## Land at Heathfield, Honiton (Honi\_01) Representations on the East Devon Local Plan (Regulation 18)

On behalf of Gleeson Land

January 2023

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## 1 Introduction

- 1.1 These representations are submitted on behalf of Gleeson Land in respect of Land at Heathfield, Honiton. Part of Gleeson's Land interest is allocated as a preferred 'second choice' allocation (Strategic Policy 21, Site: Land at Heathfield, East of Hayne Lane (Honi\_01)) ("the Honi\_01 Site") within the Regulation 18 draft East Devon Local Plan. A plan showing the Honi\_01 Site and Gleeson's adjoining land interests ("the wider Honi\_01 area") is included as Appendix 1.
- 1.2 The draft Local Plan sets out a housing requirement for the plan period from 2020 to 2040, and also plans for a 10% oversupply to guarantee delivery of the requirement. The Local Plan also sets out a spatial strategy to inform the distribution of housing and other development across East Devon, which includes provision for significant development to the west of the district where the influence of Exeter is the most significant. In the rest of East Devon, a settlement hierarchy is set out, in which Honiton is identified as a Main Centre. Housing allocations make up an important part of the supply of housing land which is set out in the plan and in an accompanying Topic Paper looking at housing matters, and the Honi\_01 Site is therefore an important component in ensuring that needs are met.
- 1.3 The Honi\_01 Site and the wider Honi\_01 area is a sustainable location, where residents will be able to access a broad range of facilities within easy walking distance, and also able to access all of the facilities available in Honiton via a short cycle ride or bus journey. The location of the Land at Heathfield within the East Devon Area of Outstanding Natural Beauty (AONB) is an important consideration. We have therefore prepared evidence to demonstrate that a landscape-led approach would enable development to come forwards without a significant landscape impact and improve the existing very hard edge of Honiton in this location, enhancing the AONB.
- 1.4 Our representations set out the benefits of bringing forward the Honi\_01 Site, but also the wider Honi\_01 area, to create a high quality edge to Honiton and assist the Council in meeting housing targets.
- **1.5** These representations therefore respond to the draft East Devon Local Plan consultation document as follows:
  - Our analysis of the housing need and supply elements of the Local Plan and the spatial strategy (Strategic Policies 1, 2 and 3);
  - comments on other policies as set out in the draft Local Plan (Strategic Policies 5, 7 and 40);

- comments on the Honiton allocations and the land identified as the allocation at Land at Heathfield (Strategic Policy 21); and
- our analysis of the sustainability of the location of the site and the opportunity to create a high-quality landscape led scheme which will provide a range of benefits for Honiton and the local community (Strategic Policy 21).

# **2 Strategic Policies 1, 2 and 3** – The Spatial Strategy, the Supply of Housing Land and the Housing Requirement.

#### Strategic Policy 1 - The Spatial Strategy

- 2.1 Strategic Policy 1 of the draft Local Plan sets out the Spatial Strategy which is used to distribute development across East Devon. The first level in the spatial strategy refers to development in the west of the district, recognising the strategic developments and new town proposed close to Exeter. The second level of the strategy focuses on Exmouth as the Principal Town and then on the five Main Centres, of which Honiton is one.
- 2.2 The spatial strategy closely follows the analysis set out in the Role and Function of Settlements Study, which found on several indicators that Honiton was the most significant town in East Devon after Exmouth and was one of only three towns in the district to have the full range of services and facilities being assessed. The identification of Honiton as a second-tier settlement is therefore supported.
- 2.3 We note that in Strategic Policy 2, the housing land supply identifies that 910 homes will be delivered at Honiton, of which 289 homes are identified on '2<sup>nd</sup> choice' allocations ie nearly a third of the homes identified to be delivered in Honiton are on the preferred second choice sites. If these allocations were not taken forward, delivery of new homes at Honiton would be much reduced. To ensure that Honiton's position as a sustainable and vibrant second tier settlement is maintained over the period covered by the draft Local Plan, it would seem to be the right approach to maximise the potential to deliver new homes in the town and to ensure that the preferred second choice allocations are retained as allocations in the Publication version of the plan.

#### Strategic Policy 2 – Housing Land Supply

- **2.4** Strategic Policy 2 sets out the supply of housing land in East Devon to meet needs over the plan period, including sites allocated in the draft Local Plan.
- 2.5 Strategic Policy 2 identifies that 18,167 new homes will be provided in East Devon between 2020 and 2040. This includes 1,953 dwellings that were completed between April 2020 and April 2022, and 4,403 dwellings that were either under construction or had planning permission at April 2022.
- **2.6** The Policy also sets out that the housing land supply does not include windfalls which are projected to come forwards over the plan period, which would total 2,335 new homes. If these windfalls are added to the supply, it would suggest that 20,502 homes could be provided over the plan period.

Paragraph 3.17 of the draft Local Plan, however, suggests that the total supply would deliver 20,441 new homes over the plan period. The Housing Need, Supply and Requirement Interim Topic Paper (November 2022) explains that this difference is due to figures set out in Strategic Policy 2 being gross – i.e., no allowance has been made for demolitions or other dwellings being removed from the supply. The true figure is that contained in paragraph 3.17 of the draft Local Plan.

- 2.7 As set out below, Strategic Policy 3 proposes a 10% uplift to be applied to the housing requirement figure of 18,920 dwellings to allow for flexibility in supply, leading to a need to identify 20,800 new dwellings capable of being delivered by 2040. We fully support and endorse the uplift to allow for flexibility. However, the following conclusions can be drawn:
  - a. Without including the windfall allowance of 2,335 dwellings, the identified supply in the plan falls some 753 homes short of the housing requirement figure, and 2,663 dwellings short of the housing requirement figure with the 10% uplift.
  - Including the windfall provision would suggest a supply of 20,441 new homes, which would therefore show that the housing requirement figure could be met. However, this supply figure would still all short of the 10% uplift requirement by 359 dwellings.
  - c. We would suggest, that given the draft Local Plan sets out a need to have certainty around the delivery of the housing target that relying upon windfall projections to ensure the housing requirement is met is not a robust approach. At the very least, there should be an identified supply ensuring that the housing requirement of 18,920 dwellings can be delivered that does not rely on windfalls. This approach would suggest that more land for housing should be identified.
  - d. Furthermore, we note that the housing land supply relies upon all of the allocated sites in the draft Local Plan to be delivered whether those allocations are preferred sites or second choice sites. There is no room for manoeuvre in the housing land supply if needs are to be met. This would suggest that all of the second-choice allocations should be confirmed as allocations for the draft Local Plan to be able to demonstrate a sound approach to meeting needs.
- 2.8 The Housing Need, Supply and Requirement Interim Topic Paper (November 2022) recognises in paragraph 6.21 that the identified supply in the draft Local Plan will not meet the housing requirement with a 10% uplift, even if the windfall provision is included. It sets out a number of options that are open to the Council to remedy the position, including:
  - a. A design approach that delivers some sites at a higher density,

- b. Further evidence and analysis of the delivery trajectory on sites particularly on larger sites,
- c. Identifying additional sites.
- 2.9 We would agree that the draft Local Plan as drafted is not setting out a robust approach to ensuring that the housing requirement can be met without relying upon unidentified windfall sites, and that the draft Local Plan is also failing to meet its own policy requirement to identify a 10% uplift. The suggested actions in paragraph 6.21 would help to identify additional supply, and we suggest that one option open to the Council is to identify the larger area of land at the Land at Heathfield site enabling a higher number of homes to be delivered.

#### Strategic Policy 3 – The Housing Requirement

- 2.10 Strategic Policy 3 of the draft East Devon Local Plan sets out that housing requirement that the plan will deliver over the 20-year period 2020 2040. The policy sets out that at least 18,920 new homes should be delivered by 2040, of which at least 4,070 should be delivered as affordable homes. This equates to an average of 946 homes to be delivered each year across East Devon.
- 2.11 Strategic Policy 3 also includes a clause (3) which sets out that the Council will identify a 10% "supply headroom" in order to create supply flexibility across the district. The purpose of this element of the policy is to ensure that the housing supply in East Devon includes an uplift to ensure that there is choice and to provide certainty that the housing requirement will be met over the lifetime of the plan.
- 2.12 The 10% uplift is set out in policy, and therefore the housing supply should include sufficient sites to deliver 20,800 new homes by 2040. Clearly this figure does not replace the housing requirement figure in terms of the number of homes that should be delivered to meet needs, but it should be noted that the housing requirement is expressed as a minimum figure, and therefore delivery is able to exceed the plan requirement without being contrary to the plan.
- 2.13 The Housing Need, Supply and Requirement Interim Topic Paper (November 2022) sets out detail on how the housing requirement figure set out in the Local Plan was derived. It confirms that the East Devon Local Housing Need Assessment September 2022, produced by ORS, uses the Government's Standard Methodology for calculating Local Housing Need, as set out in the NPPF. The Topic Paper goes on to set out that factors have been examined to ascertain whether the local housing need figure should be reduced or increased from the level suggested by the Standard Methodology. No factors were identified and therefore the housing requirement set out in the draft Local Plan meets the local housing need as calculated using in the Standard Methodology. The Topic Paper usefully confirms in paragraphs 2.36 and 2.37 that the local housing need calculation has been updated to use the most recently published affordability ratios (published in March 2022) and that these ratios have led to a local housing need figure of 946 dpa.

- 2.14 The Topic Paper also sets out that Duty to Cooperate discussions have taken place with neighbouring local authorities. Paragraph 5.10 sets out that the *Council "has not received notification from other Local Planning Authorities that they have evidence which demonstrates that they have unmet housing needs and why this should be met in East Devon."* Therefore, the housing requirement in the draft Local Plan does not include an uplift to account for meeting unmet need from neighbouring authorities.
- 2.15 Therefore, from the evidence available at this point in time we have assessed that the housing requirement in the plan is based upon local housing need established using the standard methodology. Noting that the Local Plan is timetabled for Regulation 19 consultation in Autumn 2023 however, it is likely that further evidence will come forwards over the next 12 months which may change the assessment of local housing need for example it is likely that new affordability ratios will become available in March 2023, and it is also possible that neighbouring LPAs will provide evidence of unmet need which could be delivered in East Devon. We therefore reserve a position to look again at the draft Local Plan housing target at the Regulation 19 stage.

## 3 Comments on Other Local Plan Policies

- **3.1** The draft East Devon Local Plan contains a full set of policies, most of which are marked as 'strategic' for the purposes of the NPPF.
- **3.2** We do not comment on all of the policies set out in the draft Local Plan at this time. However, there are some specific policies where we believe changes should be made:

## Strategic Policy 5 - Mixed use developments incorporating housing, employment and community facilities

- **3.3** This policy sets out an approach to encouraging mixed use developments in East Devon. It seems to suggest that for all developments totalling over 100 homes, and specifically for developments in the Tier one and two settlements (which includes Honiton), the policy will require 0.4ha of employment land to be provided, and that social and community facilities to meet identified needs should also be provided on site. We are not clear whether the employment space must also be delivered on site although the suggestion in the policy title that it is aiming to create mixed use developments incorporating employment space suggests that the expectation is that the employment space will also be delivered on the site.
- **3.4** The aim of the policy is recognised attempting to ensure that housing development is complemented by employment space offering residents the opportunity to work close to their homes is laudable, as is aiming to provide social and community facilities as well. However, making this a requirement of all sites delivering over 100 dwellings seems onerous and undeliverable. It will not be feasible to physically deliver all such requirements along with a quantum of new housing on all such sites, and particularly not on sites towards the smaller end of the range. There is also the risk that an unsustainable pattern of development is created, with employment space created in locations unsuitable for industrial or business uses and where trips could be generated from large distances away. It would seem more productive to look at locating larger housing developments close to existing facilities and employment locations in the way described in Strategic Policy 65 which sets out the concept of the 20-minute neighbourhood.
- **3.5** We therefore object to Strategic Policy 5 requiring all housing developments over 100 dwellings in Tier One and Two settlements to incorporate employment space and community facilities. The policy does not factor in the viability implications of the approach, nor does it consider the ability of sites to accommodate such a mix of uses, and is therefore not deliverable or justified. We consider that it would be better to set out in allocation policies those sites which could accommodate mixed use development, and to encourage other sites to consider other uses rather than require it.

#### Strategic Policy 7 - Development beyond Settlement Boundaries

- **3.6** Strategic Policy 7 sets out that outside settlement boundaries, development will not generally be supported. We consider that this policy requirement should provide more flexibility to consider development proposals which may be in sustainable locations close to local facilities and adjacent to sustainable towns and settlements, but which are outside of a settlement boundary. Creating an in-principle presumption against developments outside of settlement boundaries without undertaking a process of assessing what sites on the edge of towns may be appropriate could have the effect of restricting opportunities for appropriate development. This in turn would limit the flexibility of policies in the plan to enable sites to come forward quickly to remedy any housing delivery issues which could arise during the life of the plan and could certainly reduce opportunities for windfall housing sites to come forward in sustainable locations as assumed in Strategic Policy 2.
- **3.7** We therefore object to Strategic Policy 7 and suggest that it should be re-drafted to include provisions to enable consideration of sites beyond settlement boundaries over the life of the plan.

#### Strategic Policy 40 - Affordable Housing

- **3.8** Strategic Policy 40 sets out the District Council's approach to securing affordable housing on sites across East Devon, setting out that sites outside of the proposed second new town in the west of the district, qualifying housing sites will be required to deliver at least 35% affordable housing.
- **3.9** The aims of the policy are supported. However, some elements of the policy seem overly onerous. In particular, the policy prescribes the tenure mix of the affordable housing provision on all qualifying sites. This seems to put in place a 'one size fits all' approach which may not be appropriate. The precise mix of affordable housing sizes and tenures is likely to change according to the location of the site and will also change over time as the characteristics of the population of settlements changes. Fixing the mix over the full 20-year plan period does not seem to create a flexible policy approach.
- **3.10** We therefore object to this element of Strategic Policy 40 and would request that the policy is reworded to enable the precise mix of affordable housing sizes and tenures to be discussed for each application at the time it is considered by the Council, enabling development proposals to respond to needs at that point in time.

## **4** Housing Allocations in Honiton

- 4.1 Strategic Policy 21 of the draft Local Plan sets out the housing allocations for Honiton both preferred choice and second choice sites are listed. Part of Gleeson's Land interest is allocated as a preferred 'second choice' allocation (the Honi\_01 Site) within the draft Local Plan. A plan showing the Honi\_01 Site and Gleeson's adjoining land interests ("the wider Honi\_01 area") is included as Appendix 1.
- **4.2** We fully support the allocation of the Honi\_01 Site for housing development in the draft Local Plan, and confirm that it is available and is deliverable within the first five years of the plan period in accordance with NPPF paragraph 68.
- **4.3** As set out above, the draft Local Plan does not currently identify a sufficient number of housing sites to meet the housing requirement set out in Strategic Policy 3. Only by including a windfall allowance does the plan meet the housing requirement, and even then, it fails to identify a 10% uplift as required by Strategic Policy 3.
- 4.4 Even so, the land supply that is identified in the draft Local Plan relies upon 2<sup>nd</sup> choice allocations to make up the housing numbers that can be identified. If the 2<sup>nd</sup> choice sites were not included in the draft Local Plan, a total of 1,856 homes would be removed from the supply meaning that the identified supply to meet the housing requirement would be just 16,311. Even taking account of the windfall allowance of 2,335 dwellings would only give a supply of 18,646 homes over the life of the plan not enough to meet the housing requirement of at least 18,920 dwellings.
- **4.5** Therefore, it is considered that 2<sup>nd</sup> choice allocations should be confirmed as allocations in the Submission draft Local Plan.
- 4.6 We believe that there are strong site specific reasons and benefits associated with the Honi\_01 Site that supports its allocation in the plan. Similarly, we also set out the benefits associated with also allocating the wider Honi\_01 area for residential development. These reasons are explained below.

#### Land at Heathfield, East of Hayne Lane (Honi\_01)

- 5.1 The extent of the Land at Heathfield, East of Hayne Lane (Honi\_01) Site is shown on the draft Policies Map. This shows that the land proposed for allocation is a field adjoining the existing southern edge of Honiton at Maple Close and Oakfield Close.
- 5.2 The Honi\_01 extent reflects the East Devon HELAA Site Assessment (2022), which is available as an evidence base document on the Council website supporting the draft Local Plan. The allocation of the Honi\_01 Site in the draft Local Plan is fully supported. The Honi\_01 Site is available and deliverable and could be brought forwards in the first five years of the plan period.

#### Highways Considerations

- 5.3 In terms of the access to the site, the analysis set out in the East Devon HELAA confirms that Dorset County Council Highways Department have confirmed that access can be taken from the A375 Sidmouth Road, and this would be the preferred way to access the Site.
- 5.4 A Technical Note produced by iTransport and setting out transport and access considerations has been produced and is submitted with these representations (Appendix 2). The analysis demonstrates that the Honi\_01 Site could easily be accessed from the A375 Sidmouth Road by means of a ghost roundabout. This would provide safe access to the allocated site.

#### Landscape Considerations

**5.5** The site is located in the East Devon AONB and therefore would require a landscape led design approach to confirm the quantum of development that can be sensitively accommodated in this location. Alongside these representations we have therefore supplied a Landscape and Visual Capacity Technical Note (LVC Technical Note) from Bradley Murphy Design Ltd (Appendix 3) that contains a landscape-led capacity plan for the Honi\_01 Site with access off Sidmouth Road (Appendix 3, Figure 12). Associated with the access off Sidmouth Road, some limited single-storey dwellings, along with public open space (POS), and a Local Equipped Area of Play (LEAP) are also shown within the landscape-led capacity plan within the adjoining eastern field. The POS, the LEAP

and strong landscape buffer along the sites eastern and southern boundary limit any impact of development and creates a soft transition from rural to urban form.

- **5.6** The analysis in the LVC Technical Note sets out a detailed consideration of the AONB in this location and the potential to create a sensitive landscape led scheme. Some of the points set out in the Technical Note include:
- 5.7 The East Devon AONB boundary in this location does not follow the edge of the settlement. The existing development to the north of the site is mostly from the late 20<sup>th</sup> century and early 21<sup>st</sup> century, and due to the way that the AONB boundary is drawn here as a straight line, a number of dwellings on these developments fall within the AONB already. Approximately 15 dwellings along Oak View and 7 along Bracken Close, some of which are 2-2.5 storey dwellings but for the most part are single storey bungalows, are located on the northern edge of the AONB.
- 5.8 The note also sets out that the settlement edge in this location is very hard and represents a poor edge to the AONB "The limited extent of green infrastructure, within the residential area to the north of the Site, creates a hard interface between Honiton and the East Devon AONB. Whilst other areas of the town are sympathetic to the setting on the edge of the AONB, properties along streets adjacent to the Site's northern boundary have very limited softening by the existing landscape features. There is currently only a low, regularly managed hedgerow between the undeveloped part of the AONB and these properties, which creates an unsympathetic urban edge to the town in this location."
- **5.9** The note goes on to set out ways in which the development of the site could assist in creating a more sympathetic edge to the town and better interface with the AONB.
- **5.10** An appraisal of the landscape impact has been carried out, picking up views of the site from nearby locations as well as from more distant viewpoints. This analysis has helped to inform the assessment of impacts.
- 5.11 The Technical Note concludes that "New development on the southern edge of Honiton would extend the settlement boundary further south into a very small proportion of the East Devon AONB. However, should development be set within a strong framework of green infrastructure (retaining and integrating the existing structural vegetation on the Site), it is considered that residential development could be assimilated in both nearby and longer distance views, without significant

visual harm to the East Devon and Blackdown Hills AONB's, and the surrounding context." Furthermore, it suggests that development of the site "offers the opportunity to both: shape new development on the Site and to contribute strongly to the sense of place; along with enhancement to the AONB's interface with Honiton."

- 5.12 The Technical Note therefore concludes that with the use of a strong landscape framework, around the Site boundaries and along key corridors through the Site, development can demonstrably be achieved without significant landscape a visual harm on the surrounding landscape context. The landscape capacity plan for the Honi\_01 Site and the adjoining access road land (Appendix 3, Figure 12) shows how the site can be designed in a sensitive way which would conserve and enhance the AONB in this location.
- **5.13** Additionally, the Sustainability Appraisal (SA) accompanying the draft Local Plan makes an assessment of the sites allocated in the plan. The SA flags the AONB location of the Honi\_01 Site as a significant negative landscape effect. For Honiton to deliver new homes to meet needs both locally and for the district, there will need to be some development taking place within and on the edge of the AONB. Therefore, the test must be whether that development can be designed sensitively to conserve and enhance the AONB, rather than there being a presumption against development. The analysis we have presented by BMD concludes that a sensitively designed landscape led scheme can be delivered, which would result in enhancement of the AONB in this location, and which would also avoid any significant landscape harm.
- **5.14** We would therefore suggest that the analysis in the Sustainability Appraisal for the Honi\_01 Site should be adjusted to reflect the BMD evidence.
- 5.15 The SA goes on to consider the site against a range of other indicators against which it scores generally positively. The summary statement regarding Honi\_01 reflects this conclusion: "Honi\_01 Land at Heathfield, preferred as 2nd best allocation and consistent with spatial strategy, good access to facilities, employment and public transport, considerable landscaping would be required on the site due to significant negative effects upon the landscape."

#### Flood Risk

**5.16** The Site lies in Flood Zone 1, with a very small area within Flood Zone 3. The Flood Zone 3 land in question is associated with the stream gully that runs roughly south east to north west across the

Honi\_01 site's western boundary, and then continues through the existing housing development to the north. A very limited part of the site (the HELAA estimates 0.05ha) along the stream gully is in Flood Zone 3. However, the extent of the flood area here is very small in the context of the Site as a whole. The HELAA concludes, and we agree that the extent of the Flood Zone 3 is not a constraint to development on the Site.

#### Other On-Site Matters

- **5.17** The HELAA assessment for the Honi\_01 site correctly confirms that:
  - There are no biodiversity constraints to development on the site and clearly any development of the site would comply with the Biodiversity Net Gain requirements.
  - There are no identified heritage assets on or within close proximity to the site. An Archaeological Desk Based Assessment (2015) concluded that 'the Site is unlikely to have a significant archaeological impact due to the limited archaeological potential of the site and the impact of medieval and more recent ploughing'. This conclusion is not expected to have changed.
  - The Site is within a walking and cycling distance to local facilities and services, including public transport services.
  - There are no high voltage power lines of gas mains crossing the site.
- **5.18** Overall, the HELAA concludes that the site is suitable and available for housing.
- **5.19** In view of the above, we can confirm the Honi\_01 site is available and endorse the Council's conclusion that it is deliverable within the first five years of the plan period. The Honi\_01 site should be maintained as an allocated site within the Submission draft Local Plan.

#### The Wider Honi\_01 Area

**5.20** Gleeson Land control of the field to the west of the Honi\_01 Site. The western field is separated from the Honi\_01 Site by a steep wooded gully. The Technical Note produced by iTransport outlines that the western field is accessible from Honeysuckle Drive to the south – leading to two distinct elements of a development proposal accessed from different locations, but potentially joined by cycle and walking routes across the stream and gully. This separation also means that these two elements (the Honi\_01 Site and the western field) could be brought forwards as separate but related development opportunities.

