

**Parishes of Ottery St Mary and West Hill
Neighbourhood Development Plan**

2017 - 2031

Basic Conditions Statement

July 2017

1. Legal requirements

1.1 This statement has been prepared by the Neighbourhood Plan Working Group on the behalf of Ottery St Mary Town Council and West Hill Parish Council to accompany the submission to East Devon District Council of the Parishes of Ottery St Mary and West Hill Neighbourhood Development Plan (“the Neighbourhood Plan”) under section 15 of the Neighbourhood Planning Regulations 2012 (“the Regulations”).

1.2 In September 2014 Ottery St Mary Town Council, as a “relevant body” for the purposes of section 61G of the Town and Country Planning Act 1990, made an application to East Devon District Council (“EDDC”) for the designation of the Parish of Ottery St Mary as a Neighbourhood Plan Area. The designation was approved by EDDC on 7th January 2015. The map of the Neighbourhood Area and copy of decision by EDDC are at Appendix A.

During 2015 & 2016 a Community Governance Review was undertaken, and as a result a new parish council for West Hill was created on 1 April 2017. The boundaries of the new parish are entirely within the previous Ottery St Mary parish, therefore the Neighbourhood Plan Area is unchanged.

1.3 The plan proposal relates to planning matters (the use and development of land) in the designated neighbourhood area and covers the period from 2017 to 2031. The endpoint was chosen to align with the East Devon Local Plan. It does not contain policies relating to excluded development as laid out in the Regulations.

1.4 The following statement will address each of the four ‘basic conditions’ required of the Regulations and explains how the Neighbourhood Plan meets the requirement of paragraph 8 of schedule 4B to the 1990 Town and Country Planning Act.

1.5 The Regulations state that the neighbourhood plan will have met the basic conditions if it:

- has regard to national policies and advice contained in guidance issued by the Secretary of State;
- contributes to the achievement of sustainable development;
- is in general conformity with the strategic policies of the development plan for the area;
- is compatible with European Union (EU) and European Convention on Human Right (ECHR) obligations.

1.6 This Basic Conditions Statement is submitted alongside our neighbourhood development plan. In submitting the Statement, and through its content we have demonstrated how our plan meets the Basic Conditions and have satisfied one of the requirements of Regulation 15 (1) of the Neighbourhood Planning (General) Regulations 2012. This Regulation sets out what the parish councils, as the “qualifying body” responsible for producing the plan, must submit as part of the neighbourhood plan proposal. These are submitted, alongside this Statement. Regulation 15 (1) states that:

(1) Where a qualifying body submits a plan proposal to the local planning authority, it must include—

(a) a map or statement which identifies the area to which the proposed neighbourhood development plan relates;

(b) a consultation statement;

(c) the proposed neighbourhood development plan; and

(d) a statement explaining how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act.” (i.e. this Statement).

1.7 In addition, in February 2015, the Government introduced a requirement for one of the following documents to be provided alongside other submission documents.

1. a statement of reasons for a determination under regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations 2004 that the proposal is unlikely to have significant environmental effects; or,

2. an environmental report prepared in accordance with paragraphs (2) and (3) of regulation 12 of the Environmental Assessment of Plans and Programmes Regulations 2004.

2. Introduction and Background

2.1 Our reasons for producing the Parishes of Ottery St Mary and West Hill Neighbourhood Plan are:

- Our community wanted to develop its own local planning policies so that we can have an influence over the type, scale, design and form of development which may come forward in the area between now and 2031;
- Ottery St Mary Town has accepted a lot of new housing over recent years, amounting to 25% growth already, but without sufficient thought to infrastructure and traffic;
- West Hill has also accepted a significant amount of new housing with growth of 10% in the Plan period already;
- We wanted to have a say in shaping the future of our neighbourhood area including how our valued town centre heritage assets and conservation area are protected, maintained and enhanced and how we can help to ensure that our services and facilities are sustained into the future;
- We wanted to have some control over local planning matters and decisions;
- We wanted to maintain the special character of our rural landscape and environment and our villages;
- We wanted to ensure that any new development had a positive effect.

2.2 The Neighbourhood Plan has been developed with the full participation of the local people as members of the Working Group and through a process of regular community consultation. The principle of sustainable development, that is meeting the needs of the community now and in the future, is the underpinning theme.

2.3 The highly valued countryside, the unique character of the many settlements scattered across the countryside and how those settlements work together to achieve a sustainable whole that provides homes, employment, essential community services and leisure opportunities - and the connectivity of those settlements - is at the heart of our vision.

2.4 Three principle themes - Environment, Community and Economy (reflecting the three strands of sustainable development) - emerged during the structured development of the Plan together with the recognition that the Town, West Hill and the smaller villages necessarily required individual consideration to reflect the part that they contribute to the whole with each addressed under a separate theme. This has led to the identification of 6 principal themes that are set out in the following table. Through this thematic analytical approach, 19 objectives have emerged. These identify the key issues that the Neighbourhood Plan addresses as it seeks to secure the Vision for the period up to 2031.

	<p>Neighbourhood Plan Objectives</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Environment</p>	<ol style="list-style-type: none"> 1. Protect and enhance the character and nature of the settlements of the Neighbourhood Plan Area ensuring new development proposals are suitably scaled, complementary and locally distinct. 2. Preserve and enhance habitat and scenic value of the Neighbourhood Plan Area for current and future generations. 3. Celebrate our heritage which is central to the character and ‘sense of place’ of the Parishes. 4. Reduce issues of traffic congestion and enhance road safety across the Parishes. 5. Address flooding risk within the Neighbourhood Plan Area and reduce this where possible.
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Community</p>	<ol style="list-style-type: none"> 6. Enhance and support linkages and accessibility within the settlements, across the Parishes and further afield for the benefit of residents and visitors, and to promote sustainability. 7. Support the housing needs of the current and future community of the Parishes to meet the needs of the population at all stages of life, whilst balancing pressure for development which could detrimentally impact on the valued character of the Parishes. 8. Ensure that the social and physical infrastructure needs of the community are met, particularly in relation to education, healthy lifestyles and well-being, health and social care, transport and roads, drains and sewerage. 9. Support the delivery of upgraded sustainable infrastructure to address existing inadequacies and meet the needs of the growing population particularly with regard to roads, utilities and communications infrastructure. 10. Meet the social and recreational needs of the community within the Parishes as far as possible to support a sustainable, inclusive, fulfilling and healthy lifestyle.

Economy	<p>11. Support the local economy to enhance the prosperity and sustainability of the Parishes.</p> <p>12. Enhance Ottery St Mary town centre as a vital service centre for the Parishes AND a tourist destination where people come to enjoy the independent shopping, history, culture and environment.</p> <p>13. Encourage innovation which is sensitive and appropriate to the environment.</p> <p>14. Support the future of farming in the Parishes.</p>
Ottery St Mary Town	<p>15. Reduce the impact of traffic and on-street car parking on OSM TownCentre.</p> <p>16. Enhance Ottery St Mary Town Centre to achieve public realm and accessibility improvements that will help to make the town centre a safer and more inviting space and strengthen the long term vitality of the town.</p> <p>17. Protect, enhance and preserve our Town Centre Conservation Area.</p>
West Hill	<p>18. Protect and maintain the unique character and special qualities of West Hill, whilst enhancing the settlement's sustainability.</p>
Smaller Villages	<p>19. Support a sustainable future for the smaller settlements of the Neighbourhood Plan Area which protects their special character whilst allowing for a vibrant future, recognising the needs of the community.</p>

3. Having regard to National Planning Policy

3.1 The Neighbourhood plan has been prepared having regard to the policies set out in the National Planning Policy Framework (NPPF) of April 2012. It also gives regard to the 12 core planning principles contained in paragraph 17 of the National Planning Policy Framework, alongside the National Planning Practice Guidance (NPPG) published by the Government in April 2014 in relation to the formation of Neighbourhood Plans.

3.2 This section demonstrates that the Neighbourhood Plan for the Parishes of Ottery St Mary and West Hill has regard to relevant policies within the NPPF in relation to:

- Building a strong, competitive economy
- Ensuring the vitality of town centres
- Supporting a prosperous rural economy
- Promoting sustainable transport
- Supporting high quality communications infrastructure
- Delivering a wide choice of high quality homes
- Requiring good design
- Promoting healthy communities
- Meeting the challenge of climate change, flooding and coastal change
- Conserving and enhancing the natural environment
- Conserving and enhancing the historic environment

Building a strong, competitive economy

3.3 The NPPF states in paragraph 19 that *“Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.”*

3.4 The NPPF states in paragraph 21 that *“Investment in business should not be over-burdened by the combined requirements of planning policy expectations. Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:*

- *support existing business sectors.....*
- *identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and*
- *facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.*

3.5 The NPPF states in paragraph 22 that: *“Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits and the relative need for different land uses to support local communities.”*

3.6 The Neighbourhood Plan sets out the following policies to build a strong and competitive economy:

Policy NP18 Supporting Ottery St Mary as the Economic Focus for the Parish

Policy NP19: Employment uses Finnimore Industrial Estate

Policy NP20: Small-scale Farm Based Tourism

Policy NP21: Working from Home

Policy NP23: Ottery St Mary Town Centre Public Realm Improvements and Highways Improvements

3.7 The Neighbourhood Plan supports the NPPF's aims by encouraging and supporting new retail and small scale employment in Ottery St Mary town centre, and by supporting the retention and improvement of existing employment areas. The Neighbourhood Plan also recognises that some buildings in Ottery are already redundant, or may become so, and that they should be re-developed for retail, commercial or community use. The Neighbourhood Plan also supports the NPPF's aims by building on the economic land allocation in the East Devon Local Plan and supporting development of the Finnimore Industrial Estate, and by improving its attractiveness to businesses and to users. Tourism is an important part of the economy and is supported. Live/work units and working from home is supported.

Ensuring the vitality of town centres

3.8 Paragraph 23 of the NPPF states: *"Planning policies should be positive, promote competitive town centre environments and set out policies for the management, growth of centres over the plan period....local planning authorities should:*

- *recognise town centres as the heart of their communities and pursue policies to support their viability and vitality...*
- *promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres..*
- *where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.*

3.9 The Neighbourhood Plan sets out the following policies to ensure the vitality of the town centre of Ottery St Mary:

Policy NP18: Supporting Ottery St Mary as the Economic Focus for the Parish

Policy NP23: Ottery St Mary Town Centre Public Realm Enhancements and Highways Improvements

Policy NP24: Car Parking in Ottery St Mary Town Centre

3.10 The Neighbourhood Plan supports the aims of the NPPF by supporting new retail and small scale employment uses in Ottery St Mary town centre, and by supporting the enhancement of the town centre of Ottery St Mary, and by supporting the Town Centre Action Group. Proposals to improve car parking and congestion issues, which are a constraint on town centre development, are supported.

Supporting a prosperous rural economy

3.11 Paragraph 28 of the NPPF states that: *"Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:*

- *promote the development and diversification of agricultural and other land-based rural businesses;*
- *support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities..*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.*

3.12 The Neighbourhood Plan sets out the following policies to support a prosperous rural economy:

NP11: Small Scale Low-Carbon Energy Projects

NP17: Community Facilities of Value

NP20: Small-scale Farm Based Tourism

NP21: Working from Home

3.13 The Neighbourhood Plan supports the aims of the NPPF by supporting farm diversification in small-scale low-carbon energy projects, and small-scale farm based tourism, and by supporting home working, so long as the character of the countryside is protected. The Neighbourhood Plan supports the retention of Community Facilities of Value.

Promoting sustainable transport

3.14 Paragraph 29 of the NPPF states: *“Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives.....However, the Government recognises that different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas.”*

3.15 Paragraph 30 of the NPPF states: *“...local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport.”*

3.16 Paragraph 34 of the NPPF states: *“Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised. However this needs to take account of policies set out elsewhere in this Framework, particularly in rural areas.”*

3.17 Paragraph 35 of the NPPF states: *“Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to...”*

- *give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones...”*

3.18 Paragraph 38 of the NPPF states that: *“...Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.”*

3.19 Paragraph 40 of the NPPF states: *“Local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles...”*

3.20 The Neighbourhood Plan has identified concerns about traffic, parking, road congestion and road safety and seeks to identify policies and projects which will contribute positively to addressing these concerns, and seeks to promote sustainable transport. The following policies are relevant:

NP 9: Accessible Developments

NP10: Feniton to Sidmouth Cycle Link

NP24: Car Parking in Ottery St Mary Town Centre

NP25: Land Identified for Education Uses in Ottery St Mary

Community Projects: Project 1: Enhancing Road Safety, Project 2: Local Green Infrastructure, Project 3: Supporting Public Transport, Project 11: Assessing and minimising traffic impacts in Ottery St Mary town centre

3.21 The Neighbourhood Area has seen several large developments approved in recent years, and no new large developments are allocated in the Neighbourhood Plan, which constrains the future ability to promote sustainable transport. The Neighbourhood Plan seeks to improve sustainable transport by focusing on improving pedestrian and cycle routes, and Green Infrastructure. NP10: Feniton to Sidmouth Cycle Link seeks to support the cycle link and resist proposals which would prejudice its delivery. Proposals which would improve road congestion and road safety will be supported, as will proposals for parking solutions in Ottery St Mary which reduce reliance on the car for transport. Policy NP25 safeguards land for education uses, in particular a new primary school, which would serve the western end of Ottery St Mary including the Kings Reach development currently under construction, and reducing walking distances to the current Ottery St Mary Primary School.

Supporting high quality communications infrastructure

3.22 Paragraph 43 of the NPPF states: *“..local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband...”*

3.23 Policy **NP21:** Working from home includes support for proposals to enhance high speed broadband throughout the parishes.

Delivering a wide choice of high quality homes

3.24 The NPPF, in paragraph 47, requires local planning authorities to boost significantly the supply of housing. The East Devon Local Plan, in Strategy 2, sets out how the objectively assessed need for housing will be met. For Ottery St Mary town, around 500 new homes have already been consented (25% growth), and for West Hill around 80 new homes have been consented (10% growth), which

will meet the requirements of the Local Plan. Many of these are already under construction. This conformity to the Local Plan is discussed in greater detail in section 5 of this statement.

