
Representations to the Draft East Devon Local Plan (Regulation 18 consultation)

Submitted on behalf of KCS Development

Ottery St Mary sites

January 2023

REPRESENTATIONS TO THE DRAFT EAST DEVON LOCAL PLAN (REGULATION 18) CONSULTATION

Prepared on behalf of KCS Development

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1.0 INTRODUCTION

- 1.1 Barton Willmore, now Stantec, is instructed by KCS Developments ('the Client') to submit representations to the Draft East Devon Local Plan Preferred Options (Regulation 18) Consultation. The draft plan is subject to public consultation until 15th January 2023.
- 1.2 The NPPF states that during the examination of a Local Plan, it must be assessed whether plans have been prepared in accordance with legal requirements and are 'sound'. A Plan can be considered sound if it is:
- a) **"Positively prepared - providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs 21 ; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;**
 - b) **Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;**
 - c) **Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and**
 - d) **Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant."**
- 1.3 Although the plan is at Regulation 18 consultation (rather than the Regulation 19 stage prior to Submission of the plan), it is relevant to consider the tests of soundness.
- 1.4 KCS is actively promoting land at Ottery St Mary and is therefore a key stakeholder in the plan process. They are keen to ensure the council meets aspirations for housing growth in the district and therefore welcome the opportunity to respond to the consultation draft. In particular, in promoting two key housing sites in Ottery St Mary (sites GH/ED/26 and GH/ED/27), KCS wishes to ensure the plan is sound and deliverable.
- 1.5 KCS is working in a positive and constructive way with the local planning authority to bring these sites forward and is continually reviewing the development options to respond to comments raised by the local planning authority during the pre-application and local plan process. In this context, an informed Outline planning application is being considered for site GH/ED/27, which reflects previous pre-application technical advice. Regarding GH/ED/26, the extent of the developable area has been reduced to address concerns raised in the council's site assessment at HELAA (2022) Appendix F.

1.6 As such, both GH/ED/26 and GH/ED/27 are entirely logical and deliverable sites and should be allocated as such in the draft local plan.

1.7 Overall, notwithstanding the support for the allocation of land at Ottery St Mary (site GH/ED/27) we consider the emerging plan in its current form is unsound principally due to issues of deliverability of major sites and issues of a lack of supply overall.

Representations structure

1.8 The remainder of these representation therefore are structured as follows:

- Section 2: Sets the context for the relevant sites.
- Section 3: Comments on the overall plan strategy.
- Section 4: Comments on site specific matters in Ottery St Mary.
- Section 5: Summary and conclusions.

2.0 SITE CONTEXT

- 2.1 Ottery St Mary is a sustainable settlement, and benefits from access to a range of local shops, services, and associated facilities, along with public transport links and sustainable travel opportunities such as walking and cycling routes. The adopted and emerging local plan recognise the inherent sustainability of the town and appropriateness of directing further development to this area.
- 2.2 KCS controls land in Ottery St Mary, details of which have been submitted to the local planning authority through the Call for Sites process between 2017 to 2021. In total, these sites could deliver 470 new homes although KCS accepts the potential for more modest delivery to reflect site specific constraints.
- 2.3 The sites are sustainably located and suitable for new homes, with limited overall constraints, and good pedestrian, cycle, and bus links, as well as proximity to key local services.

Area 1 Site – land south and east of Strawberry Lane

- 2.4 This site is identified as a suitable housing site within the Draft Plan. It is located east of Strawberry Lane in the southwest of Ottery St Mary.
- 2.5 Various technical investigations have been undertaken and provided through the pre-application stage and through previous representations. These investigations have confirmed there are no technical constraints that could not be appropriately addressed or mitigated against through the planning application process or would preclude residential development on the sites.
- 2.6 Pre-application advice from the Council confirmed there are no technical concerns, and residential development of the site could be entirely appropriate and deliverable. The pre-application response noted an immediate planning application would, however, not be supported as the council had a demonstratable 5-year housing land supply and the site is outside the defined settlement boundary. Hence, an application in advance of the envisaged emerging plan (as it was in 2021) would not be supported at that time.
- 2.7 Since this pre-application advice the plan has now progressed and the site is a draft allocation, showing the principle of housing to be acceptable in planning terms.
- 2.8 KCS supports the draft allocation, and is preparing documents with the aim of submitting an informed Outline planning application in the first half of 2023.

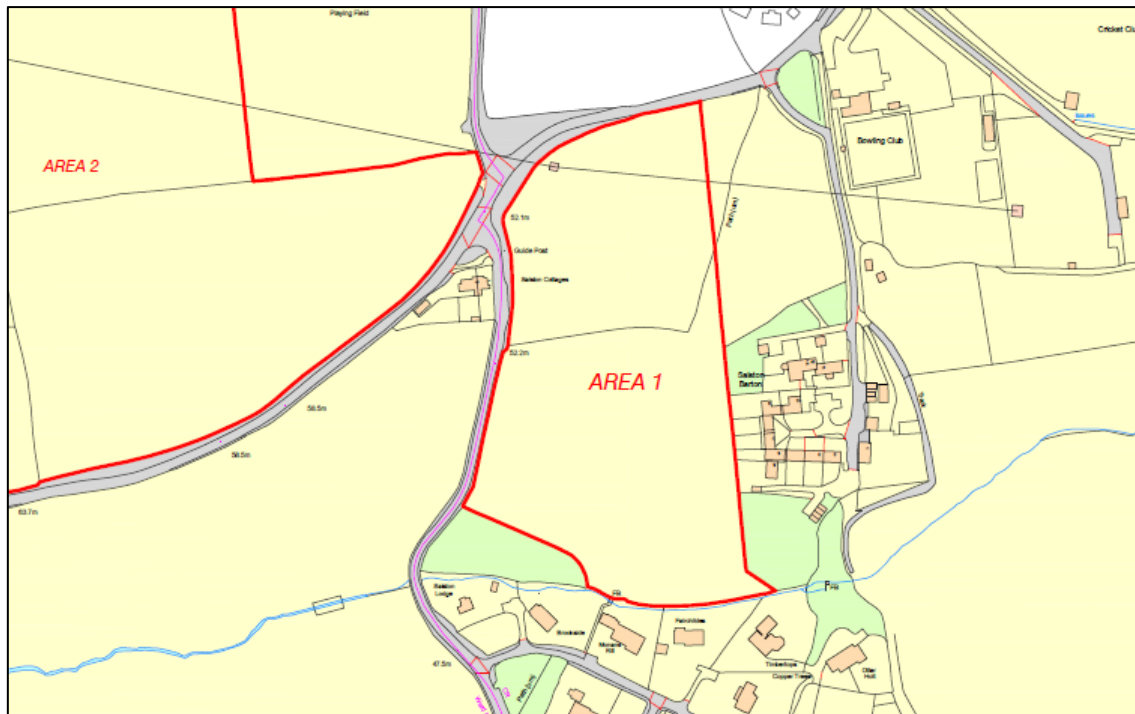


Figure 2.1 – Area 1 Site

Area 2 Site – land north of West Hill Road

- 2.9 This site extends 26.53 ha (gross) and is located to the west of the settlement and west of Strawberry Lane. It comprises agricultural fields stretching between Ottery St Mary and West Hill, with fields to the north, the Kings School playing fields to the east, West Hill Road to the south and plantation woodlands and the curtilage of the Grade II Listed Foxenhole Mills to the west.
- 2.10 The site has previously been assessed by the Council, in the Call for Sites process, as having a housing capacity of 288 homes. However, the site is not identified as a potential housing site in the emerging plan for reasons summarised later in these representations.
- 2.11 However, in response, our client now proposes reducing the area for development within the Area 2 site so development is focused in the most easterly portion of the site. Limiting development to here will mitigate and limit the possible adverse effects of development.

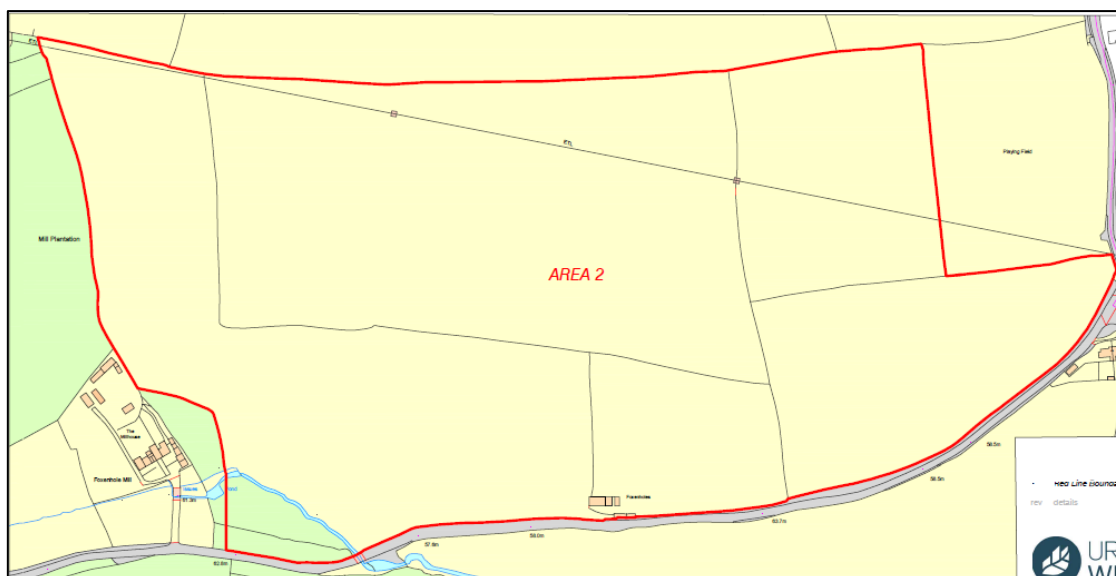


Figure 2.2: Area 2 site (entire site).

Local planning authority site summaries

2.12 The local planning authority reasoning for allocating or nor allocating the sites for development is set out in the following table.

Site	Location	LPA site ref	Size (ha)	Councils Key Reasons for Discounting/Allocating
Area 1	Land south of Strawberry Lane	GH/ED/27	3.87	Site is on the settlement periphery and has a semi-rural character. It could be considered to round off this part of the town. Tree planting is required to reduce visual impact.
Area 2	Land west of Cadhay Lane, Ottery St Mary	GH/ED/26	26.53	Site is a significant greenfield site which would extend into open countryside. It has high ecological and heritage sensitivities and development would be visible from a considerable distance.

Table 2.1 Submitted Sites

3.0 REPRESENTATIONS TO THE DRAFT PLAN – HOUSING SUPPLY

- 3.1 Our client is working with the local planning authority in bringing forward land at Ottery St Mary for sustainable high-quality housing, principally site GH/ED/27. Our client is also promoting land at site GH/ED/26 and considers the site is essential if the plan is to meet its stated objectives and deliver sufficient homes.
- 3.2 This section of the representations considers the existing housing land supply position (the 5-year housing land supply), and projected supply position should the emerging plan be adopted in 2025 as envisaged. It concludes there is sufficient uncertainty in supply, meaning additional housing sites (i.e., GH/ED/26) should be identified in the emerging plan and then actively progressed.

Existing housing land supply position in East Devon

- 3.3 Before turning to the emerging policies, it is relevant to set the context for housing land supply in East Devon, in terms of both the 'development management' focused five-year supply and the challenge of allocating sufficient sites in the emerging plan.
- 3.4 The Council is making progress in delivering the Cranbrook new settlement, however, beyond this new settlement and other sites close to the Exeter urban area there is an evident supply issue. Indeed, papers to Strategic Planning Committee (4th October 2022) accept the council does not currently have a five-year housing land supply even allowing for an optimistic approach to build-out rates and overall delivery of sites.
- 3.5 Furthermore, other reports to the Strategic Planning Committee (7th October 2022) note the challenges currently faced in allocating sufficient housing sites in the emerging plan to meet the housing need across the plan period. In light of these challenges the council has moved to identify less-preferred sites for housing where deliverability could be questionable (as per papers to the 29th September 2022 Strategic Planning Committee).
- 3.6 These supply matters are material to considering the need for additional sites to be identified in the short, medium, and long term to meet both immediate and plan-led housing requirements.

Emerging Plan Housing Target

- 3.7 Draft Strategic Policy 3 sets out the policy requirement target of delivering 18,920 dwellings over the Plan period.
- 3.8 The East Devon Local Housing Need Assessment (September 2022) provides further evidence base for housing allocations. The assessment establishes the Local Housing Need (LHN) figure at 918 dwellings per year, totalling 18,360 over the Plan period (as

of 2021). This figure was reached by adding the 12,885 dwellings needed to meet projected growth in the region, the 1,100 dwellings to address pent-up demand, and the 4,375 dwellings required for extra inward migration, totalling 18,360 dwellings over a 20-year period.

- 3.9 The Local Housing Need Assessment states that in March 2022 after the modelling of the document, the ONS released updated affordability ratios. As such, using the new ratio and the CLG 2014-based Average Annual HH Increase 2022-32, this uplifted the housing target for East Devon to 946 dwellings per annum, or 18,920 over 20 years.
- 3.10 The annualised district housing requirement for 5-year housing land supply and housing trajectory purposes will be 946 dwellings per year. In principle, this figure appears to be justified in allowing for economic growth across the region and taking account of both the Standard Method and past housing trends.

The proposed 'headroom'

- 3.11 Strategic Policy 3 states that to be flexible, a 10% increase should be added to the 18,920 identified by the LHN Assessment to provide 'headroom'. The policy notes that the headroom does not uplift the net housing requirement set out in the policy.
- 3.12 A 10% headroom would equate to a possible 20,800 dwellings over the Plan period, with 1,880 of these dwellings being the 'headroom'.
- 3.13 Our client agrees with the need for the provision of a 10% buffer to ensure housing delivery and growth within the region. The Plan states that at the time of writing there is potential to deliver approximately 20,441 dwellings in the Plan period. The potential forecast supply (20,441) of an additional 1,521 dwellings would provide only an 8% headroom (compared with the desired 10% headroom). Overall, there is support for the provision of a headroom to the housing figure, they consider the reduction of the headroom figure from 10% to 8% to be contradictory.
- 3.14 As the Local Plan states this headroom does not uplift the housing target, in other words, the additional 1,521 dwellings are unallocated. This approach is unsustainable and that if a headroom is to be provided the additional homes should be allocated in order to ensure delivery.
- 3.15 However, at present, there is no evidence to suggest that the unallocated dwellings will be delivered. If there is no available land to allocate these additional dwellings, which is why they have been included as a 'headroom' rather than actual allocation then the Council should re-assess the sites submitted in the call for sites so these additional dwellings can be allocated.

