

Appendix L – Statutory Consultees - Regulation 14 consultation

Letter to consultees



OTTERY ST MARY TOWN COUNCIL

Council Offices, The Old Convent,
8 Broad Street, Ottery St Mary,
Devon EX11 1BZ
Telephone: 01404 812252
Mrs Chris McIntyre Town Clerk

17th May 2017

Dear Sir/Madam

Parishes of Ottery St Mary and West Hill Neighbourhood Plan Pre-Submission Consultation Draft – Regulation 14 of the Neighbourhood Planning (General) Regulations 2012

Ottery St Mary Town Council, West Hill Parish Council and the Neighbourhood Plan Working Group have prepared the Neighbourhood Plan for the parishes of Ottery St Mary and West Hill, in close consultation and engagement with the local community.

The Plan has now reached the stage where formal 'Regulation 14' consultation is being undertaken with a wide range of statutory authorities, as well as further consultation with the public and local community.

A copy of the Draft Plan is on the website www.otterystmary-tc.gov.uk under the Neighbourhood Plan tab.

Alternatively, copies of the Draft Plan can be viewed throughout the Consultation period at:

- Ottery St Mary Town Council Offices by appointment (01404 812252) or email admin@otterystmary-tc.gov.uk
- West Hill Village Hall in reception, or by contacting Margaret Hall (01404 813470) or Jo Talbot (01404 814232) or email westhillpc@yahoo.com
- Tipton St John by contacting Geoff Pratt (01404 814106) or email gs.pratt@btinternet.com
- Wiggaton by contacting Geoff Pratt as above
- Alington Stores & Service Station during normal opening hours

The pre-submission consultation period runs for 6 weeks starting on Friday 19th May. We would therefore be pleased to receive your comments by Friday 30th June 2017. A proforma response form is attached.

Representations can either be sent by email to: np@otterystmary-tc.gov.uk or by mail to:
Ottery St Mary Town Council,
Council Offices, The Old Convent, 8 Broad Street,
Ottery St Mary EX11 1BZ

Yours faithfully



**Mrs Christine McIntyre
Town Clerk**

On behalf of Jo Talbot
Chair, Neighbourhood Plan Working Group

Statutory consultees

The following organisations were consulted:

National Grid	British Telecom	Canal & River Trust
Civil Aviation Authority Directorate of Airspace Policy	Civil Aviation Authority Safety Regulation Group	Devon and Somerset Fire and Rescue Service
Devon and Cornwall Police	Devon County Council Various departments	Devon Disability Network
Devon Health and Wellbeing Board	East Devon AONB Partnership	East Devon District Council Various departments
East Devon Ramblers Association	Historic England South West Region (Bristol)	Environment Agency
Exeter and Devon Airport Ltd	Exeter City Council	Forestry Commission
Fulfords (A Wilson, Exeter)	Heart of the South West Local Enterprise Partnership	Highways England
Home Builders Federation	Homes and Communities Agency	Marine Management Organisation
Mid Devon District Council	National Farmers Union	National Housing Federation
National Trust -Devon and Cornwall Regional Office	Natural England	NHS East Devon Clinical Commissioning Group
RSPB South West Regional Office	The Planning Inspectorate	South West Water
Western Power Distribution (South West) plc	Woodland Trust	Aylesbeare Parish Council
Rockbeare Parish Council	Whimble Parish Council	Talaton Parish Council
Feniton Parish Council	Gittisham Parish Council	Sidmouth Town Council
Newton Poppleford & Harpford Parish Council	Ottery Help Scheme	Hospiscare
Bovis Homes South West	Redrow Homes South West	David Wilson Homes Exeter
Blue Cedar Homes	Persimmon Homes South West	McCarthy & Stone
Bell Cornwell (Stuart & Partners)	Lord Coleridge	Martin Nancekivell
Acorn Property Group	Devon & Cornwall Housing Association	Sanctuary Housing
Devon Communities Together	Country Land & Business Association – South West	Devon Federation of WI's