3.25 Paragraph 50 of the NPPF requires planning policy to “*..deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities..*”

Local planning authorities should:

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and*
- *where they have identified that affordable housing is needed, set policies for meeting this need on site...”*

3.26 Paragraph 53 of the NPPF states: “*Local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area.*”

3.27 Paragraph 54 of the NPPF states: “*In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.*”

3.28 Paragraph 55 of the NPPF states: “*To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.*”

3.29 The following Neighbourhood Plan policies are relevant:

NP3: Infill, Backland and Residential Garden Development

NP12: Appropriate Housing Mix

NP13: Accessible and Adaptable Homes

NP27: Exception site for housing development in Alfington

3.30 Policy NP3 seeks to resist inappropriate development of residential gardens, but defines the conditions where they may be supported. Policy NP12 & NP13 seek to meet identified local needs, including for smaller homes suitable for young people and/or elderly people (of whom there are above average numbers within the parishes) and to support the provision of accessible and adaptable homes. Policy NP27 provides for a small housing allocation in Alfington to support the sustainability of the village and to enhance its vitality, consistent with paragraph 55.

Requiring good design

3.31 The following paragraphs of the NPPF describe the Government's approach to good design:

"56. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

"57. It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

"58. Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics. Planning policies and decisions should aim to ensure that developments:

- will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;*
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;*
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;*
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and*
- are visually attractive as a result of good architecture and appropriate landscaping.*

"59. Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.

"60. Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

"61. Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment."

3.32 The following policies of the Neighbourhood Plan are relevant:

NP2: Sensitive, High Quality Design

NP3: Infill, Backland and Residential Garden Development

NP26: West Hill Design

These policies seek to follow the guidance in the NPPF and build on Development Management Policies in the East Devon Local Plan. West Hill has a special character which merits a specific design policy to protect and maintain its cherished features.

Promoting Healthy Communities

3.33 The NPPF recognises in paragraph 69 that creating a shared vision with communities of the residential environment and facilities they wish to see in their town is important, and encourages local authorities to involve all sections of the community in the development of Local Plans. The process of producing the Neighbourhood Plan has involved extensive consultation and engagement with local people, and this is recorded in the Consultation Statement and supporting documents.

3.34 Paragraph 70 of the NPPF states:

“To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- *guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community’s ability to meet its day-to-day needs;*
- *ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community; and*
- *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.”*

3.35 In paragraphs 72-77 the NPPF gives great weight to

- ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities;
- access to high quality open spaces and opportunities for sport and recreation;
- protecting existing open space, sports and recreational buildings and land, including playing fields;
- protecting and enhancing public rights of way and access;
- identifying for special protection green areas of particular importance to them, by designating land as Local Green Space

3.36 The following Neighbourhood Policies are relevant:

NP5: Local Green Spaces

- NP10:** Feniton to Sidmouth Cycle Link
- NP14:** Demonstrating Infrastructure Capacity
- NP15:** Supporting and Protecting Health and Social Care Infrastructure
- NP16:** Supporting Schools
- NP17:** Community Facilities of Value
- NP25:** Land Identified for Education uses in Ottery St Mary

Community Projects 2 (Local Green Infrastructure Network), 3 (Supporting Public Transport), 5 (Developing Sports and Play Facilities), 6 (Supporting Youth Facilities), 10 (Town Centre Action Group), 12 (West Hill Green Network), 13 (West Hill Playing Field) are also relevant in supporting and implementing the Neighbourhood Plan policies.

3.37 Policy NP5 supports the identification of Open Green Spaces. Recreational facilities are supported through Policy NP10, the Feniton to Sidmouth Cycle Link, and through the Community Projects 2, 5, 6, 10, 12, 13.

Provision of sufficient school places is supported through Policies NP16 and NP25, including safeguarding a site for educational or community uses beside The King's School.

Community facilities such as shops, churches, village halls are supported through Policy NP17. Health and Social Care Infrastructure, which is currently under threat, is supported through Policy NP15.

Meeting the challenge of climate change, flooding and coastal change

3.38 Paragraph 97 of the NPPF supports policies to help increase the use and supply of renewable and low carbon energy, and states that: *“local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. They should:*

- *have a positive strategy to promote energy from renewable and low carbon sources;*
- *design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts..”*

Paragraph 98 of the NPPF states that local planning authorities *“should approve the application if its impacts are (or can be made) acceptable.”*

3.39 Paragraph 99 of the NPPF states: *“Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.”*

3.40 The relevant Neighbourhood Plan Policies are:

- NP11:** Small-scale Low-carbon Energy Projects
- NP7:** Flood Defences

Policy NP11 supports low-carbon energy projects where their design has regard to location and scale, and adverse impacts are satisfactorily addressed. Additionally the policies discussed in 3.20 above on sustainable transport will help to limit the use of the car and reduce greenhouse gas emissions. Policy NP7 expresses support for proposals for flood defences and alleviation measures.

Conserving and enhancing the natural environment

3.41 The NPPF in paragraph 109 states that: *“The planning system should contribute to and enhance the natural and local environment by:*

- *protecting and enhancing valued landscapes, geological conservation interests and soils;*
- *recognising the wider benefits of ecosystem services;*
- *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*

3.42 Paragraph 113 of the NPPF states: *“Local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, 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.”*

3.43 The Neighbourhood Plan includes the following policies that seek to conserve and enhance the natural environment:

NP1: Development in the Countryside

NP4: Settlement Containment

NP5: Local Green Spaces

NP6: Valued views

NP8: Protection of Local Wildlife Sites and Features of Ecological Value

3.44 The countryside of the Neighbourhood Plan Area is a highly valued asset. Protecting its special character and maintaining the balance between the historic town, villages and smaller settlements and surrounding countryside is of the utmost importance. Policy NP1 adds further detail to Local Plan policies having regard to Devon Landscape Character Areas, the East Devon Landscape Character Assessment and the EDDC Landscape Villages Appraisal Report. Policy NP4 seeks to maintain the separate identities of Ottery St Mary and West Hill and the open and undeveloped land between the two settlements. Policy NP5 identifies Open Green Spaces which are special to the local community and have the potential to enhance biodiversity and wildlife. Policy NP6 on Valued Views identifies particular views across landscapes which are valued by the local community and which merit protection. Policy NP8 identifies and protects Local Wildlife Sites and Features of Ecological Value. The East Devon Pebblebed Heaths, which carry SAC, SPA, and SSSI designations are on the southern fringes of the Neighbourhood Plan Area and carry great weight. The Neighbourhood Plan Area falls within the ‘zone of influence’ as set out in the Local Plan and the South East Devon European Sites Mitigation Strategy (SEDEMS).

Conserving and enhancing the historic environment

3.45 Paragraph 126 of the NPPF states: *“Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:*

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- *the desirability of new development making a positive contribution to local character and distinctiveness; and*
- *opportunities to draw on the contribution made by the historic environment to the character of a place*

3.46 The Conservation Area in Ottery St Mary has until recently been on the national Heritage At Risk Register, and there remain issues associated with its wellbeing. Policy **NP22**: Ottery St Mary Conservation Area seeks to enable positive proposals to enhance heritage assets. The Community project 9 (Ottery St Mary Heritage Action) will provide a thorough assessment, create a Conservation Area Management Plan and identify opportunities and interventions to benefit the Conservation Area and other heritage assets.

4. Contribution to the achievement of sustainable development

4.1 The NPPF states in paragraph 14 that a presumption in favour of sustainable development is at the heart of the NPPF and *“should be seen as a golden thread running through both plan-making and decision-taking.”* The Neighbourhood Plan contributes strongly to the achievement of sustainable development.

4.2 Paragraphs 6-10 of the National Planning Policy Framework outline the Government’s definition of sustainable development.

4.3 The NPPF amplifies this simple definition, at paragraph 7, stating that sustainable development has three dimensions, economic, social and environmental. Planning needs to perform a number of roles in relation to these issues: *“an economic role - contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure; a social role - supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of the present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being; and an environmental role - contributing to protecting and enhancing our natural, built and historic environment; and as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.”*

4.4 Paragraph 4.5 of the NPPF emphasises that the roles are inter-dependent and should not be treated in isolation: *“These roles should not be undertaken in isolation, because they are mutually dependent. Economic growth can secure higher social and environmental standards, and well-designed buildings and places can improve the lives of people and communities. Therefore, to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. The planning system should play an active role in guiding development to sustainable solutions.”*

4.5 From the outset the development of the Neighbourhood Plan has been framed within the context of sustainable development, with consultation workshops encouraging members of the public to consider issues under the themes of environment, economic and community. The Neighbourhood Plan seeks to address each of the three dimensions of sustainable development as prescribed by the NPPF.

4.5 The key ways that the Neighbourhood Plan will help to contribute to meeting the objectives of Sustainable Development are set out below. As discussed above, the objectives and policies cannot be taken in isolation and can address more than one role.

Relevant section of NPPF	How our plan contributes to this
<p>an economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;</p>	<p>Supporting and enhancing the economy of the Neighbourhood Area is vital to achieving a sustainable future for the community.</p> <p>The following Neighbourhood Plan objectives primarily support an economic role:</p> <ol style="list-style-type: none"> 11. Support the local economy to enhance the prosperity and sustainability of the Parishes. 12. Enhance Ottery St Mary town centre as a vital service centre for the Parishes and a tourist destination where people come to enjoy the independent shopping, history, culture and environment. 13. Encourage innovation which is sensitive and appropriate to the environment. 14. Support the future of farming in the Parishes. 15. Reduce the impact of traffic and on-street parking on OSM Town Centre 16. Enhance OSM Town Centre to achieve public realm and accessibility improvements that will help to make the town centre a safer and more inviting space and strengthen the long term vitality of the town. 17. Protect, enhance and preserve our Town Centre Conservation Area. <p>The following Neighbourhood Plan Policies support an economic role:</p> <p>Policy NP 18 supports new retail and small scale employment uses in Ottery St Mary town centre, and supports the retention of redundant buildings for employment, social or community uses.</p> <p>Policy NP19 builds on the employment provision in Strategy 24 of the Local Plan, and provides support for additional employment development at Finnimore Industrial Estate.</p> <p>Policy NP20 supports the rural economy by encouraging small-scale farm based tourism.</p> <p>Policy NP21 supports home-working and live-work units, which reduce the need to travel to work. Broadband connectivity is also supported.</p> <p>Ottery St Mary town centre, as the service centre for the Parishes currently under-performs as a space. Policy NP22</p>

	<p>supports development, including retail and businesses, that will have a positive impact on the OSM Conservation Area.</p> <p>Policy NP23 supports development in the centre of OSM Town which will enhance the public realm and buildings, including retail and employment uses.</p> <p>Policy NP24 seeks to enhance access in the centre of OSM by supporting additional car-parking capacity and reducing traffic congestion.</p>
<p>a social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community’s needs and support its health, social and cultural well-being;</p>	<p>The following Neighbourhood Plan Objectives primarily support a social role:</p> <ol style="list-style-type: none"> 6. Enhance and support linkages and accessibility within the settlements, across the Parishes and further afield for the benefit of residents and visitors, and to promote sustainability. 7. Support the housing needs of the current and future community of the Parishes to meet the needs of the population at all stages of life, whilst balancing pressure for development which could detrimentally impact on the valued character of the Parishes. 8. Ensure that the social and physical infrastructure needs of the community are met, particularly in relation to education, healthy lifestyles and well-being, health and social care, transport and roads, drains and sewerage. 9. Support the delivery of upgraded sustainable infrastructure to address existing inadequacies and meet the needs of the growing population particularly with regard to roads, utilities and communications infrastructure. 10. Meet the social and recreational needs of the community within the Parishes as far as possible to support a sustainable, inclusive, fulfilling and healthy lifestyle. 18. Protect and maintain the unique character and special qualities of West Hill, while enhancing the settlement’s sustainability. 19. Support a sustainable future for the smaller settlements of the Neighbourhood Plan Area whilst allowing for a vibrant future, recognising the needs of the community. <p>The following Neighbourhood Plan Policies support a social role:</p>

	<p>NP2 requires sensitive high quality design and a high quality built environment.</p> <p>NP12 supports an appropriate housing mix including some smaller homes to meet the housing needs of the community.</p> <p>Policy NP13 supports provision of accessible and adaptable homes.</p> <p>Policy NP14 requires new developments to show adequate provision for infrastructure.</p> <p>Policy NP15 supports and protects Health and Social Care Infrastructure.</p> <p>Policy NP16 supports proposals for new schools and expansion of schools and facilities to meet the needs of the community.</p> <p>Policy NP17 supports protection of Community Facilities of Value such as village halls, post offices, convenience stores, pubs, youth facilities, sporting and leisure facilities</p> <p>Policy NP25 safeguards land identified for Education or Community Uses in Ottery St Mary.</p> <p>Policy NP26 supports high quality design of development in West Hill</p> <p>Policy NP27 provides an allocation site for development in Alfington to improve the sustainability of the village.</p>
<p>an environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.</p>	<p>The following Neighbourhood Plan objectives support an environmental role:</p> <ol style="list-style-type: none"> 1. Protect and enhance the character and nature of the settlements of the Neighbourhood Plan Area ensuring new development proposals are suitably scaled, complementary and locally distinct. 2. Preserve and enhance habitat and scenic value of the Neighbourhood Plan Area for current and future generations. 3. Celebrate our heritage which is central to the character and ‘sense of place’ of the Parishes. 4. Reduce issues of traffic congestion and enhance road safety across the Parishes. 5. Address flooding risk within the Neighbourhood Plan Area and reduce this where possible. <p>The following Neighbourhood Plan policies address the environmental role of sustainable development:</p>

	<p>NP1 adds further detail to Local Plan Strategies to protect the countryside from inappropriate development.</p> <p>NP2 supports sensitive high quality design which enhances the built and natural environment.</p> <p>NP3 seeks to enhance the built environment by reeving criteria for infill, backland and residential garden development</p> <p>NP4 supports settlement containment to maintain the open and undeveloped feel of the open countryside between Ottery St Mary and West Hill.</p> <p>NP5 identifies Local Green Spaces which are of value to enhance the local environment</p> <p>NP6 identifies valued views which enhance the public views of the landscape.</p> <p>NP7 supports proposals to enhance flood defences.</p> <p>NP8 supports Protection of Local Wildlife Sites and Features of Ecological Value, and thereby helps to improve biodiversity.</p> <p>NP9 supports accessible developments and encourages improved walking and cycling routes.</p> <p>NP10 encourages the creation of a Feniton to Sidmouth cycle link.</p> <p>NP11 supports small scale Low-carbon Energy projects, while protecting the landscape of the Neighbourhood Plan area.</p> <p>NP26 seeks to protect the special character of West Hill.</p>
<p>Paragraph 16 of the NPPF states: The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:</p> <ul style="list-style-type: none"> • develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development; • plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan 	<p>The objectives and policies of the Neighbourhood Plan build on the relevant strategies and policies of the East Devon Local Plan.</p> <p>Ottery St Mary has recent planning approvals for around 500 houses, which meets the housing requirements for the town as identified in Strategy 2 of the Local Plan, and this is supported by the Neighbourhood Plan. Employment land allocation in Ottery St Mary in Strategy 24 is supported by the Neighbourhood Plan.</p> <p>Recent planning approvals for around 80 houses in West Hill, and 15 houses in Tipton St John meet the requirements of Strategy 2 and Strategy 27 of the Local Plan.</p> <p>The policies of the Neighbourhood Plan support and give refinement of the Local Plan Strategies and policies.</p>

5. General conformity with the strategic policies of the development plan

4.1 The Neighbourhood Plan has been prepared to ensure that it is in general conformity with the strategic policies in the development plan for the area.

