

19 December 2017

Mrs Wendy J. Burden BA(Hons) DipTP MRTPI
Mrs Yvonne Wright BSc(Hons) DipTP MSc DMS MRTPI
C/O ROBERT YOUNG – Programme Officer
Joint Local Plan Team,
Strategic Planning and Infrastructure,
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Dear Mrs Burden and Mrs Wright

PLY44 of the PCC/SHDC Joint Local Plan

In my original submission I raised the point that, towards the end of 2016, South Hams District Council had altered the status of a large area towards Dartmoor protected by a PCC designation of Strategic Landscape Area. (dev26) to one of Development in the Countryside (TTV31). This new designation affords a lower level of protection.

The question needs to be asked as to why certain areas of land are afforded a strategic level of protection only for that protection to be abandoned, without notice or reason being given to the residents of the land itself or its surrounding area? Surely, there is no point in having designation of land if it can be altered to suit the owning councils plans at any time.

I have researched the National Planning Policy Framework and would like to draw your attention to what the Planning Committee **WOULD** have had to consider had the designation of the land stayed as a Strategic Landscape area (dev26).

Paragraphs 111 of Section 11 of the **National Planning Policy Framework**-
Conserving and enhancing the natural environment-states:

*Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land. **n.b There is such a site at the old Plymouth Airport more suitable for development***

Paragraph 113 states:

Distinctions should be made between the hierarchy of international, national and locally designated sites¹, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to

wider ecological networks. **The downgrading of the lands Strategic Status negates this consideration.**

Paragraph 115 includes the statement:

*Great weight should be given to **conserving landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty. The land in question is not in Dartmoor National Park but is immediately adjacent to it.***

Paragraph 116 states:

Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy
- the cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way. **As previously mentioned there is an alternative brownfield site at Plymouth Airport which would incur far fewer costs than the proposed site in Woolwell.**
- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

Finally, the section on Landscape makes the following points:

Landscape

How can the character of landscapes be assessed to inform plan-making and planning decisions?

- **One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside.** Local plans should include strategic policies for the conservation and enhancement of the natural environment, including landscape. This includes designated landscapes **but also the wider countryside. The proposed development would most definitely NOT enhance the natural environment. Indeed it would destroy the outstanding beauty of the Woolwell environment.**

I strongly believe that South Hams District Council removed the Strategic Landscape Designation in order to stop the considerations, laid out in the National Planning Policy Framework, from being relevant to the land they proposed for the building of the 2000 new homes detailed in PLY44 of the Joint Local Plan. I consider this action underhand and to the detriment of the existing residents of this part of the South Hams who, in the majority, object to the proposed development when there is a suitable alternative in the land at Plymouth Airport.

I would ask that you give your full consideration to the points I have raised in your examination of the process undertaken by South Hams District Council in their efforts to get these plans approved.

Thank you

Yours sincerely

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