- 3.16 If the Plan aims to be flexible and provide a 10% headroom, rejected sites must be re-assessed. Failure to do so would mean the housing forecast is not 'sufficiently flexible'.
- 3.17 Site (GH/ED/26), or part of it, for example, is a suitable location for a proportion of 'headroom' dwellings. This site will be discussed in more detail in section 4.

Housing Distribution

- 3.18 The housing distribution is considered to be generally sound where it relates to the release of land at Ottery St Mary. However, there is an over-reliance on the proposed second 'new town'. While the Plan states the intent to focus growth on the west of the district close to Exeter, there are only 580 dwellings allocated to existing settlements, with all these allocations focused North of Topsham. Otherwise, dwellings are predominately to the new settlements.
- 3.19 Cranbrook is set to deliver a total of 5,514 dwellings, 4,170 of these being within the Plan Period. Regarding Cranbrook, our client's main concern is the speed of delivery. While Cranbrook benefits from a number of extant and implemented consents, at the time of publication of the draft Plan, only 543 dwellings have been completed.
- 3.20 The second new town is set to deliver 2,500 homes over the plan period, which given the likely lead in times raises questions in terms of the likely deliverability.

Delivery of proposed allocations

- 3.21 As a starting point for the assessment of likely site delivery, the emerging plan lacks the critical housing trajectory for each allocation which sets out the timescales for sites. It is noted a trajectory is provided within the HELAA Final Report (2022) at Appendix I, however this relates to all sites within the HELAA and not preferred allocations.
- 3.22 This is particularly critical when considering the ambitious proposals to deliver approximately 2,500 homes, in the plan period, from a second new settlement and the likely speed of delivery of the consented new settlement at Cranbrook.
- 3.23 Research by Lichfield's (Start to Finish Second Edition, 2020) found that for schemes of over 2,000 dwellings, average time from validation of the first planning application to the first dwelling being built is 8.4 years. Following this the average annual build out rate for schemes over 2,000 dwellings is 160 dwellings per annum. The build out figure, however, was also found to be as low as 50dpa.
- 3.24 Assuming the emerging Draft Local Plan is adopted in mid-2025 as per the latest LDS, it is unlikely that a planning application (assumed Outline or Hybrid application) at the second new town would be submitted before 2025 and may even be submitted after

Local Plan adoption (therefore potentially in 2026). Based on the Start to Finish research the first dwelling would be completed in mid-2033 or 2034 (8 years into the plan period).

- 3.25 Therefore, assuming a very ambitious average build out rate of 160dpa for the second new town may deliver 960 to 1,120 dwellings within the plan period. This is a significant short fall compared to the draft plan even based on an ambitious delivery rate. The second new settlement will require significant infrastructure and, unlike Cranbrook where development is on site, there has been no site preparatory work which is unsurprising as the site is only a draft allocation and no planning applications have been submitted. Thus, a later start on site and slower build out rate would significantly decrease the planned supply from the new settlement within the plan period. Therefore, a more conservative average build out rate of 50dpa across 14 years (assuming a start on site within the next 6 to 8 years), would result in only 300 to 350 dwellings being delivered within the Plan period.
- 3.26 As such, the anticipated delivery from the second new town should be reduced, and the possible 1,380 to 2,200 homes which may not be delivered within the second new town, should be provided in more deliverable locations.
- 3.27 Site GH/ED/26 in Ottery St Mary was rejected as an allocation. This site is, however, capable of delivering a significant portion of the homes which would not be delivered from the planned second new settlement, and GH/ED/26 (or part of) is entirely suitable in planning terms.

4.0 REPRESENTATIONS TO THE DRAFT PLAN – SITE SPECIFIC

4.1 Having considered the overarching housing need and supply position in Section 3 of these representations, this section of the representations sets out the rationale for and benefits of allocating part of GH/ED/26 and the entirety of GH/ED/27 as preferred housing sites in the emerging local plan.

Ottery St Mary context

4.2 Section 3.68 of the Local Plan states that as a Tier 2 settlement, Ottery St Mary is in principle, considered suitable for growth. It acknowledges the good road network and transport links to Exeter but identifies that expansion to the north, south and east is heavily constrained by the narrow approach to the town and conservation area.

4.3 The 4th October 2022 Strategic Planning Committee considered various site assessment papers, including sites submitted in the Call for Sites between 2017 and 2021. Of the sites assessed, five are identified as preferred allocations in Ottery St Mary including our client's site at GH/ED/27 but not site GH/ED/26.

4.4 The reports to committee provide a summary of the site-specific commentary, and this is further summarised below in respect of each site.

Site GH/ED/27

4.5 As stated previously, our client **supports** the sound allocation of this land. The emerging plan is entirely sound and correct in accepting the suitability of the site.

4.6 All technical matters have been investigated and found that appropriate mitigation to any possible adverse effects can be addressed through the planning process. There remains an intention to submit an informed Outline planning application on the site in the coming months, following favourable pre-application advice in 2021.

Site GH/ED/26

4.7 Updated documents and plans regarding GH/ED/26 were submitted to the Council in September 2022 and set out the benefits of a smaller allocation on the site. These documents are enclosed at **Appendix 1** for ease of reference.

4.8 The site is not identified as a housing site in the emerging plan, despite the evidence base and site-specific assessment for this and adjacent site showing this to be an entirely suitable location for growth. Our client **objects** to the site not being proposed for allocation and considers the failure to allocate the site to be **unsound** given the

prevailing evidence regarding this site and the fact that adjoining land with similar characteristic is allocated for development.

- 4.9 Of note, nearby and adjoining sites are identified as preferred allocations in the emerging plan (draft local plan refs: Otry_01 and Otry_09), and the sites are large greenfield sites west of the settlement and north of site GH/ED/26. The table below summarises the Council's reason for allocating or discounting the sites and shows each of these sites will have some form of impact but that in the case of GH/ED/26 these effects could be mitigated, and the assessment of GH/ED/26 is based on the entire site being allocated rather than only a portion of the site.

Assessment Summary	Site references		
	GH/ED/26	Otry_01	Otry_09
Landscape Sensitivity	Significant - due to rural character of site.	Medium - Semi-rural with some far-reaching views - careful design needed to ensure it does not appear obtrusive in distant views.	Medium – restrict development to south of site as site is visible in the landscape from a considerable distance.
Impact on Historic Environment	Moderate. Views from Grade II structures. Requires high quality design and be limited to lower slopes.	Minor impact on historic environment.	Minor impact on historic environment.
Ecological Impact	Minor adverse effect predicted (not significant).	Minor adverse effect predicted (not significant).	Significant to moderate adverse effect – adjacent County Wildlife Site and ancient woodland.
Agricultural Impact	Grade 3 land.	Grade 3 land.	Grade 3 land.
Topography	Land slopes to the east and to the south and is fairly steep in places.	Site is relatively level.	Slopes steeply in part. Northern area liable to flood.

Table 4.1: Summary of site assessment commentary

- 4.10 The HELAA concluded site GH/ED/26 does not adjoin the settlement and extends too far into the countryside with resultant heritage, ecology, and visual impact concerns. The assessment also concluded the site falls is an adopted neighbourhood plan area and would result in the coalescence of neighbouring settlements. However, the assessment was made against the entirety of the site being brought forward whereas a more appropriate assessment would be to consider a partial allocation.
- 4.11 In response to the HELAA Assessment our client now proposes that only the eastern portion of GH/ED/26 is allocated for housing. This is shown in the appended plan.

- 4.12 The western edge of Ottery St Mary is accepted (in the HELAA and draft plan) as the least constrained (and therefore suitable) area for growth. In reality, GH/ED/26 is therefore a logical extension to the settlement in a location where other sites have been identified as being acceptable in planning terms. The eastern portion of GH/ED/26 is most suitable for development as it forms a sustainable and logical extension to Ottery St Mary and can be allocated to align with the proposed allocation boundaries of the land to the north (Otry_01).
- 4.13 The allocation to the north (Otry_01) was considered as two parcels despite being a single ownership and being promoted as a single site. Following the HELAA assessment the eastern portion was allocated to avoid development in the more sensitive western portion. The commentary for Otry_01 states that the eastern section of the site is considered suitable despite the fact the site falls within an adopted neighbourhood plan area which seeks to prevent coalescence, meaning development in this part of the site would not undermine this aim.
- 4.14 The approach taken to assessing Otry_01 should be applied to GD/ED/26, and by taking this approach the site assessment outcome for GH/ED/26 would be inevitably favourable as GH/ED/26 and Otry_01 share the same characteristics. Recent submissions to the local planning authority on behalf of KCS Development have provided significant detail on this matter, and these representations reflect those submissions.
- 4.15 The Council's evidence noted that allocating GH/ED/26 would lead to settlement coalescence, however this conclusion only applies if the entirety of the site were allocated. Development in the eastern portion, however, would naturally round off the extensions to the settlement with allocations LP_Otry_01b and LP_Otry_10 and would lead to limited countryside encroachment and no coalescence.
- 4.16 As shown in table 4.1, the impacts of development between GH/ED/26, Otry_01 and Otry_09 is comparable, particularly where a reduced area of GH/ED/26 is considered in the same manner as Otry_01. Development on GH/ED/26 would result in limited adverse visual impact, limited ecological impact, and loss of Grade 3 agricultural land. In all cases visual impact ensures only part of the site can be developed, and high-quality design would be required to minimise adverse visual impact.
- 4.17 It is therefore entirely logical to also allocate GH/ED/26 as the site-specific conclusions are almost identical to Otry_01 which is a proposed allocation. Furthermore, if the allocation boundary of GH/ED/26 is restricted to align with Otry_01, then due to the proximity of these two sites, the site assessment commentary for Otry_01 relate also to GH/ED/26. GH/ED/26 is also topographically lower than Otry_01 and therefore less

visible in the surrounding countryside. It is also closer than Otry_01 to the town centre services Ottery St Mary provides.

- 4.18 In summary, the conclusions for GH/ED/26 and Otry_01 are, at worst, identical and in reality, GH/ED/26 performs better than Otry_01 in terms of topography, visibility, landscape impact, and access to services. The eastern part of GH/ED/26 should therefore be allocated for housing and could deliver up to 200 homes.
- 4.19 The necessity of identifying additional housing sites is emphasised by the conclusions in in Sections 2 and 3 of these representations which shows that key allocations within the new towns are undeliverable within the Plan period. Therefore, the possible 260-1,800 dwellings that cannot be delivered should be reallocated.

Summary

- 4.20 Ottery St Mary is a sustainable location for growth and both GH/ED/26 and GH/ED/27 are sustainably located sites. Despite this only GH/ED/27 is proposed as an allocation even though GH/ED/26 has similar characteristics to other similar sites with similar constraints which have been allocated. Therefore, in order to be sound, the Plan should also allocate part of GHJ/ED/26.
- 4.21 KCS considers it suitable to at least allocate the site as safeguarded land, or as a later phase site in order to provide the council more flexibility on the possibility of delivering this site in the future, or beyond the Plan period. This is even more pertinent if the Council aim to provide a 10% headroom as set out in Strategic Policy 3.
- 4.22 The additional allocation of GH/ED/26 would link the exiting allocations of Otry_1b and Otry_10, forming a cohesive extension to the settlement in the west.
- 4.23 As it is likely the total number of allocations included within the two new settlements are undeliverable, GH/ED/26 should be considered, at least in part, for allocation.

5.0 SUMMARY

- 5.1 This representation is made on behalf of our client, KCS Developments, who have land interests in Ottery St Mary.
- 5.2 KCS Development is actively working with the local planning authority to bring forward sustainable development in Ottery St Mary. This includes the potential for an early planning application on draft local plan site GH/ED/27 which is a preferred allocation.
- 5.3 Our client also controls land west of Ottery St Mary (site GH/ED/26) which is not identified as a preferred housing site despite being a sustainable and logical location for growth. In response to the council's HELAA assessment of GH/ED/26 the proposed developable area has been reduced to align with the boundaries of allocated land to the north (site Otry_01).
- 5.4 Our client also has concerns regarding the deliverability of certain allocations included within the Local Plan and particularly the scale of allocations within the planned second new town. Furthermore, the delivery of Cranbrook may be slower than anticipated and some of the allocated dwellings may not be delivered within the Plan period.
- 5.5 As such there may be a significant shortfall meaning the plan cannot meet identified needs let along the now stated ambition of a 10% headroom in the supply position. Turning to the proposed headroom, the plan delivers only an 8% headroom rather than the stated ambition of a 10% headroom (meaning additional sites are required).
- 5.6 In taking an overly ambitious approach to delivery of these allocations, the Plan cannot be considered effective as it is not deliverable over the Plan period, therefore making the Plan unsound. To address this, these dwellings should be allocated elsewhere, to locations that are deliverable.
- 5.7 In order to meet the identified shortfall, the plan should identify suitable and deliverable sites. Site GH/ED/27 should continue to be allocated, and part of site GH/ED/26 should be identified as a preferred site.

APPENDIX 1

BIRMINGHAM
BRISTOL
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Planning policy

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Border Road
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Sent by Email only: planningpolicy@eastdevon.gov.uk

27949/A5/NP/LW
16 September 2022

Dear Sir / Madam,

EMERGING EAST DEVON LOCAL PLAN LAND WEST OF CADHAY LANE, OTTERY ST MARY (SITE GH/ED/26)

We write regarding the emerging local plan and opportunities for sustainable and logical growth in Ottery St Mary, noting the draft plan is being discussed at a series of Strategic Planning Committees ahead of public consultation in late-Autumn this year.

This letter relates specifically to KCS Developments' interests on land west of Cadhay Lane (draft local plan site selection site ref: GH/ED/26) and the benefits of allocating the site. We have also previously made representations on behalf of KCS regarding other parcels of land at Ottery St Mary and particularly site GH/ED/27 where we support the draft allocation for 40 homes

Site GH/ED/26 is a well-located sustainable site on the edge of Ottery St Mary. The entire parcel (as assessed in the emerging local plan) extends to approximately 26ha, part of which could be allocated for new housing. Indeed, allocating this site can help the council in addressing a potential shortfall as identified in the recent papers to Strategic Planning Committee.

An Opportunities & Constraints plan is provided to assist the re-assessment of GH/ED/26. The plan shows the principles of a high-quality development that seamlessly aligns with other draft allocated sites to deliver sustainable growth in the town.

Emerging Local Plan – housing need and proposed allocations

The recent Update Report to the Strategic Planning Committee meeting of Tuesday 6 September 2022 (titled; '*Site Selection for the emerging East Devon Local Plan 2020 to 2040 – interim findings at Tier One and Tier Two settlements*') confirms additional sites are required if the emerging plan is to meet identified housing needs, in other words the plan does not currently plan for sufficient new homes. The Report presents a range of options in order to meet this shortfall, however, these

options do not include the potential to allocate a smaller part of larger sites previously discounted at earlier stages in the site selection process.