- 5.21 Clearly, the western site's landscape considerations are very similar to those of the Honi\_01 Site, and the analysis of the landscape characteristics set out above applies equally to the western field. BMD have set out a Landscape Capacity Plan (Figure 11 in Appendix A of their Technical Note) setting out how a sensitively designed landscape led scheme could be brought forwards in this location.
- **5.22** Flood risk and other on-site matters for the western field are also broadly identical to those set out above for the Honi 01 Site.
- **5.23** Overall, the western field is available and is deliverable within the first five years of the plan period.

#### A Comprehensive Heathfield Opportunity

- 5.24 Clearly, bringing forward the western field alongside the Honi\_01 Site presents a comprehensive development opportunity, enabling a wider improvements to the edge of Honiton in this location ("the Comprehensive Heathfield Opportunity"). The BMD Technical Note includes a Landscape Capacity Plan Figure 13 which sets out how a comprehensive development of Gleeson's land interests in full could be achieved, without significant landscape harm being caused, and leading to enhancement of the AONB in this location through the creation of a softer and more sensitive landscape edge to the town.
- **5.25** If the comprehensive area were to be brought forward there would clearly be the opportunity to bring forward an increased number of homes in this sustainable location, contributing to East Devon's land supply. As outlined below, the Comprehensive Heathfield Opportunity would deliver enhanced benefits to those arising from the Honi\_01 Site alone.
- **5.26** To be clear, Gleeson Land support the allocation of the Honi\_01 Site in the draft Local Plan but would suggest that the plan should be changed to show the larger site as an opportunity for sensitively designed landscape led development, and that the Honiton settlement boundary should be changed to bring the larger site within the settlement.

#### **Benefits and Characteristics**

**5.27** The Council's own assessment of the Honi\_01 Site makes clear that it is a very sustainable location for further residential development.

- 5.28 The assessment set out in the HELAA and summarised in Appendix 2 to the Site Selection interim findings at Tier One and Tier Two settlements document outline that it would be possible to produce a landscape led scheme which would mitigate any landscape effects and enhance the AONB. Indeed, the more detailed landscape and visual capacity analysis and landscape-led concept masterplans prepared by BMD for the Comprehensive Land at Heathfield Opportunity confirms the HELAA's expectation i.e., development can be accommodated without having a significant negative impact on the AONB.
- **5.29** As set out above, the landscape-led evidence prepared by BMD demonstrates that development cross the Comprehensive Heathfield Opportunity can be achieved without significant landscape harm.

#### Public Open Space

- **5.30** The Council's Open Space Assessment indicates that there is a shortage of open space within Honiton, particularly natural and semi-natural greenspace (c. 6.11 ha). The BMD Technical Note includes a plan of accessible natural greenspace in Honiton (Figure 8 in Appendix A) indicates that much of the existing accessible natural greenspace is located to the east of the town.
- **5.31** Based on the landscape-led masterplanning assumptions underpinning the BMD Landscape Capacity Plan the Comprehensive Healthfield Opportunity has the potential to deliver a network of new natural and semi-natural greenspace to the benefit of new and existing residents to the east of the town, including: a network of blue and green infrastructure corridors, woodland, the central ditch, an orchard and other amenity greenspace.

#### Site Location and Transport Matters

- 5.32 The Transport Technical Note by iTransport (Appendix 2) sets out that the Comprehensive Heathfield Opportunity can be accessed from the A375 Sidmouth Road to the east, and Honeysuckle Drive from the west.
- **5.33** The number of traffic movements from the Comprehensive Heathfield Opportunity was considered acceptable in terms of access on the local road network by Devon County Council in 2015 when the most recent application was considered. Since that time, the Technical Note sets out that baseline traffic flows around the site have fallen and are lower than they were. In addition, the implementation of a mini-roundabout scheme at the Turks Head junction has improved the operation of the

surrounding highway network, releasing further capacity. Therefore, the development of the whole site would be acceptable in traffic terms.

- 5.34 An analysis of the proximity of the comprehensive site to local services and facilities confirms it is within walking distance of neighbourhood community facilities, shopping areas and employment areas. Moreover, residents would be able to walk or cycle to the town centre and railway station and other facilities further afield in Honiton, or would have the opportunity to use public transport (see Table 3.1 below). In many respects, the site embodies the principles of the 20 minute neighbourhood set out in Strategic Policy 65 of the draft Local Plan in terms of the ability for residents to meet all of their needs within a 20 minute walk or cycle of their homes.
- 5.35 The conclusion of the iTransport Technical Note is therefore that the site is in a sustainable location with good access to local facilities, is capable of being accessed safely from the A375 Sidmouth Road (and from Honeysuckle Drive from the western field) and is acceptable in traffic impact terms.

<b>5.37</b> Journey Purpose	Destination	Distance (km)	Average Walking Time (Minutes)	Average Cycling Time (Minutes)
	Mountbatten Park Bowling and Social Club	1,570	19	6
Leisure	Honiton Town FC	1,570	19	6
	The Heathfield Inn	670	8	3
	Honiton Leisure Centre	2,470	29	9
	Tesco Superstore	570	7	2
	Aldi Supermarket	1,370	16	5
Retail	Lidl Supermarket	1,570	19	6
	Heath Retail Park	1,570	19	6
	Honiton Town Centre	1,870	22	7
Education	Little Ones Childcare Nursery	1,020	12	4
	Littletown Primary School	1,870	22	7
	Honiton Primary School	3,070	-	12

**5.36** Table 3.1: Key Local Destinations (from iTransport Technical Note)

<b>5.37</b> Journey Purpose	Destination	Distance (km)	Average Walking Time (Minutes)	Average Cycling Time (Minutes)
	Honiton Community College	2,370	28	9
Employment	Heathpark Industrial Estate	1,670	20	6
	Ottery More (Bramble Hill) Industrial Estate	1,670	20	6
	Honiton Town Centre	1,870	22	7
	Honiton Surgery	1,870	22	7
Health	Honiton Community Hospital	2,070	25	8
	Honiton Dental Centre	1,970	23	7
Transport Connections	Sidmouth Road Bus Stops	360	4	1
	Honiton Rail Station	2,170	26	8

Source: Consultant's Calculations

Note: Walk journey time assume a walk speed of 1.4m/s (Guidelines for Providing for Journeys on Foot, IHT). Cycle journey time assumes an average cycling speed of 16km/h (MfS 2). Journey times are approximate and measured via the shortest practicable route from the centre of the site.

Key:



Within 800m – comfortable walking distance Within 2.0km – reasonable walking distance Within 3.2km – acceptable walking distance

#### Flooding and Other On-Site Constraints

- **5.38** Flood risk and other on-site matters for the Comprehensive Heathfield Opportunity area also broadly identical to those set out above for the Honi\_01 Site.
- **5.39** Overall, the Comprehensive Heathfield Opportunity is available and is deliverable within the first five years of the plan period.

## 6 Conclusions

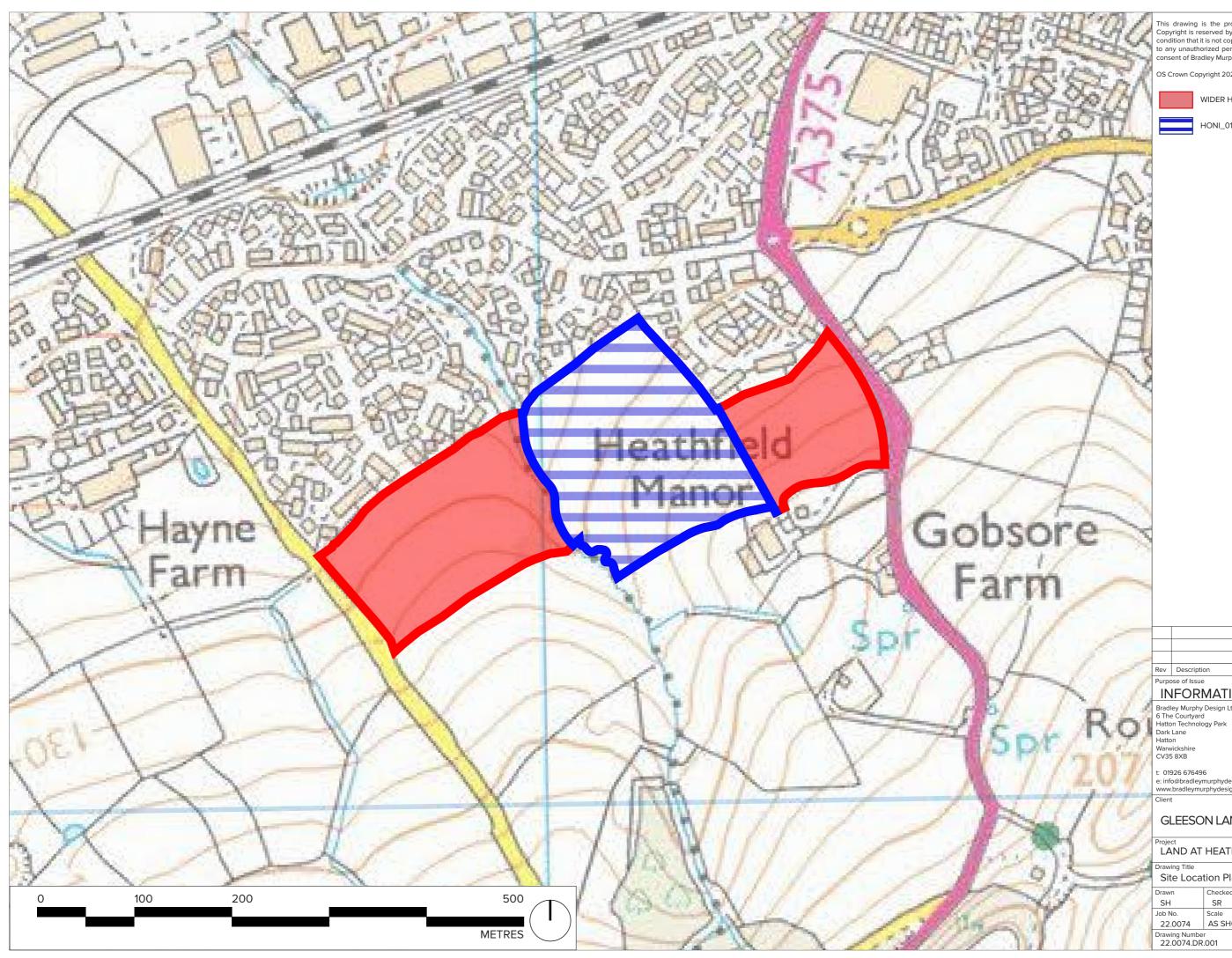
- 6.1 The East Devon Local Plan is currently subject to consultation under Regulation 18. Land controlled by Gleeson Land (Honi\_01, Land at Heathfield, Honiton) is proposed in the draft Local Plan as a 'second choice' preferred allocation for housing. Gleeson Land also controls land adjoining the Honi\_01 Site, which could also be brought forward as part of a more comprehensive development opportunity.
- 6.2 The draft Local Plan Strategic Policy 1 sets out a spatial strategy to guide the location of new development, particularly housing, across the district. This spatial strategy sets out that Honiton is a Main Centre, and is therefore one of the locations identified in the spatial strategy as a Tier 2 location for growth one of the most sustainable locations in the district. We support this identification of Honiton.
- 6.3 The draft Local Plan sets out a housing requirement of 18,920 new homes in Strategic Policy 3. The policy also sets out that there should be sufficient land identified to demonstrate a 10% uplift on the housing requirement, to demonstrate flexibility and ensure that the housing requirement will be met. The housing requirement is a minimum figure. We support this assessment of the Housing Requirement and the identification of a 10% uplift.
- 6.4 Strategic Policy 2 sets out that in terms of land supply, the Council can identify sites to deliver 18,167 new homes by the end of the plan period in 2040. The Council also projects that there will be 2,335 completions on windfall sites in this time.
- 6.5 Therefore, the Council is setting out a land supply position with the following characteristics:
  - The identified land supply (which includes all 'second choice' allocations) is not sufficient to meet the district housing requirement set out in Strategic Policy 3.
  - Only by adding in the windfall allowance which by definition is not counting identified sites does the land supply figure suggest that the housing requirement will be met by the end of the plan period.
  - Even adding in the windfall allowance, the resulting land supply of 20,502 dwellings is not sufficient to meet the policy requirement of a 10% uplift on the housing requirement (20,800 dwellings being land supply required to meet the policy requirement).
- 6.6 The following conclusions can be drawn:

- Firstly, the land supply relies upon unidentified windfall sites to provide a flexible land supply to ensure that the plan requirement is met. Given that these sites are not identified, they cannot be relied upon to ensure delivery, and therefore the draft Local Plan should identify additional capacity to meet needs.
- Secondly, in order to set out the land supply that can be identified, the draft Local Plan relies upon 'second choice' allocations. This would suggest that the 'second choice' allocations cannot be discounted without leaving a larger gap to be filled to ensure that the housing requirement can be met.
- Although we do not object to the land supply position as set out in Policy SP2, we would like to see the policy changed to set out that the 'second choice' allocations are confirmed as full allocations with no distinction made between these allocations and the 'preferred allocations.
- 6.7 Strategic Policy 21 allocates the Land at Heathfield (Honi\_01) as shown on the Policies Map.
- **6.8** We support fully the allocation of the Land at Heathfield (Honi\_01) as a housing allocation meeting local housing need in Honiton. The evidence presented within these representations demonstrate out how a landscape-led development can be brought forward on the Honi\_01 Site with access off Sidmouth Road, which would be well integrated into the landscape and would create a softer more sympathetic edge to Honiton in this location, enhancing the AONB (Appendix 3). Associated with the access off Sidmouth Road, some limited single-storey dwellings, along with public open space (POS), and a Local Equipped Area of Play (LEAP) is also shown within the landscape-led capacity plan within the adjoining eastern field. The POS, LEAP, and strong landscape buffer along the sites eastern and southern boundary will minimise landscape impact and help soften the transition from rural to urban form.
- **6.9** The Honi\_01 sites location, within walking and cycling distance of a wide range of facilities would enable a sensitively designed scheme responding to the draft Local Plan aspiration to create '20 minute neighbourhoods'. The concept plan also shows how new accessible open space would be created, providing a benefit not just for new residents but also for existing residents of this part of Honiton, where accessible open space is in short supply.
- **6.10** Overall, we can confirm the Honi\_01 site is available and endorse the Council's conclusion that it is deliverable within the first five years of the plan period. The Honi\_01 site should be maintained as an allocated site within the Submission draft Local Plan.
- 6.11 We have further shown that there are wider opportunities in this location to bring forward additional landscape-led housing growth. The BMD Technical Note includes a landscape capacity plan for the field to the west of the Honi\_01 Site, which Gleeson Land also controls, and also a comprehensive landscape-led capacity plan for the combined Honi\_01 and western field (see Appendix 3). These

concept plans demonstrate how a comprehensive development on Gleeson's land interests could be achieved, without significant landscape harm being caused, and leading to significant enhancement of the AONB in this location through the creation of a softer and more sensitive landscape edge to the town.

- 6.12 If the comprehensive site area were to be brought forward there would clearly be the opportunity to bring forward an increased number of homes in this sustainable location, contributing to East Devon's land supply. The comprehensive site area would deliver enhanced benefits to those arising from the Honi\_01 Site alone, including increased accessible open space.
- **6.13** The Council's evidence base, supplemented by our site-specific landscape and transport evidence demonstrate that a comprehensive development on Gleeson's land interests at Honiton is deliverable within the first five years of the plan period.
- **6.14** Therefore, we believe that the Submission draft Local Plan and Policies Map should broaden the extent of the Honi\_01 site allocation to include the land associated with the Comprehensive Heathfield Opportunity (Appendix 1).

## Appendix 1-Map of the site



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#### WIDER HEATHFIELD SITE AREA

HONI\_01

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of Issue		
ORMATION		
Murphy Design Ltd vurtyard echnology Park le	BM	D

t: 01926 676496 e: info@bradleymurphydesign.co.uk www.bradleymurphydesign.co.uk

#### **GLEESON LAND**

#### LAND AT HEATHFIELD, HONITON

#### Site Location Plan

Drawn	Checked	Approved	Date
SH	SR	RW	06/01/2023
Job No.	Scale	Sheet Size	Revision
22.0074	AS SHOWN	A3	
Drawing Number 22.0074.DR			

## Appendix 2iTransport Technical Note





Tel: 01256 637940

## **Technical Note**

Project No:ITB5022Project Title:Land South of Heathfield, South West HonitonTitle:Transport AppraisalRef:BT/LJ/ITB5022-012Date:12 January 2023

## SECTION 1 Introduction

#### 1.1 Background

- 1.1.1 Gleeson Land Ltd has appointed i-Transport LLP to provide transport and highways advice in relation to a potential residential development on land south of Heathfield, Honiton.
- 1.1.2 The site is located in south west Honiton, immediately to the south of the Heathfield Estate served via Old Elm Road. The A375 Sidmouth Road forms the eastern boundary to the site and Hayne Lane the western boundary. The potential development site forms three fields; a western, central, and eastern field.
- 1.1.3 East Devon District Council (EDDC) are currently in the process of preparing a new Local Plan, which will form the basis for guiding future development across the district up to 2040. The Council has published its Regulation 18 Draft Local Plan for public consultation. The central field is identified in the emerging Local Plan as Site Honi\_01 as a potential site for allocation for around 79 new homes. The full development site over the three fields has capacity for around 140-150 dwellings.
- 1.1.4 Against this background, this Technical Note assesses the potential development against the three key transport tests set out in paragraph 110 of the National Planning Policy Framework (NPPF), i.e.:
  - 1 Will the opportunities for sustainable transport modes be appropriately taken up?
  - 2 Will safe and acceptable access be provided?
  - 3 Will the residual traffic impacts be acceptable?

Date: 12 January 2023 Ref: BT/LJ/ITB5022-012

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- 1.1.5 NPPF paragraph 110 also refers to the need for transport elements to reflect national guidance (including the National Design Guide and the National Model Design Code). Whilst not addressed specifically within this note, the need for the development to reflect national guidance will be seen as a 'golden thread' throughout all elements of the scheme.
- 1.1.6 This transport appraisal also has regard to previous technical work undertaken by i-Transport LLP on the site in 2013 and 2015 as part of previous planning applications on the site which demonstrated that the site complies with the key transport tests set out in the NPPF and was agreed with Devon County Council (DCC), as local highway authority.

#### 1.2 **Planning History**

- 1.2.1 A planning application was submitted to East Devon District Council (EDDC) in November 2013 for 147 residential dwellings (13/2430/MOUT). The application was subsequently refused in May 2014 for landscape and character reasons. There were therefore no transport related reasons for the refusal of the planning application. A second application was submitted to EDDC in May 2015 (15/1027/MOUT) for 141 dwellings, which was also refused on landscape terms. Again, DCC as local highway authority, raised no objection on a transport and highways perspective.
- 1.2.2 A copy of local highway authority's consultation responses on the two applications are provided in Appendix A.

#### 1.3 Structure

- 1.3.1 The remainder of the Transport Appraisal is structed as follows:
  - Section 2 Local Policy Context;
  - Section 3 Accessibility;
  - Section 4 Access;
  - Section 5 Traffic Impact; and
  - Section 6 Summary and Conclusions.



### SECTION 2 Local Policy Context

- 2.1.1 In addition to the transport tests set out in the NPPF, the emerging East Devon Local Plan 2020-2040 Preferred Options Reg. 18 Consultation Draft Plan sets out new planning policies to guide future development across the district up to 2040.
- 2.1.2 A number of objectives have been set out realise the vision to achieve better homes and communities; a greener East Devon; and a resilient economy. Of those relevant to transport:

"Objective 9 Promoting Sustainable Transport: "To prioritise walking, cycling and public transport and make provision for charging electric vehicles, whilst reducing reliance on fossil fuelled vehicles."

2.1.3 Of the emerging policies relevant to transport, Strategic Policy 65 – Walking, cycling, and public transport states:

"New development should incorporate the features of a "20-minute neighbourhood" either within the site at larger scale development, or through links to features outside the site for smaller scale development.

Walking and cycling links should be prioritised in new development – such links should be coherent, direct, safe, comfortable, and attractive. Cycle paths should be segregated from pedestrians to reduce the potential for conflict.

New development should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (e.g., bus stops, bus priority measures).

*It is recognised that opportunities to deliver this policy will be more challenging in rural areas compared to urban areas."* 

2.1.4 Policy 67 – Travel Plans, Transport Statements, Transport Assessments states:

"Where development schemes, in the absence of mitigating actions, would generate substantive scales of additional vehicle movements planning permission will not be granted for development unless submissions are accompanied by a Transport Assessment and subsequent Travel Plan that identifies measures to secure new sustainable travel arrangements taking into account:

- the scale of the proposed development;
- availability of public transport;
- proximity to environmental designations; impact on promoting walking and cycling;
- cumulative impacts of multiple developments in the area; and
- whether there are particular types of impacts that require further evaluation.



Through future work the plan will establish size or quantity thresholds at which policy will apply."

2.1.5 Policy 70 – Safe vehicular access to sites states:

"Where development proposals will attract or accommodate new or additional vehicles proposals for development must demonstrate how safe access will be achieved. Planning permission will not be granted where safe access to a site cannot be achieved."



## SECTION 3 Accessibility (Strategic Policy 65)

- 3.1.1 This section of the note demonstrates that the site is in an acceptably sustainable location in transport terms and identifies how the opportunities to use sustainable modes of travel can be appropriately 'taken up'.
- 3.1.2 In respect of the site comprising sustainable development, the Officer's Report for the previous application stated:

"Therefore, it can reasonably be concluded that the site lies in a sustainable location close to essential services and infrastructure and sole reliance on the private motor vehicle would not be required for occupants of the development to access these services."

3.1.3 Against this background, East Devon District Council has previously concluded the site provides an appropriate level of accessibility to a range of destinations by a choice of travel modes and therefore is a sustainable development in transport terms in accordance with the guidance set out in the NPPF. The following paragraphs should be read in this context.

#### 3.2 Accessibility by Walking and Cycling

- 3.2.1 Data contained within the National Travel Survey (NTS) and the Chartered Institution of Highways and Transportation (CIHT) guidance 'Planning for Walking' (2015) indicate that the following represent reasonable walking / cycling distances:
  - Up to 800m is a comfortable walking distance;
  - Up to 1,600m is a reasonable walking distance where circa 80% of journeys are likely to be made on foot;
  - 2km is a realistic walking distance. Journeys up to this distance offer the greatest opportunity to replace car trips with walking;
  - 3.2km is the maximum walking distance for most people; and
  - 8km is an acceptable cycling distance for most (non-leisure cycling) journeys.

#### Key Destinations

3.2.2 The primary destinations for future residents of the potential development within the local area are listed in **Table 3.1**, which includes facilities for education, leisure, retail, employment, and health within the distances set out above.



