

Date: 28 March 2022  
Our ref: 383073  
Your ref: Kilmington Neighbourhood Plan Submission Consultation



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**BY EMAIL ONLY**

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Dear Angela King

Thank you for your consultation on the above dated 09 February 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

**Kilmington Neighbourhood Development Plan (NDP) Regulation 16**

**Policy CGS2:** Soon to become a mandatory requirement, biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. There is opportunity in **statement 4** of Policy CGS2 to include reference to requiring development to demonstrate a net gain in biodiversity. We would also welcome reference to biodiversity net gain to be made within policies **HD3** and **HD4**.

We welcome **sub-statement ii** of statement 4 which advises that development should aim to limit external light sources and consider their siting. We recommend including reference within the policy or supporting text to the Institute of Lighting Professionals Guidance Note 8 – Bats and artificial lighting in the UK<sup>1</sup> to further support this.

**Water Quality:** We welcome the consideration given to our comments in response to the regulation 14 consultation, and the subsequent amendments made to the Kilmington Neighbourhood Plan. We recommend however that the wording regarding sewerage is amended slightly.

Where the policies **HD3** and **HD4** stipulate that the developer must "*provide an adequate connection to the public sewer before the development can commence*", we recommend that this is reworded to better reflect East Devon Local Plan policy EN19, which requires developments to provide "*...a suitable foul sewage treatment system of adequate capacity...*". This ensures that should it be unfeasible for a development to connect to the mains sewerage system, and instead be reliant on private drainage, this is adequately supported by the NDP and Local Plan and the natural environment considered.

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<sup>1</sup> <https://theilp.org.uk/publication/guidance-note-8-bats-and-artificial-lighting/>

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 Naomi-Beth Dixon at [naomi.dixon@naturalengland.org.uk](mailto:naomi.dixon@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Kind Regards,



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