As an example of the need for additional sites, in Ottery St Mary site OTRY_01 was identified for approximately 200 homes in the Local Plan Working Draft Version (January 2022) but, due to potential landscape and visual impact, the aforementioned Update Report (September 2022) recommends allocating only the eastern parcels within OTRY_01 for 70 dwellings. As a result, the Update Report confirms other '*Potential '2nd Best' Allocation*' sites should be considered in order to partially meet the shortfall, however, the report does not consider the option to allocate a smaller area of previously discounted sites (i.e., GH/ED/26) rather than allocate less preferential sites.

This would mean at least 90 fewer homes being planned for in Ottery St Mary if '2nd best' sites are taken forward by the council, or 130 fewer homes if no further allocations are planned. This reduced supply is despite an accepted higher housing need and a potential overall shortfall in the number of homes being planned for across the authority.

The council could allocate part of GH/ED/26 and almost immediately address the accepted future shortfall in Ottery St Mary, which in turn plays a notable role in addressing the plan-wide shortfall described by officers.

Comparison of the assessment of GH/ED/26 and OTRY_01

In reviewing GH/ED/26 it is relevant to compare the site, and the council's assessment of the site, to the proposed allocation of OTRY_01 to the north. GH/ED/26 (a 26ha site) was discounted on the basis that (in summary):

'The site is a significant greenfield site which would extend into open countryside. It has high ecological and heritage sensitivities and development would be visible from a considerable distance'

However, the site assessment was based on the entire site area hence the conclusions in respect of heritage and landscape/visual sensitivity. No assessment was made of the potential to allocate only part of the site.

By comparison, OTRY_01 (a 19ha site) immediately to the north is proposed for allocation, in part, for housing and employment uses on the basis:

'Development of the eastern field only, adjacent to existing development, would reduce landscape impact...

'The scale of development on this site would help deliver the district-wide housing requirement in a manner that is consistent with the spatial strategy. Good access to facilities, provision of employment within the site, medium landscape, and low ecological sensitivity... The site is well located in terms of accessibility and this section of the site relates well to the existing adjacent built form, however careful design is needed to ensure it does not appear obtrusive in distant views. Suggest that 5.1ha is allocated for mixed use, of which at least 1.25ha is for employment use.'

Officers have therefore concluded that allocating the entirety of OTRY_01 would be inappropriate (i.e., the same conclusion as GH/ED/26) but a partial allocation is supported. However, the same approach has not been taken to GH/ED/26 whereby officers have simply assessed and discounted the entire site without considering whether a smaller allocation could address the perceived concerns.

On this point, a detailed site comparison document was submitted to the council in September 2021, and assessed a wider parcel of land (which included the entirety of site GH/ED/26 and land to the

south east) against four other parcels of land across Ottery St Mary (including site OTRY_01). The comparison document shows GH/ED/26 and OTRY_01 share similar characteristics in terms of landscape classifications and type, general location proximity to the existing settlement, potential for new access and improvements to walking/cycling routes and access to services. The eastern part of site GH/ED/26 is closer to existing services and facilities in Ottery St Mary than OTRY_01, would have a lesser visual impact, and technical considerations (drainage, ecology, etc.) can be addressed.

Therefore, it stands to reason the council should take the same approach to assessing both GH/ED/26 and OTRY_01 – i.e., undertake an assessment of a smaller parcel of GH/ED/26 which follows the proposed western boundary of OTRY_01. Were such an approach taken it is entirely reasonable and logical to conclude that GH/ED/26 should also be allocated.

Benefits of allocating GH/ED/26

The site adjoins the settlement boundary and is in a highly sustainable location with access to local services and facilities within walking distance, as accepted in the council's assessment of the site through the emerging local plan site selection process.

In terms of detailed design and technical matters:

- Ottery St Mary is identified as a sustainable settlement and the site adjoins the settlement as well as other proposed allocations (as shown on the submitted plan).
- The layout can:
 - Work with the existing site constraints such as existing cables.
 - Include strategic and structural planting, such as the western and southern boundary to minimize landscape impact.
 - Incorporate areas of publicly accessible green space within the layout.
 - Provide sustainable drainage features.
 - Provide walking and cycling routes both to/from Ottery St Mary and around the western edge of the settlement (linking to adjacent allocations).
- The landscaping and planting offer additional benefits in terms of biodiversity net gain.
- Ecological features can be provided within the site and/or on adjoining land.
- The site is within the least constrained area around the town in landscape terms as shown in the submitted comparison document.
- Vehicular access can be provided, without severe effects on the local highway network.

Therefore, the site layout can respond to the site characteristics and there are no significant constraints that would prevent the development from being delivered.

Summary

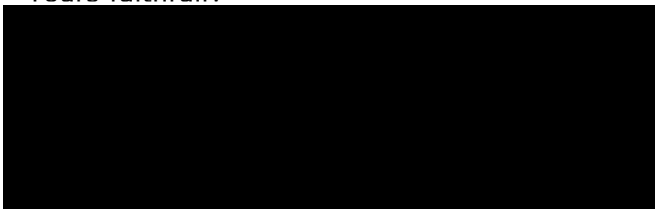
Our client has land interests in Ottery St Mary; sites GH/ED/26 and GH/ED/27 as identified in the emerging local plan site selection process. Both sites are suitable, available, and deliverable. Site GH/ED/27 benefits from a draft allocation for housing in the emerging plan and our client fully supports the emerging allocation. This letter focusses on the council's assessment of GH/ED/26 and the benefits of allocating the site in the emerging plan.

The council has accepted (in recent updates to Strategic Planning Committee) the emerging plan does not currently identify sufficient sites to meet the identified need. Therefore, allocating part of GH/ED/26 can assist in meeting identified needs, with development in a wholly appropriate location.

The site (GH/ED/26) adjoins the settlement boundary and this proximity to Ottery St Mary can ensure the sustainable growth of the town. Furthermore, there are no technical constraints which would preclude the delivery of housing that cannot be successfully mitigated. Indeed, part of the land to the north has a draft allocation for housing (site OTRY_01) and our site has very similar and in some cases superior characteristics to the adjoining draft allocation alongside which it should be allocated to provide a consistent approach to the growth of the settlement.

We trust these comments will be afforded full consideration by the Council and look forward to further engagement in the consultation process as the plan progresses. In the meantime, if you have any queries, or would like to discuss these representations in further detail, please do not hesitate to get in touch.

Yours faithfully



Associate Director



OTTERY ST MARY

A Comparative Study of:

Potential Sites for Housing

On behalf of KCS Development Ltd, February 2019



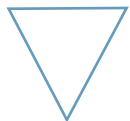
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APPENDIX A



1. INTRODUCTION




1. INTRODUCTION

Purpose and Objectives

- 1.1 Urban Wilderness was commissioned by KCS Development Ltd to undertake a comparative appraisal of areas surrounding the town of Ottery St. Mary.
- 1.2 The purpose of the appraisal is to determine the feasibility of developing land within KCS control when compared to that of other areas surrounding Ottery St Mary.
- 1.3 A high level evaluation will be conducted to determine which areas of the town, if developed, would amount to the least impacts upon landscape and / or visual amenity.
- 1.4 Sites assessed will be theoretically based on having the capacity to accommodate 700+ homes at a ratio of 60% development to 40% open space.
- 1.5 The appraisal will be limited to sites which immediately surround Ottery St Mary which appear as an extension to the town rather than a new development independent of the town's main urban area.
- 1.6 All photography within this report was taken during a site visit on 27 September 2017. Photos were taken in good weather and with good visibility.

LEGEND

 Ottery St Mary Urban Extent

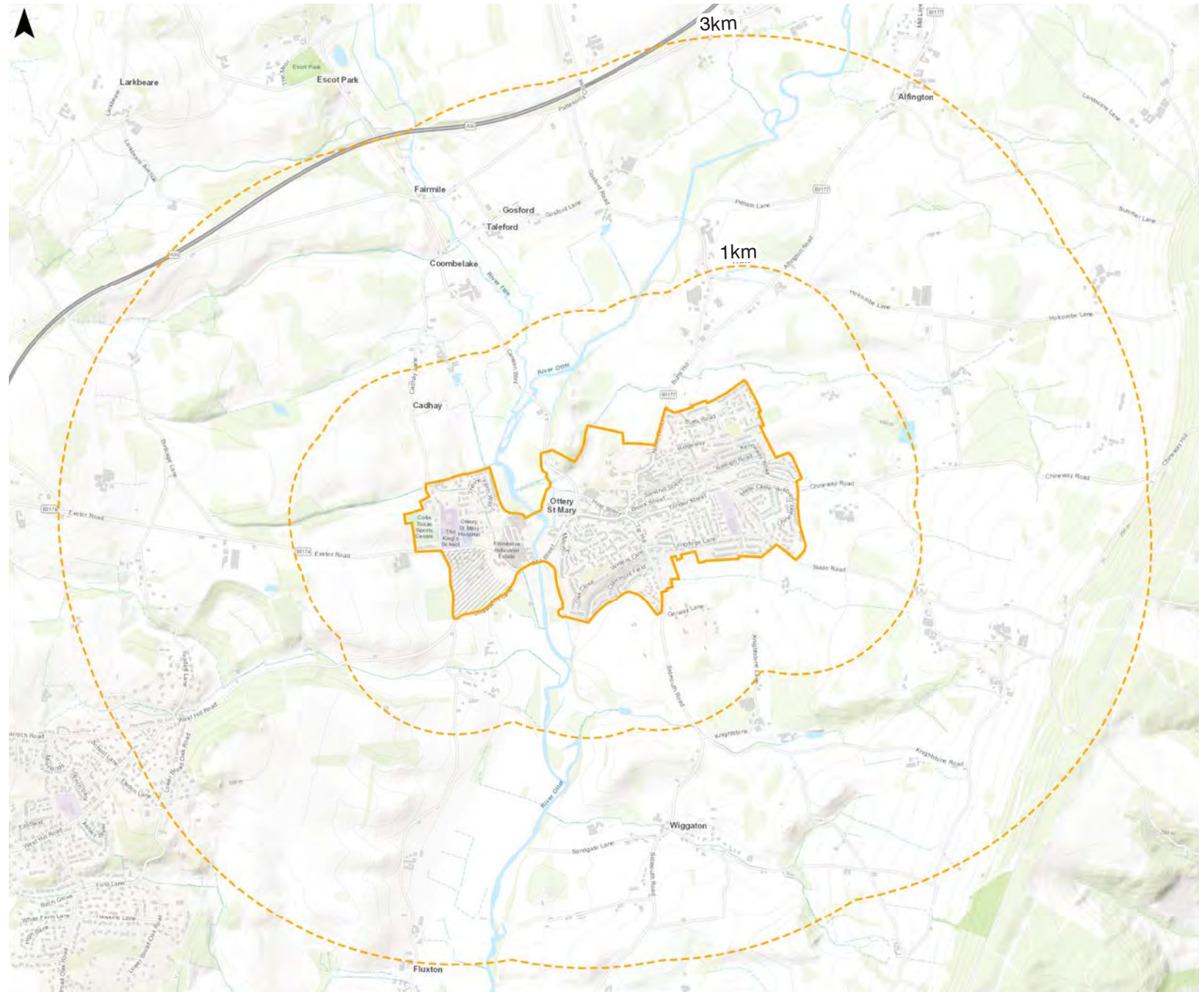


Figure 1: Site Location and Study Area

2. THE PROCESS

INTRODUCTION

2.1 In order to establish a spatial understanding of Ottery St Mary, the following process will be undertaken which examines the wider landscape, visual resource, settlement patterns and urban growth pattern of the town.

LANDSCAPE RESOURCE

2.2 We have used GIS software to produce the mapping. Datasets have been collated from Natural England, MAGIC Maps, English Heritage and East Devon District Council policy and publications, to produce the various layers of information. These illustrate landscape designations, heritage assets, landscape constraints such as flood risk areas and topographical constraints.

2.3 Following a mapping exercise, areas of land will be removed from consideration where the landscape is deemed too sensitive. This will be decided either through the presence of formal designations or by assuming land is non-developable due to topographical or environmental constraints.

VISUAL RESOURCE

2.4 Analysis of the visual resource will begin by identifying land that is deemed developable following the landscape analysis.

2.5 Once identified, boundaries will be formed which cater for a development allowance of a minimum of +700 homes at a ratio of 60% built form to 40% open green space.

2.6 A Zone of Theoretical Visibility (ZTV) will be produced to measure the potential visual impacts of a theoretical residential development upon the wider visual resource.

2.7 Following this exercise, a comparative exercise will be undertaken to analyse the ability of all potential sites identified to successfully accommodate new development.

URBAN FORM

2.8 A high level study of urban form will be carried out to (i) map the growth of the town historically and (ii) determine the areas of the town that present the best options for growth whilst maintaining a balanced and harmonious urban grain.

2.9 An exercise will also be undertaken to map existing facilities. This will help to provide an understanding of the proximity of existing provision in relation to each identified site.

2.10 Each facility will include a 400m isochrone based on recognised, preferable walking distances. This will help to determine the sustainability of each location in terms of reducing short distance car journeys etc.