4.2 The current development plan for the area is the adopted East Devon Local Plan 2013-31.

Table 2: How the NP policies conform to the strategic policies in the East Devon Local Plan.

NP Policy	NP Policy Title	EDLP Strategy	How has the Neighbourhood Plan had regard to Strategic policies in the EDLP?
NP1	Development in the Countryside	Strategy 7	The Policy builds on the requirements of Strategy 7 and provides further detail.
NP2	Sensitive High Quality Design	Strategy 6 Strategy 43	Development Management Policies D1, D2, are also relevant. The Policy follows the principles outlined in the Local Plan and provides further detail relevant to the Neighbourhood Plan Area.
NP3	Infill, Backland & Residential Garden Development	Strategy 6	The Policy adds more detail to the requirements of Strategy 6 regarding infill, backland and residential garden development, and is consistent with the text in paragraph 6.22 regarding inappropriate backland development.
NP4	Settlement containment	Strategy 7 Strategy 8 Strategy 46	The Policy has regard to Strategy 8 on Green Wedges, and seeks to apply some of the same principles to the area between Ottery St Mary and West Hill. The Policy has regard to Strategy 7 and adds more detail as to where development is appropriate. It has regard to Strategy 46 with the objective of conserving the landscape character of the area.
NP5	Local Green Spaces	Strategy 3	The Local Plan does not designate any Green Spaces, but the Policy NP5 is supported by the NPPF paragraph 77 and is consistent with the principles of Sustainable Development as outlined in Strategy 3.
NP6	Valued Views	Strategy 7	The Policy is consistent with Strategy 7 and adds specific detail on valued landscapes which should be protected from development.
NP7	Flood Defences	Strategy 3 Strategy 5 Paragraph 12.5 h)	The Policy has regard to the principles of sustainable development and flood prevention outlined in Strategy 3 and Strategy 5. Improvements in flood defences around Ottery St Mary are supported in paragraph 12.5 h).
NP8	Protection of Local Wildlife Sites & Features of Ecological Value	Strategy 3 Strategy 5 Strategy 47	The Policy has regard to the principles of sustainable development expressed in Strategy 3 regarding conserving and enhancing the environment, and Strategy 5 in supporting County Wildlife Sites, conserving and enhancing SSSI's, and Strategy 47 on Nature Conservation. The Policy also has regard to Development Management Policy EN4 and is consistent with it.

NP9	Accessible Development	Strategy 5 Strategy 5b Strategy 24	The Policy has regard to Strategy 5 in maximising opportunities for enhancing green infrastructure and creating green networks and corridors to link urban areas and the wider countryside. It has regard to Strategy 5B in supporting sustainable transport, and to Strategy 24 in improving pedestrian and cycle links. It is also consistent with Development Management Policy TC4 in promoting improvements to facilities for pedestrians and cyclists.
NP10	Feniton to Sidmouth Cycle Path	Strategy 5 Strategy 5b Strategy 24	The Policy supports a specific project consistent with Policy NP9, and Strategies 5, 5b and 24. The policy is also consistent with Development Management Policy TC5 which safeguards Disused Railway Lines.
NP11	Small Scale Low-Carbon Energy Projects	Strategy 3 Strategy 28 Strategy 39	The Policy has regard to Strategy 3 in supporting renewable energy, Strategy 28 in sustaining and Diversifying Rural Enterprises, and Strategy 39 in supporting suitable Renewable and Low Carbon energy projects that are acceptable in limiting the harm to the environment and landscape character. It provides some greater detail on information to be provided in proposals for development. The Policy does not allocate any sites for wind turbines, which is consistent with Strategy 39.
NP12	Appropriate Housing Mix	Strategy 4	The Policy seeks to address housing needs of the local community in providing housing for smaller families and older people, and is consistent with Strategy 4. It also has regard to Development Management Policy H2 on the Range and Mix of New Housing Development.
NP13	Accessible and Adaptable Homes	Strategy 36	The Policy is consistent with Strategy 36 in supporting provision of accessible and adaptable homes.
NP14	Demonstrating Infrastructure Capacity	Strategy 4 Strategy 50	The Policy has regard to Strategy 50 and supports the need for infrastructure expressed in Strategy 4.
NP15	Supporting and Protecting Health & Social Care Infrastructure	Strategy 3 Strategy 4 Strategy 24 Strategy 50	The Policy has regard to the requirements for infrastructure delivery in Strategies, 3, 4, 24 and 50, but adds specific detail regarding Health and Social Care Infrastructure which is under threat.
NP16	Supporting Schools	Strategy 3 Strategy 4 Strategy 24	The Policy is consistent with Strategies, 3, 4, and 24 and adds specific detail about schools.
NP17	Community Facilities of Value	Strategy 3 Strategy 4 Strategy 32	The Policy has regard to Strategy 3 in promoting social wellbeing, Strategy 4 in securing community facilities. It is consistent with Strategy 32 which seeks to resist the loss of community sites and buildings.
NP18	Supporting Ottery St Mary as the Economic Focus for the Parish	Strategy 24 Strategy 32	The Policy is consistent with Strategy 24 in supporting retail and employment facilities in the town centre, and Strategy 32 in resisting the loss of employment, retail or community sites and buildings.

NP19	Employment Uses Finnimore Industrial Estate	Strategy 3 Strategy 24	The Policy is consistent with Strategy 24, which allocates employment land at Finnimore Industrial Estate, and introduces conditions which make it more acceptable.
NP20	Small-scale Farm Based Tourism	Strategy 28 Strategy 33	The Policy is consistent with Strategy 28 in supporting rural enterprise. It is consistent with Development Management Policy E20 in supporting tourism in rural areas.
NP21	Working from Home	Paragraph 15.9, 15.23 Strategy 31	The Policy is consistent with text at 15.9 and 15.23 in supporting employment in rural areas and reducing the need to commute to work. It has regard to Strategy 31 which encourages the provision of live/work units and encourages this provision in smaller developments in the Neighbourhood Plan Area.
NP22	Ottery St Mary Conservation Area	Paragraph 12.5 d) Strategy 49	The Policy is consistent with Strategy 49 in seeking to conserve and enhance the historic environment. It also has regard to Development Management Policies EN8 and EN9 on heritage assets, and EN10 on Conservation Areas. The associated Community Project 9 is consistent with these policies and adds further detail.
NP23	Ottery St Mary Town Centre Enhancements & Highways Improvements	Strategy 5b Strategy 24 Paragraph 12.5 g)	The Policy has regard to Strategy 5b in supporting sustainable transport proposals. It is consistent with Strategy 24 in supporting proposals to improve and enhance Ottery St Mary town centre and adds detail. The Policy and the associated Community Project 10 have regard to Development Management Policies E9 and E13 on retail areas in the town centre.
NP24	Car parking in Ottery St Mary Town Centre	Strategy 5b Strategy 24	The Policy, in conjunction with Community Project 11, has regard to Strategy 5b in supporting sustainable transport. It has regard to Development Management Policy TC9 on parking in new development & town centres in so far as solutions are sought to reduce town centre congestion.
NP25	Land Identified for Education uses in Ottery St Mary	Strategy 24	The Policy is consistent with Strategy 24 which safeguards land for education uses in Ottery St Mary.
NP26	West Hill Design	Strategy 3 Strategy 6 Strategy 7 Strategy 27 Strategy 48	The Policy has regard to Strategy 3 on Sustainable Development, particularly in respect of conserving and enhancing the Environment. It is consistent with Strategy 6 on criteria for development within Built-Up Area Boundaries, and adds further detail. The Built-Up Area Boundary for West Hill will be as determined in the East Devon Villages Plan DPD, now submitted for examination. The Policy is consistent with Strategy 7 and does not explicitly permit any development in the countryside except that permitted by other Local Plan Policies.

			<p>The Policy is consistent with Strategy 27.</p> <p>The Design principles are consistent with Strategy 48 on Local Distinctiveness in the Built Environment, also with Development Management Policies D1, D2 and D3 and add detail relevant to West Hill.</p>
NP27	Exception Site for housing development in Alfington	<p>Strategy 3</p> <p>Strategy 7</p> <p>Strategy 27</p> <p>Strategy 35</p>	<p>The Policy has regard to Strategy 3 on Sustainable Development in promoting social wellbeing by providing housing. It has regard to Strategy 7 by explicitly stating a policy that permits development. It has regard to Strategy 27 by permitting a small development that has community support, which will help to promote the objectives of sustainable development in Alfington.</p>

6. Compatibility with EU obligations and legislation

6.1 The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. Considerable emphasis has been placed throughout the consultation process to ensure that no sections of the community have been isolated or excluded.

6.2 A screening process was carried out by East Devon District Council which determined that the Neighbourhood Plan did not require a Strategic Environmental Assessment.

6.3 It was also determined that the plan did not require a Habitats Regulations Assessment.

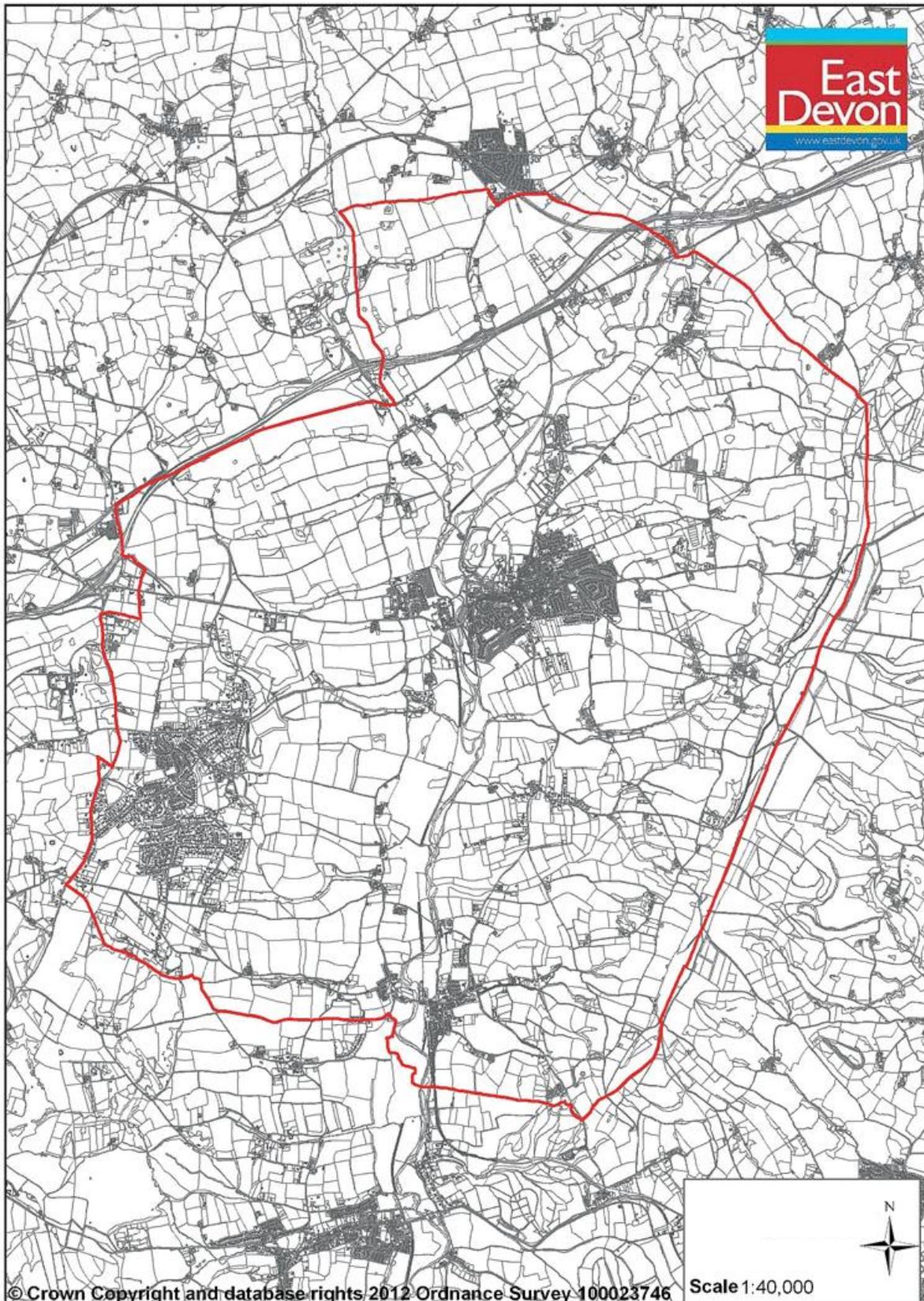
6.4 The Final Screening Report prepared by East Devon District Council is at Appendix B

7. Conclusions

The Basic Conditions as set out in Schedule 4B to the TCPA 1990 are considered to be met by the Neighbourhood Plan for the Parishes of Ottery St Mary and West Hill and all the policies therein. It is therefore respectfully suggested to the Examiner that the Neighbourhood Plan for the Parishes of Ottery St Mary and West Hill complies with Paragraph 8(1)(a) of Schedule 4B of the Act.