#### Table 3.1: Key Local Destinations

Journey Purpose	Destination	Distance (km)	Average Walking Time (Minutes)	Average Cycling Time (Minutes)
	Mountbatten Park Bowling and Social Club	1,570	19	6
Leisure	Honiton Town FC	1,570	19	6
	The Heathfield Inn	670	8	3
	Honiton Leisure Centre	2,470	29	9
	Tesco Superstore	570	7	2
	Aldi Supermarket	1,370	16	5
Retail	Lidl Supermarket	1,570	19	6
	Heath Retail Park	1,570	19	6
	Honiton Town Centre	1,870	22	7
	Little Ones Childcare Nursery	1,020	12	4
Education	Littletown Primary School	1,870	22	7
Education	Honiton Primary School	3,070	-	12
	Honiton Community College	2,370	28	9
	Heathpark Industrial Estate	1,670	20	6
Employment	Ottery More (Bramble Hill) Industrial Estate	1,670	20	6
	Honiton Town Centre	1,870	22	7
	Honiton Surgery	1,870	22	7
Health	Honiton Community Hospital	2,070	25	8
	Honiton Dental Centre	1,970	23	7
Transport	Sidmouth Road Bus Stops	360	4	1
Connections	Honiton Rail Station	2,170	26	8

Source: Consultant's Calculations

Note: Walk journey time assume a walk speed of 1.4m/s (Guidelines for Providing for Journeys on Foot, IHT). Cycle journey time assumes an average cycling speed of 16km/h (MfS 2). Journey times are approximate and measured via the shortest practicable route from the centre of the site.

Key:



Within 800m – comfortable walking distance Within 2.0km – reasonable walking distance Within 3.2km – acceptable walking distance



- 3.2.3 The local facilities and services, as well as the walking catchments are shown on **Figure 3**.
- 3.2.4 The analysis in **Table 3.1** demonstrates that The Heathfield Inn and Tesco Superstore, which is the principal foodstore within Honiton and provides a wide range of food, drinks and homeware as well as an in-store pharmacy, are located within a short walking distance from the site and offer a good opportunity for residents to walk to these destinations.
- 3.2.5 Aldi and Lidl Supermarkets, Heath Retail Park, as well as Heathpark Industrial Estate and Ottery More (Bramble Hill) Industrial Estate are all within a reasonable 20-minute walking distance of the centre of the site. These are directly accessible via Sidmouth Road where there is good, existing pedestrian infrastructure in the form of footways on both sides of the carriageway, separated by a grass verge. The route is street lit.
- 3.2.6 There are also footways located on both sides of Old Elm Road and elsewhere within the existing residential area located immediately to the north of the site, including Honeysuckle Drive. There are dropped kerb crossings complete with tactile paving on the Battishorne Way and Sidmouth Road (north) arms of the Sidmouth Road / Battishorne Way / Old Elm Road roundabout.
- 3.2.7 To the west of Sidmouth Road, Beggars Lane forms a shared-surface route for access towards Heathpark Industrial Estate, as well as the retail facilities at Heath Retail Park, Lidl, and Aldi. There is a footway on the southern side of Exeter Road which ties into the existing footways within Heathpark Industrial Estate.
- 3.2.8 To the west of the site, the pedestrian facilities on Old Elm Road provide a link to the footway located on the western side of Hayne Lane. This provides alternative pedestrian access to the Heathpark Industrial Estate via Devonshire Road.
- 3.2.9 Honiton Town Centre, Honiton Hospital, as well as Littletown Primary School, are all within a realistic 2.0km walking distance of the centre of the site. There is a good quality, wide footway on the northern side of High Street to the east of the junction with Sidmouth Road, which provides a pedestrian link towards the facilities and services located within Honiton town centre.
- 3.2.10 Littletown Primary School can be accessed along Battishorne Way where footways are located on both sides and separated from the carriageway by a grass verge. This route is also suitable for on-road cycling.
- 3.2.11 Against this background, the site is well located within good proximity to a number of local services and facilities giving future residents a genuine opportunity to travel by sustainable modes encourage a healthy and active lifestyle.



#### 3.3 **Proposed Pedestrian/Cycle Provision**

- 3.3.1 To promote the uptake of sustainable travel, a series of improvements have been previously identified with DCC and include the following works:
  - A footway on the western side of Sidmouth Road between the site access and the Sidmouth Road / Battishorne Way / Old Elm Road roundabout;
  - An uncontrolled crossing with dropped kerbs and tactile paving on the southern arm of the Sidmouth Road / Old Elm Road / Battishorne Way roundabout;
  - The footways along Honeysuckle Drive will be extended into the site;
  - A 3.0m wide pedestrian / cycle link to Maple Close connecting with the existing pedestrian network through the residential development; and
  - A 3.0m pedestrian / cycle / emergency access will also be provided from Hayne Lane to the west of the site.
- 3.3.2 This strategy will satisfy the objectives of **Strategic Policy 65** through the provision of improved pedestrian/cycle facilities and delivering improved accessibility and safety.

#### 3.4 Accessibility by Public Transport

- 3.4.1 There are several bus stops in close proximity of the site. There is a bus stop on Old Elm Road opposite the junction with Honeysuckle Drive (complete with a bus shelter and timetable information) approximately 3-minutes walking distance from the northern boundary to the site.
- 3.4.2 There are also bus stops located in both the northbound and southbound direction on the A375 Sidmouth Road immediately to the north of the junction with Battishorne Way (located adjacent to the Tesco superstore and providing bus shelters and timetable information), which are also approximately 2-3 minutes walking distance from the eastern boundary of the site.
- 3.4.3 Sidmouth Road forms the principal bus corridor between Honiton, Sidmouth, Exeter, and Taunton. The primary bus routes serving Sidmouth Road are no's 367, 9, and 20. The no. 367 forms a Honiton Town Circular route, which also serves the bus stop on Old Elm Road, provides a half-hourly hourly service throughout the day to the key services and facilities located within Honiton, including the town centre, railway station, Honiton Hospital, and Littletown Primary School. The no. 9 provides an hourly service to Sidmouth and Exeter; and the no. 20 provides five return bus journeys per weekday between Taunton and Seaton.



- 3.4.4 The journey time by bus to Honiton town centre is approximately 13-minutes, with a 35-minute journey to Sidmouth. The first available service to Honiton town centre leaves the bus stop on Old Elm Road at 0725 and the last return journey is at 1810. The first service to Sidmouth and Exeter departs at 0813 and the last return journey from Sidmouth is at approximately 1900.
- 3.4.5 The site is therefore well related to regular bus services that provide direct connections to Honiton town centre and nearby towns to accommodate a range of journey purposes, including travel to/from work and shopping trips.
- 3.4.6 Honiton rail station is located approximately 2.1km to the north-east of the site, and therefore is within an acceptable walking distance and comfortable cycling distance of the site. It is also directable accessible via the no's 9 and 367 bus services. The station has 16 secure cycle parking spaces, equipped with shelters and CCTV, and provides 1-2 trains per hour to destinations including Exeter, Yeovil Junction, Salisbury, and London Waterloo thereby providing easy access to a wider range of employment, leisure, and retail facilities.
- 3.4.7 Importantly, the close distance to the bus stops provides great potential for residents to combine walking and public transport to reach a number of destinations, facilities, and services.
- 3.4.8 Therefore, whilst the areas immediately surrounding the development offer a varied and extensive range of facilities and services, those wishing to travel to other areas, i.e., Exeter, Yeovil, and Taunton (that offer yet more facilities) can do so easily by using public transport services.

#### 3.5 Travel Plan

3.5.1 A robust Travel Plan for the site can also be implemented. The Travel Plan would be developed in accordance with any DCC residential travel plan guidance and will encourage and facilitate travel by walking, cycling, and public transport use through a range of measures. In particular, this may include provision of travel vouchers to new residents, which can be used for purchasing public transport taster tickers.

#### 3.6 **Summary**

3.6.1 There is a range of retail, employment, education, healthcare facilities within a reasonable walking distance of the site. These facilities and services are accessible via the existing good quality, safe and direct pedestrian provision in the vicinity of the site. There are also a variety of key destinations accessible well within a comfortable cycling distance, offering an alternative, quicker means of sustainable travel. A number of pedestrian links and off-site walking improvements have also been identified that the development can bring forward to maximise the accessibility of the site on foot.

- 3.6.2 There are bus stops located on Sidmouth Road and Old Elm Road within a comfortable walking distance of the site. These stops offer frequent services into Honiton town centre, Sidmouth, Exeter and Taunton, providing further opportunities to access a range of employment, leisure, and retail facilities.
- 3.6.3 Honiton Rail Station is located within an acceptable walking distance and comfortable cycle distance of the site, as well as being directable accessible via the no's 9 and 367 bus services, and provides direct and frequent connections to Exeter, Yeovil, Salisbury, and London Waterloo, providing excellent opportunities to access a wider range of employment, leisure, and retail facilities by public transport.
- 3.6.4 A travel plan would also be developed for the site which would assist in encouraging journeys by modes other than single occupancy car use. This may include the provision of a public transport travel taster tickets for every household to maximise the opportunity for future residents to use public transport services from first occupation.
- 3.6.5 It has therefore been demonstrated that the site is in a sustainable location in accordance with the guidance in the NPPF and satisfies **Strategic Policy 65** of the emerging East Devon Local Plan 2020-2040. This was accepted by East Devon District Council as part of the previous planning applications on the site.

## SECTION 4 Access (Policy 70)

- 4.1.1 This section of the note summarises the proposed site access arrangements.
- 4.1.2 DCC, as local highway authority, had no objection to the proposed access arrangements via the A375 Sidmouth Road and Honeysuckle Drive as part of the previous applications on the site.

#### 4.2 Site Access Arrangements

- 4.2.1 The western field is contiguous with the southern end of Honeysuckle Drive; whilst the eastern parcel abuts the A375 Sidmouth Road. The central parcel is not contiguous with the highway and a watercourse separates the western and central fields. There was no vehicular link proposed between the western and central fields as part of the previous applications on the site with vehicular access to the central field proposed via the eastern field onto Sidmouth Road. A footpath / cyclepath link was proposed to link the central and western fields.
- 4.2.2 There is therefore the potential to provide two vehicular accesses to serve the full site; a new ghostisland junction on the A375 Sidmouth Road; and via an extension of Honeysuckle Drive. These are set out in more detail in the following paragraphs.

#### A375 Sidmouth Road – Proposed Ghost Island Junction

- 4.2.3 A new ghost-island priority junction from the A375 Sidmouth Road provides the potential to serve the eastern part of the site. A potential arrangement is shown in i-Transport drawing no. ITB5022-GA-009, a copy of which is provided in the drawing section at the rear of this document.
- 4.2.4 To incorporate the right turn lane into the site and the two straight ahead lanes, Sidmouth Road would be widened on its west side along the site frontage. The site access road would have a carriageway width of some 5.5m with 10m junction radii to / from Sidmouth Road. A footway would be provided on the western side of Sidmouth Road between the site access and the Sidmouth Road / Battishorne Way / Old Elm Road junction (including some minor alterations to the southern Sidmouth Road arm and splitter island) to provide pedestrian access to the eastern field. This would require a minor narrowing of the carriageway to some 6.5m north of the proposed junction arrangement.
- 4.2.5 Sidmouth Road is on an incline from north to south in the vicinity of the proposed junction and is derestricted along the site frontage with a 30mph speed restriction commencing approximately 100m south of the roundabout junction with Battishorne Way / Old Elm Road. A vehicle speed survey was undertaken on the A375 Sidmouth Road as part of the original application on the site. The survey observed an 85th percentile dry weather speed of 40.4mph (65.0kph) in the northbound direction and 36.5mph (58.7kph) in the southbound direction.



- 4.2.6 In order to provide a 'worst case' assessment of visibility requirements the guidance provided in Design Manual for Roads and Bridges (DMRB) (i.e. the statutory guidance for trunk roads) has been used. CD 123 'Geometric Design of At-Grade Priority and Signal-Controlled Junctions' states that for roads with design speeds of 70kph (circa 43.5mph) the visibility provision along the main road should be some 120m, i.e. a vehicle approaching along Sidmouth Road needs to see and be seen from an emerging vehicle from the proposed access at a distance of 120m. This visibility provision is therefore robust for the observed vehicle speeds of circa 59kph 65kph, as identified by the speed survey.
- 4.2.7 i-Transport drawing no. ITB5022-GA-009 demonstrates that the proposed access provides visibility splays of 2.4m by 120m to both the left and right to the nearside kerbline. Furthermore, i-Transport drawing no. ITB5022-GA-015 demonstrates that unobstructed visibility to the right is achievable within the vertical plane from a typical driver's eye height of 1.05m to 0.6m above the carriageway.
- 4.2.8 The ghost-island right turn lane provides a 10m turning length and 25m deceleration length and therefore is also in accordance with the requirements of DMRB CD 123 on the basis of the observed vehicle speeds.
- 4.2.9 The proposed site access from Sidmouth Road therefore provides a safe and suitable access to the site from the local highway network.
- 4.2.10 A Stage One Road Safety Audit of the potential access onto Sidmouth Road was carried out as part of the previous application. The comments made were taken on board and the layout presented in drawing no. ITB5022-GA-009 therefore shows the 'safety audit' compliant site access arrangement which has previously been agreed by the local highway authority.
- 4.2.11 As set out in the previous application, if considered desirable, there is also the potential to extend the existing 30mph speed limit on Sidmouth Road to include the proposed site access in order to better integrate the site with the existing urban area. However due to the observed vehicle speeds and proposed junction layout, changing the speed limit is not essential.

#### Honeysuckle Drive

4.2.12 There is the potential to extend Honeysuckle Drive into the site to provide vehicular access to the western field and was agreed with DCC as being acceptable as part of the previous applications on the site. The existing footways on both sides of Honeysuckle Drive can also be extended into the site to provide the principal pedestrian access for the western parcel. This potential arrangement is presented in i-Transport drawing no. **ITB5022-GA-012**.



- **4.2.13** Honeysuckle Drive is a 250m long residential cul-de-sac, which also provides access to five further small cul-de-sacs. It forms a 5.0m wide carriageway with footways on both sides. At its northern end it forms the minor arm of a simple priority junction with Old Elm Road.
- 4.2.14 The existing 5.0m wide carriageway exceeds the minimum width to enable a large vehicle to pass a car (ref: MfS Figure 7.1), and also accords with the street width of 5.0m recommended by BS5906:2005, which allows a refuse vehicle to comfortably pass a parked car (ref: MfS paragraph 6.8.7).
- 4.2.15 Sight lines in excess of 2.4m x 43m are achievable to both the left and right for vehicles emerging from Honeysuckle Drive at the junction with Old Elm Road and therefore exceed the visibility requirements set out in MfS for the existing 30mph speed limit on Old Elm Road.

#### **Additional Pedestrian and Cycle Accesses**

- 4.2.16 In addition to the pedestrian provision at the potential vehicular accesses, an additional 3.0m wide pedestrian / cycle link to Maple Close can be provided. This will provide access to the existing good quality pedestrian provision through the residential development immediately to the north linking to the Sidmouth Road / Battishorne Way / Old Elm Road roundabout and beyond.
- 4.2.17 A 3.0m wide pedestrian / cycle / emergency access can also be provided from Hayne Lane to the west of the site. This is a very lightly trafficked rural road and operates as a shared surface and provides an alternative pedestrian access to Heathpark Industrial Estate.

#### 4.3 **Summary**

- 4.3.1 There is the potential to provide two vehicular accesses to serve the full development site. The eastern and central fields can be accessed via a ghost island priority junction off the A375 Sidmouth Road and Honeysuckle Drive can be extended into the site to provide vehicular access to the western field. A footpath / cyclepath only link was proposed to link the central and western fields as part of the previous applications on the site.
- 4.3.2 A footway is proposed on the western side of Sidmouth Road between the proposed access and the existing pedestrian facilities at the Sidmouth Road / Battishorne Way / Old Elm Road roundabout. An additional pedestrian / cycle link to Maple Close and a pedestrian / cycle / emergency access from Hayne Lane to the west of the site can also be provided.
- 4.3.3 These access arrangements comply with current design guidance and were agreed with DCC as part of the previous applications on the site.



4.3.4 As a result, safe and suitable access can therefore be provided for all users for the central field, as identified in the emerging Local Plan as a potential site for allocation, in line with the requirements of the NPPF, as well as for the full development site comprising the eastern and western fields. The full development site therefore satisfies **Policy 70** of the emerging East Devon Local Plan 2020-2040.



## SECTION 5 Traffic Impact (Policy 67)

5.1 This section of the note assesses the vehicular traffic impact of the potential development on the local and strategic road network.

#### 5.2 **Previous Planning Application**

- 5.2.1 As part of the transport assessment for the previous planning application for 141 dwellings on the site (EDDC planning application reference: 15/1027/MOUT) an analysis of the cumulative traffic impact of the development was undertaken.
- 5.2.2 Using parameters agreed with DCC, it was predicted that the development proposal would generate up to approximately 90 two-way vehicle trips during the weekday morning and evening peak hours. In agreement with DCC, the vehicular trips generated by the development were assigned to the highway network using a combination of Census Travel to Work Data %) and a gravity model.
- 5.2.3 The analysis allowed for appropriate background traffic growth and the traffic generated by committed developments, including the demolition of existing Honiton Motel and erection of replacement 66-bedroom hotel building with ancillary restaurant/bar (planning application reference: 13/2641/MFUL); and the development of up to 300 dwellings on Land West of Hayne Lane (planning application reference: 13/2744/MOUT).
- 5.2.4 Since that planning application was determined, the Turks Head (Turks Head Lane / Exeter Road) junction has been upgraded to a mini-roundabout (it was completed in 2016) which represents a significant improvement in capacity terms in comparison to the existing priority junction arrangement and has assisted in improving the operation of the wider highway network.
- 5.2.5 A summary of the analysis presented in the transport assessment is as follows:
  - The proposed ghost-island junction on the A375 Sidmouth Road will provide ample capacity in the weekday peak hour periods to accommodate the development generated traffic and will result in negligible delay to vehicles travelling on Sidmouth Road;
  - The A375 Sidmouth Road / Battishorne Way / Old Elm Road junction is forecast to retain ample spare capacity in the weekday morning and evening peak hour periods with the additional traffic generated by the proposed development;
  - The additional traffic associated with the proposed development will not have a noticeable impact on the performance of the Exeter Road / High Street / A375 Sidmouth Road junction and it will continue to operate without significant queuing and delay;



- The proposed development will not have a noticeable impact on the performance of the A30 Westbound Off-Slip junction and it is forecast to retain sufficient spare capacity in the weekday morning and evening peak hours;
- The additional development traffic at the High Street / A373 Dowell Street signalised junction
  will have a negligible impact on the performance of the junction and it will continue to operate
  without significant queuing and delay (allowing for some minor adjustments to the signal
  timings); and
- The proposed development will not have a noticeable impact on the performance of the Turks Head mini-roundabout and the junction will retain sufficient spare capacity in the weekday morning and evening peak hours.
- 5.2.6 Overall, the previous analysis demonstrates the residual cumulative transport impacts of the proposed full development of the site on the local and strategic highway network would not be material and would fall short of the 'severe' test set out in paragraph 111 of the NPPF. This analysis was agreed with DCC as local highway authority, and National Highways (then Highways Agency).

#### 5.3 **Comparison between 2013 and 2022 Traffic Data**

5.3.1 The current two-way traffic flows on the A375 Sidmouth Road immediately to the east of the site (using data from a permanent ATC site operated by DCC) have been compared with traffic surveys undertaken in 2013 as part of the previous planning applications on the site and is assessed in Table 5.1 below.

Table 5.1: A375 Sidmouth Road (south of Battishorne Way) – 2013 and 2022 Comparison (Total
Vehicles – Two-Way)

Date	Morning Peak	Evening Peak
June 2013	500	660
June 2022	477	560
Difference	-23 (-4.6%)	-100 (-15.2%)

Source: Traffic Surveys

5.3.2 Table 5.1 shows that the traffic flows on the A375 Sidmouth Road in the vicinity of the site during the weekday morning and evening peak hour periods are significantly lower than in 2013. The analysis presented in the previously submitted transport assessment is therefore robust.

#### 5.4 **Summary**

- 5.4.1 The proposed allocation of the central field in the emerging Local Plan for 79 dwellings will generate fewer vehicle movements and will therefore have a lesser impact on the operation of the local and strategic highway network than has already been considered acceptable by DCC as the local highway authority and National Highways (then Highways Agency) in relation to the A30 as part of the previous applications on the site. Therefore, it must follow that the proposed allocation is acceptable in traffic terms.
- 5.4.2 Furthermore, the implementation of a mini-roundabout scheme at the Turks Head junction has improved the operation of the surrounding highway network and it has been demonstrated that the current base line traffic flows in the vicinity of the site are lower than they were in 2013.
- 5.4.3 Against this background, the development of the full site for around 140-150 dwelling must also be acceptable in traffic terms and will fall short of the 'severe' test set out in paragraph 111 of the NPPF.
- 5.4.4 The full development site therefore satisfies **Policy 67** of the emerging East Devon Local Plan 2020-2040.

### SECTION 6 Summary and Conclusion

#### 6.1 **Summary**

- 6.1.1 Gleeson Land Ltd are promoting a residential development on land south of Heathfield, Honiton. The potential development site forms three fields; a western, central, and eastern field. The central field is identified in the emerging East Devon Local Plan 2020-2040 as a potential site for allocation for around 79 new homes. The full development site has capacity for around 140-150 dwellings.
- 6.1.2 This note demonstrates the acceptability of the proposed residential development in transport terms against the key transport tests set out in the NPPF and the transport specific points of the emerging East Devon Local Plan 2020-2040.
- 6.1.3 The site is situated in an accessible location with a range of retail, employment, education, healthcare facilities that can be easily accessed by future residents using non-car modes with good opportunities for the site to connect into the existing pedestrian, cycle and public transport infrastructure. This was accepted by East Devon District Council as part of the previous planning applications on the site. These opportunities will be improved by the delivery of a number of pedestrian links and off-site walking improvements, and the provision of a Travel Plan. The site therefore offers the opportunity to pass the NPPF test for appropriately taking up the opportunities for sustainable travel and satisfies **Strategic Policy 65** in the emerging East Devon Local Plan 2020-2040.
- 6.1.4 Vehicular and pedestrian access to the eastern and central fields is readily achievable from the A375 Sidmouth Road via a ghost island priority junction and via an extension of Honeysuckle Drive into the western field. An additional pedestrian / cycle link to Maple Close and a pedestrian / cycle / emergency access from Hayne Lane to the west of the site are also achievable. These access arrangements comply with current design guidance and were agreed with DCC as part of the previous applications on the site. Safe and suitable access can therefore be provided for all users in line with the requirements of the NPPF. **Policy 70** of the emerging East Devon Local Plan 2020-2040 can also be satisfied.
- 6.1.5 The traffic analysis undertaken as part of the previous planning applications on the site demonstrates that the residual cumulative transport impacts of the proposed full development site on the highway network would not be material and falls short of the 'severe' test set out in paragraph 111 of the NPPF. The implementation of a mini-roundabout scheme at the Turks Head junction has since improved the operation of the surrounding highway network and it has been demonstrated that the current base line traffic flows in the vicinity of the site are lower than they were in 2013 so it must follow that the full development site remains acceptable in traffic terms.

