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20 January 2022

EP ref: 18-141

Stephen Harris
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By email only: planningconsultations@middevon.gov.uk

Dear Sir/Madam,

Re: Willand Neighbourhood Plan

We are instructed by Wainhomes South West Holdings Ltd to submit this representation to the consultation to the Proposed Boundary to the Willand Neighbourhood Plan Area. Wainhomes has a land interest to the north of Willand as shown in the location plan below.

With regard to a Proposed Boundary, the PPG advises:

“What considerations, other than administrative boundaries, may be relevant when deciding the boundaries of a neighbourhood area?”

The following could be considerations when deciding the boundaries of a neighbourhood area:

- *village or settlement boundaries, which could reflect areas of planned expansion*
- *the catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities*
- *the area where formal or informal networks of community based groups operate*

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- *the physical appearance or characteristics of the neighbourhood, for example buildings that may be of a consistent scale or style*
- *whether the area forms all or part of a coherent estate either for businesses or residents*
- *whether the area is wholly or predominantly a business area*
- *whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway*
- *the natural setting or features in an area*
- *size of the population (living and working) in the area*

Electoral ward boundaries can be a useful starting point for discussions on the appropriate size of a neighbourhood area; these have an average population of about 5,500 residents.

Paragraph: 033 Reference ID: 41-033-20140306

Revision date: 06 03 2014"

We consider that the above criteria mean that a wider boundary should be applied if the Neighbourhood Plan is intending to allocate land for development. We assess key criteria from the PPG below.

village or settlement boundaries, which could reflect areas of planned expansion

The proposed boundary to the north of Willand excludes Site WI2 which is the employment allocation in the adopted local plan. The boundary would also exclude the land that our client has an interest in.



Therefore, we propose that the northern boundary between the M5 and B3181 is extended to include WI2, our client's land and intervening land. This is also necessary to meet the following three criteria from the PPG:

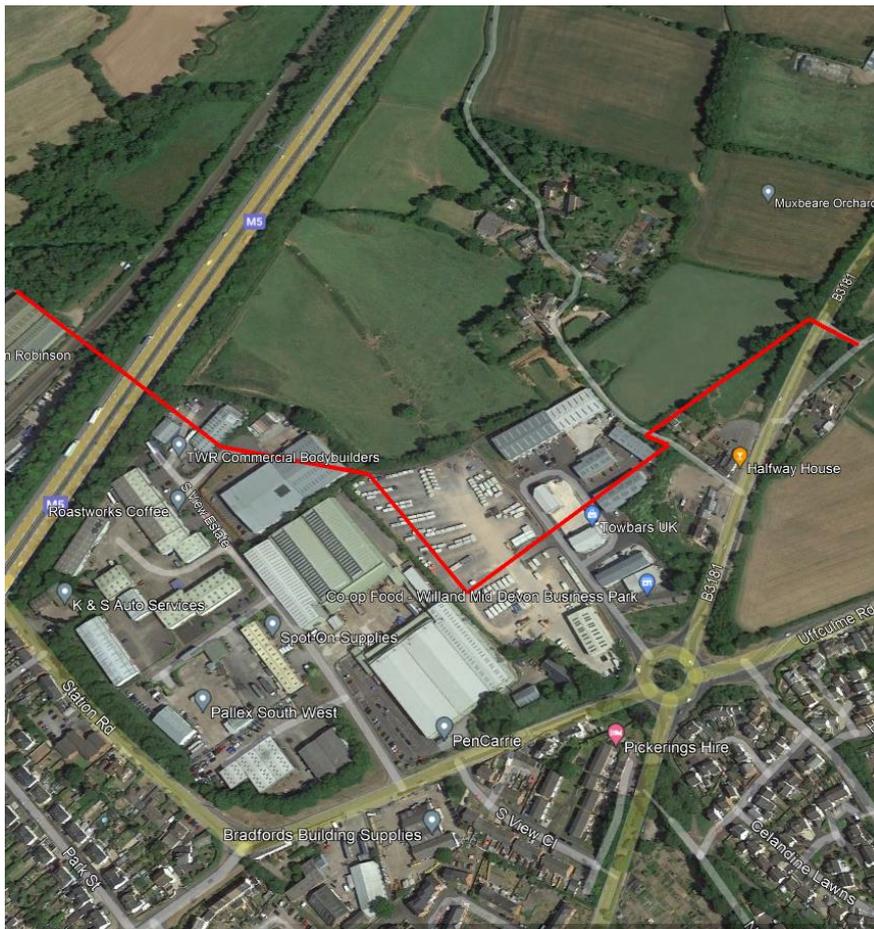
- *the catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities;*
- *whether the area forms all or part of a coherent estate either for businesses or residents; and,*
- *whether the area is wholly or predominantly a business area.*

