

Ms J Kingaby  
Intelligent Plans & Examinations Ltd  
29 Monmouth Street  
Bath  
BA1 2DL

Your ref: 02/JK/ONP  
Our ref: 20200318-1

18 March, 2020

Dear Ms Kingaby,

### **Otterton Neighbourhood Plan - Your Initial Queries**

Thank you for your letter of 12 March.

Our delegated Steering Group within the Parish has provided the following responses to the points you have raised:

#### **1 Changes Proposed by EDDC Landscape Architect to wording of ONP5 and ONP7**

- a) The expression (“semi-natural”) in policy ONP5 deliberately restates a term contained within the Devon Biodiversity Records Centre Report (see Appendix K), so we would prefer to retain this existing wording.
- b) The other wording changes would be acceptable to us.
- c) We will ask EDDC to provide this map to us again – at the time of writing the report our contact did not have access to a version showing the maintenance yard.

#### **2 References to Flooding Alleviation**

We are happy to include cross-references to the Local Plan policy in our policies ONP1, ONP5 and ONP6. We would also be happy to extend the final paragraph of 4.4.4 as follows:

“As such no development will be supported that might exacerbate flooding issues. Strategy 5 of the Local Plan aims to protect from development areas that are vulnerable to surface water runoff and flooding. Local Plan Policy EN22 has specific requirements for new development that creates surface water runoff implications, and this Plan endorses these requirements. Policy EN21 addresses river and coastal flooding with a sequential approach. Wherever possible developments should be sited in Flood Zone 1 (low probability), as defined in the [East Devon District Council Flood Risk Assessment](#).”

Otterton has recently experienced significant surface water runoff during the wet winter months. This has particularly been the case following autumn maize harvesting, following which land has been left bare; the resulting unrestrained runoff has given rise to a serious loss of valuable topsoil from the land. This practice should be discouraged as it represents poor land management, and has resulted in several overtopping incidents along Otterton Brook through the village.”

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### 3 **Economy, Business and Employment**

Our relevant policy (ONP6) is specific about supporting small-scale developments, but this is within the context of preservation of the high natural value of nearly all of the Parish.

In a balance between preserving the character and value of the AONB on the one hand, and a strong push for allowing inappropriate development on the economy front on the other, we have come down firmly on the former. This is in line with the views expressed by those responding to our initial questionnaire research.

The needs of young people for local employment should not be considered purely as requiring provision of jobs in the Parish – like most rural areas, people commute in and out (reference the number of building trades operating in the Parish who are based in Sidmouth, Exmouth or Exeter). Indeed, servicing the needs of the retired members of the population is a significant source of economic activity.

So in summary, we believe the NP is sufficiently positive in this respect.

### 4 **ONP6 and ONP7 – Constraints on Development**

Our research revealed a strong preference amongst villagers to restrict development, whether for housing or business, to be highly-attuned and sympathetic to the natural character of the Parish. This has informed the nature of these two policies. We are happy to accept the suggestion that the phrase ‘for local people’ should be removed on grounds of difficulty of definition.

There was strong support in the village for restrictions to be placed on Ladram Bay’s development, mainly, as the ED officer suggests, due to perceived traffic issues but also in order to protect the very high quality coastal landscape within which it is located (within an AONB and immediately adjoining the Jurassic Coast World Heritage Site, SSSI and an ancient orchard).

Whilst the Park generates many employment opportunities, the benefit to the village itself is relatively low – most employees live elsewhere, particularly Exmouth; there are just a few outlets in the village (e.g. Otterton Mill and the Community Shop) where money might be spent by Ladram visitors and benefit the village (the pub is owned by the same Group as Ladram Bay). The benefit to the area of visitors spending within the larger region of the authority is not in doubt.

As such, we wish to retain the conditions stated in the policies in order to ensure that the character of the area is retained for the benefit of residents and visitors alike, whilst permitting limited development and improved infrastructure to support small-scale enterprise including home working.

Our approach accords with Local Plan Policy E19 – Holiday Accommodation Parks; this recognises that whilst such parks will have a positive effect on the District economy, this should not be to the detriment of the natural environment. The Local Plan Policy sets out a series of criteria which should apply to applications *outside* designated landscape areas, but makes it clear that *within* designated landscapes the criteria should be met in full and should provide no permanent structures, only replacement structures designed to blend into their surroundings.

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We consider that the AONB landscape, particularly when viewed from the numerous public vantage points along the coastal footpaths, is of exceptional quality and value and our Policy provides additional detail and identifies the extent of the Holiday Park, expanding upon and adding local context to E19.

We hope this addresses your queries satisfactorily and would be happy to discuss further if required.

Please will you advise at what point we should submit a revised version of our Neighbourhood Plan (and presumably Basic Conditions Statement)?

Yours sincerely,

Mrs Fran Mills

Clerk – Otterton Parish Council

c: Claire Rodway – EDDC  
Angela King – EDDC  
Otterton NPSG  
ONPSG members  
Ilan Birch  
Rosemary Birch  
John Hiles  
Linda Lowes  
Dee Woods