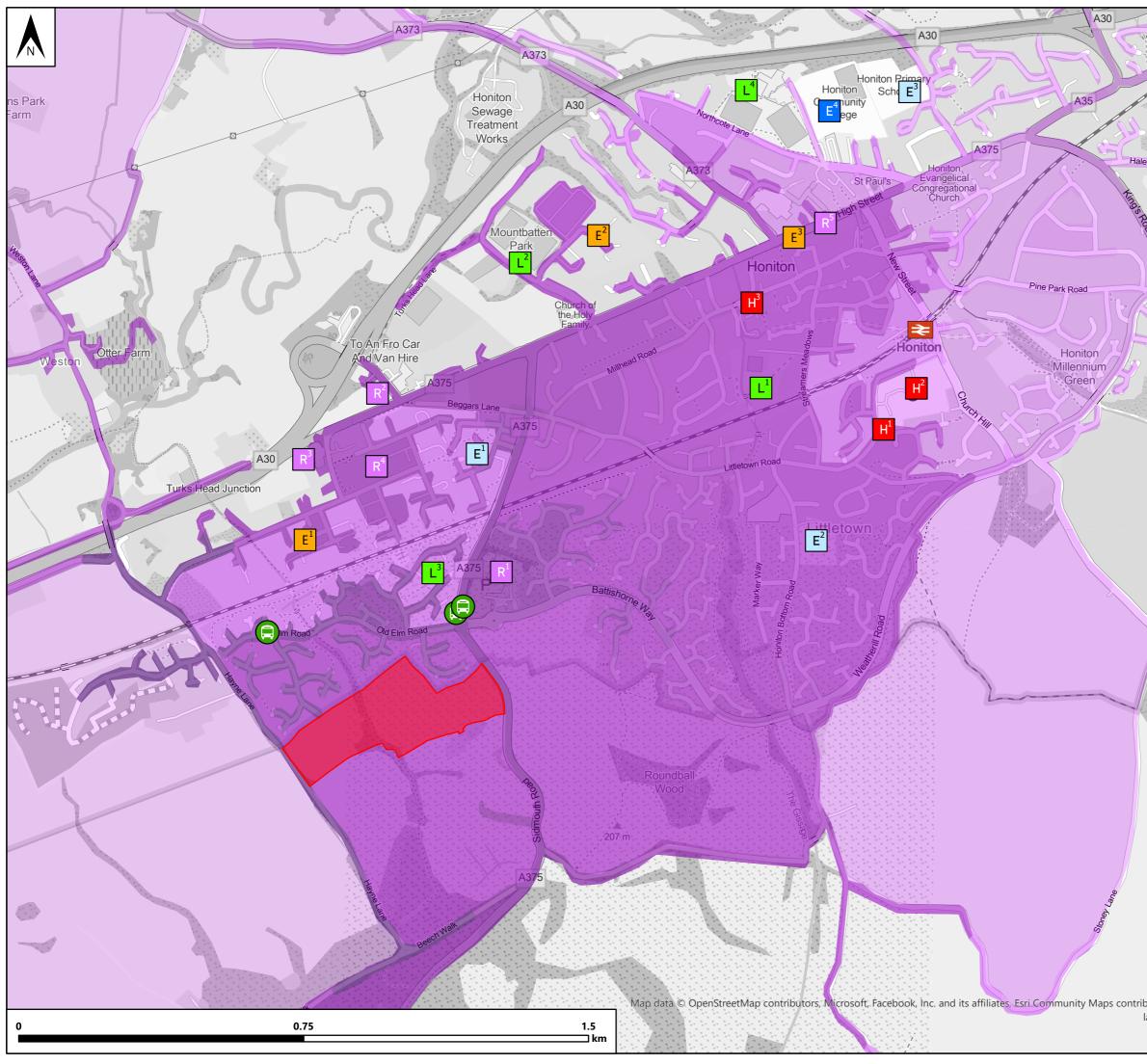


6.1.6 The proposal therefore complies with the requirements of the NPPF and satisfies **Policy 67** of the emerging East Devon Local Plan 2020-2040.

#### 6.2 **Conclusion**

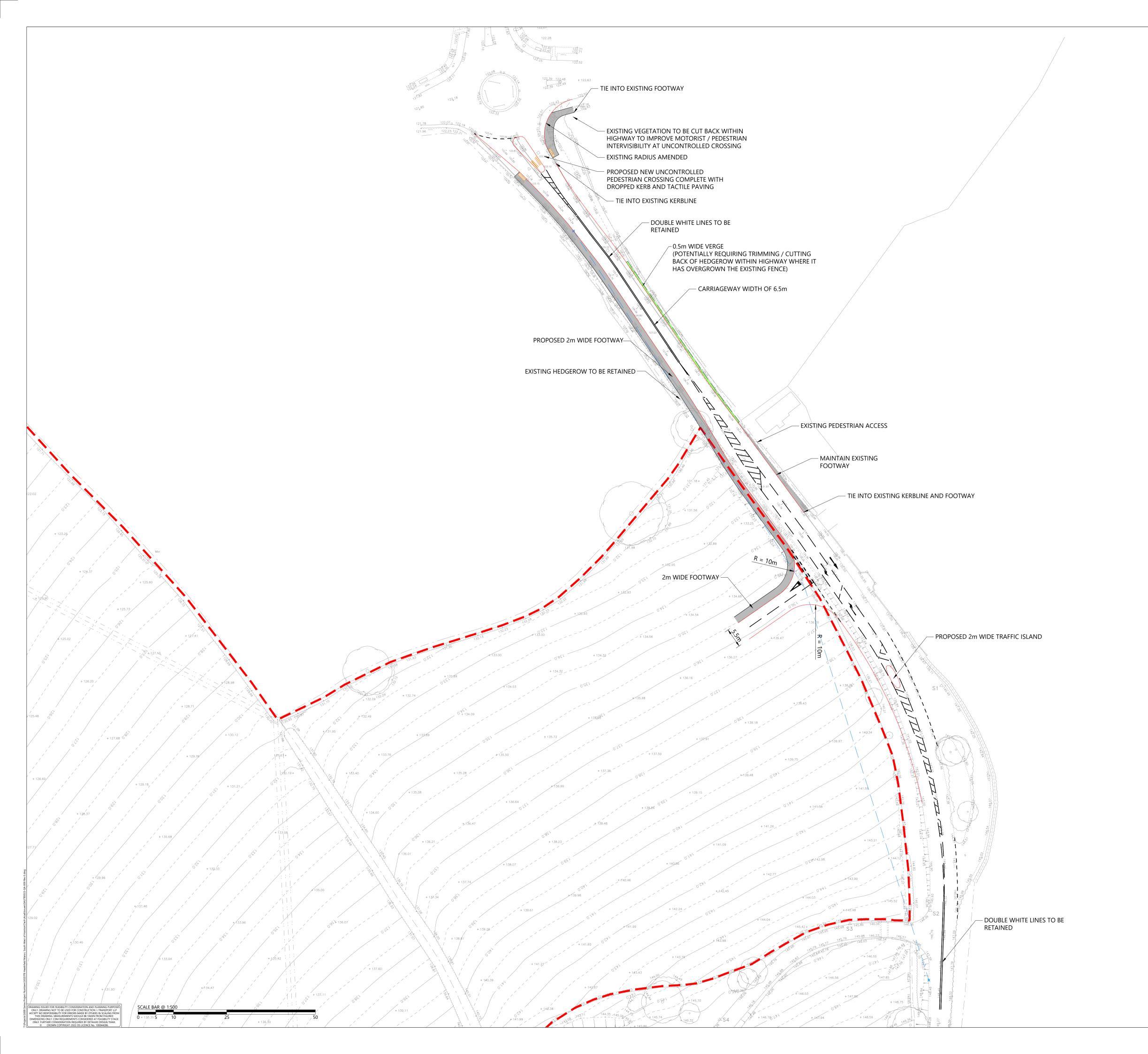
- 6.2.1 The development of the site can therefore comply with the relevant NPPF tests and the transport requirements of the emerging East Devon Local Plan 2020-2040, as follows:
  - There are good opportunities for sustainable travel that can be appropriately taken up;
  - Safe and suitable access is achievable for all people; and
  - The development will not have a material (and certainly not severe) impact on the operation of the surrounding local and strategic highway network.
- 6.2.2 The proposed residential development on land south of Heathfield, Honiton is therefore acceptable in transport and highways terms and there are no highway reasons for the full development site of around 140-150 dwellings to not be allocated in the emerging East Devon Local Plan 2020-2040.

**FIGURES** 



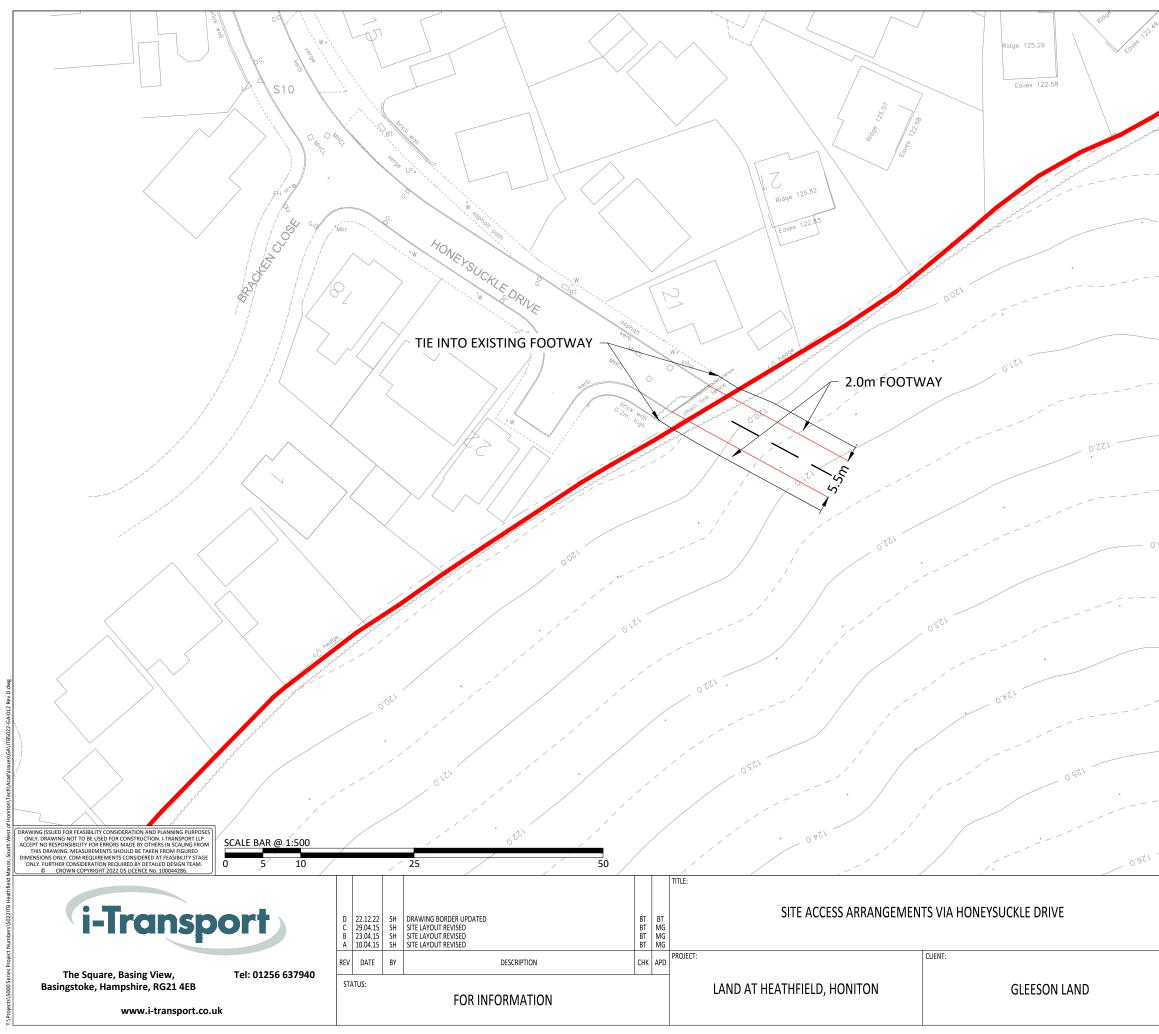
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**DRAWINGS** 

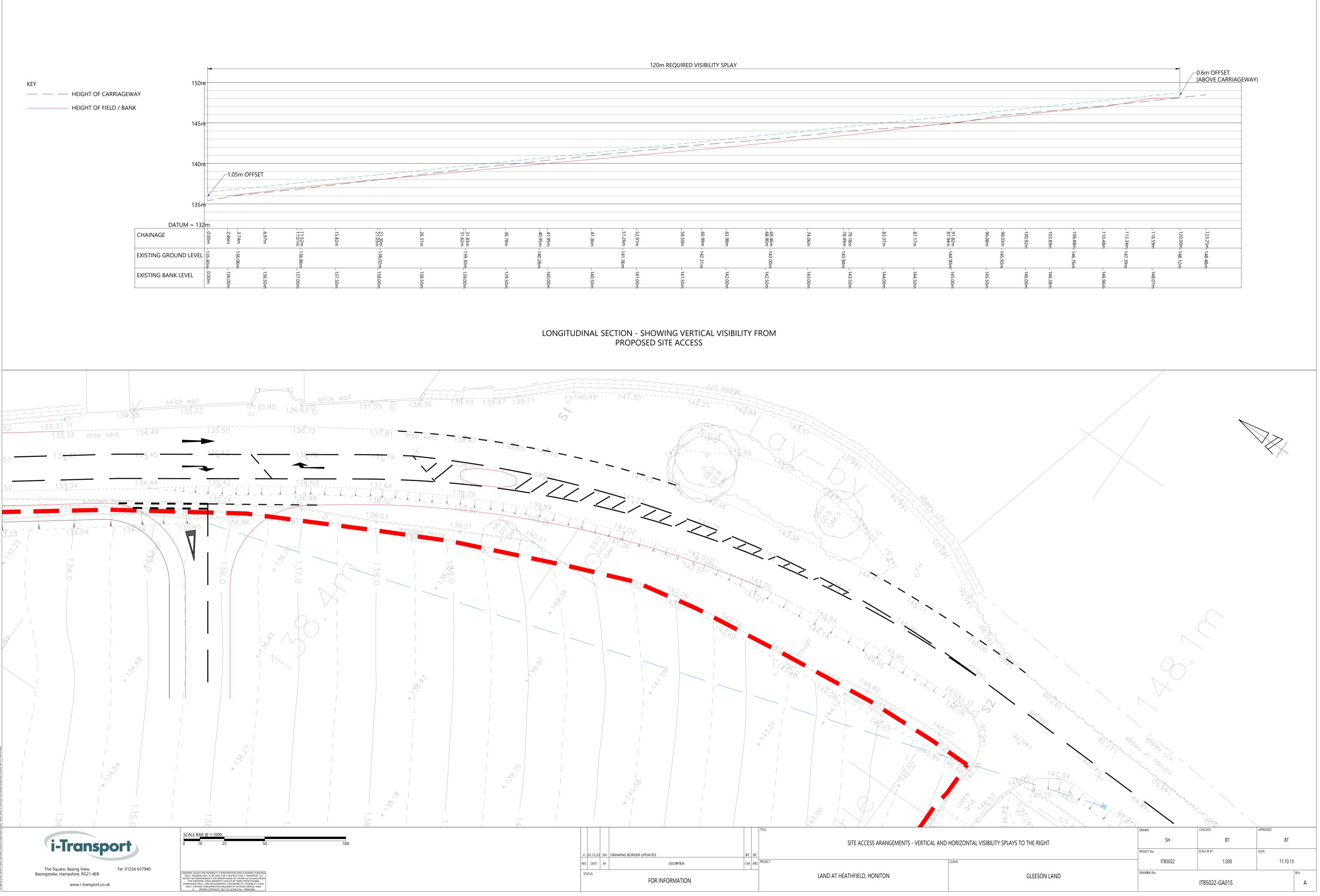


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# **APPENDIX A.** DEVON COUNTY COUNCIL CONSULTATION RESPONSE



Planning, Transportation and Environment

To: Corporate Director - Environment East Devon District Council The Knowle Sidmouth EX10 8HL From:

Development Management (East) Lucombe House County Hall Topsham Road Exeter EX2 4QD

Your Ref: 13/2430/MOUT

#### PLANNING APPLICATION – HIGHWAY CONSULTATION REPLY

#### APPLICATION NO: ED/02430/2013

APPLICANT: Gleeson Developments Ltd

**DETAILS OF APPLICATION:** Residential development of up to 147 homes, new vehicular access from Sidmouth Road and Honeysuckle Drive and pedestrian, cycle and emergency access points, strategic landscaping and open space.

**LOCATION:** Land at Heathfield (Land East of Hayne Lane) Gittisham

#### **Observations:**

The proposed development requires a new junction off the A375 Sidmouth Road to the south of the Battishorne Way/A375/Old Elm Road junction. This junction layout has been the subject of design considerations with the County Highway Authority (CHA) and the applicant. As part of the design proposals, an independent Road Safety Audit – Stage 1 was requested by CHA .This report has been recently undertaken and was received by the CHA on Thursday 29<sup>th</sup> January 2014, hence the lateness of this Consultee Response. I will deal with this RSA S1 later in this response.

The principle of residential development on this land is in the *emerging Local Plan* and is therefore considered to be in a sustainable location.

The general concept of the development in terms of scale, connectivity both for vehicular and pedestrian/cycle accesses and also emergency vehicle access has also been broadly agreed at meetings with the developer, the LPA and the CHA as recorded in the accompanying Transport Assessment.

With regard to the Transport Statement:-

- I note that the signal controlled junction of High Street/Dowell Street is predicted to be at capacity for the 2018 Baseline in both the AM & PM peaks. The proposed mitigating proposals are bound to have some 'knock-on' affects on the local network and possibly on other key junctions in Honiton. Any proposed mitigation involving traffic signal times will have to be tested by the County Councils Traffic Signal Team before I could make any recommendations regarding this junction.
- It is predicted that the development will generate minor increases in queuing on the off slip from the A30. However, this development will worsen the traffic conditions at the Turks Head junction making it less likely that future developments would be acceptable to the CHA should they generate more than 30 2-way movements per hour through the junction. The Highways Agency, East Devon District Council and the County Highway Authority our working together to agree a suitable improvement scheme for this junction and until a scheme has been decided upon, whether that is a traffic signal controlled junction or not, its future capacity is still in the balance.
- The recently undertaken Road Safety Audit Stage 1 Report (dated 24/01/2014) has • resulted in an amended plan (ITB5022-GA-009) which incorporates points raised within the RSA 4.1, 4.2 & 4.3. However, under General Issues 5.2 says: COMMENT 3.5 from previous RSA. "The proposed scheme includes the extension of the existing 30mph speed restriction to a point some 80metres to the south of the existing access to Heathfield Manor. The provision of a speed restriction on the northbound approach to the access is supported as an important safety feature. However, as Sidmouth Road falls at a gradient of up to some 10% down into Honiton, in the vicinity of the proposed access works, there is some concern about introducing the 30mph speed limit without a preceding 40mph buffer zone. It is suggested that consideration be given to extending the 30mph zone for a lesser distance than proposed in the audited scheme, whilst introducing a 40mph buffer zone on the approach to the extended 30mph speed limit from the south." The Designers Response does not take into account the movement of the 30mph speed restriction, as requested and commented upon in Appendix B – Record of Pre-Application Meeting with EDDC & DCC. Nor does it include any drawing to show were the relocation of the 30mph speed restriction or any 40mph buffer zone restriction will be. Whilst such traffic speed restrictions cannot be conditioned within any grant of planning and will require a Traffic Regulation Order under different legislation than the Town & Country Planning Act, I believe that for the avoidance of doubt they should be shown on the application drawings.

In view of the above, unfortunately, I recommend that the application is refused on lack of suitable information.

#### **Recommendation:**

#### THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, RECOMMENDS THAT PERMISSION BE REFUSED FOR THE FOLLOWING REASONS:-

- 1. The proposed development would interfere with the implementation of the approved road improvement scheme at the junction of Turks Head Lane and Exeter Road, Honiton contrary to paragraph 32 of the National Planning Policy Framework.
- 2. Adequate information has not been submitted to satisfy the Local Planning Authority that the proposal is acceptable in terms of relocation of existing traffic speed limits and the proposed mitigation measures to amend the timings at the High Street and A373 Dowell Street contrary to paragraph 32 of the National Planning Policy Framework.

Officer authorised to sign on behalf of the County Council

Date: 3 February 2014

## County Highway Authority

### Comment Date: Wed 02 Apr 2014

01/04/2014 The CHA and the LPA has received drawing (ITB5022-GA-017) which shows the relocation of the 30mph speed restriction on the A375 Sidmouth Road. This drawing should be read in conjunction with the site access drawing (ITB5022-GA-009 Rev A) as part of the application and accords with the recommendations made in the attached Road Safety Audit (dated January 2014).

The CHA has examined the proposed minor alterations to the existing traffic signal timings at the High Street / A373 Dowell Street junction and is content that the proposed mitigation measures are adequate to cope with the minimal traffic impact from the proposed development at this junction.

The existing Turks Head junction will be operating at capacity during peak traffic times but the development is predicted to result in only a minor increase in queuing and the total forecast queue length will be contained within the slip road without blocking back onto the main line A30 carriageway.

East Devon District Council, the Highways Agency and the County Highway Authority are working together bring forward a design scheme for Turks Head junction that will improve the operating nature of this junction and it is hoped that a suitable scheme will be brought forward shortly and that capacity issues at peak hours will eased.

In consideration of the above the County Highway Authority can amend its previous recommendation for refusal for reasons of insufficient detail to one of recommended approval with conditions.

Recommendation: THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, RECOMMENDS THAT THE FOLLOWING CONDITIONS SHALL BE INCORPORATED IN ANY GRANT OF PERMISSION: - []]]

1. The proposed estate road, cycleways, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, road maintenance/vehicle overhang margins, embankments, visibility splays, accesses, car parking and street furniture shall be constructed and laid out in accordance with details to be approved by the Local Planning

Authority in writing before their construction begins, For this purpose, plans and sections indicating, as appropriate, the design, layout, levels, gradients, materials and method of construction shall be submitted to the Local Planning Authority.

REASON: To ensure that adequate information is available for the proper consideration of the detailed proposals.

2. The development hereby approved shall not be carried out otherwise than in accordance with a phasing programme which shall previously have been submitted to and approved by the Local Planning Authority in writing.

REASON: To ensure the proper development of the site.

