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PLYMOUTH AND SOUTH WEST DEVON JOINT LOCAL PLAN 2014-2034 ID NO: 1002904

There are parts of the Kingsbridge Development Boundary that have change without consultation or comment as to why they have changed.

The changes have encroached the Undeveloped Coast without comment.

This leads me to ask the flowing questions:

Has this change been done without consultation with the relevant bodies and why was the General Public not consulted on this change?

What are the intentions with regards to the changes?

Please review these maps:
The JLP Plan - Notice the areas ringed in red!
The Existing Development Boundary.

You will now see that there has been a boundary change that really has not been offered for consultation for the JLP consultation.

On to the Undeveloped Coast Boundary.
As you can see there is a bit of an issue here!

The new development boundary is eating into an adjacent area of what is supposed to be a protected area the undeveloped coast.

It can hardly be both: The undeveloped coast and development area?

That is also the case for the Joint Local Plan?
Double Check: Plymouth JLP Planning Maps.

https://www.google.com/maps/d/viewer?mid=1Q2qFSODE3YhYEhhhisRMHPBrpZtQ&ll=50.279241162355845%2C-3.7219980567016364&z=14

Still identical!

Did the LPA consult anyone before altering the Kingsbridge Town boundary?
The New Joint Local Plan policy DEV25:

Policy DEV25

Undeveloped Coast and Heritage Coast

Development which would have a detrimental effect on the undeveloped and unspoilt character, appearance or tranquility of the Undeveloped Coast, estuaries, and the Heritage Coast will not be permitted except under exceptional circumstances. Development will only be permitted in the Undeveloped Coast where the development:

1. Can demonstrate that it requires a coastal location.
2. It cannot reasonably be located outside the Undeveloped Coast.
3. Protects, maintains and enhances the unique landscape and seascape character and special qualities of the area.
4. Is consistent with policy statements for the local policy unit in the current Shoreline Management Plan 2.
5. Is consistent with the relevant Heritage Coast objectives, as contained within the relevant AONB Management Plan.

Development for the purposes of agriculture, forestry, public access and enjoyment of the coast and estuaries, or community facilities that meet the objectively assessed needs of the local community, will be supported if it meets the above tests.

This map change is not in accordance with this policy?
### Policy DEV27

**Nationally protected landscapes**

The highest degree of protection will be given to the protected landscapes of the South Devon AONB, Tamar Valley AONB and Dartmoor National Park. The LPAs will protect the AONBs and National Park, including their setting, and the setting of Dartmoor National Park, from potentially damaging or inappropriate development located either within the protected landscapes or their settings. In considering development proposals the LPAs will:

1. Refuse permission for major developments within or detrimentally affecting the setting of the protected landscapes, except in exceptional circumstances and where it can be demonstrated that they are in the public interest.
2. Give great weight to conserving landscape and scenic beauty in the protected landscapes.
3. Give substantial weight to other natural beauty criteria, including the conservation of wildlife and cultural heritage in the AONBs and great weight to the conservation of wildlife and cultural heritage in Dartmoor National Park.
4. Assess their direct, indirect and cumulative impacts on natural beauty.
5. Encourage small-scale proposals that are sustainably and appropriately located and designed to conserve, enhance and restore the protected landscapes.
6. Seek opportunities to enhance and restore protected landscapes by addressing areas of visually poor quality or inconsistent with character, securing through the development visual and other enhancements to restore local distinctiveness, guided by the protected landscape’s special qualities and distinctive characteristics or valued attributes.
7. Support proposals which are appropriate to the economic, social and environmental wellbeing of the area or desirable for the understanding and enjoyment of the area.
8. Require development proposals located within or within the setting of the AONB to protected landscape:
   i. Conserve and enhance the natural beauty of the protected landscape with particular reference to their special qualities and distinctive characteristics or valued attributes.
   ii. Be designed to prevent the addition of incongruous features, and where appropriate take the opportunity to remove or ameliorate existing incongruous features.
   iii. Be located and designed to respect scenic quality and maintain an area’s distinctive sense of place, or reinforce local distinctiveness.
   iv. Be designed to prevent impacts of light pollution from artificial light on intrinsically dark landscapes and nature conservation interests.
   v. Be located and designed to prevent the erosion of relative tranquillity and, where possible use opportunities to enhance areas in which tranquillity has been eroded.
   vi. Be located and designed to conserve and enhance flora, fauna, geological and physiographical features, in particular those which contribute to the distinctive sense of place, relative wilderness or tranquillity, or to other aspects of landscape and scenic quality.
   vii. Retain links, where appropriate, with the distinctive historic and cultural heritage features of the protected landscape.
   viii. Further the delivery of the relevant protected landscape management plan, having regard to its supporting guidance documents.
   ix. Avoid, mitigate, and as a last resort compensate, for any residual adverse effects.

Fails that test too.
The LPAs need to resolve the Kingsbridge Development Boundary & undeveloped coast issue & declare what is going on?

Why was it not consulted on?

Another consultation shortcoming.

Yours sincerely,

Mr L N Pengelly.