Statutory Consultee responses

Ref	Consultee	Received	Comment (summary)	Action
S1	DCC Planning Transportation & Environment	17/5/17	Acknowledgement	
S2	Historic England David Stuart	30/6/17	<ol style="list-style-type: none"> 1. We are happy to reiterate how impressed we are with the Plan, especially in its objective of reinforcing distinctive local character. 2. As the Conservation Area is no longer on the national Heritage At Risk Register 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. The issue of traffic dominance and the need for and improved and effective management regime remains. This objective is now set out on p21. Policies NP23 & 24 appear to cover the matter in broad terms but we still wonder whether this would benefit from being more forcefully presented as a policy ambition or aspiration. 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 be 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. 	<p>Noted</p> <p>Amend 3.10 & 9.4</p> <p>Project 11 amended to cover these concerns</p> <p>Add criterion as suggested</p>
S3	Natural England	6/7/17	<p>We are pleased to note that our comments on the Neighbourhood Plan have been taken into account (Refer to Appendix 1 of this letter)[NE response to SEA/HRA screening opinion]. The below comment is a clarification to that previously made.</p> <p>Chapter 2.2 notes that part of the plan area is within the East Devon AONB. The third sentence might read better thus: Part of the Neighbourhood Plan area along the eastern and</p>	Amend text of 2.2 as suggested

			<p>southern boundary including part of village of Tipton St John, lies within the East Devon Area of Outstanding Natural Beauty (AONB).</p> <p>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.</p>	
S4	CAA	17/5/17	Acknowledgement	
S5	Highways England South West Operations Division Gaynor Gallacher	18/5/17	<p>Thank you for providing Highways England with the opportunity to comment on the pre-submission draft of the Neighbourhood Plan for the Parishes of Ottery St Mary and West Hill. Highways England is responsible for operating, maintaining and improving the strategic road network (SRN) which in this instance consists of the A30 which passes through the north of the plan area.</p> <p>We are satisfied that the proposed plan policies are unlikely to result in development which will impact significantly on the SRN and we therefore have no specific comments to make on your draft. We have however noted policy NP19 in relation to development at Finnimore Industrial Estate (allocated for employment use in the Local Plan), and related comments within Appendix 4, which looks to encourage HGV routing via the A30 Daisymount junction in preference to increasing HGV traffic on the narrow local road network, particularly through Alfington and on the Sidmouth Road. We would therefore welcome engagement in any discussions you have with Devon County Council as the local highway authority on this issue, but would in any event expect employment development coming forward at this location to be supported by an assessment of traffic impact, to include the SRN junction as appropriate.</p> <p>These comments do not prejudice any future responses Highways England may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the appropriate policy at the time</p>	Noted
S6	Devon Countryside Access Forum	1/6/17	Position statement	Noted
S7	Stuart Partners Ltd via agent	20/6/17	<ol style="list-style-type: none"> 1. It is clear from paragraph 3.32 that affordability in the parishes is an issue, with average house prices being quite a bit higher than the average for Devon. Census data suggests that there is a lack of smaller homes in the parishes. Real concern has been noted from local people, including school children, that they will be forced to leave the area that they have grown up in due to the lack of housing opportunities. For this reason, our client is supportive of Neighbourhood Plan Objective 7 – to <i>‘support the housing needs of the current and future community of the Parishes to meet the needs of the population</i> 	Noted

