**From:** Duncan Smith   
**Sent:** 29 June 2018 11:39  
**To:** 'Ann Turner' <[annc.turner@hotmail.co.uk](mailto:annc.turner@hotmail.co.uk)>  
**Cc:** SW-Neighbourhood Planning <[NeighbourhoodPlan@swdevon.gov.uk](mailto:NeighbourhoodPlan@swdevon.gov.uk)>  
**Subject:** Informal Comments on the Modbury Neighbourhood Plan Regulation 14 Submission

Ann…..Despite my email yesterday I managed to find time today to get this done. I set out below my informal comments on the Modbury Neighbourhood Plan; Regulation 14 submission. As indicated when I met the NP Group on 19th June the comments I make are informal and will be followed up by formal comments once the issues around the housing allocations is resolved. At this stage I have not commented upon those housing allocations and will discuss this issue with you once a clear picture has emerged. Please contact me if you wish to discuss any of the issues raised below….Regards…Duncan

**INFORMAL COMMENTS ON THE MODBURY NP: REGULATION 14.**

**Introduction**

It would be worth mentioning that although the plan parallels the JLP in running to 2034 the NP must be reviewed every 5 years to maintain its status as a planning policy tool.

Bottom of page 8 should read National Planning Policy Framework **2012**

**3 Vision and Objectives**

3.2 i…….Should read…..”Create a town square….”

3.2 k…… Amend to read support a study being undertaken.

3.2 j…… Amend to read support a study being undertaken.

**4..Policies and Proposals**

Policy MNP2 b......Modbury Village Design Statement 2003 is not, I believe, Supplementary Planning Guidance and therefore should not be included in the Policy. It can be referred to in the Policy justification.

DEVELOPMENT SITES (pages 13-14)……..As indicated above I have withheld commenting on this section until full consideration of the issues raised at our meeting on 19th July are resolved.

For information the County Highways Officer raised no objection to the development of the Ayleston Park at level proposed in the NP.

Policy MNP4 c……See comments on Policy MNP2.b….these apply.

HOUSING

Paras 4.13 to 4.16……It would be worth quoting from and cross referencing to the evidence base that form the basis for Policy MNP5.

Policy MNP5 c……..The JLP %age for affordable housing is 30% not 33%.

PRINCIPAL RESIDENCE REQUIREMENT

As discussed at our meeting a researched evidence base is required. Also, I mentioned local NPs that had successfully included this Policy with Thurlestone at 39% second homes and Newton and Noss overall 18% with 40% at some locations.

The figure I quoted (just over 5% for Modbury) was questioned. Representatives of the NP Group felt the figure was at least double this. In any event a researched and evidenced information base is required. I understand that since the meeting Mark Lawrence has contacted Cassandra Harris as part of efforts to do this.

ROAD SAFETY AND TRANSPORT

As indicated at the meeting this Section needs to be revised extensively. At the meeting with the officer from County Highways involving myself and Lee Bray, the officer confirmed the following:-

1. County Highways do not support proposals making Brownston Street one way.
2. County Highways do not support the proposed Relief Road.

In each of these instances no objection would be raised to the NP including a non Policy statement relaying the NP’s support for studies into each of these proposals being undertaken. Policy MNP7 should be amended to take account of this.

EMPLOYMENT AND BUSINESS

Policy MNP8 2……..Can this be more specific?

Policy MNP8 3……...This is very restrictive and needs to be qualified along the lines….unless evidence is produced that the premises cannot be let for that use and the use proposed does not conflict with other uses on the estate.

COMMUNICATION

Policy MNP10…..Should 3) and 2) read 1) and 2)?...and d) , e) and f) read a),b) and c).

Policy MNP10 2…..Connectivity Statement cannot be requested since it doesn’t form part of the Development Management Checklist…….We will check with BT in the light of their comments to you.

SERVICES AND FACILITIES

4.25……The issue of pedestrian links between the Recreation Ground and the rest of town are seen as very important. See further comments below

Policy MNP11 d….The list here is long and you are not going to be able to obtain finance to do all this…….Is it worth prioritising…..The pedestrian links above are mentioned several times in the text of the NP ……is this the top priority?

ENVIRONMENT AND SUSTAINABILITY

Policy MNP12 first line….”maintain” should be replaced with “conserve”.

Policy MNP12 a ….”Planning Guidance” should be replaced with “Management Plan”

Policy MNP12 b….Important views should be identified….I have sent a copy of the Stoke Fleming Plan to Ann which does this.

Policy MNP12 c…add in “design” after landscape in the first line.

MAP 8…..Plan should be at a larger scale it is difficult to pick out the designations.

MAP 8….A Policy should be created that deals with the designation…”Significant local, heritage trees and groups of trees.

MNP13……This is largely a repeat of national and strategic policy can you add the local flavour?….what’s important to Modbury?

MNP14 a second line……replace “welcomed” with “required where necessary”.

MNP14 c……This is a lot of greens spaces. Is there an evidence base for the choice of these sites……have they been subject of testing against NPPF criteria set out at paras 76 and 78.

MNP14 d……..This policy needs to be more specific about where and to what extent…..have you contacted owners of the land which you have in mind…….how will it be funded? Also have the necessary ecological checks been carried out to ensure planting would not disturb ecosystens that exist.

MAP 10…….. Plan should be at a larger scale it is difficult to pick out the designations.