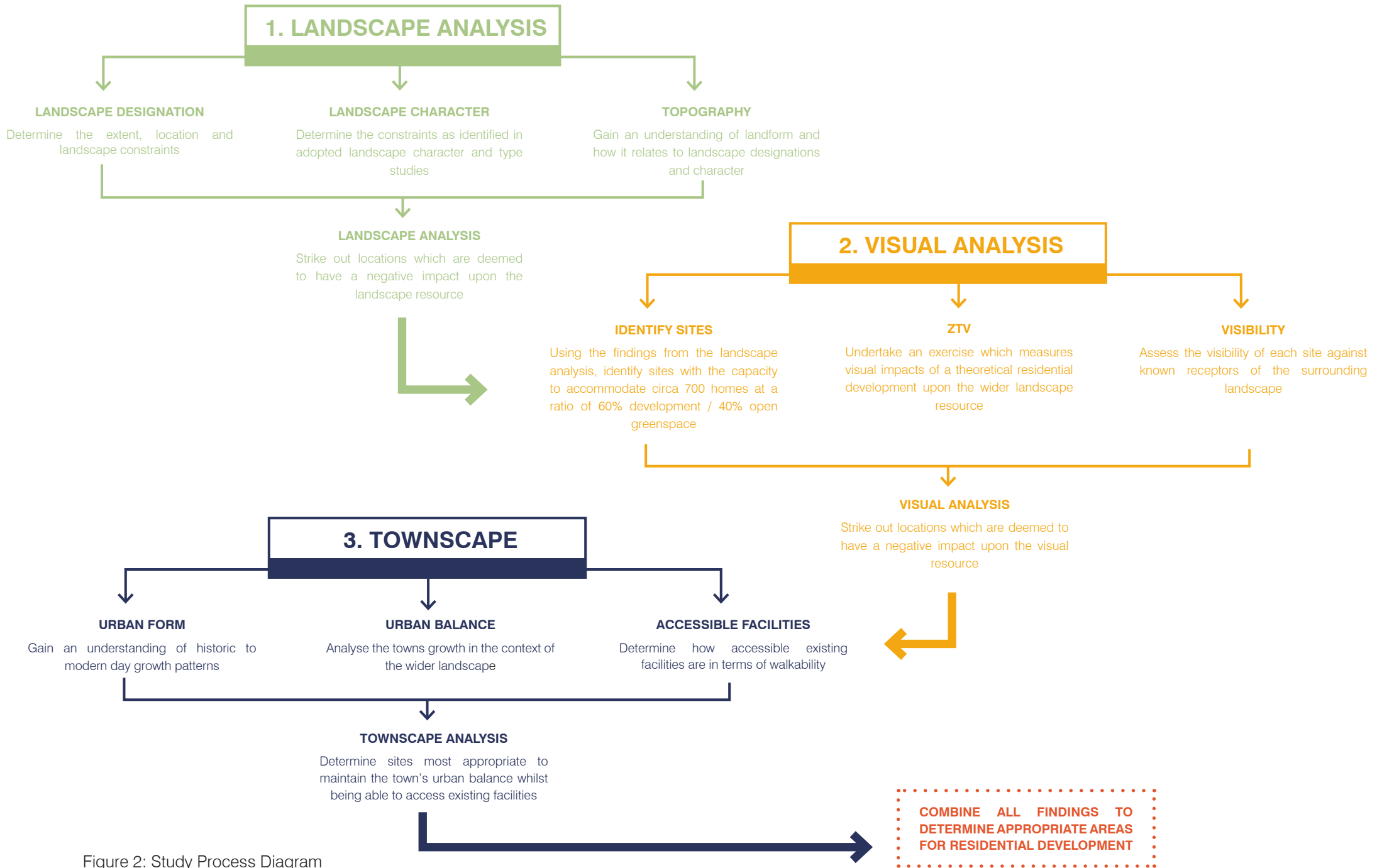


Figure 2: Study Process Diagram



3. LANDSCAPE ANALYSIS



Landscape Designations

- 3.1 To gain an initial understanding of the baseline conditions of Ottery St Mary, desk based research into landscape designations and constraints has been carried out.
- 3.2 Information has been sourced using current, publicly available information sourced from the Natural England, Environment Agency and East Devon County Council.
- 3.3 All these findings have been mapped using GIS datasets in order to build a visual narrative of the combined constraints which can be found in Figures 3.

LANDSCAPE DESIGNATIONS

- 3.4 The most significant landscape designation within the study area is the East Devon Area of Outstanding Natural Beauty (AONB). The AONB wraps around Ottery St Mary in the east and south and lies between 2km - 5km in distance from the main urban areas.
- 3.5 The rolling nature of the landform result in extended views both to and from the AONB. Rising landform east of Ottery St Marys main urban areas form the landscape setting to the AONB and are currently in agricultural use. As such, the predominant character is rural.

HERITAGE DESIGNATIONS

- 3.6 The majority of heritage assets are clustered in and around the urban area of Otter St Mary.
- 3.7 Heritage designations include Ottery St Mary Conservation Area which includes a high number of listed assets, including the Grade I Listed Ottery St Mary Parish Church, Grade II* Listed The Chanters House, and the Grade II Listed Manor House and Garden Wall. The Conservation Area covers the extents of the designed landscape to the north of the buildings.
- 3.8 Located to the north of the main Ottery urban area is Cadhay House; a Grade I Listed manor and Registered Park and Garden set in open countryside.
- 3.9 Similarly, to the south of the main Ottery urban area is Knightstone; a Grade I Listed Tudor manor.
- 3.10 Nestled in an elevated position on rising ground to the south west of Ottery St Mary urban areas is Grade II Salston Lodge and Salston Hotel.
- 3.11 Elsewhere within the study away from the main Ottery St Mary urban area, listed assets are identified as Grade II and are widely dispersed.

3.12 FLOOD ZONE

- 3.13 The River Otter runs in a north to south direction through the western half of Ottery St Mary. Due to the nature of the valley bottom landform, the river Otter's Flood Zone extends to create a significant non-developable corridor which serves to dissect the town.
- 3.14 Figure 3 maps all known constraints relating to landscape, heritage, character, topography and flood zone constraints.

LEGEND

- ▲ Listed Building - Grade I
- ▲ Listed Buildings - Grade II
- ▲ Listed Buildings - Grade II*
- - - Public Right of Way (PRoW)
- Conservation Areas
- Scheduled Monuments
- Registered Parks & Gardens
- Ancient Woodland
- Sites of Special Scientific Interest
- Watercourses
- ▨ Flood Zone 3
- ▨ Flood Zone 2
- ▨ Area of Outstanding Natural Beauty (AONB)

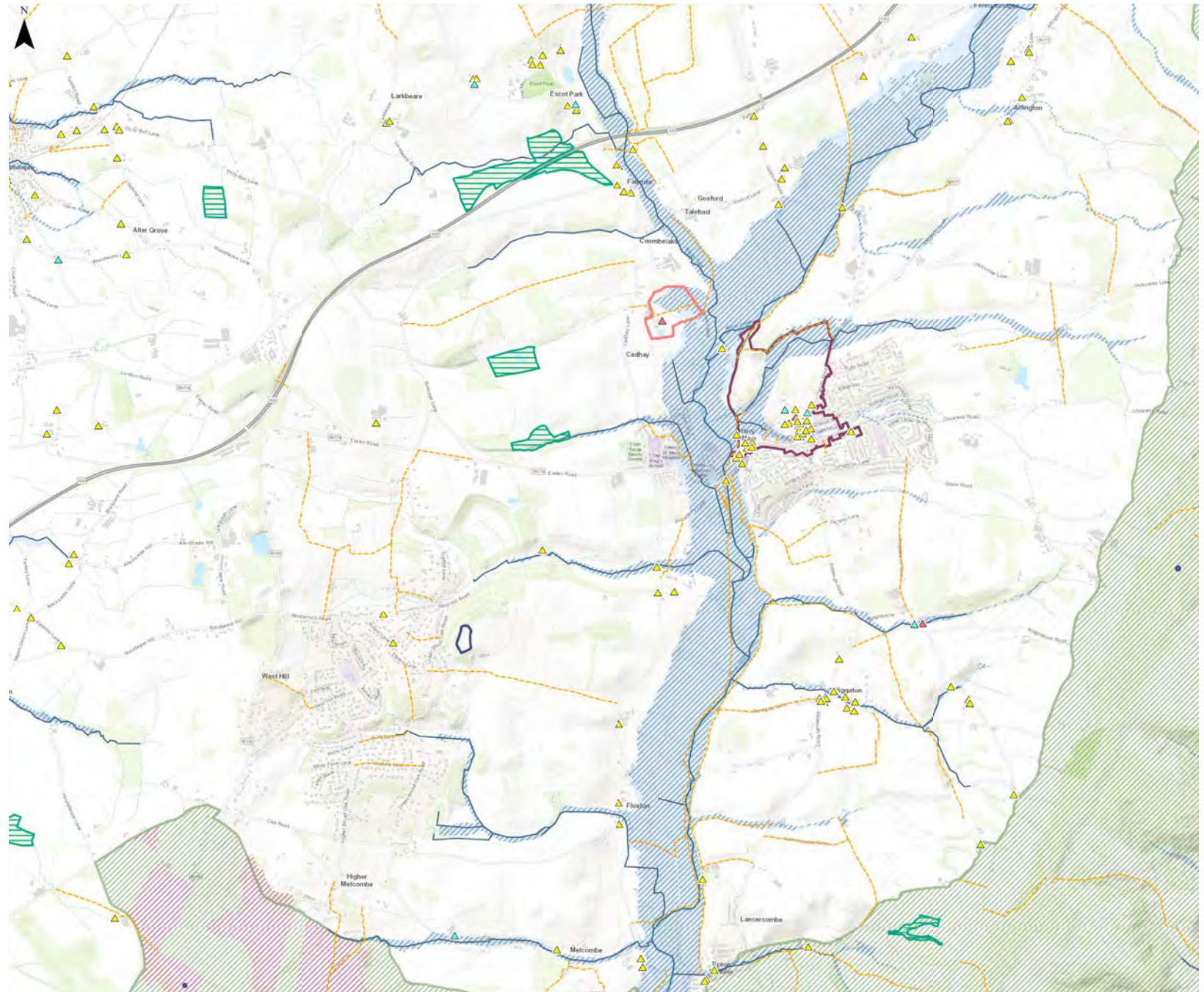


Figure 3: Landscape Designations and Constraints

Topography

TOPOGRAPHY

- 3.15 The main urban area of Ottery St Mary lies within a valley bottom between 20m - 90m AOD.
- 3.16 The valley runs in a north to south direction with the River Otter following the route of the 20m contour line.
- 3.17 Landform rises sharply in the east to 250m where it meets the East Devon AONB located approximately 1.5km from the eastern urban edge of Ottery St Mary.
- 3.18 Landform to the west rises to 160m AOD over a distance of 2.5km from the western urban edge of Ottery St Mary to the point where Exeter Road meets the A30.
- 3.19 These changes in landform result in a dramatic landscape character with long range views to and from elevated areas.
- 3.20 Figure 4 illustrates contour data across the study area at 10m intervals



Photo 1: View eastwards overlooking Ottery St Mary towards the east Devon AONB escarpment

LEGEND

20	100	180
30	110	190
40	120	200
50	130	210
60	140	220
70	150	230
80	160	240
90	170	250

(measurements in metres)

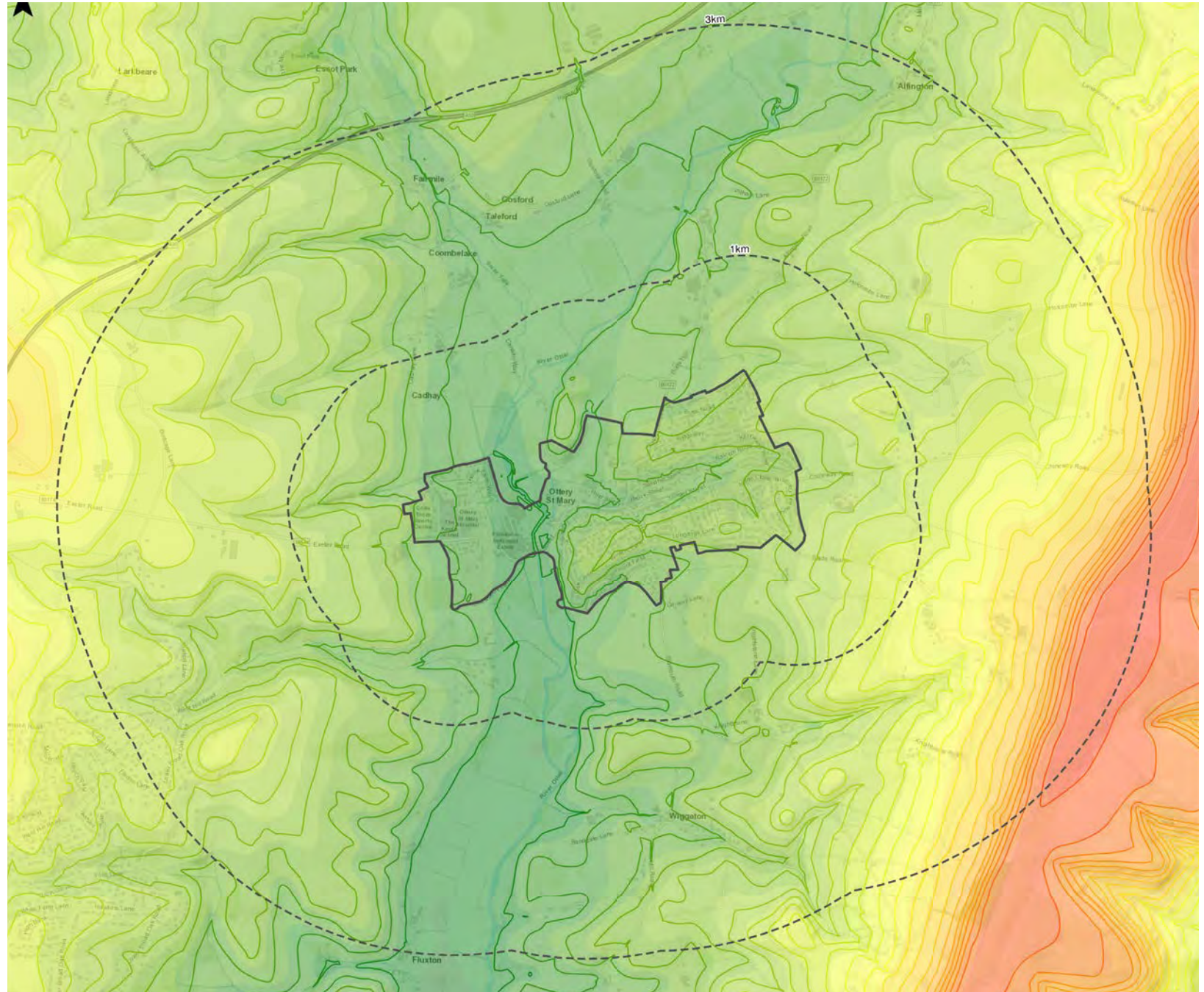


Figure 4: Topography

Landscape Character

DEVON CHARACTER AREAS

3.21 The diverse landscape surrounding Ottery St Mary is categorised into 2 Devon Character Areas (DCA); Clyst Valley Lowlands and East Devon Central Ridge. Each DCA has a distinct character which combine to form a distinct sense of place.

LANDSCAPE CHARACTER TYPES

3.22 In addition to the identified DCA, the study area is also formed of five Landscape Character Types (LCT):

- LCT 1C: Pebble Bed Heathlands;
- LCT 3A: Upper Farmed And Wooded Valley;
- LCT 3B: Lower Rolling Farmed and Settled Valley Slopes; and
- LCT 3C: Sparsely Settled Farmed Valley Floors; and
- LCT 3E: Lowland Plains.

3.23 Each Landscape Character Type is described in further detail within East Devon and Blackdown Hills Landscape Character Assessment and Management Guidelines 2018, which is currently out to consultation ahead of a formal adoption.

3.24 A Landscape Strategy for each LCT outlines the district authority's aims and objectives. We have made an assumption that in broad terms, two of the five LCT's are identified as having the capacity to accommodate land use changes of the scale required for new housing within the study area. These are: LCT 3B: and LCT 3E. Other LCT are considered too sensitive due to either geological, archaeological, historic fabric, visibility or flooding constraints.

3.25 Whilst there is no specific guidance to refrain from development within LCT 3B and LCT 3E, both acknowledge the need to retain the existing landscape structure of hedgerows and woodlands to retain character and landscape setting.