		<p><i>at all stages of life, whilst balancing pressure for development which could detrimentally impact on the valued character of the Parishes.'</i></p> <p>2. Support must be given for small-scale affordable and smaller homes in sustainable locations that are well-related to the services and facilities on offer in West Hill. The Neighbourhood Plan should provide the opportunity for sensible, sustainable development to come forward on infill sites, which would prevent the need for spread into areas that genuinely are open countryside.</p> <p>3. Our client objects to draft policy NP1 as currently worded. The policy is too restrictive and it is not clear what constitutes exceptional circumstances. In light of the circumstances set out in paragraph 3.32 of the draft Neighbourhood Plan and in order to meet Neighbourhood Plan Objective 7, both of which are summarised above, Policy NP1 needs more flexibility to allow for some carefully considered development in locations abutting or very well related to forthcoming built-up area boundaries and on obvious residential infill sites and Policy NP1 must be explicit on this. Otherwise there is a real risk that the Plan will not be able to meet its key objectives and local people could be forced to leave the area i.e. the policy doesn't reflect the evidence on which it is based. Neighbourhood plan policy must support the development of new homes on sustainable sites abutting or very well related to forthcoming built-up area boundaries and on obvious residential infill sites to ensure that development that is needed can be delivered and important settlements such as West Hill continue to thrive and retain their role of supporting both the larger and smaller surrounding settlements.</p> <p>4. Our client is generally supportive of draft Policy NP3 and the list of criteria. However, the approach is fundamentally flawed in that, as drafted, according to paragraph 6.13, Policy NP3 should be applied specifically to development within the BUABs of Ottery St Mary and West Hill and to rural exceptions sites. This requirement should be deleted from paragraph 6.13 to provide the flexibility needed to support sensible, carefully considered sustainable development that is well-related in scale and design to the local area, on obvious residential infill sites that abut or are very well related to built-up area boundaries. Otherwise there is a real risk that development that is needed, especially for smaller homes and more affordable homes, will not be able to be delivered.</p>	<p>Policy NP3 covers infill sites. Development in within West Hill is supported within the BUAB, or mixed affordable/market schemes compliant with EDLP Strategy 35</p> <p>NP1 mirrors EDLP Strategy 7 and is consistent with it.</p> <p>Disagree. The BUAB has been determined on the basis of sustainability. The policy should apply to BUABs of Ottery St Mary and West Hill and rural exception sites.</p>
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S8	Draycott Estates	22/6/17	<p>Multiple documents submitted in support of development at Great Well Farm. Summary of points raised in letter:</p> <p>1. Broadly support the vision set out in the emerging Neighbourhood Plan in terms of encompassing the principle of sustainable development. Consider that the Plan needs to be more flexible in the wording of its Policies to allow for a sustainable level of open market and affordable housing delivery, allowing suitable sites to be considered.</p>	Noted

			<p>2. Promotes land west of Great Well Farm as suitable for housing (130 dwellings). Neighbourhood Plan could be more flexible in its approach to further housing at Ottery St Mary, given the reliance of both the East Devon Local Plan and the Greater Exeter Strategic Plan on a relatively large number of small sites. Well recognised affordability gap in East Devon. The site would provide affordable housing to address the clearly identified need. The site at Great Well Farm could potentially deliver just over 30 affordable homes, subject to viability.</p> <p>3. Support the overall vision of the Plan and the principle of sustainable development set out in Para 4.1. Provision for additional flexibility around housing development is required, particularly given Ottery St Mary’s excellent sustainability credentials.</p> <p>4. Vision Statement: Wording set out in the draft Neighbourhood Plan Vision Statement is too rigid and inflexible particularly with respect to land adjoining the edge of the town.</p> <p>5. Policy NP1: Whilst the EDLP does not specifically allocate any further new housing to Ottery St Mary at this point in time, we are concerned that both the East Devon Local Plan and the emerging Greater Exeter Strategic Plan place too much emphasis on a small number of large sites dominated by a small number of volume house builders reliant on traditional labour intensive construction methods. Recent <i>Housing White Paper</i> addresses affordability gap and delivery of affordable homes and promotes a step change in housing. Likely that increase in need over the Plan period will be identified and will need to be reflected in GESp.</p> <p>6. Policy NP2: Support</p> <p>7. Policy NP4: Consider that this approach is inflexible. One of the key aims of the Neighbourhood Plan is to guard against the negative impacts of speculative development but for the reasons set out above, the draft Plan’s current approach to potential housing land outside of the current settlement boundary could result, at least in the medium term in unplanned speculative growth rather than making provision for sensitively designed planned growth in a sustainable location.</p>	<p>Additional large allocations around Ottery St Mary not supported by residents.</p> <p>This site would be an exception site, where 50% affordable homes would be expected.</p> <p>Noted</p> <p>Noted</p> <p>GESp will cover housing need until 2040-45 and is outside the scope of this Neighbourhood Plan, which is in conformity with EDLP, until 2031.</p> <p>Noted</p> <p>Noted. Site promoted by consultee is not in area covered by Policy NP4.</p>
S9	East Devon District Council	26/6/17	Policy NP1 – The policy mentions new buildings but is silent on changes of use and conversion of buildings. Is this an oversight? The use of ‘exceptional circumstances in the	NP1 wording amended to remove word “new”, so will apply

