**DUNKESWELL RESPONSE TO EDDC LOCAL PLAN AMENDMENTS 8th JUNE 2015**

*At the examination of the draft plan, in 2014, the Inspector advised EDDC to review some of its content, including Strategy 27 (Development at the Small Towns and Larger Villages). He was concerned that the figures in the draft plan were not based on an assessment of the ability of the settlements concerned to accommodate growth and that a general application of 5% growth was too crude a tool.*

*The District Council commissioned a Small Town and Village Development Suitability Assessment (STVDSA) to establish a consistent approach to deciding what development each of the 42 smaller communities in East Devon could sustain. It was carried out by EDDC Officers and published in September 2014.*

*The assessment included a series of 12 criteria to establish each settlement's relative suitability for development. The selected criteria included whether each community has basic facilities such as a doctor's surgery, general stores, post office, primary school, public transport and so forth.*

*The conclusion (STVDSA pages 18 to 26) was that 15 settlements were sustainable and should have Built Up Area Boundaries (BUAB), whilst 27 settlements,* ***including Dunkeswell****, had too few facilities to be sustainable and should not have a BUAB. Specific development to meet local needs (e.g. for local need) was to be left for the unsustainable communities to identify, if appropriate, through a Neighbourhood Plan. Most sustainable settlements seem to have met 7 or more on the sustainability criteria.*

*Dunkeswell Parish Council are therefore extremely concerned that at the last minute addition, against the officers recommendation, and despite not qualifying to proceed even to the second stage of scoring, that our parish suddenly become one of the few selected communities which retains its Built Up Area Boundary, which, as we understand it from the recording of the meeting at which this was agreed, undergo a boundary review process during the summer months to facilitate future development.*

*Dunkeswell Neighbourhood Plan was submitted for comments to the District Council some months ago and is soon to go to inspection. Our Neighbourhood Plan (for which we hoped the District Council might show due regard) demonstrates no support for significant development of open market housing which is why the proposal made by our ward member that Dunkeswell should retain and review its boundary in order to allow more housing seems obscure and questionable.*

*Having* [*listened*](http://eastdevon.gov.uk/recordings/planning/sdmc230315pmrecording.mp3) *to and read the minutes for Special Meeting of the Development Management Committee 23 March 2015 in which Strategy 27 was discussed, we were concerned that at 59:35 on the recording, Cllr Buxton stated that Dunkeswell ought to be one of the villages retaining its built up area boundary, he suggested briefly that it was sustainable (despite the careful measures and comparisons made by EDDC officers against a set of criteria in the* ***EDDC Small Town and Village Development Suitability Assessment*** *which states:*

**Dunkeswell**

2.32 Dunkeswell is not suitable for site allocations as it does not have a primary school and is not considered to be sustainable in transport terms.

2.33 Dunkeswell is a village with approximately 734 A to H Council tax banded properties within its existing Built Up Area Boundary and 400m catchment area with an estimated population of 1615. Although this settlement has a range of services and facilities it does not have a primary school which is an important facility consideration when looking to allocate sites that will be occupied by amongst others families. Devon County Council note that housing development in areas that do not have a local primary school will place additional pressure on primary home to school transport and therefore housing development is not supported in the context of schools provision.

*Cllr Buxton told the meeting that ‘a site for the school has already been designated and was out for consultation with County now’. At 1:01 on the recording (less than a minute after the proposal) it was agreed without any formal discussion that Dunkeswell should be added to the list.*

*The Parish Council are NOT aware of any school site being allocated or being consulted on by County and would like to know what exactly this refers to.*

*Even if there are currently discussions taking place with a developer over a primary school which we are not party to, this cannot be assumed to come to fruition, and if in future it did, and this brought with it other benefits which might make our parish more sustainable, a boundary could be considered under Strategy 27 when this might arise.*

*The DMC approved the amendments and forwarded them for adoption by the full District Council, to be included in the Local Plan for re-examination. On 26/03/2015, the full District Council discussed the amendments, including those to Strategy 27. At 02:42 on the* [Audio recording for Council on 26 March 2015](http://eastdevon.gov.uk/recordings/council/eocouncil260315recording.mp3) *Dunkeswell was agreed as an addition without any discussion, Chardstock had some very ill-informed discussion, part of which someone shouted out that Dunkeswell didn’t have a school, this was ignored, as were suggestions that any amendments to the list might be tackled in consultation with the villages during the summer as part of the Villages Document.*

*The proposal to declare Dunkeswell sustainable, despite contrary evidence, had been neither publicised nor discussed with Dunkeswell’s residents nor with their Parish Council or Neighbourhood Plan Team. The Parish Council had not even been notified that it was to be put forward at the full council meeting.*

*Dunkeswell’s first draft Neighbourhood Plan has already been submitted to EDDC for comment, but at no point in the meeting was the need for local consultation or the fact of Dunkeswell’s emerging Neighbourhood Plan even referred to, nor the parish council consulted. A suggestion from another councillor that the matter be referred back to the DMC and reconsidered as part of the District Council's forthcoming Villages Development Plan, was simply ignored as was a question about the views of affected Parish Councils.*

*EDDC's Chief Executive reminded members that the DMC had approved the report as it was. Officers had established that if measured against a list of consistent criteria, Dunkeswell, like many other villages, was unsustainable "Dunkeswell doesn't meet the criteria". So either the criteria are wrong for all of the 42 villages considered, or Dunkeswell is, currently, unsustainable by their own criteria.*

*However, the Chairman allowed a vote on the proposal. The voting figures appear neither in the recording nor in the published minutes of the meeting. The motion was seconded by another councillor, and was duly declared "carried". This is not the best way to produce a credible, soundly evidenced Local Plan.*

***Conclusion and Summary***

*Dunkeswell Parish Council believes it to be self-evident that East Devon District Council's decision to ignore the Small Town and Village Development Suitability Assessment and the consequential recommendation of the DMC about Dunkeswell's relative sustainability was against of the principle of evidence-based planning and inconsistent with the Council's policy elsewhere. It also serves to undermine the government's flagship localism agenda.*

*Apart from the unorthodox, pre-emptive way that the proposal was advanced, the main concerns are:*

*Dunkeswell is known to be directly comparable to other settlements declared unsustainable on the evidence of the Small Town and Village Development Suitability Assessment, yet the District Council chose to act on an unsubstantiated claim that a school is about to be built and focused on just this one community in isolation. No new, accurate, factual information or other tangible justification was adduced in support of the proposal.*

*Officers had already provided a properly evidenced decision-making framework, which was used in all other cases. The decision was taken against professional advice and in full knowledge that it was inconsistent with the Council's practice in similar places elsewhere in the same district and as part of the same exercise.*

*Members of the District Council also failed to give any thought to Dunkeswell's emerging Neighbourhood Plan or the already published research and evidence (questionnaires and reports) that will underpin it.*

*A lack of thorough scrutiny of the arguments presented, before taking action, and a willingness to be led by the unsubstantiated opinions of one councillor, caused the District Council on 23rd March 2015, to make a decision which, viewed objectively, cannot be justified. This decision needs to be reconsidered, properly scrutinised and corrected before Strategy 27 of the Local Plan can be regarded as fit for purpose.*