3. No part of the development hereby approved shall be commenced until:

A) The access road has been laid out, kerbed, drained and constructed up to base course level for the first 20 metres back from its junction with the public highway

B) The ironwork has been set to base course level and the visibility splays required by this permission laid out

C) The footway on the public highway frontage required by this permission has been constructed up to base course level D) A site compound and car park have been constructed to the written satisfaction of the Local Planning Authority

REASON: To ensure that adequate on site facilities are available for all traffic attracted to the site during the construction period, in the interest of the safety of all users of the adjoining public highway and to protect the amenities of the adjoining residents

4. The occupation of any dwelling in an agreed phase of the development shall not take place until the following works have been carried out to the written satisfaction of the Local Planning Authority:

A) The spine road and cul-de-sac carriageway including the vehicle turning head within that phase shall have been laid out, kerbed, drained and constructed up to and including base course level, the ironwork set to base course level and the sewers, manholes and service crossings completed;

B) The spine road and cul-de-sac footways and footpaths which provide that dwelling with direct pedestrian routes to an existing highway maintainable at public expense have been constructed up to and including base course level;

C) The cul-de-sac visibility splays have been laid out to their final level;

D) The street lighting for the spine road and cul-de-sac and footpaths has been erected and is operational;

E) The car parking and any other vehicular access facility required for the dwelling by this permission has/have been completed;

F) The verge and service margin and vehicle crossing on the road frontage of the dwelling have been completed with the highway boundary properly defined;

G) The street nameplates for the spine road and cul-de-sac have been provided and erected.

REASON: To ensure that adequate access and associated facilities are available for the traffic attracted to the site

#### **County Highway Authority**

Comment Date: Fri 19 Jun 2015

Observations:

The Highway Authority has made comment on the previous planning application (13/2430/MOUT) for this site. This application from a highway perspective has changed very little. The Highway Authority would no longer require the 40MPH speed restriction, on the A375 Sidmouth Road. As this has proved to be against Devon County Council policy and the traffic speed data provided by the applicant as part of the application shows that 85th % traffic speeds are within acceptable limits for the approach to the site from the south. The proposed development requires alterations to the existing junction off the A375 Sidmouth Road to the south of the Battishorne Way/A375/Old Elm Road junction. This junction layout has been the subject of design considerations between the Highway Authority and the applicant.

The existing Turks Head junction will be operating at capacity during peak traffic times but the development is predicted to result in only a minor increase in queuing and the total forecast queue length will be contained within the slip road without blocking back onto the main line A30 carriageway. East Devon District Council, Highways England and the Highway Authority are working together bring forward a design scheme for Turks Head junction that will improve the operating nature of this junction and it is hoped that a suitable scheme will be brought forward shortly and that capacity issues at peak hours will be reduced.

RECOMMENDS THAT THE FOLLOWING CONDITIONS SHALL BE INCORPORATED IN ANY GRANT OF PERMISSION

1. The proposed estate road, cycleways, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, service routes, surface water outfall, road maintenance/vehicle overhang margins, embankments, visibility splays, accesses, car parking and street furniture shall be constructed and laid out in accordance with details to be approved by the Local Planning Authority in writing before their construction begins, For this purpose, plans and sections indicating, as appropriate, the design, layout, levels, gradients, materials and method of construction shall be submitted to the Local Planning Authority.

REASON: To ensure that adequate information is available for the proper consideration of the detailed proposals.

2. The development hereby approved shall not be carried out otherwise than in accordance with a phasing programme which shall previously have been submitted to and approved by the Local Planning Authority in writing.

REASON: To ensure the proper development of the site.

3. No part of the development hereby approved shall be commenced until:

A) The access road has been laid out, kerbed, drained and constructed up to base course level for the first 20 metres back from its junction with the public highway

B) The ironwork has been set to base course level and the visibility splays required by this permission laid out

C) The footway on the public highway frontage required by this permission has been constructed up to base course level

D) A site compound and car park have been constructed to the written satisfaction of the Local Planning Authority

REASON: To ensure that adequate on site facilities are available for all traffic attracted to the site

during the construction period, in the interest of the safety of all users of the adjoining public highway and to protect the amenities of the adjoining residents

4. The occupation of any dwelling in an agreed phase of the development shall not take place until the following works have been carried out to the written satisfaction of the Local Planning Authority;

A) The spine road and cul-de-sac carriageway including the vehicle turning head within that phase shall have been laid out, kerbed, drained and constructed up to and including base course level, the ironwork set to base course level and the sewers, manholes and service crossings completed;B) The spine road and cul-de-sac footways and footpaths which provide that dwelling with direct pedestrian routes to an existing highway maintainable at public expense have been constructed up to and including base course level;

C) The cul-de-sac visibility splays have been laid out to their final level;

D) The street lighting for the spine road and cul-de-sac and footpaths has been erected and is operational;

E) The car parking and any other vehicular access facility required for the dwelling by this permission has/have been completed;

F) The verge and service margin and vehicle crossing on the road frontage of the dwelling have been completed with the highway boundary properly defined;

G) The street nameplates for the spine road and cul-de-sac have been provided and erected.

REASON: To ensure that adequate access and associated facilities are available for the traffic attracted to the site

## Appendix 3-BMD landscape note



## **TECHNICAL NOTE**

Project:	Land at Heathfield, Honiton	Ref:	BMD.22.0074.TN.001
Subject:	Landscape & Visual Capacity Technical Note	Date:	12.01.2023
Status:	For Information	Rev:	-

#### LANDSCAPE & VISUAL CAPACITY TECHNICAL NOTE

Following a request from Gleeson Land, Bradley Murphy Design Ltd. (BMD) has undertaken a high-level Landscape and Visual Capacity Appraisal (LVCA) in relation to Land at Heathfield, Honiton. The area of study (referred to as the 'Site') focused on an area of agricultural land on the southern edge of Honiton, west of Sidmouth Road and east of Hayne Lane, as shown on **Figure 1 in Appendix A**. The Site lies on the northern edge of the East Devon Area of Outstanding Natural Beauty (AONB).

This Landscape and Visual Capacity Technical Note was prepared by Stuart Robinson CMLI from Bradley Murphy Design Ltd, a chartered landscape architect, with over 7 years' experience in private practice.

The aim of the LVCA reported in this Technical Note is to assess the suitability of the Site for development, with regard to its landscape and visual sensitivities, and to identify recommendations for sensitively integrating the development into the Site and surrounding context in landscape and visual terms.

A brief review of the following documents has been undertaken to understand, define and record the context, character, setting and sensitivity of the Site, in order to consider its capacity and that of the surrounding landscape and visual resource to accommodate development:

- East Devon Local Plan 2013 to 2031, Jan 2016
- Emerging East Devon Local Plan 2020 2040
- East Devon Open Space Study, 2012
- East Devon and Blackdown Hills Landscape Character Assessment. At County level, the majority of the Site lies within Landscape Character Area (LCA) 3: Blackdown Hills, while a small proportion of the Site is located within LCA 4: Clyst Lowland and Farmland. At District level, the Site lies entirely within Landscape Character Type (LCT) 3A: Upper Farmed and Wooded Valley Slopes.
- Devon County Council Green Infrastructure Strategy
- East Devon AONB Partnership Plan, 2019-2024, Management Framework for the East Devon Area of Outstanding Natural Beauty

#### Existing Context

The landform for the land to the south of Honiton along the northern extent of the East Devon AONB, falls down the valley slopes from south east to north west, from approximately +235m AOD, towards the existing settlement and the A30, where it plateaus along the river corridor at approximately +75m AOD. To the north of the river, the landform begins to sharply rise up the valley slope towards the Blackdown Hills AONB, which covers an expansive area immediately north of Honiton. Overall, the landform of the surrounding landscape is undulating and varied, with sharp changes in topography in places, associated with the two AONB's that converge around Honiton. There are long distance views across the valley between the two AONB's, which create focal points and beacons within the landscape. The wooded valley slopes create a green backdrop to these long distance views, in what is for the most part, a scenic and tranquil landscape.



The town of Honiton borders the Site on its northern boundary and sits between the two AONB's, within the valley and along the lower end of the valley slopes. The town itself is well integrated into the surrounding landscape and sympathetic to its setting between two AONB's, falling south east to north west between +164m AOD and +88m AOD. There are a number of vegetated corridors within the town, mainly associated with the existing railway line and along watercourses. These help to break up the urban form and soften views towards the town from the AONB's. There is a substantial area of commercial built form in the north western part of the town, towards the toe of the valley slope. Field survey work has identified that, although new development is limited in the area, most likely due to the sensitive nature of the AONB's, there has been a recent expansion to Honiton along its western boundary, extending the settlement boundary westwards into what was formerly open agricultural fields.

Beyond the settlement boundary of Honiton, there are several small outlier villages within the study area. Weston lies approximately 1km to the north west of the Site, while Gittisham lies approximately 1.5km to the south west. Field survey work has confirmed that there is unlikely to be any intervisibility with the developed Site due to a combination of intervening mature field boundary vegetation, built form and landform.

The Site lies adjacent to the southern edge of Honiton, bound to the east by the A375 Sidmouth Road, to the west by Hayne Lane, to the north by existing settlement on the southern edge of Honiton and to the south by a field boundary hedgerow and a timber post and wire fence. The Site comprises three regularly shaped fields, currently in agricultural use. There is a mature linear tree belt that dissects the Site between the central and western field parcels, along which there is also an existing watercourse. The landform across the Site falls from approximately +140m AOD in the south east, to a low point along the Site's northern boundary with Honiton at approximately +116m AOD. There are open, unfiltered views north towards the Blackdown Hills AONB from within the Site, as well as from nearby receptors. For the most part, vegetation is limited to Site boundaries and along the existing linear tree belt between the central and western parcels.

There are no on Site Public Rights of Way (PRoW) and in fact there is a limited PRoW network within the surrounding landscape. Nearby PRoW's of relevance to this LVCA include:

- Public footpath Gittisham 3, approximately 1.2km south of the Site;
- Public footpath Honiton 27, approximately 600m north east of the Site;
- Public footpath Honiton 26, approximately 2.3km east of the Site;
- Public footpath Honiton 12, approximately 4.4km east of the Site; and
- Public footpath Honiton 14, approximately 4.4km east of the Site.

Noting the limited network of PRoW's within the surrounding landscape, including from with the East Devon AONB, within which the Site is located, the surrounding landscape is of limited recreational value despite its designated status.

The Site does not feature any ancient woodland however, there are small stands of woodland scattered across the landscape, often linked by hedgerow field boundaries, particularly within both AONB's to the north, east and south of the Site.

There are two Conservation Areas identified within the study area: Honiton Conservation Area, approximately 0.9km north east of the Site at its closest point; and Gittisham Conservation Area, approximately 1.5km south west of the Site at its closest point. There are a large concentration of listed structures within both Conservation Area's, including Grade II\* structures within Honiton and a Grade I listed structure within Gittisham. However, due to the intervening built form within Honiton and the layering of vegetation between Gittisham and the Site, it is considered that these heritage designations will be unaffected by development of the Site. There are a number of Grade I, II\* and II Listed structures outside of these Conservation Areas, located at Combe House Registered Park and Garden to the south west of the Site. Field survey work has confirmed that these designations will also be unaffected due to the intervening distance, landform and layering of field boundary vegetation.

There are no listed buildings or Scheduled Monuments on Site. The nearest listed structures that have potential to share intervisibility with the Site are the Grade II Listed Heathfield Farmhouse, approximately 200m north of the Site,



and Coombehayes Farmhouse, approximately 1km east of the Site. There is one Scheduled Monument identified within the study area - the Two Ring Cairns 410m south east of Higher Blannicombe, forming part of a round barrow cemetery on Farway Hill Scheduled Monument, approximately 2.2km south east of the Site.

There is one registered Park and Garden within the study area:

 Combe House Registered Park & Garden (Grade II) approximately 0.7km south west of the Site, between Gittisham and the A375 within the East Devon AONB. Confirmed through testing during field work, there is no intervisibility between the Site and Combe House due to the layers of intervening parkland and wooded vegetation between the parkland edge and the southern Site boundary. Therefore, any effects from this location will likely be negligible to neutral.

#### Landscape Character Analysis

At county level, the majority of the Site lies within LCA 3: Blackdown Hills, as defined by the East Devon and Blackdown Hills Landscape Character Assessment. This LCA is defined as "elevated, exposed and open in character and which fans out into narrow ridges at its edges where it is fringed by steeply sloping wooded greensand edges and farmed slopes which descend into river valleys". The key characteristics of the LCA and of relevance to the Site include:

- Landscape drained by streams and springs radiating out from the plateau area and draining into the Culm or Otter valley;
- Higher ground sparsely wooded with characteristic beech hedgebanks and some pine shelterbelts;
- Steep scarp slopes that are densely wooded ancient oak with bluebells and primroses; and some conifer plantations which extend onto the ridges;
- Regular modern and parliamentary fields of large and medium scale on the plateaux, reflecting late enclosure of common land, contrasting with smaller curving fields of medieval origin on valley slopes;
- Low narrow earthbanks with hedges on plateaux; with wider historic banks in the upper farmed valleys; and more species-diverse Devon hedges (e.g. beech, sycamore, ash, hazel and gorse) with flower, fern and moss-rich banks on lower slopes;
- Mainly pasture (often improved) and dairy farming with some mixed farming on heavy brown soils;
- Remnant areas of gorse, heathland and bracken on the plateau; ancient semi-natural and broadleaved woodlands on the scarp slopes; semi-improved and unimproved acidic and neutral grassland and springline mires (including carr woodland) occurring mainly on the scarp slope and in the upper farmed valleys;
- Clustered hamlets and villages at road crossings and spring lines. Farmsteads scattered throughout, nestled in dips with beech shelterbelts;
- Straight roads with verges on narrow ridges descending abruptly and steeply to sinuous lanes defined tightly by close hedgebanks; and
- Strong overarching perceptions of tranquillity and remoteness in many areas.

A small proportion of the Site's northern extent is located within LCA 4: Clyst Lowland Farmland, described as "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 key characteristics the LCA exhibits of relevance to the Site include:

- Lowland, undulating farmed landscape underlain by mudstones, siltstones and sandstones;
- Landscape crossed by streams and meandering watercourses which feed into the more distinct valleys of the Clyst (a tributary to the Exe) and the Tale (a tributary to the Otter);
- Higher ground to the north at Budlake (harder igneous geology) providing a more distinctive and often wooded skyline;
- Generally well treed appearance due to significant numbers of hedgerow trees although few woodlands with exception of Killerton Estate (part of Ashclyst Forest);
- Notable small orchards often on the outskirts of villages;
- Mixture of small to medium scale fields often with curving boundaries reflecting medieval origin;



- Mixed farming including arable and some pasture along watercourses where there is seasonal flooding, as well as areas of horsiculture and hobby farming;
- Nature conservation interest provided by unimproved neutral grassland and marshy grassland, particularly fringing streams and plantation/ semi-natural and ancient woodland in the north-west;
- Historic parkland in the north-west of this area with notable areas of parkland and veteran trees;
- Dispersed pattern of small villages (particularly along the watercourses many with 'Clyst' place names), dispersed farmsteads and town of Honiton;
- Strong local vernacular of cob and thatch;
- Overarching perceptions of tranquillity and quintessential English lowland farmland when away from infrastructure and communication corridors and a sense of isolation in parts; and
- Views to surrounding ridges of higher land.

At a district level, the Site lies entirely within LCT 3A: Upper Farmed and Wooded Valley Slopes, described as "an ancient and settled landscape, containing patchworks of irregular fields, woodland, winding lanes, scattered farms and small villages, often with square-towered churches. There are several small parklands and estate villages, and a high density of archaeological and historical sites. This creates a timeless quality and strong sense of history". Key characteristics of relevance to the Site include:

- Undulating upper valley slopes;
- Deciduous woodland and copses, especially on upper slopes;
- Well-treed pastoral farmland, with some arable cultivation on lower slopes;
- Small to medium sized fields with irregular boundaries;
- Wide, species-rich hedges with many hedgerow trees;
- A dispersed settlement pattern of isolated farms and small villages;
- Very winding narrow lanes;
- An intimate and intricate landscape with wider views often confined by vegetation; and
- Relatively remote and tranquil with little obvious modern development.

Identified forces for change for LCA3A: Upper Farmed and Wooded Valley Slopes, of relevance to the Site include:

- Loss of ash tree and a result of ash dieback;
- Unknown impacts of future changes to agricultural grants and policies;
- Climate change potentiall affecting agricultural practices, tree species and water supplies;
- Light pollution, particularly bright lights in farm yards / buildings;
- Upgrading of roads (particularly the A30) increasing their visibility in the landscape; and
- Continued development pressure.

The key landscape guidelines for LCA3A: Upper Farmed and Wooded Valley Slopes, of relevance to the Site include:

- Protect:
  - The historic fabric of the landscape and its setting;
  - Historic farm buildings, exploring alternative uses for redundant buildings which retain their external appearance;
  - The distinctive patchwork of field patterns, associated with traditional Devon smallholdings and often dating back to the medieval period; and
  - The character of rural lanes, resisting pressure for unnecessary signage, particularly at the entrances to villages.
- Manage:
  - Hedgerows and hedgerow trees;
  - Woodlands, aiming to promote age and species diversity, using traditional techniques (e.g. coppicing) where possible. Link woodland blocks with copses and tree belts to improve habitat resilience; and



• Grassland sites, promoting appropriate grazing to control scrub and maintain unimproved grassland, flushes and wildflower meadows.

#### • Plan:

- o Develop natural flood management techniques to control water run-off;
- Carefully consider the impacts of proposed development on upper slopes, as these sites are often particularly visible in wider views;
- Retain the pattern of small-scale settlements constructed of local materials;
- Improve integration of new development into the wider landscape, specifically through characteristic landscape features such as hedges, earth banks and small woodlands;
- Where new dwellings are required, they should be carefully sited with regard to the traditional settlement form; and
- Work with highways authorities to develop effective signage which minimises visual clutter and does not detract from historic settlements or village approaches.

#### East Devon AONB Management Plan

The East Devon AONB Partnership Plan 2019-2024, presents three overarching themes for the long term vision of the AONB: Place; People and Prosperity; and Communication and management. The guidelines within the AONB Management Plan, of relevance to the Site and landscape character, include:

#### Place

- Forces for Change:
  - Agricultural practices and market influences;
  - Habitat and species change (diseases such as Ash Dieback/invasives);
  - Climate change;
  - Government policy post-Brexit environmental legislation;
  - Urban Character Analysis; and
  - Built development new housing, business units, roads.

#### • Priority Actions:

- Review and update the East Devon Landscape Character Assessment with EDDC, DCC and BHAONB;
- o Encourage appropriate woodland creation projects especially in areas of high soil erosion;
- Secure partnership and funding for follow on Legacy to Landscape project;
- o Seek to develop cross boundary guidance on protecting areas of tranquillity; and
- Confirm and deliver actions in support of the Government' s 25 year Environment Plan; in particular developing Natural Capital and achieving Net Gain.

#### People and Prosperity

- Forces for Change:
  - Global market price changes;
  - o Climate change and trend for natural flood management tools;
  - o Increasing recognition of the health and welfare benefits of outdoor recreation;
  - o Population increase through housing development;
  - o Population increase/ housing development within the AONB and its setting;
  - Protected landscape policy/proposals for a Dorset and East Devon National Park
  - o Impacts of new technologies on domestic and commercial properties;
  - Post Brexit impact on planning regulations and related environmental protection;
  - Traffic increase through greater housing development;
  - Increasing interest in cycling and safe off-road routes;
  - Management of the highway corridor for wildlife/safety;
  - o The recognised health and welfare benefits of outdoor recreation; and
  - 'Natural capital' models may influence future rural business and land management.



#### • Priority Actions:

- Influence, support and encourage environmental stewardship schemes;
- o Work with partners to develop and support sustainable woodland and hedgerow/tree management;
- To encourage use of Landscape Sensitivity Assessments in and within the setting of the AONB;
- o Contribute to the development of sustainable transport initiatives;
- Investigate options to monitor and identify tranquil areas within the AONB; including the creation of a network of quiet lanes; and
- Encourage and support safe off-road access routes for all users.

#### Communication and Management

- Forces for Change:
  - Defra/government policy post-Brexit;
  - Local authority/partner funding and support; and
  - Community involvement and support.

#### Urban Context Appraisal

A high-level appraisal of the urban character and existing settlement pattern of Honiton has been undertaken, using a combination of desktop and field survey work, to understand how the existing character of the town might influence the potential development of the Site (refer to **Figure 9** at **Appendix A**). The following observations have been identified:

- The existing settlement immediately north of the Site, appears to be a late 20<sup>th</sup> or early 21<sup>st</sup> century development, comprising predominantly single storey detached and semi-detached bungalows, with occasional 2-2.5 storey detached dwellings at the end of cul-de-sacs. This is true of Bracken Close, Honeysuckle Drive, Heather Close, Maple Close and Sycamore Close. The remaining properties located to the south of Old Elm Road are, for the most part, single storey bungalows, presumably due to their location on the rising valley slope and proximity to the East Devon AONB. The predominance of single storey dwellings, with only occasional 2-2.5 storey dwellings, is likely to be less visually intrusive on views from the north within the Blackdown Hills AONB, across the valley.
- Immediately adjacent to the Site's northern boundary, there is a small proportion of existing dwellings that fall within the boundary of the East Devon AONB, which provides a reference for residential development being acceptable within the designated landscape. Approximately 15 dwellings along Oak View and 7 along Bracken Close, some of which are 2-2.5 storey dwellings but for the most part are single storey bungalows, are located on the northern edge of the AONB. It is also worth noting that green infrastructure is limited to private gardens to the properties in these areas.
- To the north of Old Elm Road, the use of single storey bungalows continues, but there is a greater presence of 2-2.5 storey dwellings, located lower down the valley slope towards the existing railway line and the commercial estate along Devonshire Road.
- Materiality of existing dwellings within Honiton is varied. Properties closest to the Site are predominantly a mix of buff brick (potentially of local origin) and white render, with occasional red brick dwellings.
- The use of red brick increases further north down the valley slope, extending to boundary walls as well as building facades.
- Dormer windows are a frequently used feature on existing dwellings. Hoods above front doors are more infrequently used.
- Existing roof materiality includes red and grey clay tiles.
- Front garden treatments are varied throughout the town. Properties closest to the Site often have generous front gardens set back from the road edge by 5-10m, while others have very narrow front lawns. Typically, there are infrequently used boundary hedgerows, walls or railings located in front gardens, with the preference instead being an open boundary.
- Road materiality changes between black tarmac along streets, with red tarmac and a raised table to indicate a private drive or cul-de-sac.



- Due to the often generous front gardens, as well as the wooded backdrop of the nearby East Devon AONB to the south and views across the valley to the Blackdown Hills AONB to the north, the streetscape feels rural and informal with a strong green infrastructure theme due to the influence of the AONB's. This is also true of other suburban areas of the town, such as along Weatherill Road to the east and Millhead Road to the north.
- There is a recently completed residential development along the western edge of the town at Hayne Farm, accessed from Hayne Lane. This new estate comprises a combination of 2-2.5 storey redbrick houses and occasional 3 storey flats with a white render finish. From views within the surrounding connext, including on Site, the white render flats often stand proud and are clearly visible.
- The surrounding settlement edge of Honiton, as well as the Site itself, is located within easy walking and cycling distances to a series of local amenities including: shops; medical centres; Honiton Library; sports facilities and Honiton Town Centre (see **Figure 7** at **Appendix A**).
- A high-level appraisal of the existing accessible greenspaces has been undertaken as part of this LVCA (see **Figure 8** at **Appendix A**), using the Accessible Natural Greenspace Standards (ANGSt). The appraisal has identified that, while Honiton is adequately covered by accessible open spaces of 20ha and 100ha, there is a current local deficiency in 2ha greenspaces. Development of the Site could help to address these open space deficiencies for not just the new residents, but for the existing community as well.