Appendix A

Neighbourhood Plan Area



Extract of Minutes of EDDC Cabinet 7 January 2015:

*146 Proposed designation of Ottery St Mary Parish Neighbourhood Area The report of the Neighbourhood Planning Officer set out a proposal received to designate Ottery St Mary Parish as a Neighbourhood Area. The public consultation period had now expired and no objections to the proposal had been received. Councillor Roger Giles, Ottery St Mary Town Ward Councillor, thanked officers for their work with the parish. He said that the designation would benefit the local community.

RESOLVED that Ottery St Mary Parish be designated a Neighbourhood Area..

REASON

The legal requirements have been properly followed and the area is deemed appropriate for designation.

Appendix B

**Ottery St Mary Neighbourhood Development Plan
Strategic Environmental Assessment and Habitat
Regulations Assessment**

Final Screening Report

Prepared by Officers of East Devon District Council

May 2017

1 Introduction

- 1.1 The purpose of this report is to assess the policies contained within the draft Ottery St Mary & West Hill Neighbourhood Development Plan to determine whether it requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. An SEA is required under this legislation for all plans which may have a significant effect on the environment.
- 1.2 This report will also screen to determine whether or not the Plan requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010. An HRA is required when it is deemed that the implementation of the plan is likely to cause negative significant effects on protected European Sites (Natura 2000 sites).
- 1.3 The conclusion of the assessment is that the plan is unlikely to have a significant effect on the environment so an SEA is not required to accompany the Plan. It is also unlikely to have a negative impact on any Natura 2000 sites so should not be subject to HRA.
- 1.4 This report has been sent to the three statutory consultees designated in the Regulations (Historic England, Environment Agency and Natural England) to elicit their views on the findings. Historic England and Natural England both provided responses, each agreeing with the view that SEA and HRA are not required. These can be found in appendix 3.

2 Ottery St Mary & West Hill Neighbourhood Plan

2.1 The Neighbourhood Plan has been in production for approximately two years. It has undergone significant consultation and a first draft of the plan has recently been drawn up

2.2 Although all policies of the plan have been considered, the Local Authority's view is that there are a number of key policies of the plan and have been a particular consideration in the formation of this report. The policies in question that they have specifically identified land for a particular use or purpose and/or they deviate from the Local Plan in what would generally be considered policy compliant and therefore have the greatest potential for environmental impact. These are as follows:

- Policy NP4: Settlement Containment
- Policy NP5: Local Green Spaces
- Policy NP12: Locally-tied Affordable Self Build Exceptions Plots
- Policy NP29: Exception Site for housing development in Alfrington

3 SEA screening

- 3.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005).
- 3.2 The objective of SEA is '*to provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of development plans... with a view to promoting sustainable development*' EU Directive 2001/42/EC (Article 1).
- 3.3 At present, there is no legal requirement for all Neighbourhood Plans to produce an accompanying SEA; however, Local Authorities are legally obliged to advise the plan producers as to whether an SEA is required based on the contents of the plan.
- 3.4 To ascertain if SEA is required, a "screening" exercise will be undertaken by East Devon District Council evaluating the plan against the criteria set out in the SEA Directive. These criteria are set out in the SEA Directive and can be found in Figure 1.
- 3.5 Should the screening report reach the conclusion that the plan will have a significant impact on the environment; a full SEA should be undertaken.
- 3.6 An SEA was conducted to accompany the adopted East Devon Local Plan 2013-2031 and has been taken into account whilst undertaking this screening assessment.

Figure 1: Application of the SEA Directive to plans and programmes

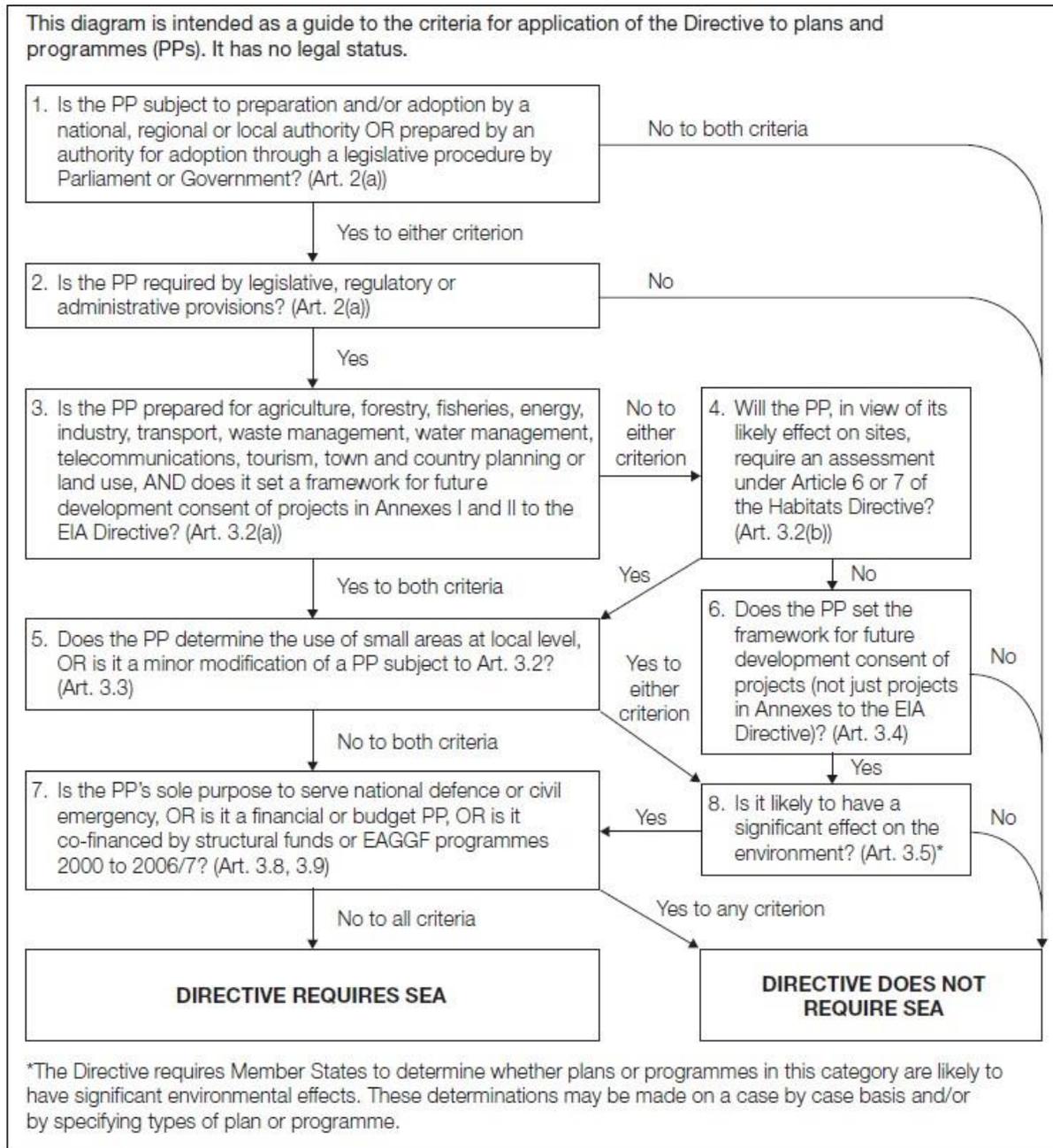


Figure 2: Screening assessment against the criteria for whether the plan requires an SEA.

Stage	Y/N	Reason
Is the plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The plan has been prepared by the Town Council and will be adopted by East Devon District Council as part of the Development Plan, subject to a successful examination and referendum.
Is the plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	The plan meets the characteristics set out in the Government's Practical Guide to the SEA Directive in that that it will be publicly available, prepared in a formal way and involve consultation with interested parties.
Is the plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	The plan is prepared for Town and Country Planning and land use and may provide the framework for development of a scale that would fall within Annex II of the EIA Directive at a Neighbourhood Area level.
Does the plan determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The plan will determine the use of small areas at a local level.
Is it likely to have a significant effect on the environment? (Art. 3.5)	N	See screening assessment for environmental effects in figure 3 of this report.

Directive Does Not Require SEA

4 Assessment of Environmental effects

4.1 Under step 8 of the Application of the SEA directive (Figure 1), in order to establish whether a plan requires an SEA, it was necessary to conduct a thorough assessment of whether the plan is likely to have a significant effect on the environment.

4.2 The table below sets out the criteria on which the impact of the plan will be judged, as outlined in Article 3.5 of the SEA Directive.

Figure 3: Environmental impact screening assessment

Criteria for determining the likely significance of effects (Schedule 1 of SEA regulations)	Is the plan likely to have a significant environmental effect?	Justification for Screening Assessment
<p>The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>	<p>N</p>	<p>The plan sets a framework for developments within the neighbourhood area. Whilst the Neighbourhood Plan identifies land as a green wedge, the identified area comprises locations outside of the built-up area boundary designated in the Local Plan, and therefore would not normally be considered areas to be acceptable for development, so a significant impact is unlikely in this regard. The Plan also identifies various areas as local green space. It is considered that all of these either comprise existing recreational land or areas otherwise afforded some protection through Local Plan policy and therefore their identification is not expected to have a significant environmental impact. Local Plan strategy 35 currently allows for exceptions housing coming forward outside of built-up area boundaries where there is a demonstrable Local affordable housing need. It is considered that this approach is not wholly different than the Local Plan policy in this regard as it would be allowing housing to come forward for those in local need and therefore a significant negative impact is not expected. The Plan also allocates a small site for 5 dwellings in Alfington. Although the size of the allocation is small it is situated in a location in the Local Plan that is not</p>

		<p>considered suitable for open market housing due to its lack of services and facilities, although affordable housing would be acceptable in principle. On this basis there is a small conflict with the local plan, although it should be noted that the site was previously allocated in the Villages Development Plan Document for 5 dwellings prior to a change in approach prompted by the Local Plan Inspector. In terms of location, the site is set back off the main road and with no dedicated pedestrian footway. The site is however fairly well related to the settlement, located centrally between the two 'halves' of Alfington. It is noted that there is the opportunity to provide improved pedestrian footpath access to other parts of the village alongside the potential of increased play park provision. The proposal is a small development of 5 houses and on balance it is considered that the size and location of the allocation in Alfington in principle is unlikely to have a significant environmental effect. The remaining policies are more general encouraging or setting criteria for particular kinds of development and are not considered to have a significant environmental impact.</p>
<p>The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.</p>	<p>N</p>	<p>The plan must be in general conformity with the adopted East Devon Local Plan and have regard to national guidance. It must also be compatible with EU law and the ECHR obligations. It is not considered to have an influence on other plans other than individual planning applications that may come forward in the area.</p>
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>N</p>	<p>The plan will contribute towards the achievement of sustainable development, as required by the "basic conditions" on which the plan will be judged at examination. In the plan there is an emphasis on the protection of the natural environment but the impact of this is considered to be small.</p>
<p>Environmental problems relevant to the plan or</p>	<p>N</p>	<p>The plan proposals are not considered to have a significant impact on any existing</p>

programme.		environmental problems that are present in Ottery St Mary.
The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	N	These community legislation types are not relevant to the plan and will not need to be considered.
The probability, duration, frequency and reversibility of the effects.	N	The plan will influence development that will likely come forward over the plan period and therefore any impact will be long term and not easily revisable. However, the impact of this is likely to be small.
The cumulative nature of the effects.	N	The cumulative effects of the plan are not considered to have a significant effect on the environment.
The trans-boundary nature of the effects.	N	There are not considered to be any proposals in the Neighbourhood Plan which will have a significant trans-boundary effect.
The risks to human health or the environment (e.g. due to accidents).	N	There will be a minor positive impact on human health through the promotion of wellbeing and recreation spaces.
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	N	The plan is concerned only with development within the parishes of Ottery St Mary, which has a joint resident population of 5185. If there are any effects they are not considered to be wide ranging.
The value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; intensive land-use; the effects on areas or landscapes which have a recognised national, Community or international protection status.	N	<p>Ottery St Mary Parish is situated in an areas which is very sensitive in terms of environmental and heritage considerations.</p> <p>The entirety of the Neighbourhood Area is covered by the East Devon Area of Outstanding Natural Beauty, an area recognised nationally for its distinctive character and beauty.</p> <p>In terms of the site allocation in Alfington, landscape appraisals of the site were conducted as part of the draft version of the Villages plan 2014. The landscape impact of the site was considered overall</p>

		<p>to be Low-Medium and concluded that 'The enclosed nature of the site, the exception being from views from the west, and its existing on-site buildings, means that it and development on it should be less sensitive in terms of adverse impacts than other potential development locations.' . This appraisal is reproduced in appendix 1.</p> <p>The Otter Estuary and Cliffs are designated as sites of special scientific interest and the Town itself is flanked by 4 county wildlife sites- The Golf Course, Floors and Knowle to the west and Otter Meadows to the east. No significant impact is anticipated on any of these sites and the plan includes policies to protect and enhance existing sites rich in ecological value.</p> <p>With regards to heritage, the parish has a total of 40 listed features in the parish- all grade 2. 30 of these are situated within the conservation area located in the town centre. The plan includes a policy seeking to protect existing heritage assets in the parish.</p> <p>The heritage impact of the site allocation in Alfington is addressed in the accompanying heritage impact review, provided in appendix 2. The site is approximately 30m away from the nearby grade II listed Alfington Farmhouse. The review concludes that a minimal impact is likely with the potential for some improvement, due to its brownfield nature with the possibility of renovating a number of dilapidated buildings on the site that have lain derelict since 1998. Views towards the nearby listed building are largely obstructed by deep vegetation along the southern boundary. The vegetation acts as a natural barrier and officer visual assessment is that the proposed site does not make an active contribution to the setting of the listed building.</p>
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Conclusion

4.3 Taking the above assessment into consideration, The plan is unlikely to have a significant environmental impact beyond that has previously been identified through the SEA of the Local Plan. Although Ottery St Mary is located in a sensitive area in the district, the impact of the policies in the plan is not considered to be significant enough to warrant further analysis through a bespoke SEA.