3.26 Figure 5 maps all the LCT within the study area.

LEGEND

- 1A. Open inland planned plateaux
- 1B. Open coastal plateaux
- 1C. Pebbled heaths
- 1D. Estate wooded ridges & hilltops
- 1E. Wooded ridges and hilltops
- 2A. Steep wooded scarp slopes
- 3A. Upper farmed and wooded valley slopes
- 3B. Lower rolling farmed and settled valley slopes
- 3C. Sparsely settled farmed valley floors
- 3E. Lowland plains
- 3G. River valley slopes and combes
- 3H. Secluded valleys
- 4A. Estuaries
- 4B. Marine levels and coastal plains
- 4D. Coastal slopes and combes
- 4H. Cliffs
- 5D. Estate wooded farmland
- 7. Main cities and towns

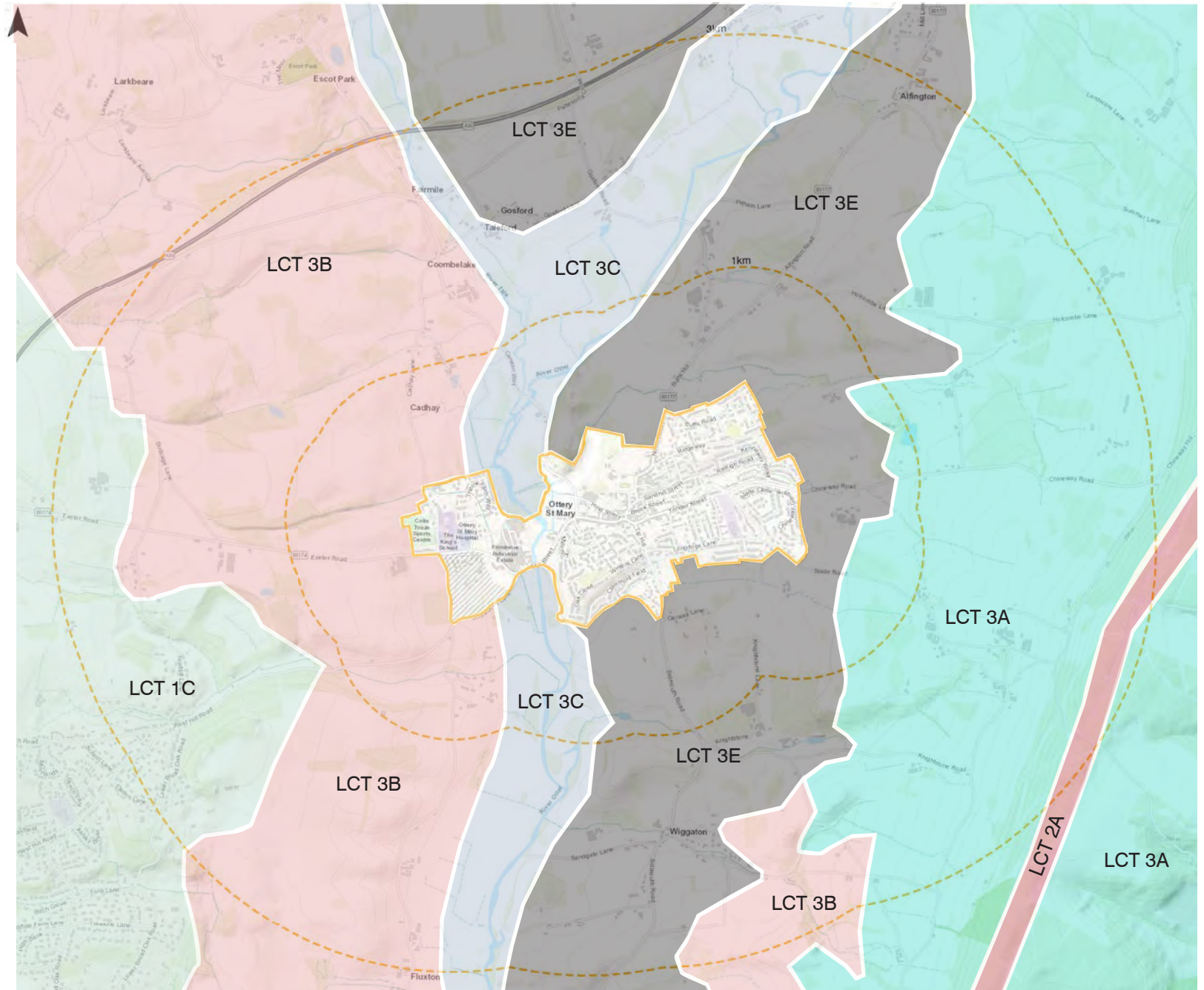


Figure 5: Landscape Character Types

Landscape Evaluation

LANDSCAPE DESIGNATIONS

- 3.27 The most significant landscape designation in the study area is the East Devon AONB. AONBs are designated for their natural beauty. As such, any development within the AONB (or of land which forms its setting), should be in keeping with the character of the landscape and should seek to conserve and enhance its inherent qualities.
- 3.28 Both the Local Plan and AONB Management Plan acknowledge that the district needs to accommodate development. However, high levels of protection are afforded to AONBs to “*Ensure that new developments are appropriate in scale, form and design, are in keeping with their setting and take full account of the local natural and cultural heritage.*”
(East Devon Local Plan 2013 to 2031, 28 Jan 2016, page 136, para 18.31 (c))
- 3.29 Areas to the east of the Ottery St Mary urban areas form the landscape setting to the AONB. This is particularly relevant where landform rises from 90m AOD to meet the edge of AONB. As such, we recommend that any development occurring in these areas, in particular from 90m+ AOD, should be sensitive towards the character of the AONB. This area is therefore regarded as unsuitable for large-scale housing development.

HERITAGE DESIGNATIONS

- 3.30 Ottery St Mary has a number of listed heritage assets including Ottery St Mary Parish Church, The Chanters House, Cadhay House and Knightstone.
- 3.31 Each asset is unique and there are no definitive policies preventing development to the landscape setting of such assets. However, Policy EN8 ‘Significance of Heritage Assets and their Setting’ specifically requests a systematic assessment of significance should development have the potential to impact upon the landscape setting. This policy ensures that appropriate measures are in place to conserve and enhance these assets
- 3.32 East Devon Local Plan 2013-2031 outlines the authorities intentions for Ottery St Mary with specific reference to historic qualities; “*Conserving the built environment and historic qualities of Ottery St Mary, especially in the town centre, and promoting these as assets for visitors to the town and residents.*”
(East Devon Local Plan 2013 to 2031, 28 Jan 2016, page 136, para 12.5 (d))

LANDSCAPE CHARACTER

- 3.33 LCT 3B and LCT 3E are identified as having the capacity to accommodate land use changes of the scale required for new housing.






FLOOD ZONE

- 3.34 The flood zone (zones 2 & 3) of the River Otter and River Tale forms a significant open space corridor that essentially results in a study area of two halves (east and west). Policy EN21 River and Coastal Flooding within the East Devon Local Plan advises that whilst a sequential approach will be considered for locations within flood zone 2, ‘*This shall not apply to ‘highly vulnerable’ development in Flood Zone 3a or ‘less vulnerable’; ‘more vulnerable’; or ‘highly vulnerable’ development in Flood Zone 3b...’*’.

- 3.35 Figure 6 combines all landscape constraints to illustrate:

- All areas considered **undevelopable** due to a combination of landscape, heritage, character, topography and flood zone constraints.
- Landscape Character Types which are considered to be **developable** LCT 3B and LCT 3E
- The identification of areas located within **developable** areas that form a natural extension to the existing urban area of Ottery St Mary.

LEGEND

-  Ottery St Mary Urban Extent
-  Areas considered undevelopable due to landscape constraints
-  LCT 3B
-  LCT 3E
- } Developable LCTs
-  Sites considered developable following Landscape Evaluation

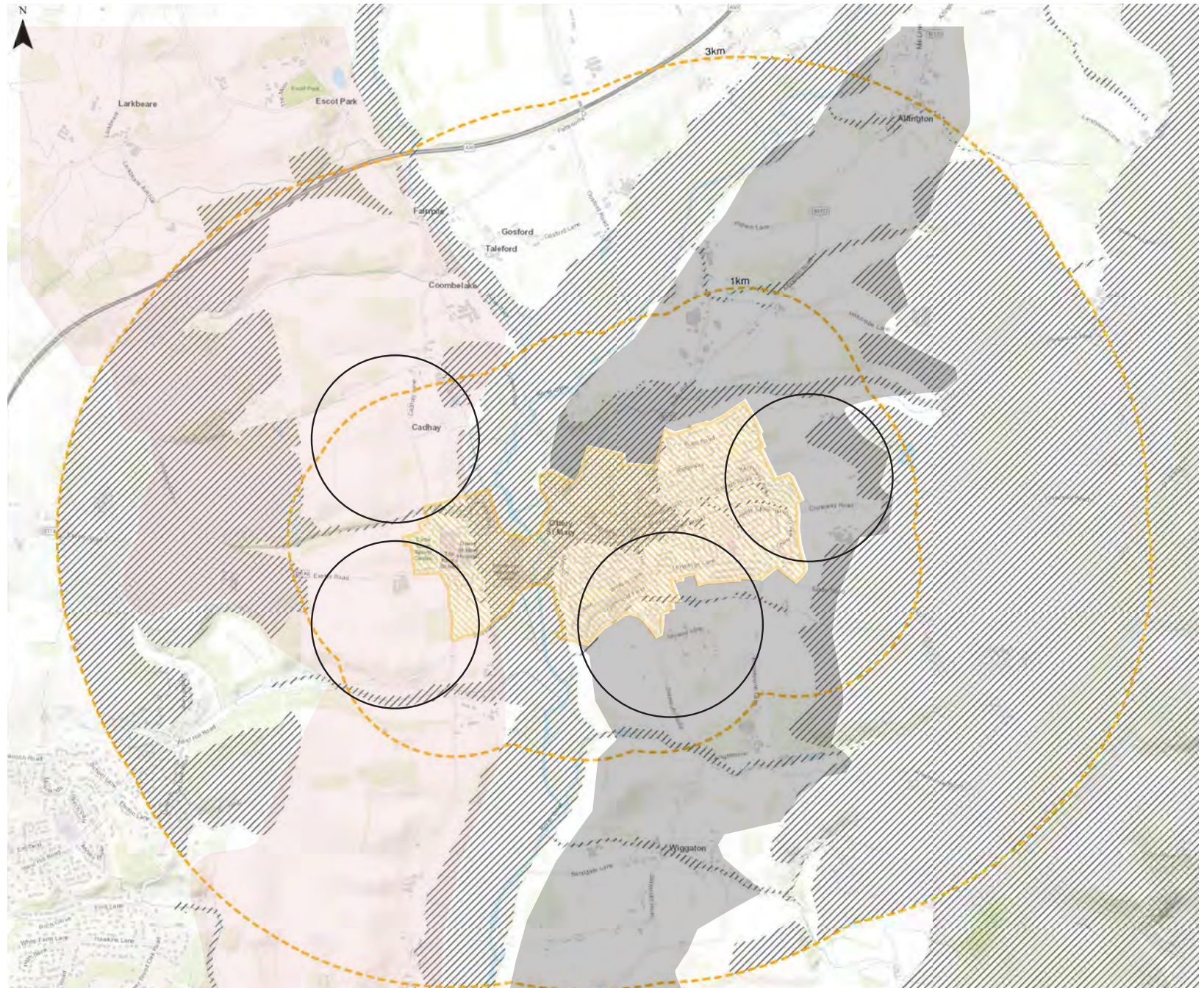


Figure 6: Landscape Evaluation Plan



4. VISUAL ANALYSIS



Visual Parameters

Site Selection

- 4.1 Four sites have been selected on which to undertake a Zone of Theoretical Visibility (ZTV) assessment. Site selection is based on the following criteria:
- That sites fall within areas that have previously identified as being of low landscape impact;
 - That sites have the capacity to accommodate a between 700 - 900 homes; and
 - Sites are considered to be, if developed, a natural extension to the urban areas of Ottery St Mary.
- 4.2 The selected site boundaries do not accord with those allocated within the East Devon SHLAA Assessment. This approach has been taken in order to gain a broader understanding of the landscape capacity surrounding Ottery St Mary rather than a 'moment in time assessment' focused on available sites.
- 4.3 The boundary of each site follows existing field boundaries. However, the ownership of this land is currently unknown.

ZTV Limitations













- 4.4 The ZTVs have been conducted in accordance with the following principles:
- Proposed development is assumed to be 9.5m high
 - The ZTV assumes a bare earth approach in order to illustrate a worst-case scenario, i.e. screening elements such as buildings and trees are not included but changes in topography are;
 - ZTVs are high level, non-verifiable desk-based assessments. They are typically produced to inform site visits ahead of formal visual impact assessments. In this instance, ZTVs are to portray an initial understanding of visibility only;
 - Landscape constraints such as woodland, tree groups and urban settlements have been mapped and considered as part of the visual analysis. Whilst the ZTV process does not digitally analyse these items, visualising their location will add a level of detail which can be used to establish the visual baseline.

- The visual assessment is based on a wide range of desk-based assumptions. In order to substantiate the full range of potential visual impacts, a full landscape and visual assessment will need to be undertaken based on specific proposals for specific sites; and
- Appendix 'A' gives further details of the scoring mechanisms used within this report to determine sensitivity, magnitude of change and significance of effects.

Key Receptors

- 4.5 Receptors include East Devon AONB, local residents, users of recreational facilities and users of roads. In overall terms, the first three categories are considered to be of higher sensitivity than the latter due to the prolonged and or proprietary interest in the view, although the context of individual receptors can have a bearing on their sensitivity.
- 4.6 Key receptors locations are mapped in Figure 7, and are discussed in further detail within the following sections ZTV Site A - D.
- 4.7 Please refer to Figure 7 for each site's location, visual constraints and receptor locations.