#### Visual Analysis

This LVCA has identified visual receptors that have potential for views of, and are the most sensitive to, residential led development on the Site. This visual analysis is based on the findings from a combination of desk-based and field survey work and is supported by a number of representative viewpoints (refer to **Appendix B - Viewpoint Sheets**).

The Site is located on the elevated valley slope of the East Devon AONB, with limited vegetation cover within the Site or along Site boundaries. The most significant views are likely to be from receptors immediately adjacent to the Site boundaries, in particular Heathfield Manor along the Site's southern boundary and the dwellings along the Site's northern boundary along Oak View, Maple Close, Heather Close, Honeysuckle Drive and Bracken Close.

For residential receptors at Heathfield Manor (**Viewpoint 1**) along the Site's southern boundary, views towards the Site are direct and open, with only a small boundary post and wire fence which separates the property from the Site. Beyond the Site, there are expansive and elevated panoramic views over Honiton towards the escarpment of the Blackdown Hills AONB. The A375 is a moderately busy road and does not greatly impact the views out over the surrounding landscape. There are a number of visual detractors within the immediate landscape, which do have an impact on the tranquillity and remoteness of the area, including the industrial / commercial units along Devonshire Road and the high voltage pylons that cross the lower edges of the Blackdown Hills AONB to the north of Honiton. Development of the Site would bring built form closer to this existing property and care would need to be taken on the proposed locations, height and massing of new built form so as not to impinge on the panoramic views towards the Blackdown Hills AONB.

Road users along the A357 to the east of the Site (**Viewpoint 2**), will experience transient, oblique but open views across the Site's easternmost parcel. Development of the Site will bring residential built form closer to these receptors, although there are already a series of urbanising features within the view, between the receptor and views of the Blackdown Hills AONB, including the settlement edge of Honiton and the A375 Sidmouth Road.

**Viewpoint 3** is from further north along the A357 and is representative of the nearby residential receptors along Sidmouth Road as well as the road receptors. From this view, there are direct open views across the arable fields and southern edge of Honiton, with long distance views to the Blackdown Hills AONB, which form an elevated and wooded backdrop to the town. The single storey bungalows that form the towns southern extent are recessed in the landscape, resulting in a limited degree of visual intrusion in the view, with only the roof tops being visible. Development of the Site will bring residential built form closer to these receptors, however, these will be viewed in the context of the existing southern edge of Honiton and the A357.



Receptors on the southern edge of Honiton (**Viewpoints 4**), will experience rear of house, direct and occasionally filtered views out over the Site, usually through field boundary vegetation and from upper storey windows of occasionally occupied rooms within those dwellings closest to the Site boundary. Views from the existing safeguarded area of public open space (**Viewpoint 5**), between Heather Close and Maple Close, will experience heavily filtered glimpsed views towards the Site through the intervening vegetation. This area of public open space is already heavily urbanised due to its surrounding context, and is likely to be infrequently used due to its enclosed nature and limited recreational or amenity value for a large number of people.

Users of Hayne Lane (**Viewpoints 6 and 7**) within the East Devon AONB, will experience indirect, transient views towards the western development parcel, for the most part heavily filtered due to the intervening mature roadside vegetation. There are occasional breaks in the vegetation associated with agricultural access into the fields, but these are infrequent and of limited visual importance.

There are a series of longer distance views from within the surrounding landscape (**Viewpoints 9, 10, 11 and 12**) all from within one of the surrounding AONB's, which have the potential to experience direct but heavily filtered views towards the Site. While these views are from within the AONB's, where panoramic views are of importance to the receptors enjoyment of the landscape, any changes in the current view are likely to be limited to a very small proportion of the view, seen in the context of Honiton and the surrounding infrastructure, including busy roads and the industrial / commercial estate on the towns western edge. The rising landform of the Site will create an element of residential built form, higher up on the slope within the East Devon AONB, but it is considered that by using a combination of sensitively integrated housing types, materials and landscape buffers, these could be accommodated without significant harm to these views or their receptors.

From **Viewpoint 8**, along Roundball Lane and by the Grade II Listed Building, there are no views towards the Site due to the intervening layering of vegetation and the undulating landform. Therefore, it is considered that there will be no impact upon these receptors as a result of the completed development.

Open Space Typology	East Devon Quantity Standard (ha/1000 population)		
	Urban	Rural	
Allotments	0.25	0.3	
Amenity Open Space	0.35	0.3	
Outdoor Sport - Pitches (open access) & Outdoor Sport - Pitches (LA: limited access)	0.65	1.5	
Parks and Recreation Grounds	1	0.4	
Play Space - Children	0.05	0.05	
Play Space - Youth	0.05	0.05	
Natural and Semi Natural (accessible)	1	1	
TOTAL: Open Space	3.35	3.6	

#### Open Space Requirements

The above open space standards are taken from the East Devon Open Space Study, 2012. The open space standards outline the approach that should be taken to inform the location and provision of open space and play for the Site, with regards to East Devon's current and projected future needs. Therefore, should development of the Site be pursued, the adopted open space standards and area required for public open space should be used to inform the masterplanning process.



#### **Design Recommendations**

Following the desktop landscape and visual analysis, and on consideration of findings, three **Landscape and Visual Capacity Plan** options have been produced (refer to **Figures 11-13** in **Appendix A**) which illustrates the key design considerations and potential capacity for the Site to inform the iterative design process. These arise from consideration of: existing features and the landscape / visual context; analysis following desktop research, including review of published guidance documents and the requirements of planning policy; key constraints including identified flood mapping and underground utilities; and the findings during field survey.

In consideration of the above analysis, this LVCA has identified opportunities and constraints for the potential to develop the Site and has outlined a series of recommendations to maximise these opportunities and to assist in assimilating development into the landscape - minimising its impact on the existing character and views.

#### Policy Requirements

The adopted **East Devon Local Plan** sets out a series of strategic objectives to guide and deliver the vision for the county. **Spatial Strategy 1 – Spatial Strategy for Development in East Devon**, states that the seven main towns of East Devon will form focal points for development to serve their own needs and the needs of surrounding rural area.

**Spatial Strategy 3 – Sustainable Development**, seeks to ensure that sustainable development is promoted, with emphasis placed on:

- Conserving and Enhancing the Natural Environment;
- Prudent natural resource use;
- Promoting social wellbeing;
- Encouraging sustainable economic development; and
- Taking a long term view of our actions.

**Spatial Strategy 5 – Environment**, seeks to ensure that all development proposals contribute to the delivery of sustainable development, ensure conservation and enhancement of natural historic and built environmental assets, promote ecosystem services and green infrastructure and geodiversity.

**Spatial Strategy 7 – Development in the Countryside**, states that the countryside is defined as *"all those parts of the plan area that are outside the Built-up Area Boundaries and outside of site specific allocations"*. Development will only be permitted where it is in accordance with specific Local or Neighbourhood Plan policy and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located.

**Spatial Strategy 43 – Open Space Standards**, seeks to ensure that the open space standards that are defined within the Open Space Study, 2012 are adhered to and delivered on Site. Sites of between 50 – 199 dwellings are required to deliver amenity open space and children's and youth play space on-site as per the standards.

**Spatial Strategy 46 – Landscape Conservation and Enhancements to AONB's**, states that "development will need to be undertaken in a manner that is sympathetic to, and helps conserve and enhance the quality and local distinctiveness of, the natural and historic landscape character of East Devon, in particular in Areas of Outstanding Natural Beauty". Development will only be permitted where it:

- Conserves and enhances the landscape character of the area;
- Does not undermine landscape quality; and
- Is appropriate to the economic, social and well being of the area.

**Policy EN5 – Wildlife Habitats and Features**, states that where potential arises, opportunities for habitat creation will be encouraged through the development process and that mitigation will be required, where necessary, to reduce and negative impacts.

**Policy EN22 Surface Run-Off Implications of New Development**, requires that surface water run-off implications are fully considered and appropriate remedial measures are included as an integral part of the development.



The emerging **East Devon Local Plan 2020 to 2040**, 2022 has a series of draft policies, which will guide future growth over the plan period. Strategic Policy 1 states that the plan will promote significant development at the main centres, including Honiton.

**Strategic Policy 35 – Flooding**, states that development proposals will be required to ensure that any flooding measures respond to the specific requirements of the site and respect the character and biodiversity of the area.

**Strategic Policy 74 – Landscape Features**, states that development will only be permitted where the applicant is able to demonstrate that it will protect and enhance features that contribute to the nature and quality of East Devon's landscape.

## Strategic Policy 75 – Areas of Outstanding Natural Beauty, seeks to safeguard the AONB's and that development within an AONB will only be permitted where:

- It conserves and enhances the character and natural beauty of the AONB;
- It is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB; and
- The application is accompanied by a proportionate Landscape and Visual Impact Assessment.

It also states that major development will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest.

#### Reducing Adverse Landscape and Visual Effects

- Sensitive design, placement within existing landform, suitable development offsets and strengthening of existing vegetation within the Site and along its boundaries will be an essential requirement to assimilate any future development proposals into its context, especially with regard to the East Devon AONB, within which the Site is located.
- There are open elevated views north across the valley towards the Blackdown Hills AONB from surrounding residential receptors, including Heathfield Manor and dwellings along Sidmouth Road, and from within the Site itself. Where possible, the Site should seek to retain views towards the AONB from these nearby properties to limit the degree to which their rural setting and views are impinged upon. Opportunities should be explored to frame views towards the AONB from within the Site, particularly from the southernmost boundaries, which are elevated and where wider panoramic views are experienced, to maximise the contribution that this special landscape can have on the setting and place making for the Proposed Development.
- An appropriate landscape buffer should be provided between the Proposed Development and Heathfield Manor, to limit the impact that development of the Site will have on the existing property. This landscape buffer should comprise new tree and woodland planting, which will provide a degree of filtering and screening towards the new development from this receptor. This will also help to integrate the development in longer distance views from the north (**Viewpoints 11 and 12**), providing a wooded backdrop to the development and reducing the degree of contrast between the surrounding wooded and arable landscape and the built form edge.
- Care should be taken to limit the extent to which the development of the Site impacts upon adjacent residential properties to the north of the Site, along Oak View, Maple Close, Heather Close and Bracken Close. A landscape buffer should be provided along the northern Site boundary, between the Proposed Development and the existing residential properties, again comprising tree and woodland planting, to create a sense of physical and visual separation and maintain the rural character of those nearby dwellings..
- The landform of the Site falls from south east to north west, down the valley slope of the AONB, from approximately +140m AOD at its highest point, to +116m AOD at its lowest point (refer to Figure 2 at Appendix A). Due to the elevated nature of the eastern parcel and its potential to be viewed in longer distance viewpoints from within the Blackdown Hills AONB, consideration should be given to the proposed



building heights within this land parcel. The residential dwellings to the immediate north comprise predominantly single storey bungalows, due to their location on the edge of the AONB boundary and on the rising valley slope. The Proposed Development should seek to reflect these existing height parameters on the most elevated parts of the Site, to limit the extent to which new dwellings break the skyline and surrounding tree canopies, to help reduce their visual impact on the surrounding landscape. Single storey built form will also aide in retaining the long distance panoramic views out across the valley slope towards the Blackdown Hills AONB from the nearby residential and road receptors..

- Materiality of the Proposed Development should be considered to help integrate it into the wider landscape. Within the nearby existing residential neighbourhoods, as well as at the under construction development at Hayne Farm, there is a frequent use of white render to upper storeys of residential properties. While it is likely that this is in keeping with the local vernacular for Honiton and East Devon, care should be taken to limit the extent to which this is used at the most elevated points of the Site. Darker building facades, such as the buff or red brick that is also commonly used in Honiton, would be better placed at more elevated locations, to blend in with the wooded backdrop to the Site within the East Devon AONB.
- Lighting within the development should be to industry best practice standards to minimise light spill, sky glow and any adverse effects on nocturnal wildlife and the dark skies within the AONB, with the layout of the development carefully designed to focus activity on the internal areas, minimising the potential for noise and lighting to spill out into the surrounding landscape.

#### Green Infrastructure and landscape mitigation

- The network of existing hedgerow and hedgerow trees on Site boundaries are important landscape features and should be retained and enhanced by replanting new hedgerow and hedgerow trees using locally appropriate species to reinforce the distinctive pattern and character. Future development proposals should seek to retain and incorporate the Site boundary hedgerow and trees, as part of the landscape framework. Any hedgerow loss must be mitigated with a compensatory habitat as part of the landscape proposals. A survey and assessment of the quality and importance of the existing Site hedgerows must be undertaken, using Hedgerows Regulations 1997, by a qualified ecologist to identify 'important' hedgerows (identified for potential historical / ecological importance).
- Provide a network of Green-Blue Infrastructure links throughout the development, retaining existing habitats, woodland, trees, hedgerows and watercourses of value and providing linkages to features in the surrounding landscape.
- Species-rich grasslands should be integrated within green infrastructure corridors on the field margins and on road side verges, to create a source of food for invertebrates as part of pollinator corridors. Opportunities should be explored to provide vegetated corridors within the core development area, to provide a layering of vegetation within long distance views from the Blackdown Hills AONB, helping to further integrate the Proposed Development into the surrounding landscape.
- In addition, proposed streets should also include vegetated verges with opportunity for street tree planting, to add a further layer of filtering and screening to nearby receptors and those longer distance views. This will also enhance the biodiversity potential for the Site and will contribute to safer, more attractive dwelling frontages.
- Sustainable drainage (SuDS) should be integrated into the landscape strategy where possible, to include above ground systems such as ponds and swales, maximising their contribution to biodiversity / wildlife habitat and the landscape character / identity of the development. Where appropriate, these should work in conjunction with the green links to provide multi-functional green and blue infrastructure corridors, which will provide biodiversity, landscape and visual and placemaking benefits.
- Across the development, plant predominantly native species of local provenance that are appropriate for the location to link with areas of existing vegetation. Planting layouts and densities should be arranged to complement the existing character of the area and fit within the existing landscape.



- Generous green infrastructure network and mitigation planting will also contribute to achieving a Biodiversity Net Gain on Site and to facilitate safe movement of wildlife through the mosaic of habitats that can be provided throughout.
- Care should be taken to positively address newly created areas of public open space and Site edges with outward facing development parcels. Public open spaces could be located towards the southern edges of the Site, in areas that are most visually prominent, to ensure that the new dwellings are located further down the valley slope and are therefore away from visually sensitive locations.
- Opportunities should be explored to provide better connectivity to the nearby green infrastructure assets, such as the accessible open space immediately north of the mature tree belt, between Heather Close and Maple Close.
- Development of the Site should seek to deliver the required POS provision, based on East Devon's open space standards. Compliance with Spatial Strategy 43 Open Space Standards should be considered when determining the development capacity for the Site, to ensure that sufficient space is provided within the masterplan in line with sustainable design principles.

#### **Climate Adaptation**

- The landscape design should respond to the specific climate constraints of the local area. Opportunities should be sought to incorporate grey water harvesting and other innovative carbon reduction solutions into the landscape and townscape of the project, to contribute to climate change adaptation and improve the carbon neutrality of the project.
- Proposals should promote walking, cycling and the reduction of car use through new and innovative movement opportunities within the landscape and green infrastructure framework. Local amenities (potentially including shopping facilities, parks, allotments, doctor and dental surgeries) should be located within walking distance from people's homes and encourage sustainable travel alternatives.

#### Conclusion

Based on the landscape and visual analysis, the urban character analysis and on consideration of the findings, if designed in a manner sensitive to the landscape context and following the recommendations outlined in this landscape and visual capacity appraisal technical note, it is considered that the Site has the capacity to accommodate residential development. Given the AONB designation within which the Site is located, a landscape led approach to masterplanning will be essential to ensure that adverse effects are limited or prevented with regards to the AONB and the landscape and visual receptors identified within the study area. The Landscape Capacity Plan Options (refer to **Figures 11 – 13** in **Appendix A**) have identified how through using a strong landscape framework around the Site boundaries and along key corridors through the Site, that the Proposed Development could be accommodated without significant landscape and visual harm on the surrounding context. We would recommend that a full LVIA is prepared to inform and future planning application on the Site.

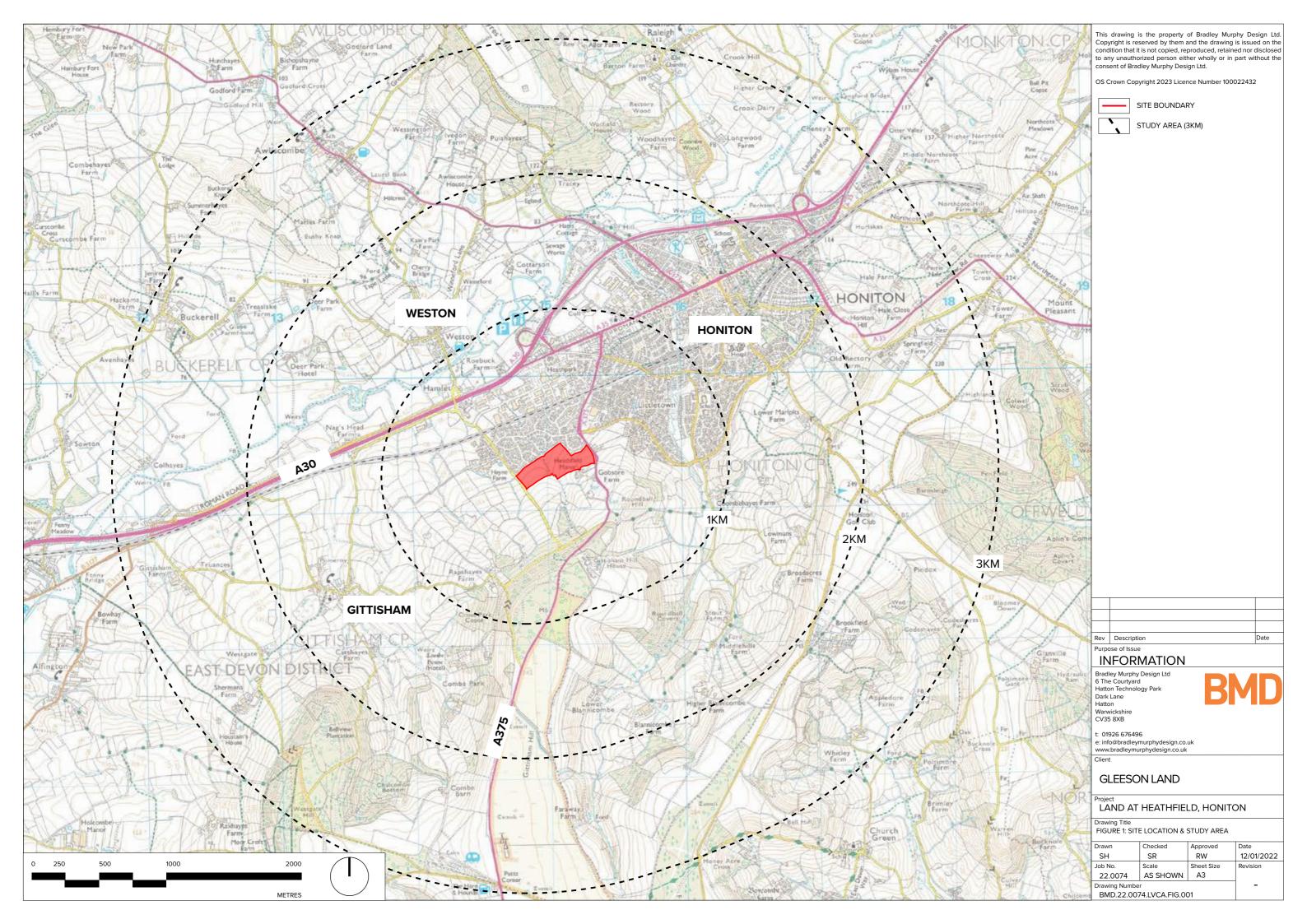
Proposed Development on the southern edge of Honiton would extend the settlement boundary further south into a very small proportion of the East Devon AONB. However, but utilising the vegetated Site boundaries and enhancing these with additional tree planting and new areas of robust tree and woodland planting to provide a layering of vegetation within which the Proposed Development would be sited, it is considered that residential development could be assimilated in both nearby and longer distance views, without significant visual harm to the East Devon and Blackdown Hills AONB's, and the surrounding context.

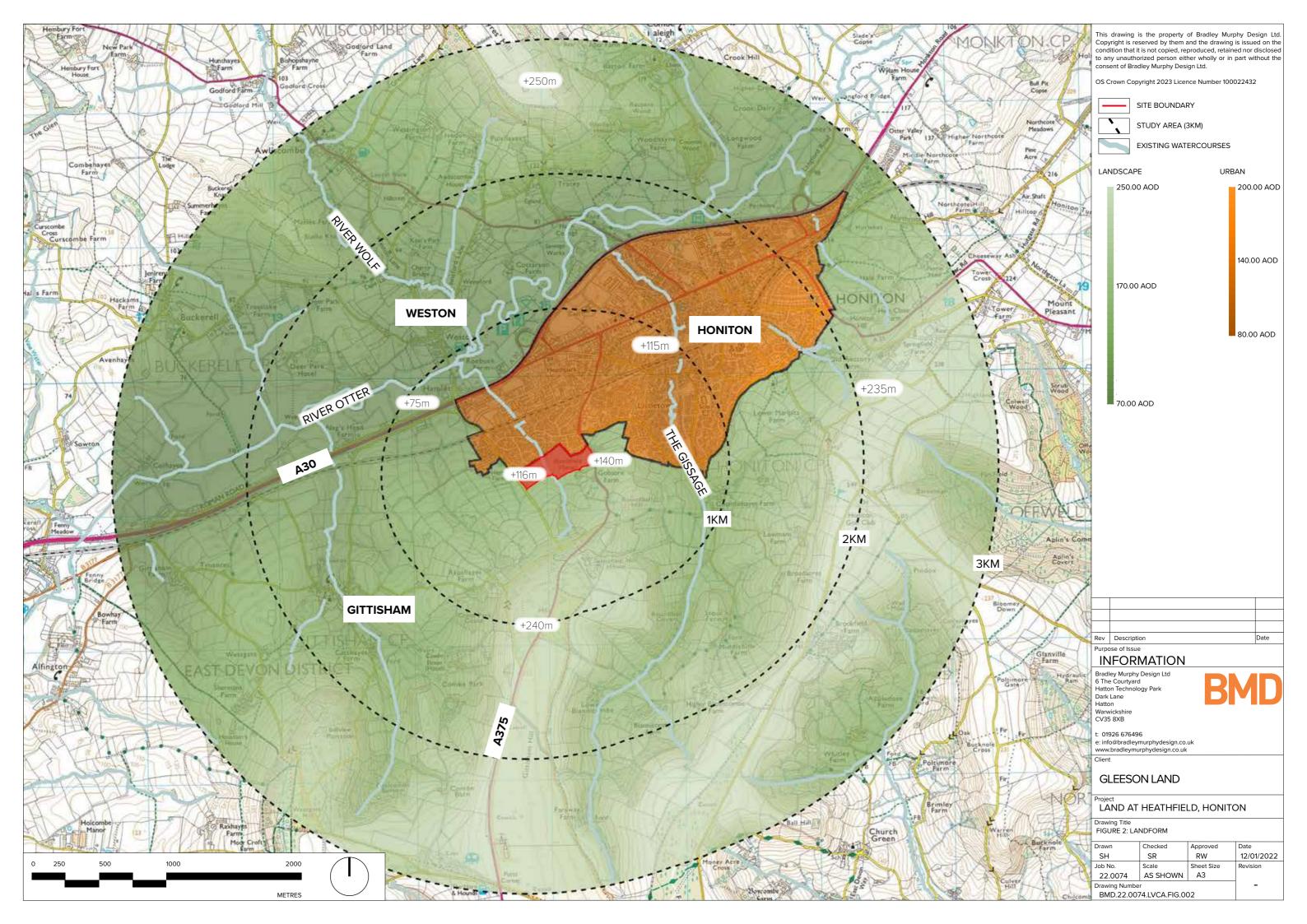
Proposed Development on the Site would need to be set within a strong Green and Blue Infrastructure Framework and incorporate an area of public open space, compliant with East Devon's adopted open space standards.