6 Habitat Regulations Screening Assessment

- 6.1 The draft version of the plan has been used to undertake this screening assessment. As the conclusion is that a full Habitat Regulations Screening is not required, any significant variations or additions to Plan will be subject to a further screening. A screening report was produced as part of the production of the adopted Local Plan and has been taken into account in undertaking this screening assessment.
- 6.2 The Conservation (Natural Habitats &c.) Regulations 1994 (The Habitats Regulations) transpose the requirements of the European Habitats Directive 92/43/EEC into UK law. The Habitats Directive and Regulations afford protection to plants, animals and habitats that are rare and vulnerable in a European context.
- 6.3 Habitats Regulations Assessment (HRA) is a systematic process through which the performance of a plan or project can be assessed for its likely impact on the integrity of a European Site. European Sites, also referred to as Natura 2000 sites, consist of Special Protection Areas (SPA), Special Areas of Conservation (SAC); Potential Special Protection Areas and candidate Special Areas of Conservation (pSPA and cSAC); and listed or proposed Ramsar sites.
- 6.4 Article 6(3) of the Habitats Directive states:
- ‘Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives’.
- 6.5 A small part of the Pebblebed Heath SAC, SPA and SSSI lies within, at the extreme south west edge, of Ottery St Mary Parish. The Parish is within the mitigation zone for this area. There are several traditional orchards, a scheduled ancient monument, a number of county wildlife sites and a small section of AONB also within the Parish.

Screening Criteria Questions

1. Is the Neighbourhood Plan directly connected with, or necessary to the management of a European site for nature conservation?

No

2. Does the Neighbourhood Plan propose new development or allocate sites for development?

The Neighbourhood Plan proposes one specific site for new housing, at Alfinton, to the north of the Parish. This site is small, and the Neighbourhood Plan Policy states that it is suitable for up to 5 houses. Any housing which is constructed is considered to be sufficiently far away from the pebblebed heaths that any impact can be satisfactorily mitigated, and this mitigation is provided for

in Local Plan policy. The Neighbourhood Plan requires the scheme to provide an equipped play park which will reduce the need for local residents to travel to facilities elsewhere. A range of larger alternative areas for recreation and access to the countryside are also available at a similar or closer distance to the site than the pebblebed heath, for instance at the nearby town of Ottery St Mary. The Neighbourhood Plan also allows for affordable housing schemes at Tipton St John and Alfington, outside the AONB. The scale of such development would be in line with Local Plan policy and this type of growth was envisaged in Local Plan policy.

A screening opinion was provided by Land Use Consultants early in the Local Plan production process and an HRA was completed by Footprint Ecology before, and informed, the submission version of the Local Plan. It indicated that the Local Plan will have sufficient policy provisions to enable the subsequent delivery of necessary measures to avoid and mitigate adverse effects on the integrity of European Sites.

3. Are there any other projects or plans that together with the Neighbourhood Plan could impact on the integrity of a European Site?

No

Conclusion

6.6 The Ottery St Mary Neighbourhood Plan does not require a Habitat Regulation Assessment.

6.7 The Ottery St Mary Neighbourhood Plan is unlikely to have an adverse effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010 (d), alone or in combination with other plans and projects. It does not propose a level of development significantly over and above that in the adopted Local Plan (which was itself subject to SEA). Should adverse impacts arise, there is an agreed range of mitigation measures which will be implemented.

Location and landscape character context

This assessment considers the village of Alfington and a 1.5 km radius around¹. Alfington is located approximately 3 km north of Ottery St Mary. Alfington itself is a small village stretching along the north-south running B137, this road forms a dominant feature bisecting the village and it forms the main easterly access route from the A30 to Ottery St Mary (and Otter Nursery). The village has one notable pinch point (northern part of the village) and the heavy traffic using this road causes adverse environmental impacts, congestion and safety concerns at this point and elsewhere.

Alfington has limited public footpaths, only parts of the B3177 has paths, and a terrace of houses in the north of the village front directly on to this road. Travelling both north and south out of the village there are no footpaths along the side of the B3177 which makes for uncomfortable pedestrian access. However quiet villages roads away from the main road and path provision elsewhere does provide for some safe pedestrian access. There are limited community facilities in Alfington. These do include a shop/petrol filling station on the southern edge and a village hall in the northern part of Alfington. Until recently a public house, now converted into a dwelling, occupied a position in the centre of Alfington.

The village is formed by a mixture of older and newer properties and Alfington lies on the western side of the River Otter adjacent to its lower lying floodplain. The southern parts of the village are also lower lying and bisecting by a stream that forms a tributary to the Otter. The northern parts of the village, which includes a number of lower density more modern (20th century built) homes are on rising/higher land. There has been a recent 'cottage style' development of a dozen or so properties to the east of the B137 in a central point in the village.

Overall the village has a rolling/undulating character and land to the east of the village rises quite sharply. The East Devon AONB lies around 1.25 kilometres to the east of the village and the boundary of the designated AONB area includes the higher land to the east of the village and specifically the scarp slopes and higher plateau that sits above the village. North and west of the village, stretching across the floodplain of the river Otter, the land is much flatter with fewer and less well defined hills.

Alfington is in Ottery St Mary town Council area and the roadside hamlet of Fenny Bridges lies around ½ km to the north of the core of Alfington village. Fenny Bridges is bisected by the (still busy) old A30. The properties of Fenny Bridges vary in age from older historic to a number of newer buildings. There are a number of commercial businesses strung along the old A30 with some in or close to the hamlet of Fenny Bridges, including the Greyhound Public House. Whilst there are small groupings/clusters of dwellings and buildings around Alfington there are no other settlements in the immediate surrounds.

The assessment criteria have been applied with regard to small scale residential development (9m height/2 storey properties) unless otherwise identified. Six potential sites for development have been put forward around Alfington. One of these sites is at Fenny Bridges, initially promoted in the 2010 SHLAA as a substantial area though submitted in the 2012 SHLAA as a much smaller roadside site. As this Fenny Bridges site is not considered to be at Alfington, and therefore not compliant with the emerging Local Plan policy it has not been assessed.

¹ 1.5km was selected as this captures the likely extent of visual issues associated with potential settlement edge development.

The Draft Local Plan indicates 5 dwellings for Alfington, which amounts to an increase in settlement size of approximately 5 %.

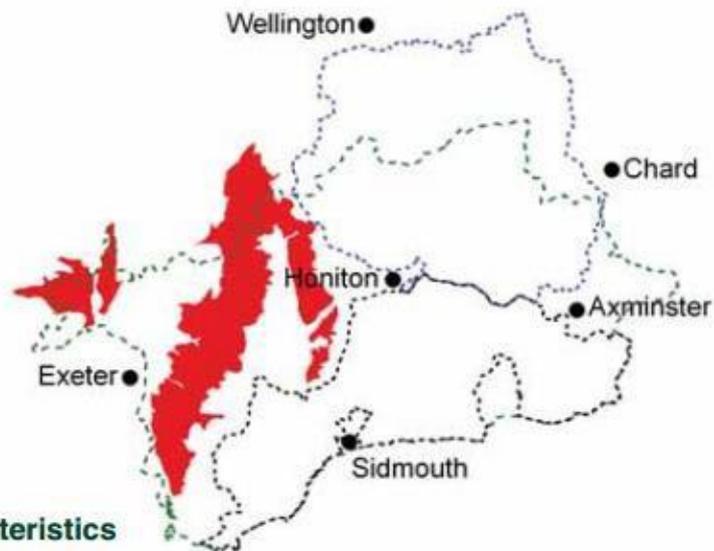
National character area (NCA): Alfington falls within The Devon Redlands National Character Area (NCA). See:

<http://www.naturalengland.org.uk/publications/nca/southwest.aspx>

The assessment advises *"has a very strong, unified character. The underlying red sandstone and consequent red soil dominate the landscape through ploughed fields, cliffs and exposures, and are visually evident in the traditional stone and cob farmsteads, hamlets and villages that are scattered across the area."*

District LCA: The East Devon District landscape character assessment identifies the settlement of Alfington as falling within landscape character type/s (LCT) 4: Valley floors - LCT 4D LOWLAND PLAINS

The assessment shows most of Alfington village lying in an area classified as a **Lowlands Plain area**. Land to the west of the village is classified as **Unsettled farmed valley floors** and land to the east as **Upper undulating farmed and wooded slopes**. The map below shows areas edges/boundaries.



Key Characteristics

- Level to gently sloping landform
- Mixed farmland, often in arable cultivation
- Small discrete broadleaf woodlands
- Regular medium to large field pattern with local variation
- Wide low roadside hedges and banks with hedgerow oaks
- Settled, with mixed pattern of large villages, hamlets or isolated farms
- Some villages significantly enlarged and modified by 20th century expansion
- Victorian estate cottages and large farm buildings
- Extensive commercial development
- Long views over low hedges
- Surprising feeling of remoteness in some parts, despite general level of development



These characteristics are largely represented in the landscape at and surrounding Alfington which includes an undulating mix of arable and pastoral small to medium fields, bordered by wide low hedges and hedgerow trees.

The **Devon Landscape Character Assessment** classifies Alfington and surroundings as falling in the East Devon Area – **Clyst Lowland Farmland** area.

See:

http://www.devon.gov.uk/index/environmentplanning/natural_environment/landscape/landscapecharacter/landscape-map.htm

Of this overall classification it advises that:

“This is a low lying, intensively farmed landscape with a uniformity to its undulating topography except in the north where there are a couple of outliers of higher ground. The uniform topography and pattern of hedgerows and hedgerow trees mean that there are few distinguishing features and this coupled with winding rural lanes results in a landscape which can feel quite disorientating. A

distinguishing element of the area are ‘Clyst’ place names which mean ‘clear water’ and the numerous small streams which drain the area, along with the more prominent Clyst and Tale valleys, are defining characteristics. This is a settled landscape with a dispersed pattern of villages and farmsteads and includes modern communications and infrastructure, namely the A30 corridor, railway lines, pylons and more recently Exeter Airport. It also includes the town of Honiton.”

The assessment advises of an overall strategy for this area classification:

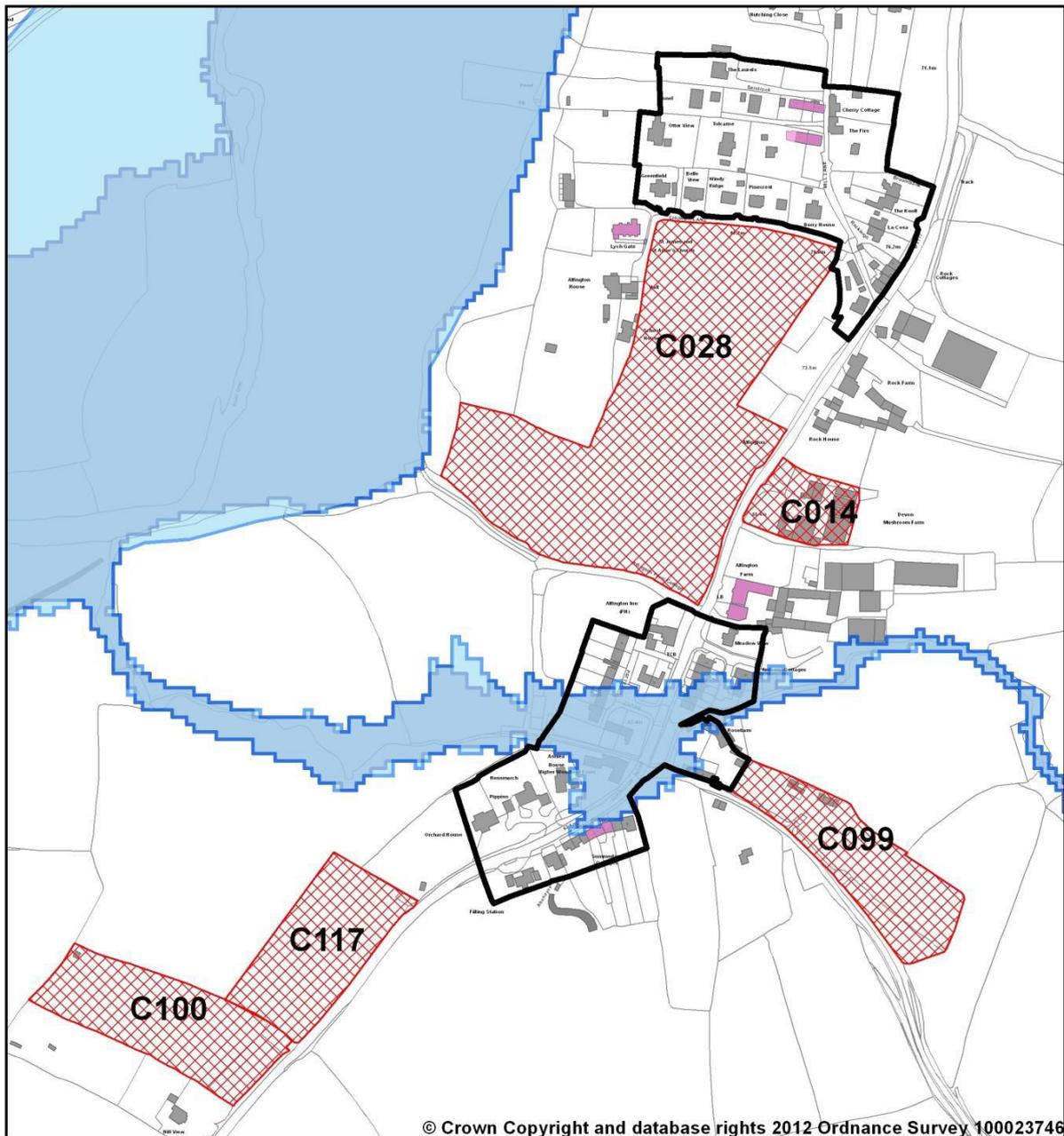
“To protect and enhance the landscape’s low-lying wetland character associated with streams and rivers and also the views to wooded skylines on hills within and around the area.