	Neighbourhood Planning Team	<p>policy was queried by a colleague, but I think this is explained in the supporting text and can remain in the policy.</p> <p>Policy NP2 – You might want to clarify the meaning of ‘an overall positive contribution to the Neighbourhood Plan Area’ as it would be difficult to assess in determining a planning application. The use of the word ‘expected’ is too vague- “are” would be better.</p> <p>Policy NP3 – We wouldn’t normally mix criteria which state development will only be permitted under certain criteria with criteria that then mention why proposals will be resisted. It might be clearer to reorder the policy so that the permissive criteria come first with the reasons why an application would be refused set out at the end. Re. point 1- ‘It’ would be better as ‘development’</p> <p>Policy NP4 – The NP boundaries tally with our LP boundaries- it is worth stating this in the supporting justification. A colleague read ‘proposals for development within this area.’ as meaning within the BUAB (wheras I think you mean outside the BUAB in the areas referred to in the previous para.) You might want to clarify this.</p> <p>Policy NP5 – You could clarify ‘ancillary to their existing use’ by stating ‘...existing recreation or amenity use...’. I did wonder what the ‘very special circumstances’ might be, but I think you’ve clarified this in the supporting text.</p> <p>Policy NP7 – ‘will usually be supported’ or ‘subject to other considerations’ might be better as the policy doesn’t take account of matters such as design or impact on amenity so you might not wish to support them in all circumstances.</p> <p>Policy NP8 – Is any further work planned in respect of unconfirmed wildlife sites to determine whether they are actually of wildlife importance? I fully support the principle of protecting wildlife site and encouraging biodiversity but am uncomfortable with requiring a developer to carry out detailed survey work as a result of speculation that a site may be significant. I think the term ‘unconfirmed wildlife sites’ increases the likelihood of a developer challenging the requirement.</p>	<p>to all development including change of use & conversions. “Exceptional circumstances” are described in supporting text, and also is term used in EDLP Strategy 7</p> <p>NP2 amended as suggested.</p> <p>NP3 amended to separate positive and restrictive conditions.</p> <p>NP4 amended to clarify it refers to development outside the BUABs. Supporting text also amended.</p> <p>NP5 amended as suggested.</p> <p>NP7 amended as suggested.</p> <p>NP Working group does not propose any additional work on Unconfirmed Wildlife Sites.</p>
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S10	Devon County Council via agent	28/6/17	<p>Devon County Council own land that forms part of the County Farm Estate, at Thorne Farm, Exeter Road, Ottery St Mary. The land is let inconjunction with another County Farm Estate holding and extends to approximately 10.33 ha (25.41 acres).</p> <p>Part of this land, approx 3.27 ha (8.08 acres), has been allocated within the adopted New East Devon Local Plan 2013-2031 (adopted 28 January 2016)</p> <p>for community/educational use and Strategy 24 - Development at Ottery St Mary, makes specific reference to the need for additional primary school provision in the area. An area of approximately 0.29ha (0.73 acres) of the allocated land is currently leased to the Ottery St Mary Town Council for use as a skateboard and BMX park.</p> <p>A copy of the New East Devon Local Plan Urban Inset Map for Ottery St Mary is attached for ease of reference. This shows the current allocation of 3.27 ha {8.08 acres) of land for community/education use edged blue and stippled</p> <p>Education/Community Use</p> <p>The County Council, as education authority, has recently consulted on the opportunity to provide a new primary school that will replace the existing Tipton St John Primary School and provide additional capacity for the Ottery St Mary area on the County Council's land at Thorne Farm. The proposed primary school will provide 210 places and 26 nursery places in Phase 1 with a further 210 school places planned for Phase 2. A school of this size requires a site of around 1.76 ha (4.35 acres). This, together with the skateboard park, will require just over half of the allocated site within the Local Plan.