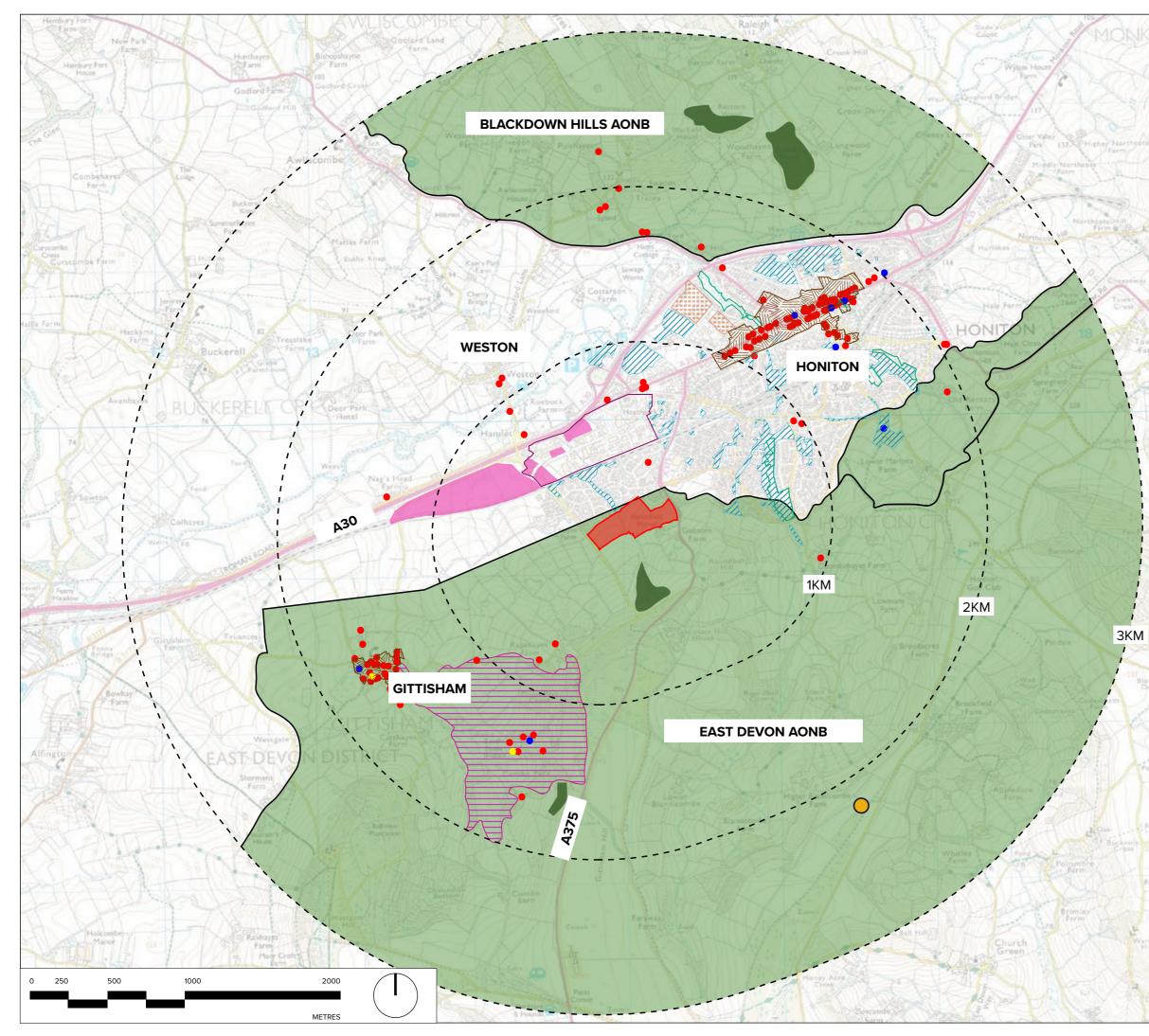
The existing on Site landscape features including the landform, the existing watercourse, woodland and hedgerow field boundaries, as well as providing visual links to the well wooded backdrop that the East Devon AONB provides from views to the north, offers the opportunity to shape the Proposed Development and contribute strongly to the sense of place.

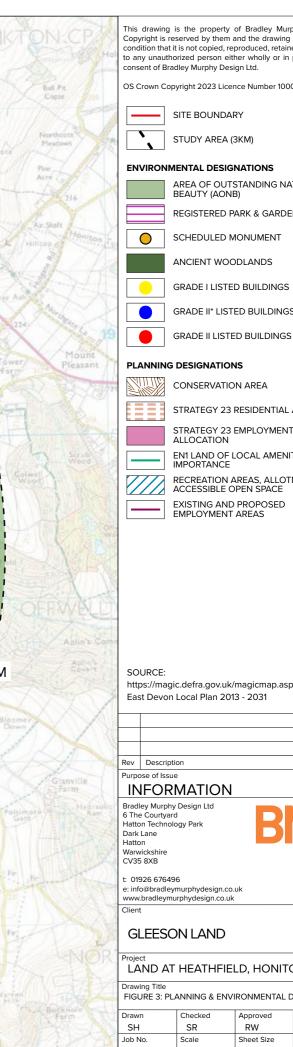


APPENDIX A SUPPORTING FIGURES









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SITE BOUNDARY

STUDY AREA (3KM)

## ENVIRONMENTAL DESIGNATIONS

AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

REGISTERED PARK & GARDEN

SCHEDULED MONUMENT

ANCIENT WOODLANDS

GRADE II\* LISTED BUILDINGS

GRADE II LISTED BUILDINGS

#### PLANNING DESIGNATIONS

CONSERVATION AREA

STRATEGY 23 RESIDENTIAL ALLOCATION

STRATEGY 23 EMPLOYMENT ALLOCATION

EN1 LAND OF LOCAL AMENITY IMPORTANCE RECREATION AREAS, ALLOTMENTS, ACCESSIBLE OPEN SPACE

EXISTING AND PROPOSED EMPLOYMENT AREAS

https://magic.defra.gov.uk/magicmap.aspx East Devon Local Plan 2013 - 2031

Date

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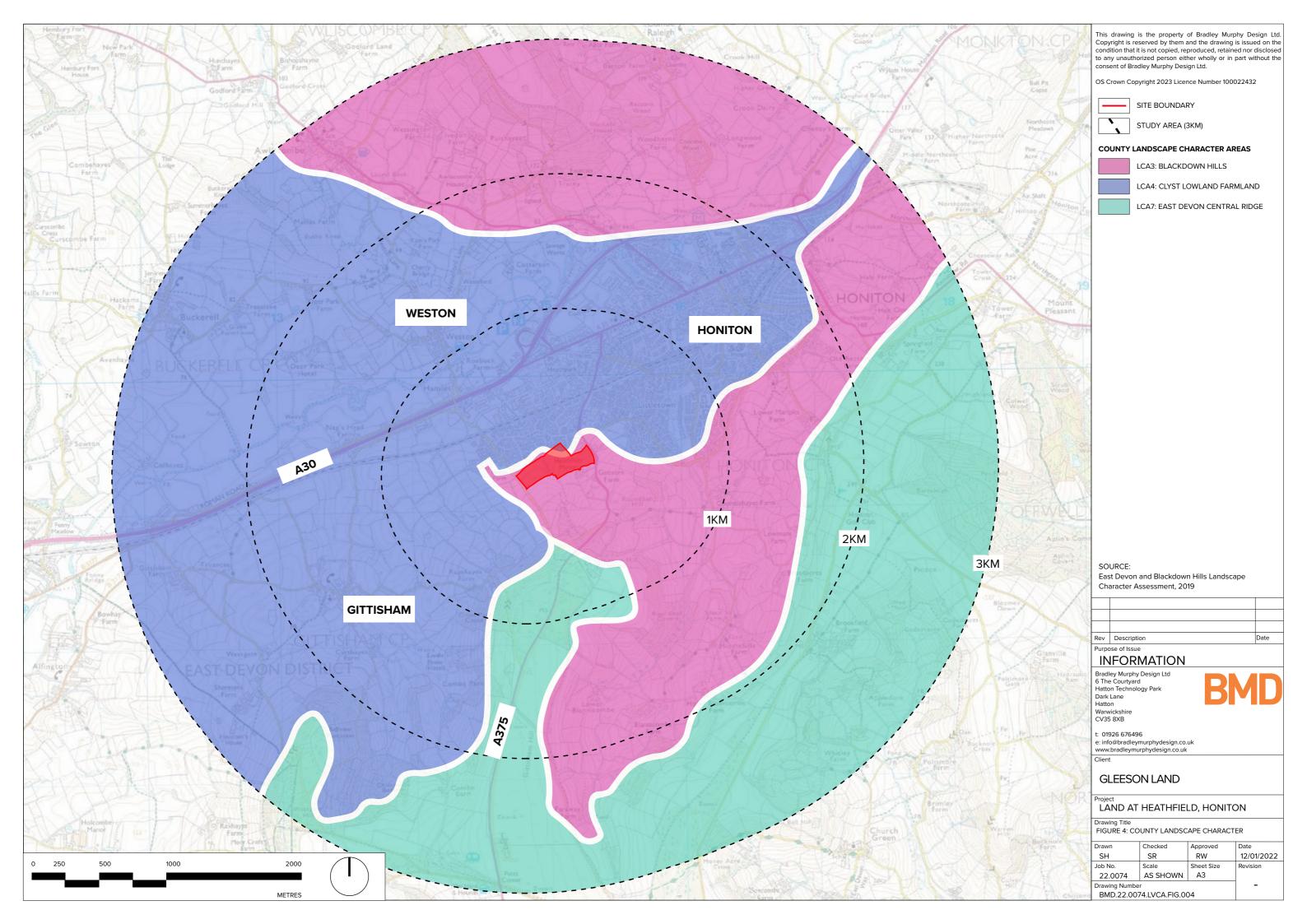
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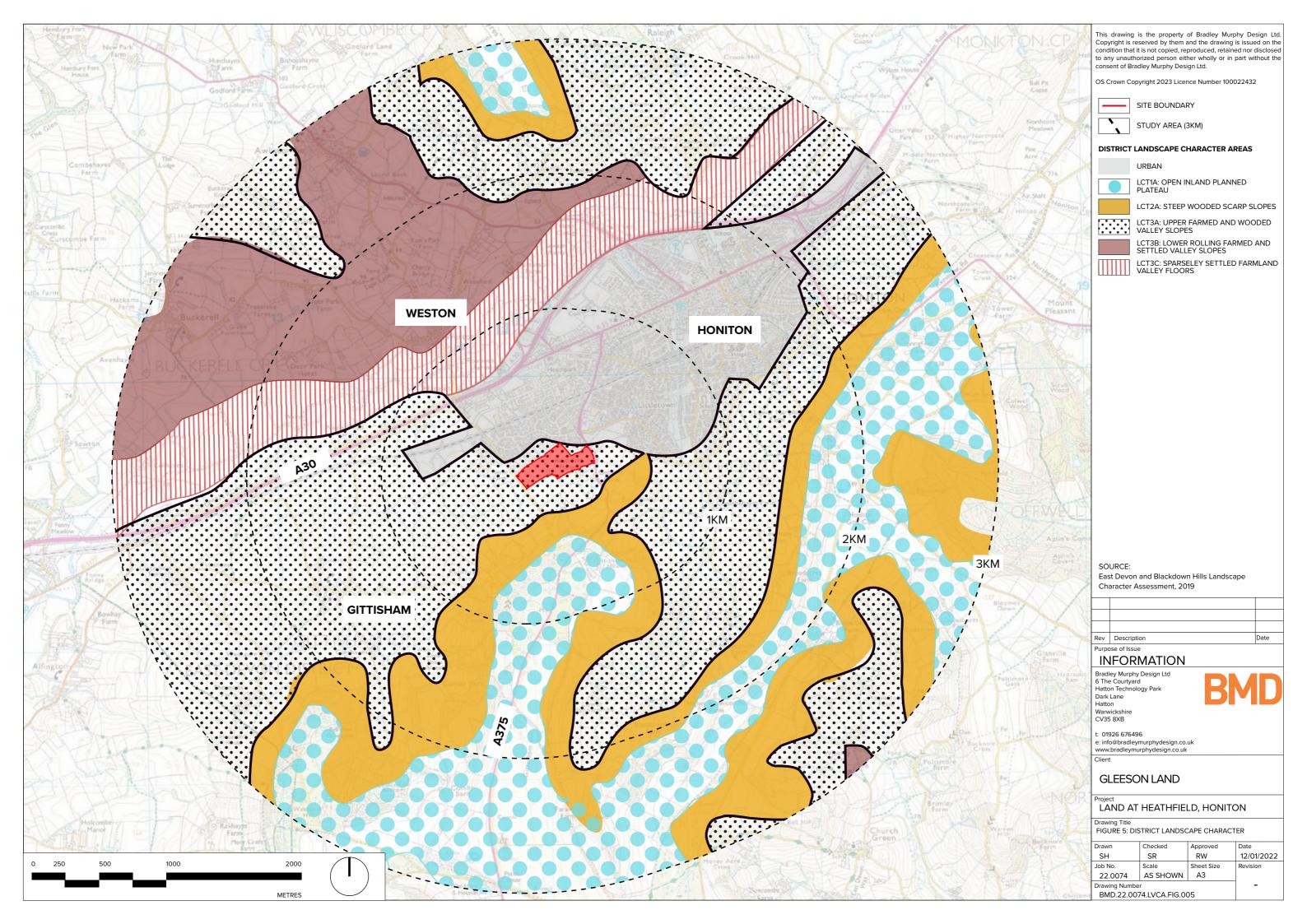
#### **GLEESON LAND**

