhere. This is in direct conflict with Spatial Strategy (particularly Policy S2(e)). Public transport is expensive and inadequate and not 'good' as described in preliminary planning evaluation. The proposals will destroy hedges, natural habitats and general biodiversity. It will increase flooding risk. It will strain local resources.
5. Once significant development commences outside the settlement limits, it sets precedent, and further development becomes harder to resist and control. Examination of the current housing market for Silverton establishes a large number of houses of all types, sizes and prices available for sale in order to meet local need. Supported by future infill and small scale, sensitive development as identified and supported by the village, this is more than enough to meet local need.

PART 2:

We wish to specifically object to any development on land south of St Mary's Church, known as 'The Glebe'.

- 1 It is within the conservation area of the village, part of an historic landscape running down from the Church and the Bury. A modern development would spoil the beauty of this area of the village, and would be at odds with its character, enjoyed by all residents of the village not just by those who live near it (Policy S10). It is in direct line of sight of the Church, a listed building.
- 2 It sits within a network of narrow lanes and has poor access. The increase in traffic from a housing development would make the lanes dangerous. Traffic would also cause air and noise pollution.

- 3 The lanes around the Glebe site give safe, level access to the countryside from the village. It is the only side of the village where this is possible. It is therefore an important amenity area for the people of Silverton where they can walk, walk dogs, push prams and ride bicycles. The Walk and Talk group (a health initiative backed by the NHS) walk in these lanes every week. Any development on the Glebe would have a negative impact on these activities.
- 4 There would be a substantial adverse effect on nature in this unspoilt area and inevitable tree loss and destruction of hedges.
- 5 The site is of archaeological interest and is high grade farm land.
- 6 Sewage and waste on this side of the village is over capacity.
- 7 The entrance to the village from the Poundslad/Hayne end is a 'Rural Gateway'.
- 8 Mass development and widening of the lanes would be out of keeping with the surrounding area.
- 9 In respect of the Local Plan Review, the proposal would be contrary to a number of statements and policies:

Spatial Strategy: Villages (p28): The development would not avoid significant increased travel by car (rather it would increase traffic congestion on many of the narrow access roads) and would not protect or enhance Silverton's environmental assets.

Sustainable development priorities - Policy S2 (p20-21): The development would not reduce the need to travel by car and would adversely affect the setting of Silverton.

Policy S10: The development would adversely affect the character and setting of Silverton.

Policy S14: The development would be contrary to this policy as the site is outside of the existing settlement limit and is not 'small scale' housing, as conceded by the Forward Planning Officer. The public transport to the village is 'poor'.

Paragraph 3.113 of the Review states that MDDC will carefully consider the impacts to the character of rural settlements. The development of land to the south of St Mary's Church will have an adverse impact on the character of the ancient village of Silverton.

In conclusion, for the above reasons, we strongly object to any development of the land to the south of St Mary's Church, known as 'The Glebe' which would be contrary to the policies and proposals of the adopted Local Plan, and contrary to proposed policies in the current Local Plan Review. We would ask that the site is deleted from further consideration for these reasons.

Regards

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