</p> <p>It is therefore submitted that the land area already allocated for community use in this location within the adopted East Devon Local Plan 2013 -2031 is more than adequate for the future identified need.</p> <p>Reference is made in the draft document to the future expansion of the Kings School. This is an Academy school and is therefore independent from the local LEA control. As such, the school can only be expanded if it wishes to do so and the LEA cannot direct that any further requirement for secondary school places are met by this particular school. It is understood that the school has no plans to increase the Published Admission Number of 180 pupils into Year 7 as stated in the Kings School Admissions Policy 2017 - 2018. The school has also undertaken a new classroom</p>	<p>The area safeguarded (not allocated) in the East Devon Local Plan was to provide for some future possible expansion by The King's School. Now part of this area is to be used for the new Primary School. Therefore it is considered reasonable to extend the safe-guarded area as stated in NP25 and shown on the proposals map.</p> <p>A letter from The King's School has been received indicating support for safeguarding the land for their possible future use.</p> <p>The area of land to be safeguarded has been reduced to remove the northern part of the site, to overcome DCC's objection.</p>
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S11	Waddeton Park	29/6/17	<p>Comments relate to points of principle only at this stage.</p> <p>Should include sufficient flexibility to respond to rapid change, and therefore should anticipate the likelihood of additional development needs during that Plan Period. The East Devon Local Plan will be reviewed within the NHP Plan Period and as far as we can tell there are no provisions within the Neighbourhood Plan for its review.</p> <p>The East Devon Villages Plan is currently the subject of consultation and objections and has yet to be examined let alone adopted. Until such time as that plan has been through this process and adopted the Neighbourhood Plan cannot proceed with any certainty.</p> <p>The Neighbourhood Plan Area directly abuts the village of Feniton and the relevant policies in relation to housing and housing in the smaller villages should refer to Feniton. There would otherwise be an artificial constraint drawn arising as a result of the accident of an ancient parish boundary falling around the southern part of this village potentially constraining development on what would otherwise be suitable development land. Feniton is a highly sustainable settlement with a rail connection direct to Exeter and to Honiton and London and so will be required to expand in the future, within the NHP period.</p> <p>The Greater Exeter Strategic Plan is also progressing and will identify the need for additional housing land, in particular within the western part of East Devon within the area in part covered by this Neighbourhood Plan Area. Until that process has proceeded once again it would seem that the Neighbourhood Plan could not be found sound.</p> <p>Ottery St Mary is quite rightly identified as one of the highest tier settlements within the East Devon Local Plan and the Neighbourhood Plan should recognise this and recognise its role and function within East Devon and the strong likelihood that further growth will be necessary. The NHP does not do this. Indeed if the local community wished to influence the likely direction of any further growth then surely this would now be the opportunity to consider that?</p>	<p>Noted. Section on Monitoring and Review added.</p> <p>NP will use BUAB for West Hill as in final version of Villages Plan DPD.</p> <p>Proposed BUAB for Feniton in Villages Plan is entirely within Feniton Parish.</p> <p>GESP covers strategic planning until 2040-45, and has only reached Issues and Options Stage. NP is consistent with EDLP.</p> <p>These issues were addressed during consultation for the NP. The Plan reflects the wishes of the local community.</p>
S12	Persimmon	30/6/17	<p>Persimmon Homes fully supports the formulation of a Neighbourhood Plan for Ottery St Mary and West Hill and would welcome further opportunities to engage in the Plan-making process.</p> <p>Greater Exeter Plan</p> <p>East Devon, Exeter, Mid Devon and Teignbridge and Devon County Council are currently in the process of preparing the new Joint Local Plan, The Greater Exeter Plan. A public consultation took place between the 27th February and 10th April 2017, and a draft Greater</p>	Noted