It is clear that this area is the key employment centre of Willand and therefore land within its catchment that could provide a close homes/jobs relationship should form part of the Plan.

whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway

With regard to the 7th criterion of the PPG, the proposed boundary does not follow a natural boundary. Indeed, the proposed boundary is drawn through the existing industrial estate as shown from the plan below which has our approximate location of the proposed boundary.

Neighbourhood Plan Boundary as Proposed in the Neighbourhood Plan (added to an google earth extract)

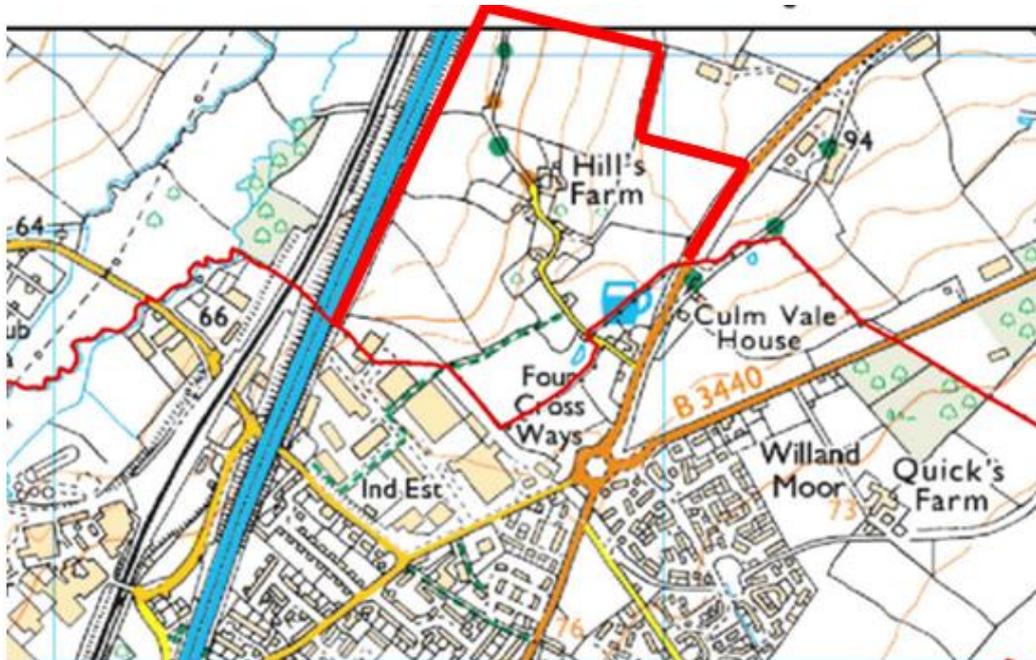


Site W12 is shown below which mainly lies outside the proposed boundary.



These plans demonstrate that Willand has already breached the Parish Boundary in order to expand and the proposed Parish Boundary in this location is not appropriate and is out of date for the purposes of development planning.

We therefore propose the following boundary. This would then enable all options adjacent to Willand to be assessed through the Neighbourhood Plan. Any option at this stage should not be excluded from the Neighbourhood Plan based on the out-of-date Parish Boundary in this location.



Should you require any further information please do not hesitate to contact us.

Yours sincerely
Emery Planning

Stephen Harris

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