LEGEND

-  Ottery St Mary Urban Extent
-  90m Contours
-  Area of Outstanding Natural Beauty (AONB)
-  Site A
-  Site B
-  Site C
-  Site D
-  Listed Building - Grade I
-  Listed Buildings - Grade II
-  Listed Buildings - Grade II*
-  Public Right of Way (PRoW)
-  Indicative Woodland/Tree Groups

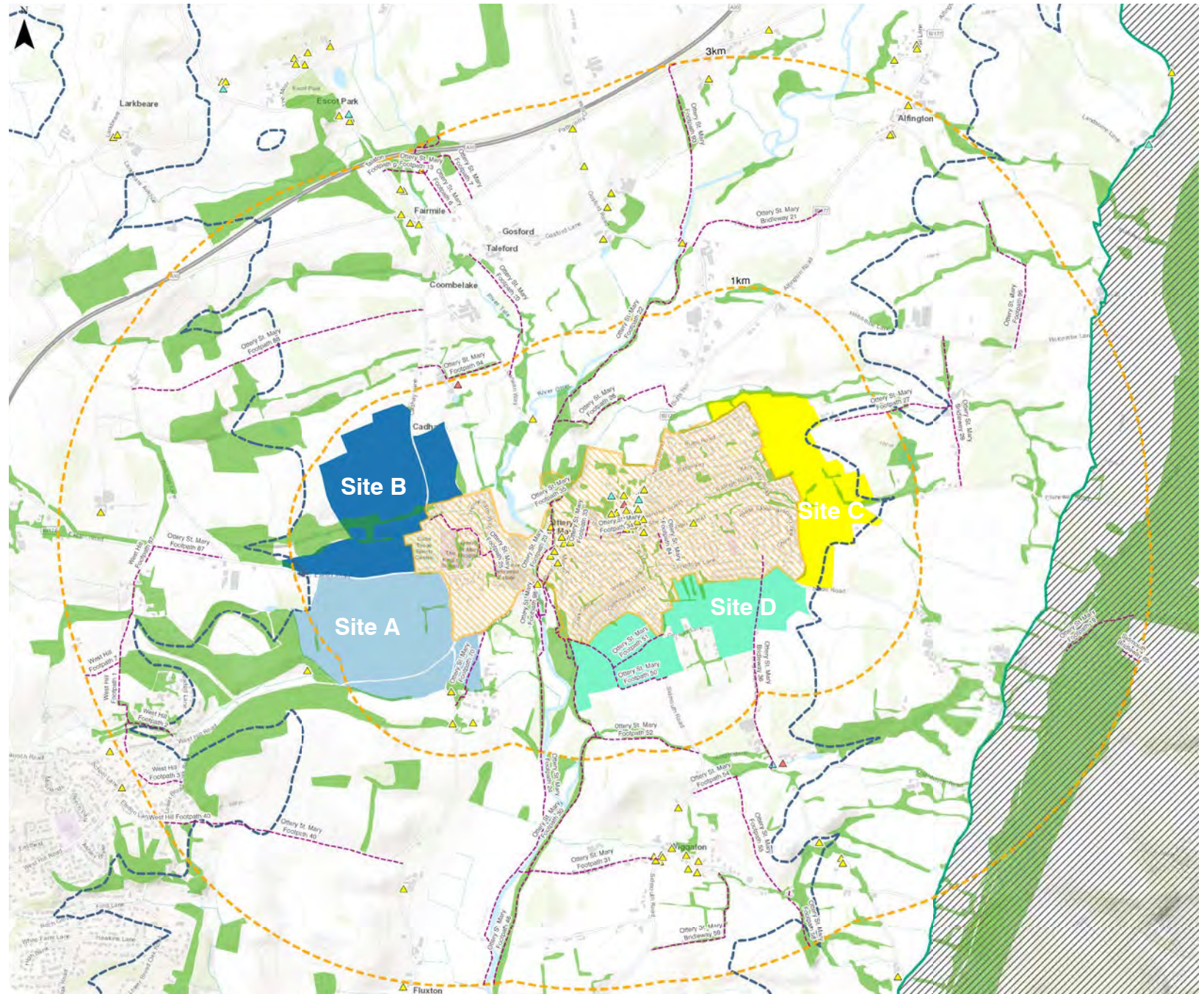


Figure 7: Sites assessed for visibility

Predicted Visual Impact upon East Devon AONB

4.8 The majority of the site will be evident in views from the elevated edge of the East Devon AONB, albeit from a distance of circa 3.5 km. Views of the site are within the context of Ottery St Mary's urban area and surrounding dispersed pockets of agricultural buildings.

4.9 The western boundary of the AONB is an elevated ridgeline which serves to delineate the AONB. This in turn limits views to the west from a very small section of the AONB.

4.10 It is anticipated that development of the site will appear as a distant extension to Ottery St Mary within a much wider panorama.

- Sensitivity to Change: **High**
- Magnitude of Change: **Low**
- Significance of Effects: **Slight**

Predicted Visual Impacts upon residents of Ottery St Mary

4.11 The site is visible from homes to the west of the main urban area which are orientated towards the site, in particularly those homes which are elevated above the River Otter.

4.12 Homes located on Exeter Road and new homes centred around Kings Reach are likely to experience the greatest change in views, due to their close proximity and orientation towards the site.

- Sensitivity to Change: **High**
- Magnitude of Change: **Medium**
- Significance of Effects: **Moderate**

Predicted Visual Impact upon Recreation

4.13 The site is predicted as being screened from the majority of surrounding PRoW's with the exception of those located to the south of the main Ottery St Mary urban area. These footpaths are located in open space within the valley bottom and are predicted to have views to the site where breaks in vegetation occur. Views of the site will be distant, within the existing urban context and limited to higher ground where landform rises above existing development. As such, they are judged to be of a lower sensitivity to change.

- Sensitivity to Change: **Medium**
- Magnitude of Change: **Low**
- Significance of Effects: **Slight**

Predicted Visual Impact upon Road Users













4.14 There are a number of roads within the urban areas of western section of Ottery St Mary where receptors will experience views to the site. Views will typically occur for a short duration and will be within the context of the existing urban setting.

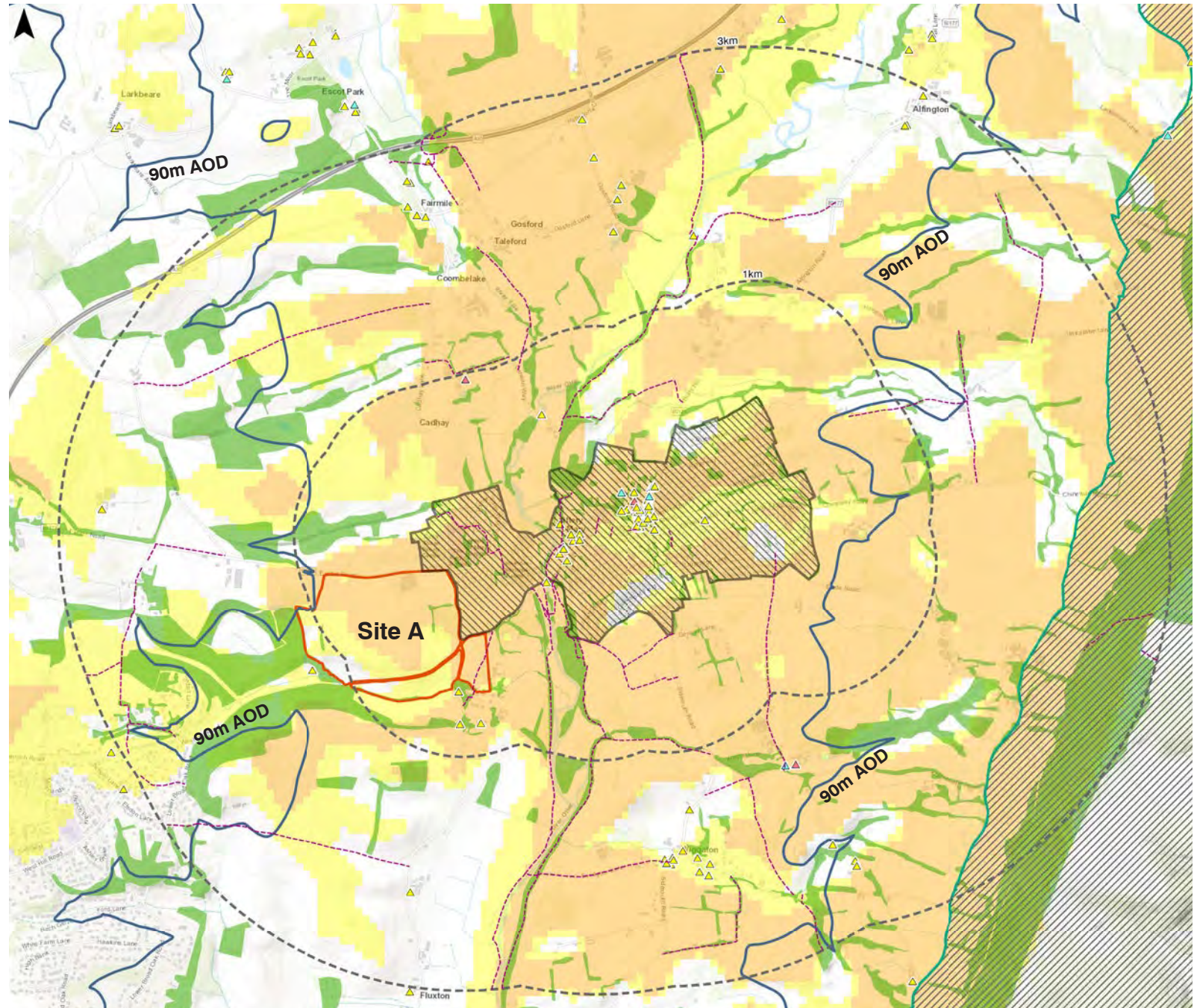
4.15 Roads within the wider landscape are typically narrow lanes, flanked by raised banks and vegetated verges, many of which include trees. As such, open and prolonged views to the site are not predicted.

4.16 Road users, who are expected to experience the greatest change in visual resource are those on Mill Street, Barrack Road, Strawberry Lane and Exeter Road. In the first two cases, views are predicted to be partly screened and filtered by intervening elements and experienced for a short duration within an urban context. Exeter Road and Strawberry Lane will experience greater levels of change due to the existing rural character of the route. However, due to the nature of the receptor, views will be transient and for the most part heavily filtered by boundary vegetation.

- Sensitivity to Change: **Low**
- Magnitude of Change: **Medium**
- Significance of Effects: **Slight**

LEGEND

-  Ottery St Mary Urban Extent
-  90m Contours
-  Area of Outstanding Natural Beauty (AONB)
-  Site A
-  ZTV - Not visible
-  ZTV - Partially visible
-  ZTV - Visible
-  Listed Building - Grade I
-  Listed Buildings - Grade II
-  Listed Buildings - Grade II*
-  Public Right of Way (PRoW)
-  Indicative Woodland/Tree Groups



Receptor	Significance of Effects
AONB	Slight
Residents	Moderate
Recreation / Heritage	Slight
Road User	Slight

Figure 8: ZTV Zone 1

ZTV - Site B

Predicted Visual Impact upon East Devon AONB

4.17 As with Site A, the majority of the site will be visible in views from the elevated edge of the East Devon AONB, albeit from a distance of circa 3.5 km. Views of the site are within the context of Ottery St Mary urban areas and surrounding dispersed pockets of agricultural buildings.

4.18 The western boundary of the AONB is an elevated ridgeline which again distinguishes the AONB's boundary. This in turn limits views to the west from a very small section of the AONB.

4.19 It is anticipated that development of the site will appear as a distant extension to Ottery St Mary within a much wider panorama.

- Sensitivity to Change: **High**
- Magnitude of Change: **Low**
- Significance of Effects: **Slight**

Predicted Visual Impacts upon residents of Ottery St Mary

4.20 It is predicted that the majority of site will be screened by intervening urban development. As such, residential receptors within the main urban areas of Ottery St Mary (east of the River Otter) are unlikely to experience views towards the site.

4.21 Immediate residential receptors located along Exeter Road and a small number of dwellings centred around Cadhay Lane and Thorne Farm Way may experience views from homes which adjoin the site. However, these views are predicted to be obtainable to a small number of the most westerly homes.

4.22 New homes at Kings Reach are likely to experience the greatest change in views, due to their close proximity and orientation towards the site.

- Sensitivity to Change: **High**
- Magnitude of Change: **Medium**
- Significance of Effects: **Moderate**

Predicted Visual Impact upon Recreation

4.23 The site is potentially visible from the Grade I listed Cadhay House, albeit from a minimum distance of 300m. However, the introduction of housing of the nature anticipated has the potential to introduce an urbanising influence on the area unless appropriately mitigated.

4.24 Whilst there are a number of Public Rights of Way (PRoW) within the wider landscape that surrounds the site, it is predicted that intervening woodland and trees groups will provide substantial screening that will screen views towards the site.













- Sensitivity to Change: **High**
- Magnitude of Change: **Medium**
- Significance of Effects: **Moderate**

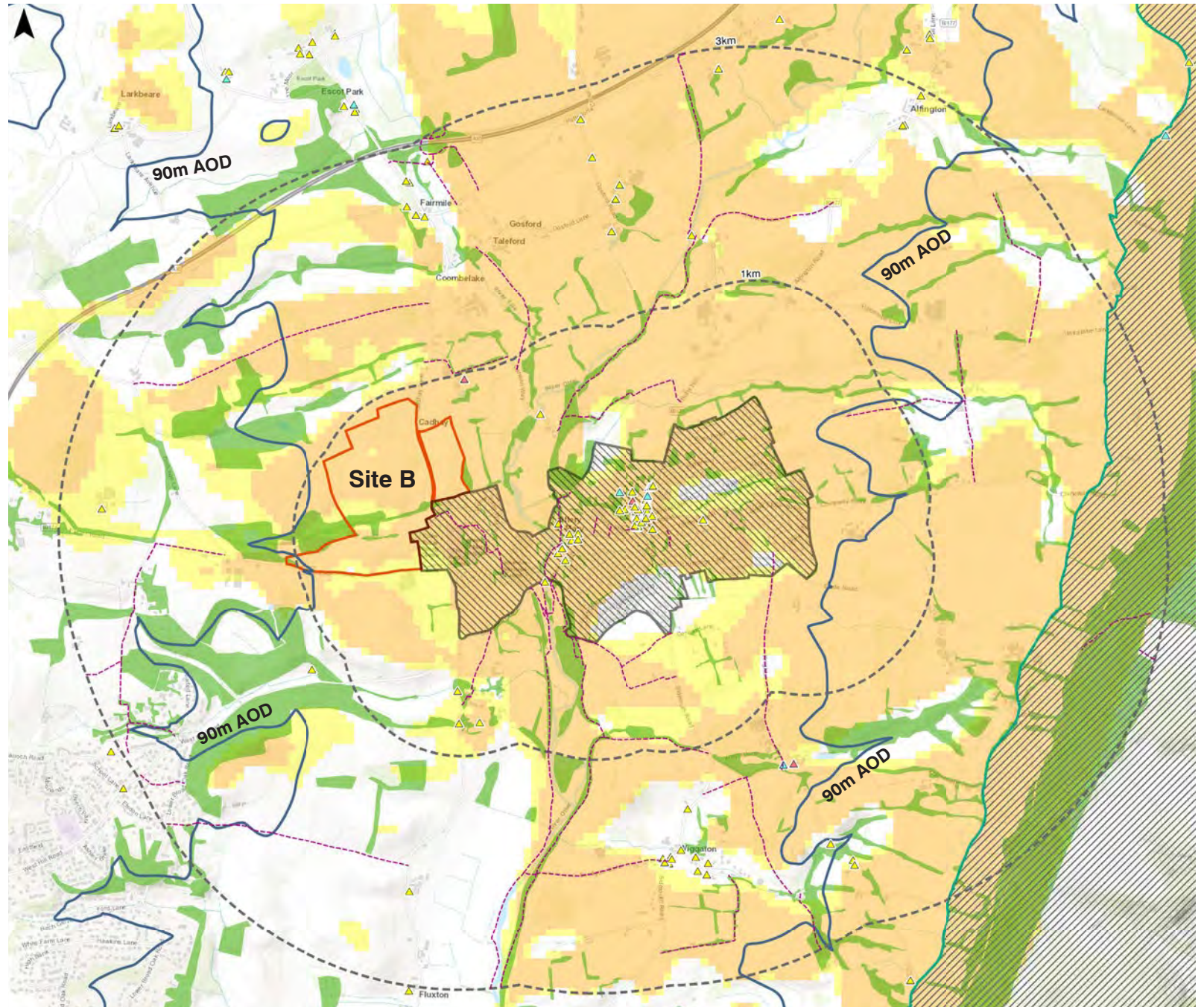
Predicted Visual Impact upon Road Users

4.25 Road users who will experience the greatest change in visual resource will be Cadhay Lane and Exeter Road, users of which will experience the site at close range and will experience at character change from semi rural to urban. However, due to the nature of the receptor, views will be transient and for the most part heavily filtered by boundary vegetation.