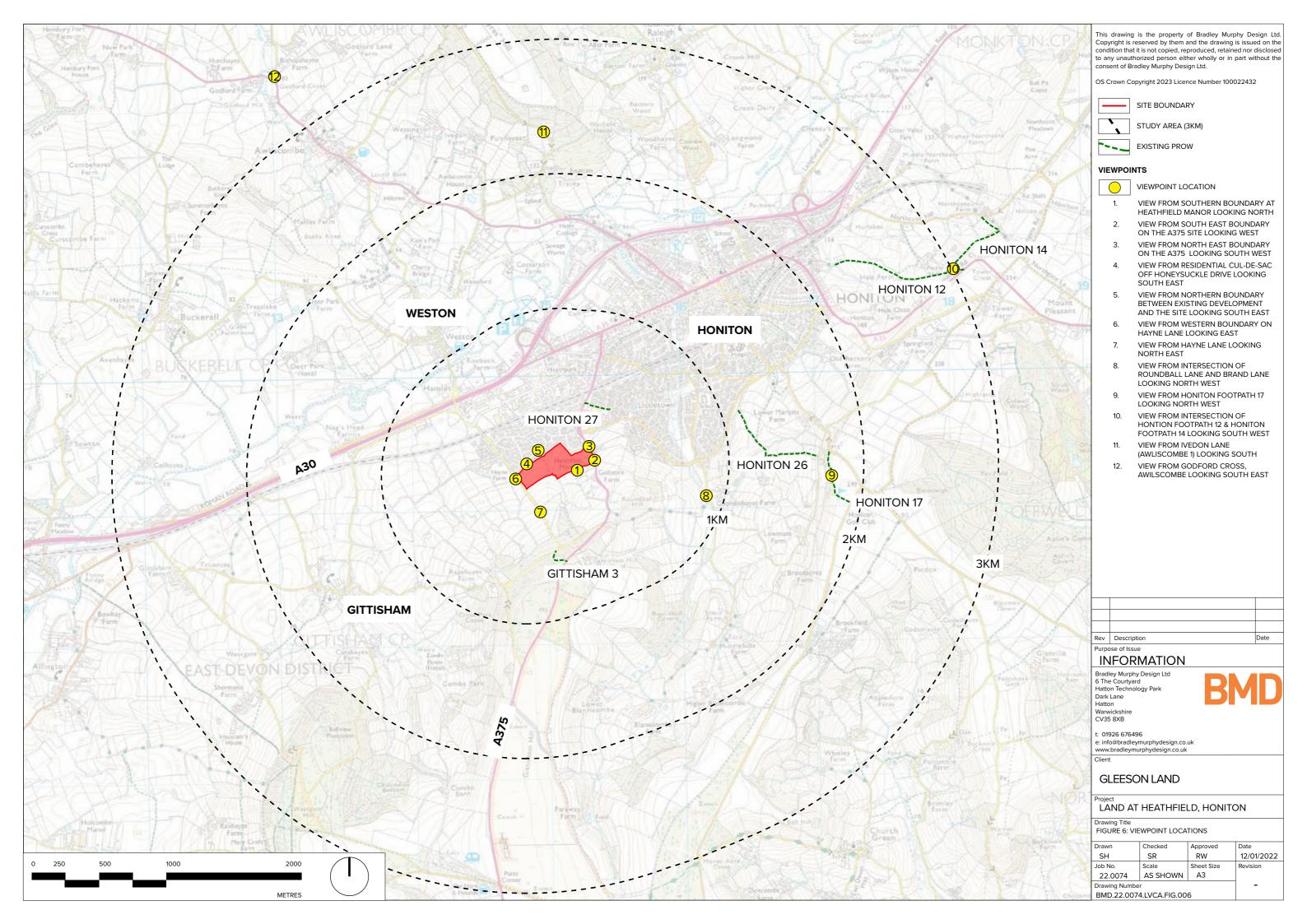
#### LAND AT HEATHFIELD, HONITON

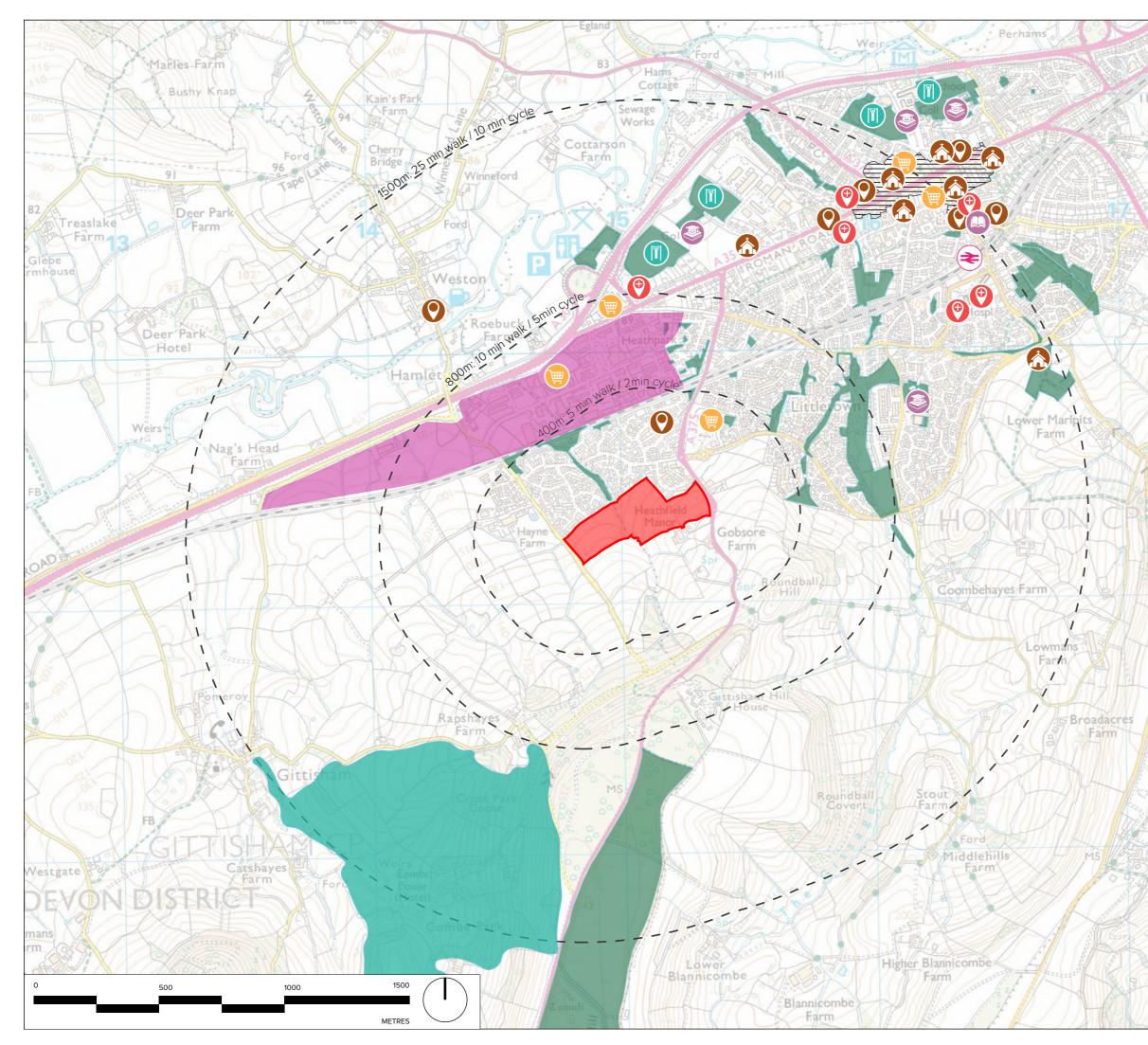
FIGURE 3: PLANNING & ENVIRONMENTAL DESIGNATIONS

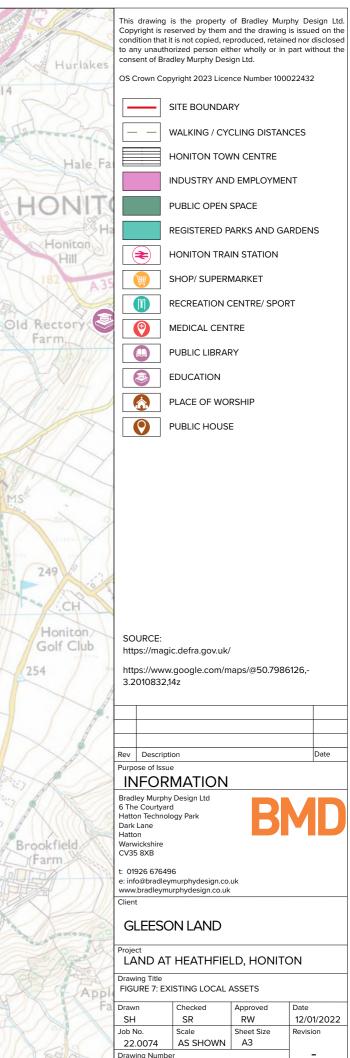
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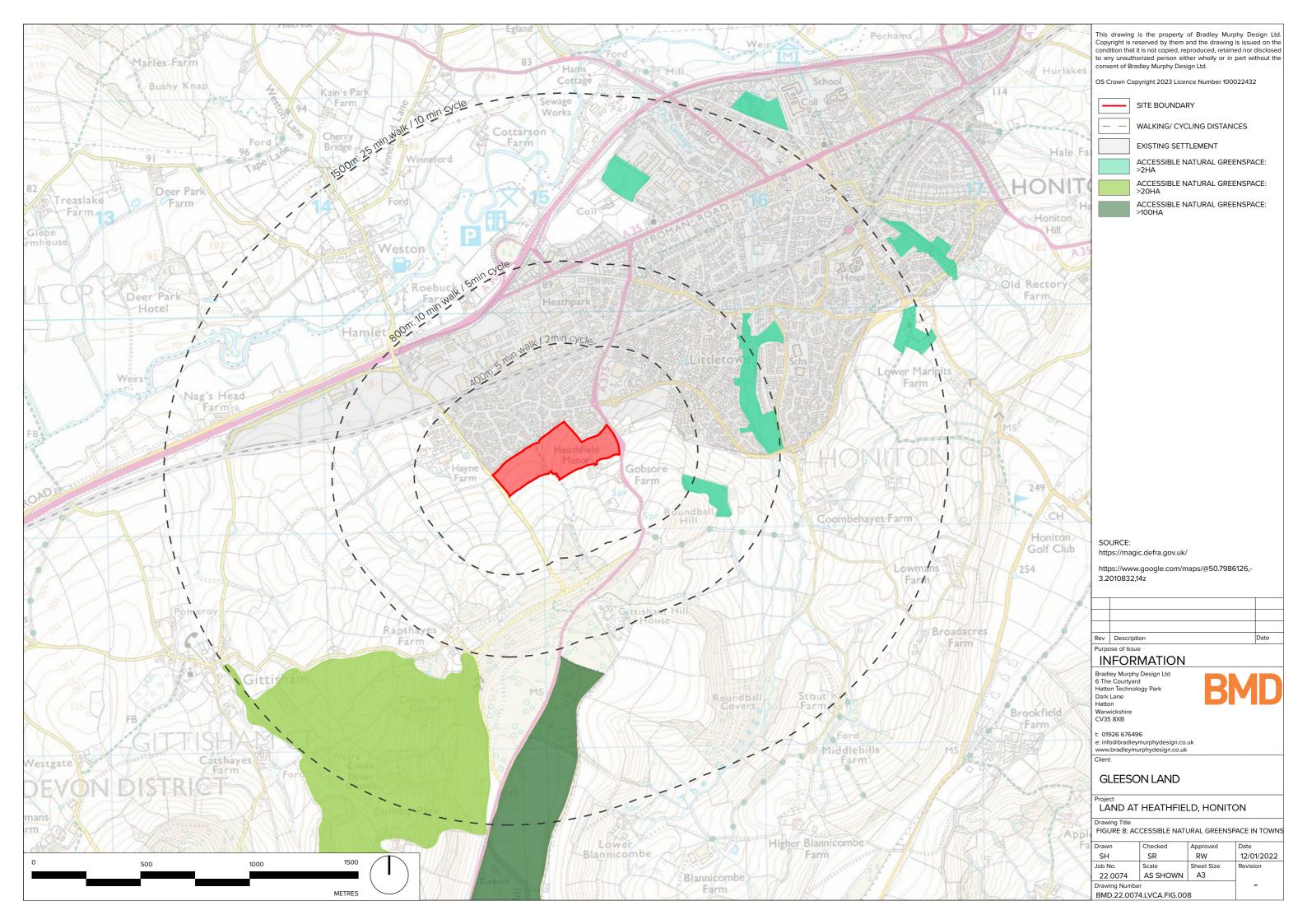


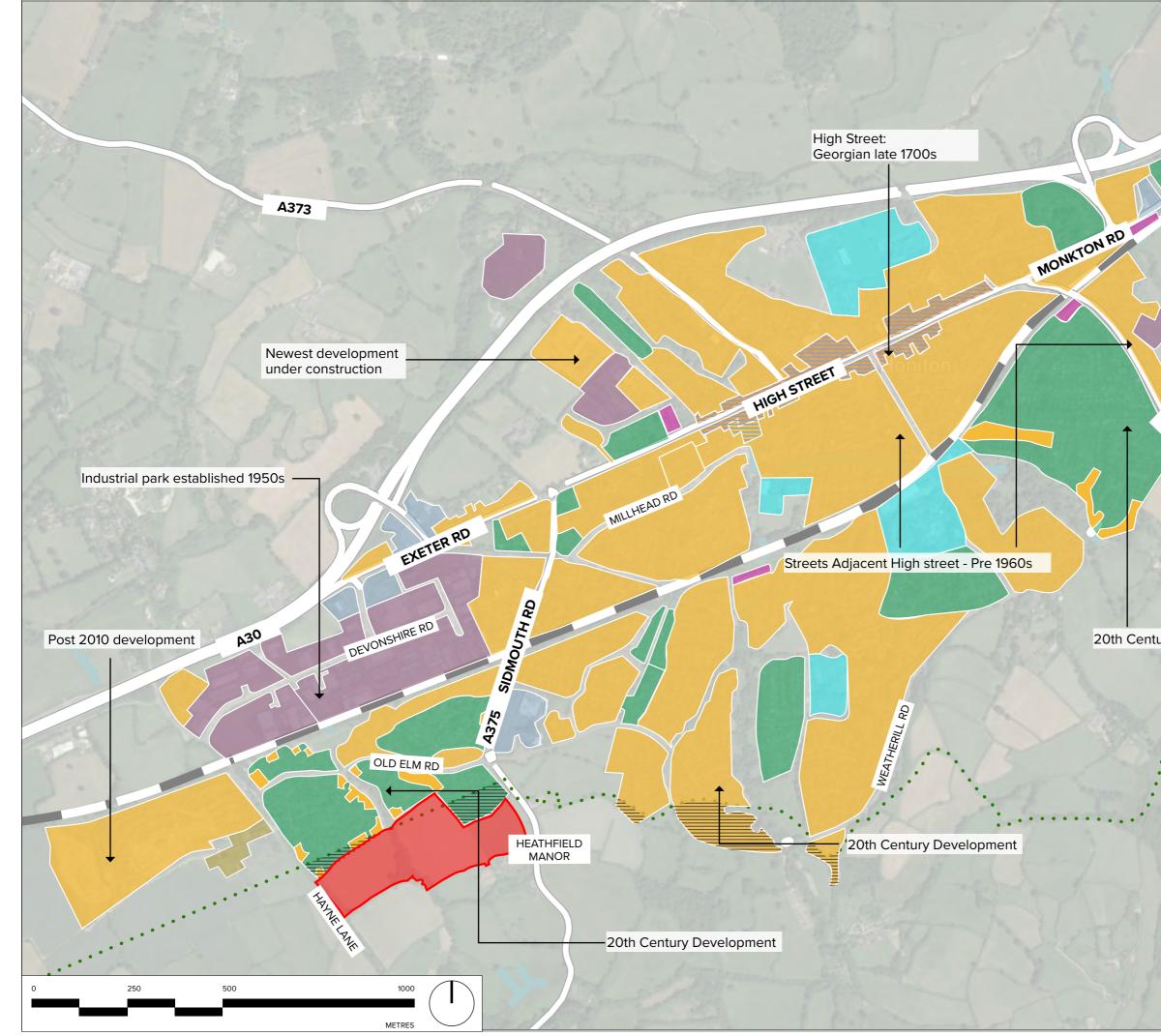






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PREDOMINANCE OF 2-2.5 STOREY DWELLINGS PRODOMINANCE OF SINGLE STOREY

DWELLINGS APARTMENTS/ FLATS

TOWN CENRE DWELLINGS (ABOVE COMMERCIAL RETAIN UNITS COMMERCIAL / RETAIL UNITS

INDUSTRIAL

COMMUNITY BUILDINGS

DWELLINGS OVERLAPPING WITH AONB

SOURCE: https://maps.nls.uk/geo/ find/#zoom=13.7&lat=50.79265&lon=-3.19820&layers= 61&b=1&z=0&point=50.80413,-3.16590&i=189240420

Google historic mapping

### 20th Century Development

⋪<sub>⋧⋦</sub>

Pg 7, figure 4 :- Land of Honiton: Design and Access Statement

Rev Description Date

B

# INFORMATION

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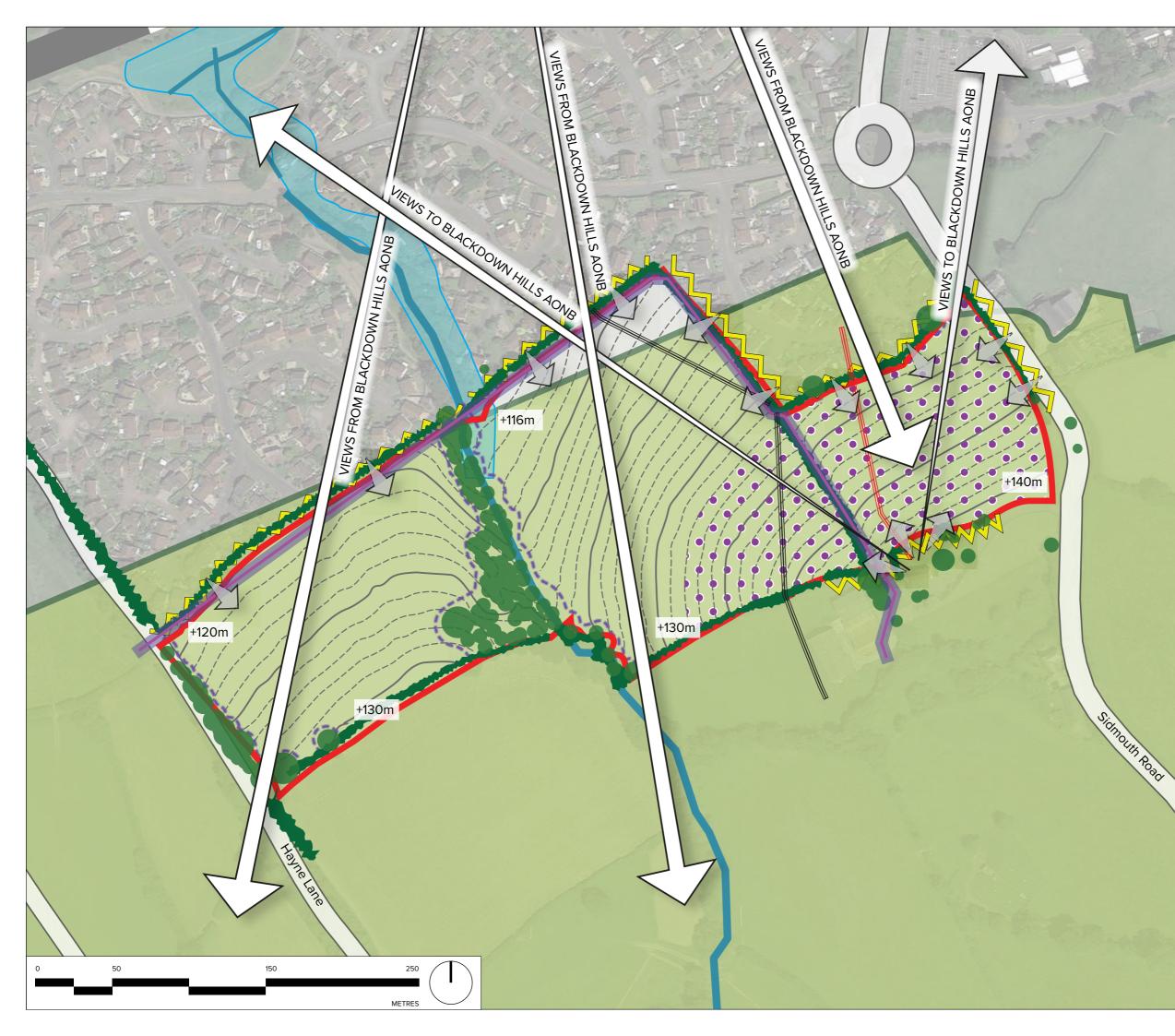
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#### GLEESON LAND

#### LAND AT HEATHFIELD, HONITON

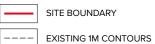
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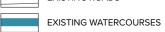




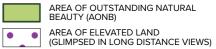
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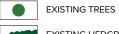


EXISTING 5M CONTOURS









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EXISTING HEDGROWS

EXISTING ROADS

FLOOD ZONE 2

TREE ROOT PROTECTION AREA (Pg 17 Land at Honiton: Design and Access Statement)

AREA OF OUTSTANDING NATURAL BEAUTY (AONB)

LONG DISTANCE VIEWS

NEAR DISTANCE VIEWS

VISUALLY SENSITIVE EDGE

TRUNK WATER MAINS (Pg 17 Land at Honiton: Design and Access Statement)

OVERHEAD POWER CABLE (Pg 17 Land at Honiton: Design and Access ment)

LOW PRESSURE GAS MAIN (Pg 17 Land at Honiton: Desing and Acces Statement)

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**GLEESON LAND** 

#### LAND AT HEATHFIELD, HONITON

Drawing Title FIGURE 10: CONTRAINTS PLAN

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Provide a network of Green-Blue Infrastructure links throughout the development, retaining existing habitats, woodland, trees, hedgerows and watercourses of value and providing linkages to features in the surrounding landscape.

Sustainable drainage (SuDS) should be integrated into the GI Framework where possible, to include above ground systems such as ponds and swales

50

-120m

150

250

METRES

VIEWS TOWARDS BLACKDOWN HIL



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SITE BOUNDARY



POTENTIAL DEVELOPABLE AREA: 2-2.5 STOREY DWELLINGS EXISTING VEGETATION 1M SITE CONTOURS EXISTING ROADS BLUE INFRASTRUCTURE CORRIDOR GREEN INFRASTRUCTURE CORRIDOR (20M) VEHICULAR ACCESS POINT DIRECTION OF SLOPE FLOOD ZONE 2 POTENTIAL LOCATION FOR SUDS LONG DISTANCE VIEWS TO BLACKDOWN HILLS AONB Rev Description Date Purpose of Issue INFORMATION Bradley Murphy Design Ltd 6 The Courtyard Hatton Technology Park Dark Lane BMD Hatton Warwickshire CV35 8XB : 01926 676496 e: info@bradleymurphydesign.co.uk www.bradleymurphydesign.co.uk Client **GLEESON LAND** LAND AT HEATHFIELD, HONITON

Drawing Title FIGURE 11: LANDSCAPE CAPACITY PLAN OPTION 1 OF 3

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A landscape buffer should be provided along the northern Site boundary, between any new development and the existing residential properties, to create a sense of physical and visual separation and to maintain the rural character of those nearby dwellings.

Opportunities should be explored to frame views towards the AONB from within the Site, particularly from the southernmost boundaries, which are elevated and where there are wider panoramic views, to maximise the contribution that this special landscape can have on the setting and place making for a development on the Site.

-130m

LEAP +140m

VIEWS TOWARDS BLACKDOWN

An appropriate landscape buffer should be provided between the Proposed Development and Heathfield Manor, to limit the impact that development of the Site would have on the existing property.

 The Proposed Development should seek to reflect the existing single storey building heights within the settlement edge to the north, on the most elevated parts of the Site, to help reduce their visual impact on the surrounding landscape.

Provide a network of Green-Blue Infrastructure links throughout the development, retaining existing habitats, woodland, trees, hedgerows and watercourses of value and providing linkages to features in the surrounding landscape.

250

METRES

150



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SITE BOUNDARY



POTENTIAL DEVELOPABLE AREA: 2-2.5 STOREY DWELLINGS

POTENTIAL DEVELOPMENT AREA: SINGLE STORY DWELLINGS

EXISTING VEGETATION

1M SITE CONTOURS

EXISTING ROADS

BLUE INFRASTRUCTURE CORRIDOR

GREEN INFRASTRUCTURE CORRIDOR (20M)

VEHICULAR ACCESS POINT

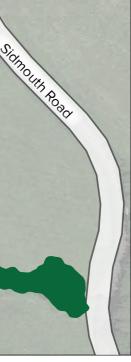
POTENTIAL LINKS BETWEEN DEVELOPABLE AREAS POTENTIAL PEDESTRIAN / CYCLE CONNECTION

DIRECTION OF SLOPE

FLOOD ZONE 2

POTENTIAL LOCATION FOR SUDS

LONG DISTANCE VIEWS TO BLACKDOWN HILLS AONB



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A landscape buffer should be provided along the northern Site boundary, between any new development and the existing residential properties, to create a sense of physical and visual separation and to maintain the rural character of those nearby dwellings.

VIEWS TOWARDS BLACKDOWN

Opportunities should be explored to frame views towards the AONB from within the Site, particularly from the southernmost boundaries, which are elevated and where there are wider panoramic views, to maximise the contribution that this special landscape can have on the setting and place making for a development on the Site.

-130m

LEAP +140m

VIEWS TOWARDS BLACKDOWN H

An appropriate landscape buffer should be provided between the Proposed Development and Heathfield Manor, to limit the impact that development of the Site would have on the existing property.

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Sustainable drainage (SuDS) should be integrated into the GI Framework where possible, to include above ground systems such as ponds and swales

50

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POTENTIAL DEVELOPABLE AREA:

POTENTIAL DEVELOPMENT AREA:

2-2.5 STOREY DWELLINGS

SINGLE STORY DWELLINGS

EXISTING VEGETATION

EXISTING ROADS

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SITE BOUNDARY



/////





BLUE INFRASTRUCTURE CORRIDOR GREEN INFRASTRUCTURE CORRIDOR (20M) VEHICULAR ACCESS POINT

POTENTIAL LINKS BETWEEN DEVELOPABLE AREAS POTENTIAL PEDESTRIAN / CYCLE CONNECTION

POTENTIAL PEDESTRIAN / CYCLE CONNECTION ACROSS WATERCOURSE

DIRECTION OF SLOPE

FLOOD ZONE 2

POTENTIAL LOCATION FOR SUDS

LONG DISTANCE VIEWS TO BLACKDOWN HILLS AONB

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GLEESON LAND

#### LAND AT HEATHFIELD, HONITON

Drawing Title FIGURE 13: LANDSCAPE CAPACITY PLAN OPTION 3 OF 3

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# APPENDIX B VIEWPOINT SHEETS



VIEWPOINT 1: VIEW FROM SOUTHERN BOUNDARY AT HEATHFIELD MANOR LOOKING NORTH



VIEWPOINT 2: VIEW FROM SOUTH EAST BOUNDARY ON THE A375 SITE LOOKING WEST



LAND SOUTH OF HONITON

CLIENT: GLEESON LAND

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APPENDIX B VIEW

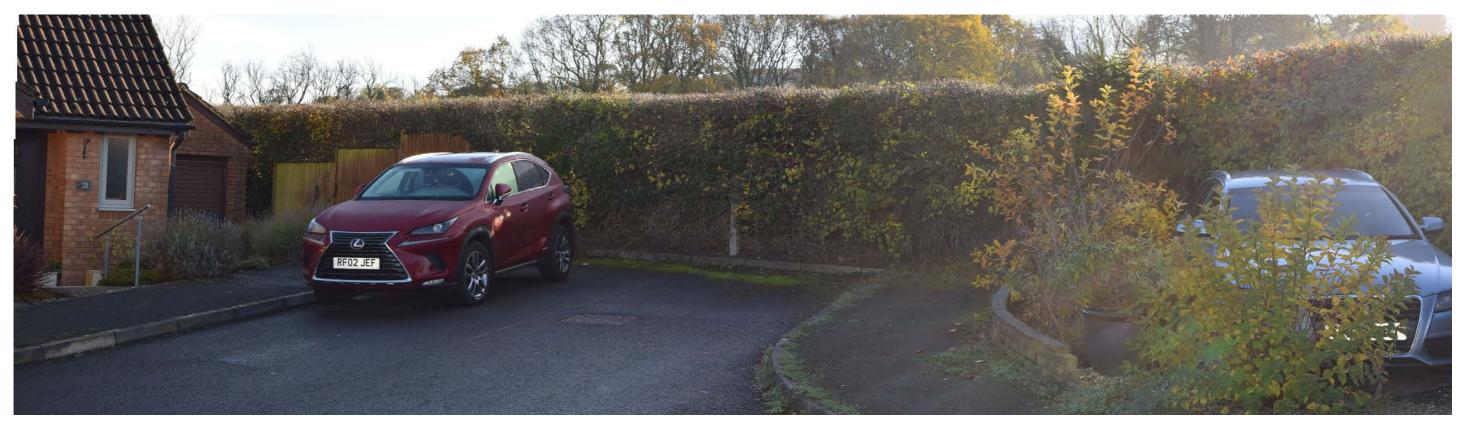
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VIEWPOINT 3: VIEW FROM NORTH EAST BOUNDARY ON THE A375 LOOKING SOUTH WEST



VIEWPOINT 4: VIEW FROM RESIDENTIAL CUL-DE-SAC OFF HONEYSUCKLE DRIVE LOOKING SOUTH EAST



LAND SOUTH OF HONITON

CLIENT: GLEESON LAND

APPENDIX B VIEW

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VIEWPOINT 5: VIEW FROM NORTHERN BOUNDARY BETWEEN EXISTING DEVELOPMENT AND THE SITE LOOKING SOUTH EAST



VIEWPOINT 6: VIEW FROM WESTERN BOUNDARY ON HAYNE LANE LOOKING EAST



LAND SOUTH OF HONITON

CLIENT: GLEESON LAND

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APPENDIX B VIEW

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VIEWPOINT 7: VIEW FROM HAYNE LANE LOOKING NORTH EAST



VIEWPOINT 8: VIEW FROM INTERSECTION OF ROUNDBALL LANE AND BRAND LANE LOOKING NORTH WEST



LAND SOUTH OF HONITON

CLIENT: GLEESON LAND

ND

APPENDIX B VIEW

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VIEWPOINT 9: VIEW FROM HONITON FOOTPATH 17 LOOKING NORTH WEST



VIEWPOINT 10: VIEW FROM INTERSECTION OF HONTION FOOTPATH 12 & HONITON FOOTPATH 14 LOOKING SOUTH WEST



LAND SOUTH OF HONITON

CLIENT: GLEESON LAND

ID

APPENDIX B VIEW

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VIEWPOINT 11: VIEW FROM IVEDON LANE (AWLISCOMBE 1) LOOKING SOUTH



VIEWPOINT 12: VIEW FROM GODFORD CROSS, AWILSCOMBE LOOKING SOUTH EAST



LAND SOUTH OF HONITON

CLIENT: GLEESON LAND

N LAND

APPENDIX B VIEW

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