		<p>Exeter Strategic Plan is anticipated to be prepared and publicised in early 2018. It aims to deliver the best possible outcomes for the provision of new homes, jobs and infrastructure.</p> <p>Planning Policy Guidance is clear that whilst a Neighbourhood Plan is not tested against policies in emerging Local Plan, the reasoning and evidence informing the Local Plan process may be relevant. The Greater Exeter Plan is a strategic document that will reflect the direction and pace of development in to the future to 2040. The Neighbourhood Plan should include reference to how the Monitoring and Review process will be carried out to incorporate this. However, there doesn't appear to have been mention of how the Neighbourhood Plan will be reviewed once the Greater Exeter Strategic Local Plan has been adopted. On this basis, it would be appropriate to deliver a forward-thinking neighbourhood plan which plans positively to address the infrastructure, delivery, affordability issues, and to provide suitable housing mix.</p> <p>Environment</p> <p>Policy NP1: Development in the Countryside seeks to restrict development in the countryside in line with national and local planning policy. Paragraph 6.4 goes on to say that the adopted East Devon Neighbourhood Plan does not identify the need to make any strategic or other housing development allocations. However, given the emerging Greater Exeter Plan, we believe there is too much weight placed on the existing plan and not enough on emerging policies. Paragraph 6.4 also goes on to say that there will be no significant developments, within or outside, of the existing settlements needed during the Local Plan Period to 2031. Again this prejudices the outcome of the Greater Exeter Plan process. We feel that it would be appropriate to review this regularly throughout the plan period.</p> <p>Housing requirement</p> <p>Policy NP14: Appropriate Housing Mix seeks to ensure that any applications for residential development that come forward provide an appropriate housing mix to support the existing and future population. The 2011 census data and the Exeter Housing Market Area Strategic Housing Market Assessment (2014) demonstrate that there is an affordability issue within the Neighbourhood Plan Area. East Devon has seen an increase in property prices from £114,793 in 2000, to £249,225 in 2013. The affordability issues and the lack of smaller houses will have an adverse impact on the local population demographic. The younger generation would continue to reduce the working age population in the area by forcing them to live elsewhere, as they will not be able to afford the local housing prices. This is supported by paragraph 3.4 which suggests that the number of working age people between 2001 and</p>	<p>NP cannot be tested against policies in a strategic plan (GESP) that is not yet available even in draft form.</p> <p>Monitor & Review section will be added.</p> <p>Noted – as above</p> <p>Noted</p>
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S13	Blue Cedar Homes via agent	30/6/17	<p>BCH is actively reviewing further schemes across the District and Neighbourhood Plan area, including on land adjoining the (Eastfield) site at West Hill (see plan attached at Appendix 2) and on land adjoining Slade Farm, Ottery St Mary (see plan attached at Appendix 3).</p> <p>Considers that NP does not comply with Basic Conditions:</p> <ul style="list-style-type: none"> • concerns that the Neighbourhood Plan has not been positively prepared and would fail to support the development needs of the area across the plan period. • with regards to the conformity with the Development Plan for the area (the East Devon Local Plan), the draft Neighbourhood Plan places too much weight on the emerging draft East Devon Villages DPD, which has not yet been examined. There are substantial unresolved objections to this document and in accordance with paragraph 216 of the Framework, is only of very limited weight at this stage.... there is a need for a proper criteria-based sustainability appraisal to determine capacity and suitability of settlements for development and that the approach to Built-up Area Boundaries requires significant review. <p>NPPG: Paragraph 21 of the Housing and Economic Development Needs section of National Planning Policy Guidance (NPPG) – <i>“Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely in their own home for as long as possible, or to move to more suitable accommodation if they so wish.”</i> It is requested that the emerging Neighbourhood Plan addresses this issue.</p> <p>Housing White Paper: <i>“Government is introducing a new statutory duty through the Neighbourhood Planning Bill on the Secretary of State to produce guidance for local planning authorities on how their local development documents should meet the housing needs of older and disabled people”</i></p>	<p>Noted</p> <p>Noted</p> <p>NP will use BUAB as determined by the Villages Plan.</p> <p>Addressed in para 7.12-7.15 and Policy NP13</p>