- Sensitivity to Change: **Low**
- Magnitude of Change: **Medium**
- Significance of Effects: **Slight**

LEGEND

-  Ottery St Mary Urban Extent
-  90m Contours
-  Area of Outstanding Natural Beauty (AONB)
-  Site B
-  ZTV - Not visible
-  ZTV - Partially visible
-  ZTV - Visible
-  Listed Building - Grade I
-  Listed Buildings - Grade II
-  Listed Buildings - Grade II*
-  Public Right of Way (PRoW)
-  Indicative Woodland/Tree Groups



Receptor	Significance of Effects
AONB	Slight
Residents	Moderate
Recreation / Heritage	Moderate
Road User	Slight

Figure 9: ZTV Zone 2

Predicted Visual Impact upon East Devon AONB

4.26 Site C is located approximately 1.5km from the eastern boundary of the East Devon AONB with a ground level up to 10m higher than that of the existing urban area of Ottery St Mary.

4.27 It is predicted that development of this site will result in the urban area rising c.10m higher than that of the existing settlement area. This additional development height and a closer proximity to the AONB is expected to increase the urban influence within views from the AONB.

4.28 Similarly, an increase in development height is predicted to increase visibility of the urban area in views from the elevated areas in the west. This has the potential to introduce an urban influence into the setting of the AONB.

- Sensitivity to Change: **High**
- Magnitude of Change: **Medium**
- Significance of Effects: **Moderate**

Predicted Visual Impacts upon residents of Ottery St Mary

4.29 It is predicted that the majority of site will be screened by intervening urban development. As such, residential receptors within the main urban areas of Ottery St Mary (east of the River Otter) are unlikely to experience views towards the site with the exception of the most immediate residents which adjoin the site.

4.30 New homes centred around Pixie Walk are likely to experience distant views of the development rising above the existing townscape. However, these views are already heavily influenced by urban development.

- Sensitivity to Change: **High**
- Magnitude of Change: **Low**
- Significance of Effects: **Slight**

Predicted Visual Impact upon Recreation

4.31 It is predicted that views to the site are obtainable from sections of a number of PRoW located to the east of Ottery St Mary. However, views from the footpaths are already heavily influenced by urban development. As such, development of the site is not predicted to change the visual resource substantially.













- Sensitivity to Change: **High**
- Magnitude of Change: **Low**
- Significance of Effects: **Slight**

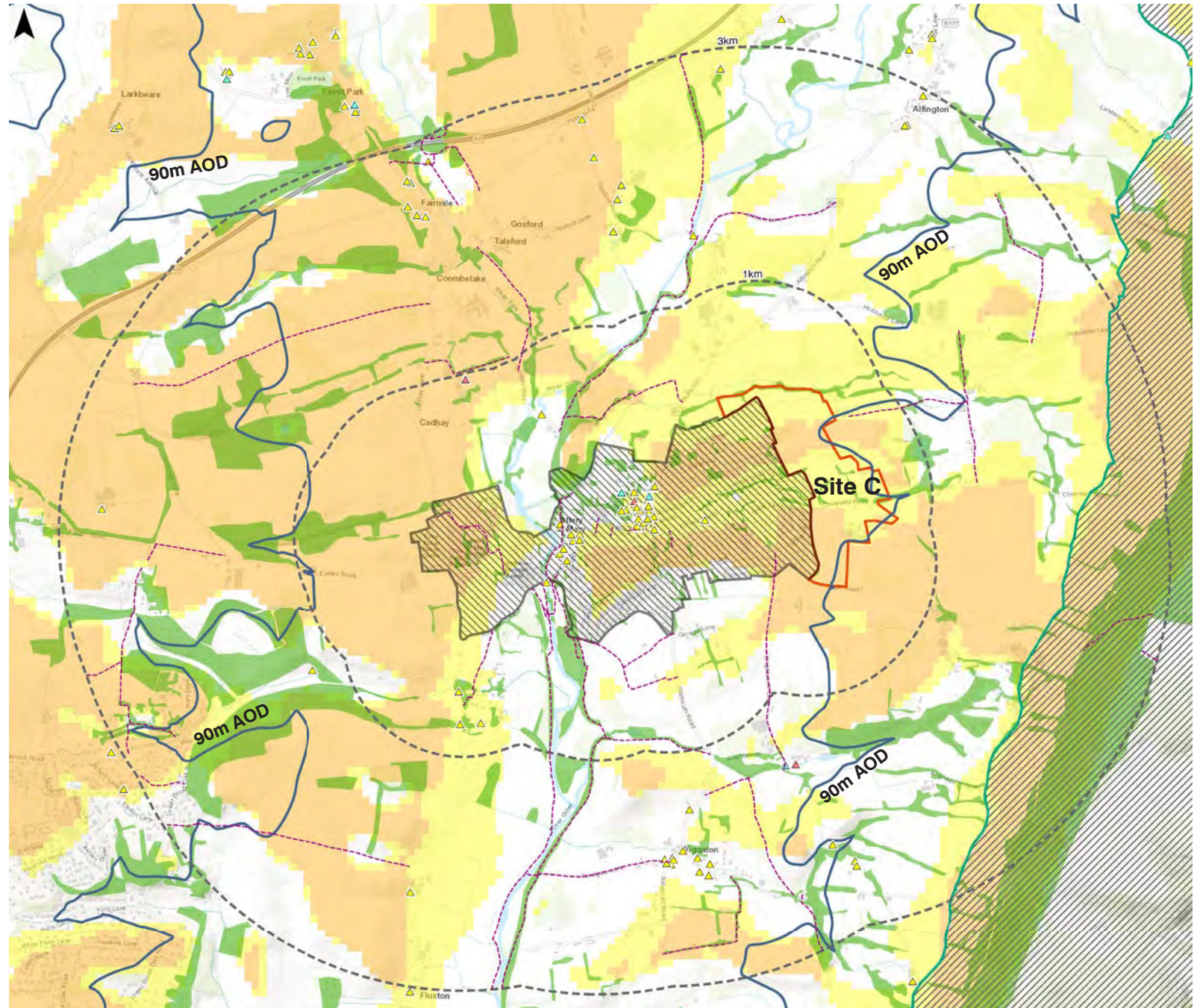
Predicted Visual Impact upon Road Users

4.32 Roads east of Ottery St Mary lead from the urban area to the East Devon AONB. Their typical character is that of a rural lane, bounded by high hedgerows and trees which prevent long range views. As such, it is predicted that views from roads will be limited to those roads that travel in close proximity to the site such as Chineway Road and Slade Road. Views from these locations are likely to be remain screened through the retention of boundary hedgerows. As such, views are expected to be limited to gaps in hedgerows created for access.

- Sensitivity to Change: **Low**
- Magnitude of Change: **Low**
- Significance of Effects: **Slight**

LEGEND

-  Ottery St Mary Urban Extent
-  90m Contours
-  Area of Outstanding Natural Beauty (AONB)
-  Site C
-  ZTV - Not visible
-  ZTV - Partially visible
-  ZTV - Visible
-  Listed Building - Grade I
-  Listed Buildings - Grade II
-  Listed Buildings - Grade II*
-  Public Right of Way (PRoW)
-  Indicative Woodland/Tree Groups



Receptor	Significance of Effects
AONB	Moderate
Residents	Slight
Recreation / Heritage	Slight
Road User	Slight

Figure 10: ZTV Zone 3

Predicted Visual Impact upon East Devon AONB

- 4.33 Due to the low-lying nature of Site D, it is anticipated that views from the AONB mostly will remain screened. In locations where views are afforded, the site is predicted to appear as a minor extension to the existing urban areas of Ottery St Mary.
- 4.34 Developing south of the main urban area has the potential to negatively impact views to the AONB from high ground in the west. However, it is predicted the site will remain out of view in the majority of locations with the potential for long range views.
- 4.35 It is considered that by developing the site, views of the AONB will be most altered when viewed from the valley bottom. Users of riverside open space and footpaths currently experience filtered views to the existing developed edge. However, developing the site will significantly increase the scale of urban development within what is essentially a rural landscape and AONB setting.
- Sensitivity to Change: **High**
 - Magnitude of Change: **High**
 - Significance of Effects: **Significant**

Predicted Visual Impacts upon residents of Ottery St Mary

- 4.36 It is predicted that the majority of site will be screened by intervening urban development. As such, residential receptors located to the northern half of Ottery St Mary are unlikely to experience views towards the site.
- 4.37 Residential receptors located in the southern half of Ottery St Mary will experience a range of views towards the development. These will range from 'oblique and filtered' to 'elevated and unbroken'. Of the sites selected it is expected that Site D will present the greatest change in visual resource to existing residents, with views towards the AONB changing from open countryside to that of dense residential development.
- Sensitivity to Change: **High**
 - Magnitude of Change: **High**
 - Significance of Effects: **Significant**

Predicted Visual Impact upon Recreation













- 4.38 There are four PRow located within the site boundary. Development of the site will result in significant changes to the visual resource of the PRow. The landscape will change from urban edge and open countryside with channeled views to the AONB to that of footpaths within an urban setting.

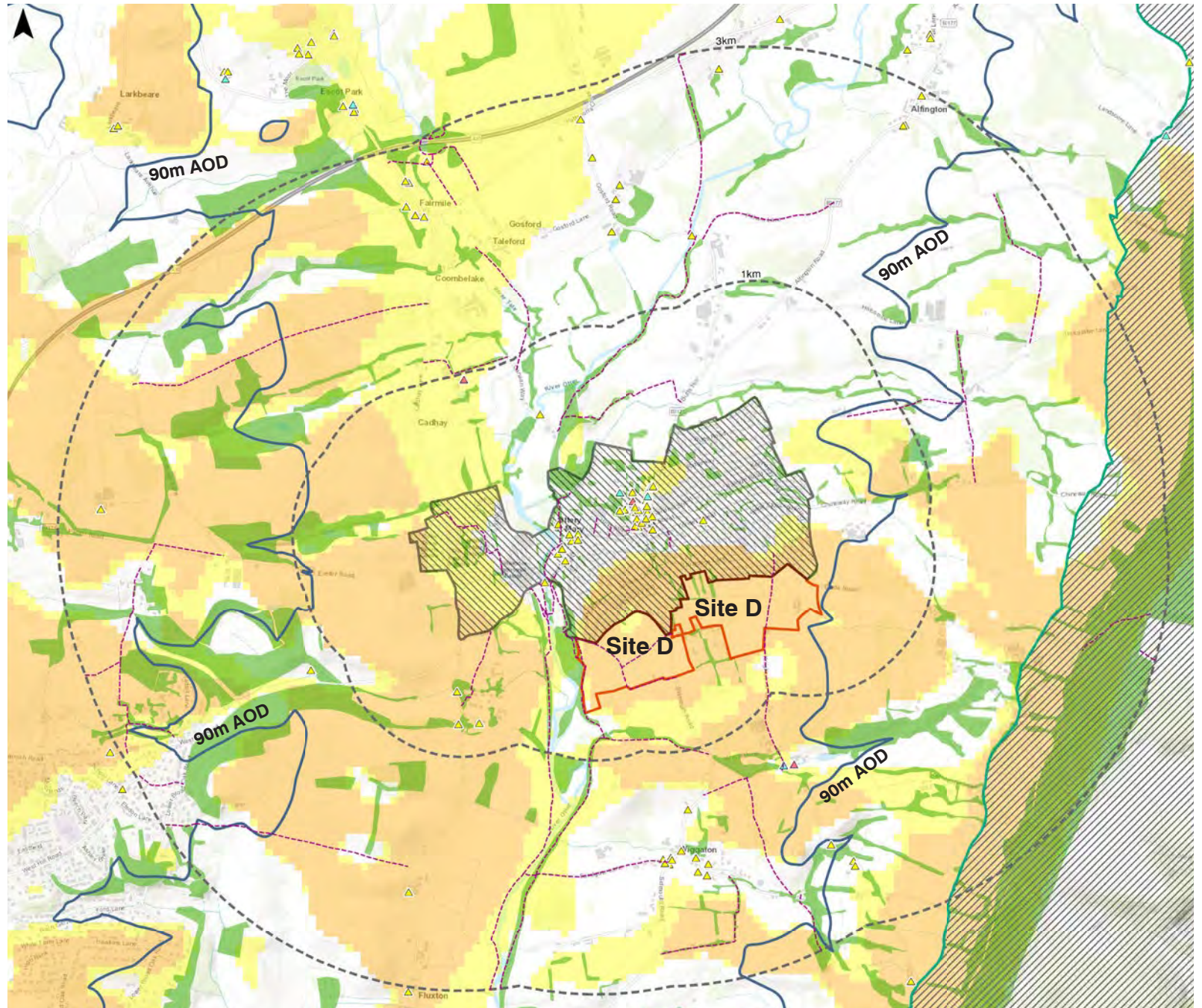
- 4.39 Views from a further four PRow are anticipated to be affected, although the existing urban context of Ottery St Mary forms part of the current view. The site will therefore appear as a minor urban extension.
- 4.40 Development of the site is predicted to affect views from the Grade II listed Salston Lodge and Salston Hotel. Views from the grounds of these listed assets potentially span the valley towards the AONB. Development of the site is predicted to appear as a large extension to the existing urban area of Ottery St Mary.
- Sensitivity to Change: **High**
 - Magnitude of Change: **High**
 - Significance of Effects: **Significant**

Predicted Visual Impact upon Road Users

- 4.41 Road users who will experience the greatest change in visual resource will be users of Sidmouth Road who will observe the site at close range. However, the southern built edge of Ottery St Mary currently is a prominent feature that has a strong influence on the existing visual resource. Therefore, development of the site will predominantly be experienced as an extension to the existing developed edge.
- Sensitivity to Change: **Low**
 - Magnitude of Change: **Medium**
 - Significance of Effects: **Slight**

LEGEND

-  Ottery St Mary Urban Extent
-  90m Contours
-  Area of Outstanding Natural Beauty (AONB)
-  Site D
-  ZTV - Not visible
-  ZTV - Partially visible
-  ZTV - Visible
-  Listed Building - Grade I
-  Listed Buildings - Grade II
-  Listed Buildings - Grade II*
-  Public Right of Way (PRoW)
-  Indicative Woodland/Tree Groups



Receptor	Significance of Effects
AONB	Significant
Residents	Significant
Recreation / Heritage	Significant
Road User	Slight

Figure 11: ZTV Zone 4

Visual Evaluation

OVERALL VISIBILITY

4.42 To quantify the findings of the high level visual assessment, the following scoring system has been applied to determine the predicted visual significance of effects from each site:

- Slight Significance of Effects = 1
- Moderate Significance of Effects = 2
- Significant Significance of Effects = 3

4.43 Using these principles, combined scores of 0-4 are slight; scores of 5-8 are moderate and 9+ are significant.

4.44 To determine the overall score for each site the significance of effects have been measured against predicted impacts upon the visual resource of the east Devon AONB, Residents, Recreation and Road users. The results will score each site between 4 (low visual impacts) to 12 (significant visual impacts)

4.45 Table 1 combines the individual scores to create a comparative scoring matrix for each of the four sites. Figure 12 illustrates these combined scores, with colours corresponding to the significance of overall visual effect. Sites A and C score best with slight visual effects; Site B with moderate effects and Site D greatest with significant visual effects.