Opportunities are sought to restore conifer plantations to broadleaves and heathland habitats on the higher land to the north which forms important skyline features and to sustain population of veteran trees within parklands. Field patterns are reinforced through the restoration and management of characteristic hedges. Distinctive tree-lined streams and wet grassland along watercourses are managed and expanded to help prevent downstream flooding, protect water quality and conserve and enhance wildlife. Traditional orchards are conserved and expanded

where feasible. The landscape’s settlement pattern and place names continue to have a strong influence, whilst opportunities for sustainable recreation and limited low-carbon development are sensitively accommodated.”

Map showing Site locations and constraints

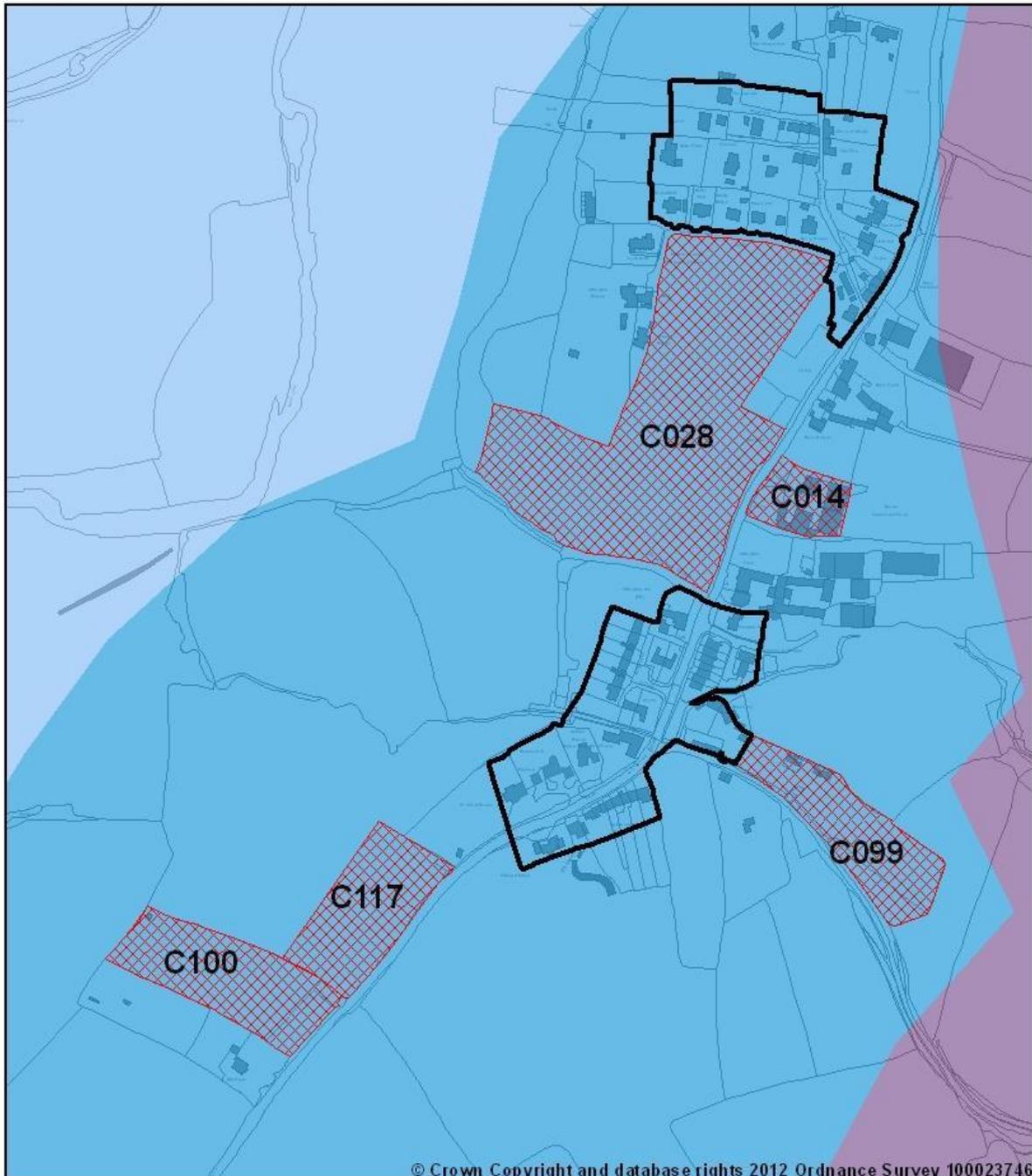
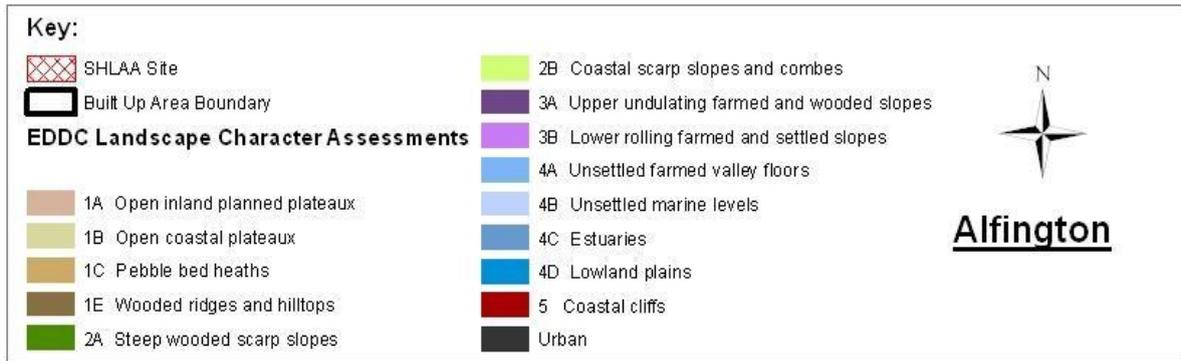
Key:	DCC Public Rights of Way	
<ul style="list-style-type: none">  Special Areas of Conservation  Special Protection Area  Sites of Special Scientific Interest  National Nature Reserves  Ramsar Sites  English_Nat_Ancient_Woodlands_EDDC  Floodzone 2 1 in 1000 chance of flooding  Floodzone 3 - 1 in 100 chance of river flooding  Recreation Areas, Allotments, Accessible Open Space  Areas of Outstanding Natural Beauty  Proposed Coastal Preservation Area  SHLAA Site  Built Up Area Boundary 	<ul style="list-style-type: none">  Bridleway  Byway  Footpath 	
	Listed Buildings	<p style="text-align: center;">Alfington</p>
	GRADE <ul style="list-style-type: none">  I  II  II*  No grade listed  DL  Scheduled Ancient Monument 	



...

Map showing DCC LCAs

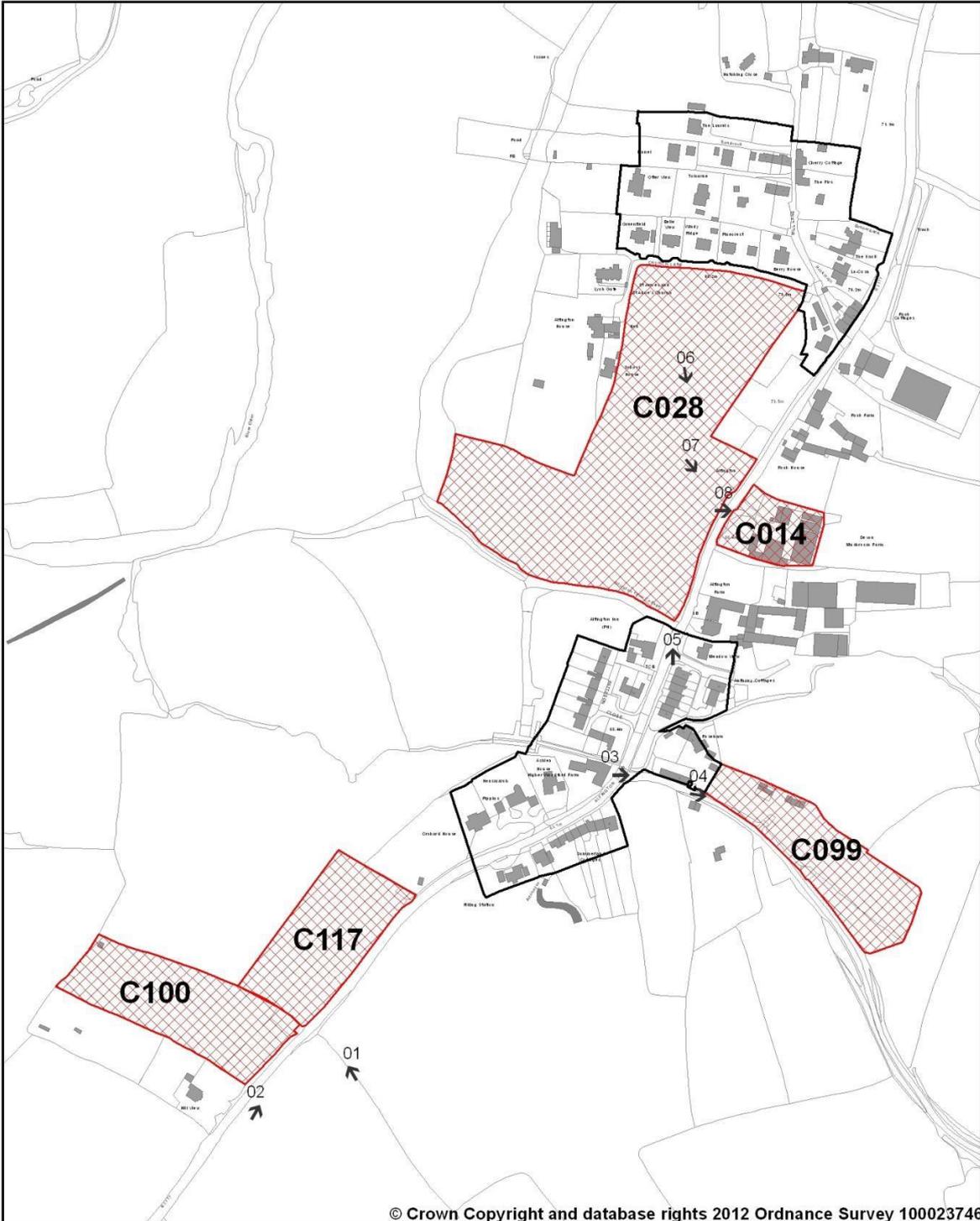
Map showing EDDC LCAs



Aerial photograph showing Site locations



Map showing photo points



Alfington Individual Site Assessments

Site name and location: **C100 and C1117**

Date and time of assessment: **afternoon – 12 February 2013**

Surveyor: **MD**

Weather: **Hazy / Overcast**



Looking north east across the eastern edge of Site C117

This view point is looking in a north easterly direction past Site C117 (on the left hand side) towards the village of Alfington. The northern edge of site C117 coincides roughly with the telegraph pole sitting centre right in the photograph. The site frontage abuts the road (left hand side of photograph).



Site Assessment - Site C100

Criteria	Lower sensitivity	↔	Higher sensitivity
Special qualities/significance of designated landscapes		L-M	
	Site C100 does not fall in a specifically protected landscape and is not close to any features of built heritage importance. The site does not fall in the nearby visual alignment of any historic features or assets of visual prominence or importance. The site is formed by small-scale enclosed pastoral field edged by hedgebanks.		
Skylines and landform			M-H
	The site occupies a slightly elevated location, for the most part sloping gently in a westerly direction. The site forms part of a largely uninterrupted unsettled skyline area that in views to the west has flatter profiles and to the east is seen against a rising/undulating hillside. Trees and a house to the south-west of the site break up views to a small extent though the flatness and openness of immediate surrounds provide for a number of longer distance views.		
Sense of openness and enclosure			MH
	Partially enclosed small scale field with managed hedges and some timber fencing. A small number of mature trees are located in the hedge bank and overall the site has an open feel. This in part reflects the separation of the site from the village.		
Landscape pattern and complexity			M-H
	Pasture field currently used for grazing that is Gently sloping towards the River Otter. Hedges forming field boundary are maintained and cropped but with a small number of mature trees present. The field is a regular rectangular shape with longer distance northerly and westerly views over open countryside and the River Otter but also with some more easterly views towards and over parts of the village.		
Experiential landscape character		M	
	The site occupies a relatively Tranquil but open landscape that is actively farmed. The relatively busy road to Ottery St Mary fronts onto the site but changes in topography of the site mean that only a smaller southerly part of the site is visually connected to the road. The bulk of the site lies beyond the small elevated ridge that runs parallel to the road some 25 metres into the site. The bulk of the site has an open aspect that is some way from the built form of the village.		
Relationship to existing settlement edge and cultural pattern		L-M	
	The nearest village houses, that in themselves form a linear roadside pattern of development, are located some 200 meters from the eastern edge of the site. Development of this site would be relatively remote from the built form of the village and would lead to an outlying area of development in a visual open location.		
Visual sensitivities and intervisibility		M	
	The site lies in open landscape setting though there are few obvious close-by public viewpoints. Glimpses of the site can be gained from elevated parts of Alington village and from more distance viewpoints to the north and south.		
Overall landscape sensitivity to residential development			M-H
	The location of the site, in a lowland plain area, but in a slightly elevated position and in an open setting away from the existing built form of Alington means that it is of some sensitivity which development could easily compromise.		

Landscape Guidance	Any development at this site would need to be accompanied by very careful landscaping treatment, and development design would need to be carefully handled to avoid adverse impacts. Extensive screening and planting, as a minimum, would likely to be essential.
Site ranking (including consideration of most/least sensitive areas if the villages is to be taken forward)	The site is considered to be of sensitivity to development being in a relatively elevated position in an open landscape setting that is relatively remote from the village of Alfington. In landscape terms the site would feature low-down in a hierarchy of potential site choices.