		<p>Specific Comments on the Neighbourhood Plan</p> <p>Both of these settlements (OSM & West Hill) are recognised as offering a range of accessible services and facilities and good public transport links and are therefore sustainable locations for development to meet local needs.</p> <p>The Inspector considered that the EDLP fails to set out a suitable approach to the provision of what is clearly an unmet need for both market and affordable housing. The Neighbourhood Plan as proposed, also fails to do that.</p> <p>It is clear from the text set out in Chapter 7 of the plan that the Neighbourhood Plan does not appear to be based on an objective assessment of the area’s needs. The document ‘plans’ in large part for development which already has the benefit of planning permission. The plan does not allocate, and would serve to prohibit, additional sites from coming forward to meet future housing needs. The NP needs to fully consider the needs of the area, in particular at the settlements of Ottery St Mary and West Hill, to ensure that sufficient provision is made for new dwellings (taking account of any lapses in the number of sites with planning permission that were reported to the Local Plan Inspector) and that those dwellings are provided in a sustainable manner.</p> <p>In relation specifically to the needs of older persons, we support the recognition in the draft NP (at paragraphs 3.4 and 7.12) that the area has a high proportion of older persons and that population projections at the district level (East Devon), as reported in the SHMA (2015) show a projected growth of 38.1% in the 65+ age group across the plan period to 2033. Bearing in mind the Government’s clear support for older persons accommodation as set out earlier, it is critical that housing of the right kind is available to meet the needs of this group. Whilst the plan does acknowledge and support the need for accessible and adaptable homes (see comments below in relation to Draft Policy NP14), clear reference should be made to open market housing specifically designed at over 55s and retirement housing. Such accommodation provides a vital role in meeting the needs of an ageing population.</p> <p>Draft Policy NP4 (Settlement Containment) – This policy is flawed as it is not founded on a criteria-based assessment of land adjoining the existing built up area of the settlements, in accordance with paragraph 113 of the Framework. This policy should therefore be reviewed. It is unclear which plan in the Appendices the policy is referring to as no plan appears to be included which clearly identified the land which is being referred to by policy NP4.</p> <p>Draft Policy NP14 (Accessible and Adaptable Homes) – We are pleased to see that the plan would support development of development of 10 or more dwellings that would deliver</p>	<p>EDLP was found sound.</p> <p>A considerable amount of windfall development has come forward in OSM and West Hill already.</p> <p>Noted</p> <p>Amend Proposals Maps in Appendix 1 to show area covered by NP4</p> <p>Noted</p>
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		<p>more than 20% accessible and adaptable market units. Key to the Blue Cedar concept is to provide homes that are capable of being adapted should resident's needs change and therefore reduce the likelihood of occupiers needing to move when unforeseen circumstances dictate.</p> <p>Draft Policy NP14 (Appropriate Housing Mix) [N.B there are two policies with the same reference number, which should be amended] – We generally support this policy which reflects the need for residential development to be provided which reflects local need, however specific reference should be made in the first paragraph of the policy to older persons, to reflect the comments which are made at paragraph 7.12.</p> <p>The second paragraph should also be amended to reflect the support expressed in Draft Policy N14 (Accessible and Adaptable Homes) for adaptable homes.</p> <p>Suitable Sites for Development Land at Eastfield, West Hill The site is situated towards the north of Eastfield, to the west of the central area of West Hill. The site adjoins existing residential development to the south and east. Part of eastern boundary also adjoins the grounds of West Hill Primary School. The area is characterised by relatively low-density housing within a mature landscaped setting. The site would comprise the logical extension to the existing development to the south (as shown on the plans at Appendices 1 and 2) and could be accessed via this existing development. The site is within flood zone 1 and is not subject to any specific planning policy constraints, including 'footnote 9' policies of the Framework. The site is considered to be suitable for 20-25 dwellings.</p> <p>Land at Slade Farm, Ottery St Mary The site is situated to the south of Slade Road and east of Knightstone Lane, towards the southeast of the town. The site adjoins existing residential development to the northwest and Slade Farm to the south, with agricultural land further south and east of the site. The site benefits from good access to the town centre and suitable vehicle access could be provided from Slade Road, with pedestrian access via Knightstone Lane. The site boundaries are defined by existing trees and hedgerows.</p> <p>The site is within flood zone 1 and is not subject to any specific planning policy constraints, including 'footnote 9' policies of the Framework. The site is considered suitable for 20-40 dwellings.</p> <p>Conclusions</p>	<p>Numbering corrected</p> <p>Previous application for this site was refused, and appeal dismissed, on grounds that it would perform poorly in relation to the objectives of sustainable development. Strong local opposition to further development at this site at present.</p> <p>Recent planning application for this site was refused, and appeal was dismissed. Inspector stated there was conflict with EDLP Strategy 46 and Policy EN13 and proposal does not represent sustainable development.</p>
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S14	National Grid	24/07/17 (letter dated 19/6/17)	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus. National Grid has identified the following high pressure gas transmission pipelines as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • FM20 - Ottery St Mary to Aylesbeare • FM14 - Barrington to Aylesbeare <p>From the consultation information provided, the above gas transmission pipelines do not interact with any of the proposed development sites.</p> <p><i>Gas Distribution – Low / Medium Pressure</i></p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact plantprotection@nationalgrid.com</p>	Noted. High pressure gas transmission pipelines already mentioned in para 7.6.

S15	Environment Agency	26/07/17	<p>We are generally supportive of the objectives and policies set out in the pre-submission draft of the Ottery St Mary neighbourhood plan.</p> <p>With regard to the Environment Objectives we welcome inclusion of objectives to preserve/enhance habitats and address flood risks wherever possible. We would, however, also recommend the inclusion of an objective that seeks to improve the quality of the water environment in the parish. At present the River Otter through the parish is classified as being at Poor Ecological Status and is failing with regard to phosphates and macrophytes/phytobenthos (both indicating high nutrient levels).</p> <p>Within policy NP1 (development in the countryside) we support the requirement for new development to protect habitats, especially tree lined streams and wetlands.</p> <p>We support the aims of policy NP7 (flood defences). However, we recommend a more ambitious policy is developed which also seeks to encourage all new developments to contribute to reducing flood risks (fluvial and surface water) overall.</p> <p>In addition, we support NP8 (protection of local wildlife sites) and Project 2 to develop a local green infrastructure network. Green infrastructure can deliver significant multi-functional benefits in terms of biodiversity, flood risk, water quality, amenity, health and recreation.</p> <p>We are pleased that the need to upgrade the sewerage and sewage treatment infrastructure to accommodate new houses in the parish.</p>	<p>..</p> <p>Noted</p> <p>..</p> <p>Noted</p> <p>Noted</p>
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