Site Assessment - Site C117

Criteria	Lower sensitivity	↔	Higher sensitivity
Special qualities/significance of designated landscapes	L-M		
	Site C117 does not fall in a specifically protected landscape and is not especially close to any features of built heritage importance. The site does not fall in the nearby visual alignment of any historic features or assets of visual prominence or importance. The site is formed by a road frontage strip of a visually open field on the southerly side of Alfington.		
Skylines and landform			M-H
	The site occupies a slightly elevated position on gently upward sloping land rising away from the village. The site forms part of a largely uninterrupted unsettled skyline area that in views to the west has flatter profiles and to the east is seen against rising/undulating hillside. There are limited features at or near to the site to break up open views and the open nature of the site in its wider setting ensures an openness of character.		
Sense of openness and enclosure			MH
	The roadside hedge, with some open patches, forming the southerly boundary of the site is the only feature creating any real sense of enclosure. This hedge bank is, however low and the absence of any boundary feature at the northern edge of the site ensures that the site is very open in character. There are a small group of trees at/to the northern site boundary but other than these there is very little sense of enclosure at or around the site.		
Landscape pattern and complexity			M-H
	Open Pasture field currently used for grazing the frontage of which, for some of its length, slopes towards the main road through the village. The frontage of the field, forming the site, is a regular rectangular shape with longer distance easterly and westerly views.		
Experiential landscape character		M	
	The site occupies a relatively Tranquil but open landscape that is actively farmed. The relatively busy road to Ottery St Mary forms the road fronts onto the site and it constitutes a site dominant feature with adverse, albeit localised impacts. The site has an open aspect that is set away from the built form of the village.		
Relationship to	L-M		

existing settlement edge and cultural pattern	The southerly edge of Alfington is formed by a linear roadside pattern of development. This site is to the south of and does not immediately abut the built form of the village. Development of this site would extend the linear character of village in a visual open location.			
Visual sensitivities and intervisibility			M	
Overall landscape sensitivity to residential development			M-H	
Landscape Guidance	<p>The location of the site, in a lowland plain area, but in a slightly elevated position and in an open setting beyond the southern existing built form of Alfington means that it is of some sensitivity which development could easily compromise.</p> <p>Any development at this site would need to be accompanied by very careful landscaping treatment, and development design would need to be carefully handled to avoid adverse impacts. Extensive screening and planting, as a minimum, would likely to be essential.</p>			
Site ranking (including consideration of most/least sensitive areas if the villages is to be taken forward)	<p>The site is considered to be of sensitivity to development being in a relatively elevated position in an open landscape setting that is relatively remote from the village of Alfington. In landscape terms the site would feature low-down in a hierarchy of potential site choices.</p>			

Site name and location: **C099**

Date and time of assessment: **afternoon – 12 February 2013**

Surveyor: **MD**

Weather: **Hazy / Overcast**

	
<p>View taken in an easterly Direction Towards the Site</p> <p>The site lies directly beyond the single story stone and brick building in the centre/left ground of the picture</p>	<p>View of Easterly Hedgerow Boundary of the Site</p> <p>The site lies to the left (north) of the mature hedgerow on the left of the lane.</p>

Site Assessment - Site C099

Criteria	Lower sensitivity ↔ Higher sensitivity				
Special		L-M			

qualities/significance of designated landscapes	Site C099 does not fall in a specifically protected landscape and is not especially close to any features of built heritage importance. The site does not fall in the nearby visual alignment of any historic features or assets of visual prominence or importance. The site is fronted by a country land formed by a small field on the southerly side of Alfington.			
Skylines and landform			M	
	The site occupies a slightly elevated position on gently upward westerly sloping land rising away from the village. The gentle pattern of the regular upward sloping land beyond the site means that although development would be visible (form a number of points) it would typically not stand on or above any skylines and as such could be expected to be reasonably contained. There are a number of mature trees and blocks of trees at or close to the site that help break up views.			
Sense of openness and enclosure			MH	
	The site has a strong sense of enclosure that is accounted for by the mature hedgerows that form strong boundary features. Although the lane runs along the southern side of the site, and is the area with public access that is closest to the site, there are limited views into the site on account of the height and density of the hedgerow boundary.			
Landscape pattern and complexity			M-H	
	The field that forms the site is used/appeared to be used for keeping horses. The strong planting around the site ensures that the site, especially In the context of land to the west, has an intimate feel. The site itself, although reasonably regular albeit of an elongated rectangular shape, falls within an area of intimate and irregular shaped small fields, some form orchards, that have strong boundary planting and some mature trees.			
Experiential landscape character			M-H	
	The site occupies a tranquil position on the south eastern edges of the built form of the village. Although quite close to the main village road the site has an enclosed quiet rural feel. The fact that the site extends, in a linear fashion, some way into the surrounding open areas and fields emphasises the rural nature and feeling of the site.			
Relationship to existing settlement edge and cultural pattern			M	
	The south-eastern built edges of Alfington are close to the site. However development of the site could result in a linear shaped area of development extending someway into what is open, although reasonably visually enclosed, countryside			
Visual sensitivities and intervisibility			M-H	
	The intimate nature of the site, in its setting and surroundings, ensures that it in a visually sensitive. Whilst screening as a result of planting, in places dense, ensures some limitations of views of the site this planting also contributes greatly to its intimacy.			
Overall landscape sensitivity to residential development			M-H	
	The location of the site, in a lowland plain area, but in a rising position in an intimate landscape setting means that it would be sensitive to development.			
Landscape Guidance	The existing screening to the site would need to help inform any development and landscaping would need to reinforce and preserve the enclosed site character and surroundings.			
Site ranking (including consideration of most/least sensitive areas if the villages	The site is considered to be sensitive to development on account of the intimate character of its landscape setting and although mature planting			

is to be taken forward)

could be reasonably expected to break-up some views of the site and any development on it the site is on rising ground and parts of it are, therefore, elevated from lower lying parts of the village.

Site name and location: **Site Number – C28**

Date and time of assessment: **afternoon – 12 February 2013**

Surveyor: **MD**

Weather: **Hazy / Overcast**



Looking northward into Site C028

This photograph is taken from a central position in the village looking northwards past the former pub (white house on left of picture).



Looking South across the southern part of C028

This photograph was taken from a point inside and roughly

halfway down site C028 on the eastern side. The central point of the photograph is the former pub in the village (the

Criteria	Lower sensitivity	↔	Higher sensitivity
Special qualities/significance of designated landscapes	L-M		
	<p>Site C028 is a substantial open field occupying a central part of the village. At around 3.5 hectares it could have capacity to accommodate 100 plus dwellings, way more than the five allocated in the Local Plan.</p> <p>The field does not fall in a specifically protected landscape and is not especially close to any features of built heritage importance other than</p>		

	a small number of listed buildings close to but beyond the site boundary. The central location of the sites means that parts of it, if not the whole, are visible from a wide ranging number of viewpoints within and beyond the village.			
Skylines and landform			M-H	
	The southerly part of the site (specifically the southern boundary) is low lying sitting on a flat valley floor but the site slopes upwards, in places quite sharply, to a high point for the site, and for the village as a whole, that occupies a northerly position on the site. The northern boundary of the site coincides with a flat elevated ridgeline that is of some prominence in respect of more distant and closer views from the south. To the north of the site and also in part to the west there are lower density residential properties, interspersed with mature trees, that are of some prominence on this skyline.			
Sense of openness and enclosure			MH	
	The size of the site and its openness from views from the south ensures that it has a very open sweeping feel. However, and despite being on/close to the ridgeline area, some more northerly parts of the site are more enclosed in character. Mature planting, and some buildings, especially on the more northerly edges of the site provide some degree of enclosure that to some extent counters the otherwise openness that is a more general characteristic of the site. The southern parts of the site have far less boundary planting and as a consequence of this and also because of the wider sweeping valley floor character they have a more open feel.			
Landscape pattern and complexity			M	
	The open field that comprises the site appeared to be rough grass/grazing use though could also have recently been used for growing crops. The site is irregular in shape and may have been formed from amalgamation of smaller fields in the past. To the north of the site a number of large mid 20 th century properties in substantial gardens dominate however there are some older properties interspersed with these. Remnant tree planting and hedgerows and some smaller nearby fields suggest a former intimate pattern of fields in this area. Fields to south and west of the site, that views open up on to, are typically larger, flatter and more open in character, sweeping views across the site extend for some distance into this open landscape. Visual connections to the east, although in some parts very open, are less pronounced. In part as the main village road forms a significant feature running past the site and also there is development beyond this road. The openness of the site field means that it lacks a specific complexity of character.			
Experiential landscape character			M	
	The site feels very visually open, this is despite development, albeit low density development, bounding it on its northern sides. The site and its setting has a pleasant though not especially distinct feel. However being elevated, rising upward to its northern edge and otherwise being open, it results in an openness to longer distance views, with a wider distinct open, edge of village, countryside feel. The south-easterly parts of the site lie adjacent to the main road running through the village and this road has some noticeable adverse noise and visual impacts (though for some length it falls below the site in a cutting). South westerly parts of the site have a distinctly more open rural feel.			
Relationship to existing settlement edge and cultural pattern			M	
	Alfington abuts the site in a number of areas, especially on the northerly sides and some parts to the east and south. The site, or at least easterly parts of it, are visually well related to the village. The lower density development to the north of the site lacks a historic cultural presence and character (noting one or two buildings of historic importance).			
Visual sensitivities			M-H	

<p>and intervisibility</p>	<p>Because the site is in an open aspect, albeit with some more significant boundary features, it (or at least large parts of it) would be sensitive to development.</p> <p>The site lies in open landscape setting though there are few obvious close by public viewpoints. Glimpses of the site can be gained from parts of Alfington village and from more distance viewpoints.</p>					
<p>Overall landscape sensitivity to residential development</p> <p>Landscape Guidance</p>	<table border="1" data-bbox="501 342 1401 376"> <tr> <td style="background-color: #ffffcc;"></td> <td style="background-color: #ffffcc;"></td> <td style="background-color: #ffff00;"></td> <td style="background-color: #ffa500; text-align: center;">M-H</td> <td style="background-color: #ff0000;"></td> </tr> </table> <p>The open nature of the site is such that it would be sensitive to development which could adversely impact on the landscape. Being so large a site there are, however, parts of the sit that are less sensitive than others. The south westerly parts of the site, for example would be a far more sensitive location, with a far more distinctly open countryside character than some of the more northerly parts of the site (even though northerly parts are more elevated).</p> <p>Any site development would have to be very careful managed given the openness and prominence of large parts of the site. Any Development would need to avoid intruding above skylines but also avoid intruding in to areas that have a distinctly open feel.</p>				M-H	
			M-H			
<p>Site ranking (including consideration of most/least sensitive areas if the villages is to be taken forward)</p>	<p>The site is considered to be of some sensitivity to development being in an open aspect location in the wider countryside. The site or at least parts of it are, however, close to the built form of Alfington. In landscape terms the site is considered to feature in a mid point position in respect of potential site choices.</p>					

Site name and location: **Site Number – C014**

Date and time of assessment: **afternoon – 12 February 2013**

Surveyor: **MD**

Weather: **Hazy / Overcast**



Looking Eastward Into Site C014

This photomontage was taken from inside C028 in an easterly direction looking into the site.



Looking Eastward Into Site C014

This photomontage was taken looking east into the site through the metal gates that occupy a centre left position in the photo above.

Criteria	Lower sensitivity	↔	Higher sensitivity
Special qualities/significance of designated landscapes	L-M		
	<p>Site C014 occupies a central part of the village that has capacity to comfortably accommodate five or more new dwellings. The site comprises of older agricultural sheds and buildings that were understood to be formerly used for mushroom farming.</p> <p>The site does fall in a specifically protected landscape and is not especially close to any features of built heritage importance. The central location of the site means that it is visible from a range of viewpoints within and beyond the village.</p>		
Skylines and landform		M	
	<p>The bulk of the site is flat and elevated above the main road running through the village and the site generally sits on land rising away to the east. Although of some prominence the site does not appear on the skyline, because of rising ground beyond, except in some near-up views, notably at the site entrance.</p>		
Sense of openness and enclosure	M-L		
	<p>Public viewpoints of the site are mostly to the east and although being slightly elevated because of frontage tree cover the site does not have an open and exposed character. There are also loosely grouped buildings to the north and south, also with mature trees, that reinforce the sense of enclosure.</p>		
Landscape pattern and complexity	L-M		
	<p>The site, comprising of hard standing and buildings, does not have a undeveloped landscape character in itself and buildings and gardens/open spaces to the north and south present a semi-developed adjoining land character. In a wider context larger scale farmed open fields lie to the east and west of the site though these are somewhat disconnected form the site.</p>		
Experiential landscape character	L-M		
	<p>The site feels visually quite enclosed and whilst the buildings on the site have a certain rustic and semi-abandoned charm they are old farm buildings sitting on poor quality and in part breaking-up concrete surfaces. The western boundary of the site, the green undeveloped part, abuts the main road through the village with this having a screening role to the site frontage. On higher land away from this frontage the site has a much quieter feel.</p>		
Relationship to existing settlement edge and cultural pattern		M	
	<p>The site occupies a very central part of the village and is well related to the existing built form, albeit surrounding buildings and houses are at lower densities though some buildings are in themselves off some physical mass.</p>		
Visual sensitivities and intervisibility	L-M		
	<p>Despite its slightly elevated position the significant site frontage and boundary planting reduces visual connectivity to surrounding areas.</p>		
Overall landscape sensitivity to residential development	L-M		
	<p>The enclosed nature of the site, the exception being from views from the west, and its existing on-site buildings, means that it and development on it should be less sensitive in terms of adverse impacts than other potential development locations.</p>		
Landscape Guidance	<p>The planted boundaries of the site and especially the planted frontage are key assets that would need</p>		

	<p>to be retained and reinforced through any development. The easterly boundary of the site, in particular, would require specific attention in order to reinforce the current sense of enclosure that forms part of the character if the site.</p>
<p>Site ranking (including consideration of most/least sensitive areas if the villages is to be taken forward)</p>	<p>The site is considered suitable for development ahead of other site options on account the lower visual impacts that development would be likely to cause and also because it does already contain buildings.</p>

Appendix 2: Heritage Impact Review

Heritage Impact Notes - Alfington Mushroom Farm Site

5th January 2017. Prep by DM.

There are six listed buildings in the village of Alfington, all of which are Grade II, including the Church of St James and St Anne. All are located within the village boundary. There is no conservation area in the village.

The Neighbourhood Plan for the parishes of Ottery St Mary and West Hill provides for a single site at Alfington to facilitate development of up to five dwellings, and including the possibility of a Children's playpark, at a location midway between the upper and lower parts of the village. This site was previously used commercially as a Mushroom farm, and consultation exercises undertaken with the local community have shown the site as being preferred for any future small housing development.

Only one listed building has been identified as having the potential to be affected because of its proximity to the allocated site. The remaining five are all at a distance of at least 240m, at locations which in all cases by virtue of topography or existing buildings are not visible from the proposed site.

Alfington Farmhouse is described by Heritage England as Grade II listed, 2 storey, stucco, under a slate roof with wide eaves on shaped brackets and extended at gable with bargeboards. Its a substantial 18th or early 19th century two storey 7 bedroom house. It is located to the south west of the proposed site, and separated from it by a large garden approximately 35 metres wide. The farmhouse is set slightly back from the road, on an alignment such that the north eastern facade, (that facing the proposed site) presents to the proposed site a view of a sizeable gable end plus single storey extension to the east. There are two small windows in this combined elevation. . Beyond this to the east, a cluster of outbuildings in various states of disrepair surround the listed building's old farmyard, and lie generally close to its south east elevation.

These outbuildings have been the subject of two failed planning applications in the past. Reference numbers: 07/2824/FUL (for nine dwellings) Validated 10th January 2008, and 08/1091/FUL (for four dwellings) Validated 21st April 2008.

The boundary between the sites comprises a line of semi-mature trees and deep vegetation, which on looking south west from the proposed site provides an effective screen to the secluded garden and listed building gable-end and single storey extension beyond.

Initial assessment is that any housing constructed on the proposed site will have minimal or minor impact on the listed building. Indeed the probability is of rather less impact than the situation pertaining today, because of the uncompromising nature of the assortment of steel, timber and possibly asbestos style buildings still standing on the site but derelict since 1998. Views to and from the site towards the listed building are largely blocked by the boundary screen of quite deep vegetation, which has grown considerably in the years since commercial operations ceased. Taken together the site has little or no material impact on the setting of the only nearby heritage asset.

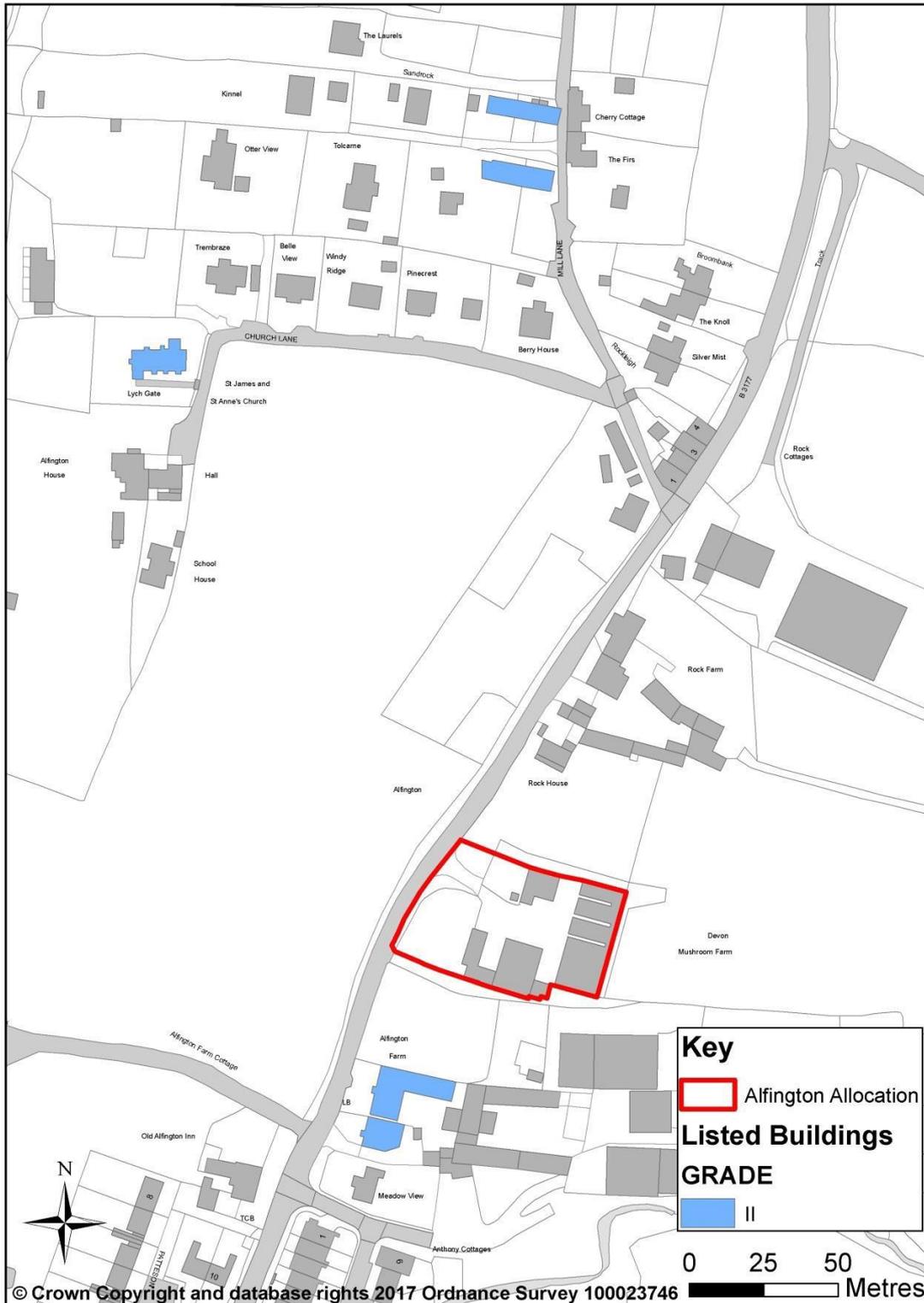
(ends)

Map showing the relative location of the proposed site - indicated by buildings at top (approx North) of plan, and Alfington Farmhouse (buildings immediately below, and barns and other agricultural buildings generally to the right of the annotation 'Alfington Farmhouse.'

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Map showing the allocation site and its proximity to nearby listed buildings.



Map showing an aerial photograph view of the proposed site and surroundings.



View north-east towards the site from outside the listed building.



Appendix 3: consultee responses

Timothy Spurway

From: Stuart, David <David.Stuart@HistoricEngland.org.uk>
Sent: 04 May 2017 14:45
To: Timothy Spurway
Subject: RE: Ottery St Mary and West Hill SEA/HRA screening consultation - UNCLASSIFIED:
Follow Up Flag: Follow up
Flag Status: Flagged

Dear Tim

Thank you for your consultation on the SEA Screening for the Ottery St Mary and West Hill Neighbourhood Plan. Our apologies for not responding before now.

I can confirm that we have no objection to the conclusion that an SEA will not be required for this Plan.

In coming to this position it was useful to have access to the draft Plan. I note that it is badged as a Consultation Draft though we have not received a copy separately from the community. Do you know if there has been a recent, perhaps Reg 14, consultation exercise? Having engaged with the community in its preparation stages I am perhaps a little surprised that they haven't sent us a copy.

I also note that the Plan website states that it has been formally submitted to EDDC so is that a Reg 16 consultation and is that the version you sent to us? Is your consultation also then a consultation on the Plan as well as the SEA Screening or will we receive a subsequent Reg 16 consultation subsequently – from 19th May for 6 weeks as per what the website says?

With this uncertainty it makes sense to provide a response on the Plan in the form received.

Generally there is little which we would wish to comment on and our observations can therefore be summarised as follows:

1. The Plan is comprehensive and impressive in its objective of reinforcing distinctive local character. The focus of our attention is on Ottery itself and while the Conservation Area is no longer on the national Heritage At Risk Register there remain issues associated with its wellbeing which we are pleased to see covered in the Plan. It is pleasing too to note the community's intention to create action groups for tackling them.
2. As the Conservation Area is no longer on the national Heritage At Risk Register (pp17 & 71) such referencing needs to be updated and text could perhaps refer to being on the Register until recently but that many of the (negative) issues responsible for that status remain in need of attention. I should highlight too that while the Area was on the Historic England Register it was EDDC's survey that originally determined it as At Risk, and then

when it wasn't.

3. Chapter 9 on the town centre covers the main issues which remain but excludes a policy on traffic management – a key factor in creating a sustainable and viable future for the town centre. The need to address this issue has been extensively highlighted in the Plan's Objectives (p23) and in Appendix 4 on Road Network Issues Plans/Proposals but this doesn't appear to have been carried through to policy in the same way as parking and public realm enhancement have been. There is a risk that such omission will be seen as a downplaying or suggesting a lack of priority for this issue, perhaps by those who will need to be major stakeholders in tackling it.

Whatever the difficulties in effecting a solution to the problem of traffic in the town centre it is important to highlight its resolution as part of an integrated approach along with those other policy areas identified. It is therefore desirable and consistent to afford it the same status in the Plan.

4. Mushroom Farm site, Alfington (Policy NP27). We note that this is a previously developed site and that redevelopment can take place without harming the setting of designated heritage assets. However, such a conclusion derives from screening provided by the heavily vegetated nature of the southern boundary of the site and the land between it and the Grade II Listed Alfington Farmhouse. While we therefore have no objection in principle to this allocation it is important to highlight the need to prevent harm to the setting of the Farmhouse, perhaps by retaining or consolidating significant aspects of the existing landscape/vegetative character, and we would recommend that this be included as a criterion in the wording of the policy itself.

Please forward comments to the
community as appropriate. Kind regards

David

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Date: 04 May 2017
Our ref: 210946



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BY EMAIL ONLY

Dear Mr Spurway,

Planning consultation: Ottery St Mary and West Hill SEA/HRA screening consultation

Location: The Parishes of Ottery St Mary and West Hill in East Devon.

Thank you for your consultation on the SEA and HRA Screening of the above Neighbourhood Plan (NP), which was received by Natural England on 15 March 2017.

TOWN AND COUNTRY PLANNING, ENGLAND – THE NEIGHBOURHOOD PLANNING (GENERAL) REGULATIONS 2012

Comments on the draft Neighbourhood Plan:

We are pleased to see that the richness of the local environment is highlighted in the description of the parishes and we appreciate the hard work that has gone into the development of the draft NP.

Chapter 2 notes that part of the village of Tipton St John is within the East Devon Area of Outstanding Natural Beauty (AONB). It should also be made clear that the AONB covers an area along most of the eastern and south-eastern boundary of the parishes.

Policy NP8: Protection of Local Wildlife Sites and Features of Ecological Value

We are pleased to see the inclusion of this policy. However, we suggest its focus on the protection of County Wildlife Sites and Unconfirmed Wildlife Sites could be broadened to include the small part of the East Devon Pebblebed Heaths SSSI (also designated as the East Devon Pebblebed Heaths SAC and East Devon Heaths SPA) in the south western corner of the NP area (although the sites mostly fall outside of the NP area, housing developments within the parishes fall within the 'zone of influence' as set out in the Local Plan and the South East Devon European Sites Mitigation Strategy (SEDEMS)) and the numerous areas of Priority Habitats spread across the parishes, including traditional orchards, coastal floodplain and grazing marsh as well as ancient woodland and replanted ancient woodland sites. Priority Habitats are highlighted in the UK Biodiversity Action Plan (UK BAP) - [click here](#) for more information.

Green Infrastructure (GI)

We are pleased to see that the plan seeks to protect local green spaces and that it recognises the benefits of good networks of walking and cycling routes as part of the local GI network.

We suggest that stronger links are made between the protection of green spaces and biodiversity with encouraging and enabling healthier lifestyles. We suggest that these interrelated and multifunctional benefits of green space and biodiversity could be pulled together more coherently through a policy on Green Infrastructure.

In addition the benefits outlined above, multi-functional green infrastructure can perform a range of functions including improved flood risk management, climate change adaptation and biodiversity enhancement. Resilience to a changing climate is helped by looking at the GI assets across an area and making linkages between them. Evidence and advice on green infrastructure, including the economic benefits of GI can be found on the [Gov.uk Natural Environment web pages](#).

Housing

We note that the plan allocates one site for the development of five houses at Alfington (Policy NP 27). This site looks to be well related to the village and is not within a designated site or protected landscape.

We suggest that the text on page 51 concerning new housing needs to more clearly state that they are not allocations in the NP.

We recommend changing the wording regarding in Policy NP12 regarding suitable site locations to 'within or well related to named settlement and not constituting isolated or sporadic development'.

Appendices

The maps contained in Appendix 1 are not clear or very useful without a map key.

A map of the County and Undesignated Wildlife Sites would be useful but is currently unpopulated (Appendix 3). It may also be useful to map green spaces and other areas of biodiversity interest here, such as areas of Priority Habitat. This could be used to highlight areas where the strategic green infrastructure network could improve linkages between sites in order to facilitate sustainable transport links (walking and cycling) and wildlife corridors. This in turn would improve the areas' biodiversity and landscape resilience in the face of the increasing challenges posed by climate change.

SEA and HRA Screening

Natural England agrees with the conclusion of the SEA screening report that a Strategic Environmental Assessment would not be required. We consider that, based on the material supplied with the consultation, in so far as our strategic environmental interests are concerned, significant environmental effects resulting from the neighbourhood plan are unlikely.

We also agree with the report's conclusions that the Neighbourhood Plan would not be likely to result in a significant effect on any European site either alone or in combination and therefore no further assessment work under the Habitats Regulations would be required.

These screening opinions are given based on the provided material. If the plan were to change

significantly (e.g. especially if it introduced site allocations) then a screening update may be needed.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Darren Horn. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

Darren Horn
Lead Adviser – Exe, East Devon and Exmoor
Team darren.horn@naturalengland.org.uk