Site / Receptor	Sensitivity to Change	Magnitude of Change	Significance of Effects	Score	Combined Score
Site 1 AONB	High	Low	Slight	1	5
Site 1 Residents	High	Medium	Moderate	2	
Site 1 Recreational	Medium	Low	Slight	1	
Site 1 Road Users	Low	Medium	Slight	1	
Site 2 AONB	High	Low	Slight	1	6
Site 2 Residents	High	Medium	Moderate	2	
Site 2 Recreation	Medium	Medium	Moderate	2	
Site 2 Road Users	Low	Medium	Slight	1	
Site 3 AONB	High	Medium	Moderate	2	5
Site 3 Residents	High	Low	Slight	1	
Site 3 Recreational	Medium	Low	Slight	1	
Site 3 Road Users	Low	Low	Slight	1	
Site 4 AONB	High	Low	Moderate	2	9
Site 4 Residents	High	High	Significant	3	
Site 4 Recreational	Medium	High	Significant	3	
Site 4 Road Users	Low	Medium	Slight	1	

Table 1: Summary of Visual Impacts

LEGEND

 Ottery St Mary Urban Extent

Site A - Slight Visual Effects

Site B - Moderate Visual Effects

Site C - Slight Visual Effects

Site D - Significant Visual Effects

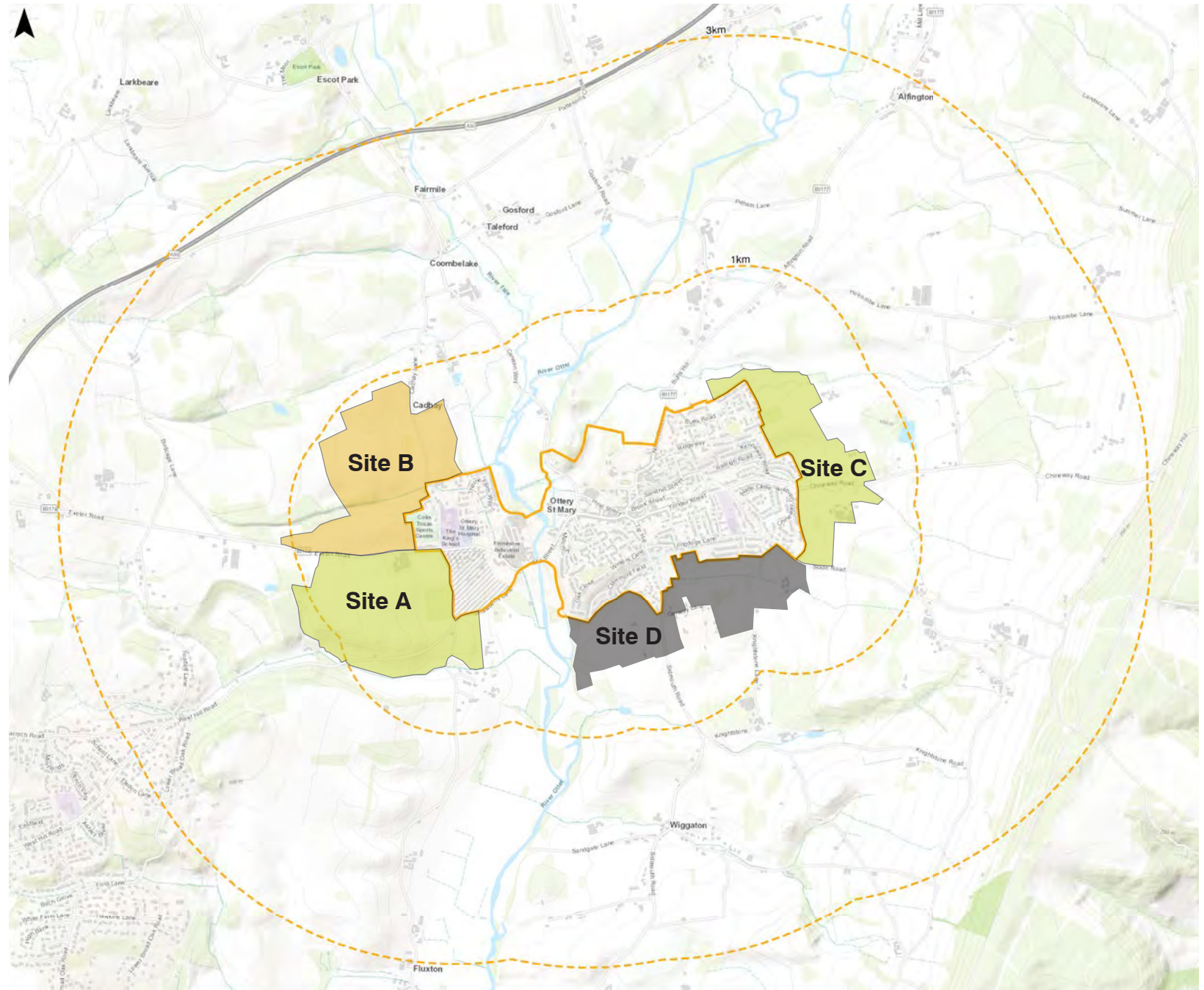
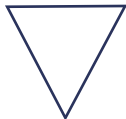


Figure 12: Visual Evaluation Plan



5. TOWNSCAPE



Accessible Facilities

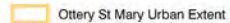
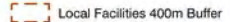


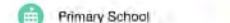





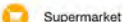
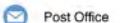
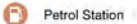

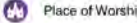
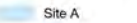
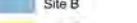

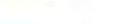
EXISTING FACILITIES

- 5.1 Figure 13 illustrates existing facilities within Ottery St Mary. Each facility has a 400m isochrome to demonstrate the commonly cited 'comfortable' ten-minute walking distance.
- 5.2 The facilities plan is not an exhaustive compendium of all the facilities within Ottery St Mary but does identify the key facilities which residents are likely to access on a regular basis.

SUSTAINABLE DEVELOPMENT

- 5.3 The general findings from the facilities mapping exercise are:
- That the facilities plan identifies that the majority of future residents will fall out of the 400m isochrome which is typically applied to ensure ongoing, easy access;
 - Sites A and B are best positioned to access secondary education at the Kings School; exercise facilities at the LED Ottery Leisure Centre; and health facilities at Ottery St Mary Hospital;
 - Any site allocation within the area, for the scale and type of residential development proposed, will undoubtedly need to provide local centres for small scale retail, recreation and community facilities in order for them to be sustainable.

LEGEND

-  Ottery St Mary Urban Extent
-  Local Facilities 400m Buffer
-  Town Centre
-  High School
-  Primary School
-  Hospital
-  Medical Centre
-  Pharmacy
-  Ottery St Mary Town Council
-  Village Hall
-  Supermarket
-  Post Office
-  Petrol Station
-  Sports Centre
-  Place of Worship
-  Site A
-  Site B
-  Site C
-  Site D

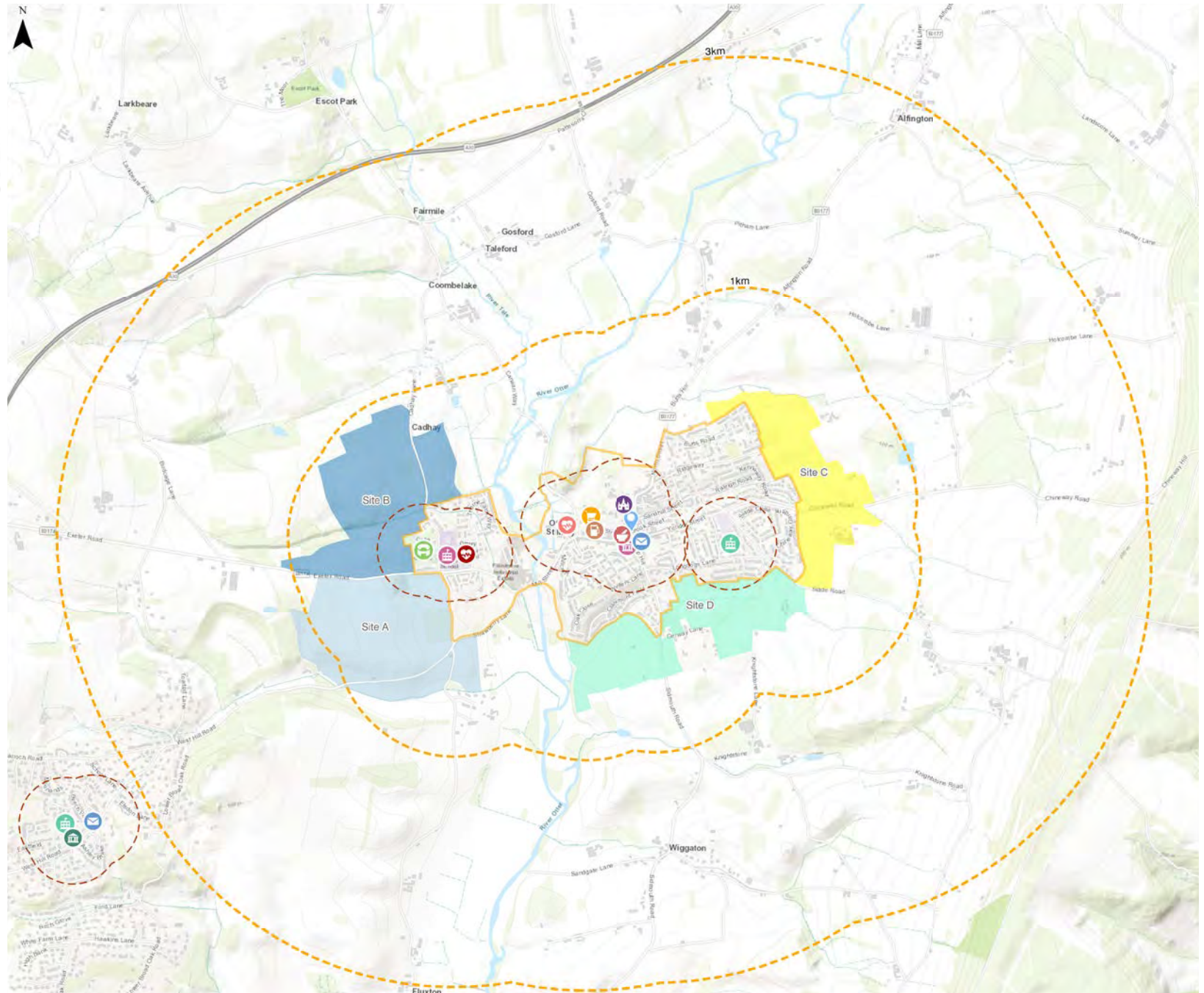


Figure 13: Facilities Plan

Urban Growth Patterns

5.4 Through a process of understanding landscape and visual constraints, zones located around Ottery St Mary have been identified and assessed for their suitability to accommodate residential development.

5.5 An analysis of the growth of the town has been undertaken which in combination with the landscape and visual findings, provides additional context to Ottery St Mary's baseline condition. From this review, historic trends can be identified which help highlight suitable sites which promote a balanced, sustainable settlement pattern.

URBAN EXPANSION

5.6 Historically the urban core of Ottery St Mary has grown from a riverside location (now designated as a Conservation Area) in an eastwards and southwards direction, aligning with the low-lying valley bottom surrounding the River Otter. Development of the town is typically set between 20 - 80m AOD.

5.7 A high level urban growth plan has been produced to illustrate the incremental growth of the town. Please refer to Figure 14.

5.8 The recent Kings Reach development at Exeter Road and Strawberry Lane has established a new precedent for the town of Ottery St Mary by way of establishing substantial development west of the River Otter. Kings Reach is situated between residential development centred around Thorne Farm Way, the Kings School Complex and light industry centred around Alansway. Cumulatively these developments establish a considerable urban area west of the River Otter. These extend the town in a westerly direction, producing a linear conurbation on an east-west axis.

5.9 The development of Site A will continue this pattern of growth. Should development continue to 80-90m AOD in a westerly direction, a balance in the urban grain will be established that mirrors the existing pattern to the east of Ottery.

5.10 When viewed in the context of the townscape, Site B is considered to extend too far north if it is to wholly accommodate 600-900 homes. By extending into the landscape beyond Thorne Farm Way, urbanising characteristics will be introduced into a predominantly rural landscape. A section of Site B which aligns with Exeter Road is in keeping with the identified organic growth pattern of the town. However, development of this site will give rise to visual impacts to nearby residential receptors (most notably those living to the north of the newly constructed Kings Reach).

EFFECTS UPON URBAN BALANCE

5.11 It is predicted that the development of Site C could give rise to Moderately adverse visual impacts upon the AONB and its landscape setting. Focusing future urban growth away from the eastern boundary of Ottery St Mary will maintain a development-free setting for the AONB, thus reducing the threat of urban encroachment and preserving the AONB's unique landscape character.

5.12 Site D has been identified as posing the greatest risk to visual amenity. This is in part due to the location within the valley bottom, the number of sensitive receptors likely to be affected and the extent to which urban development will protrude into open land.

5.13 Due to the low-lying landform, extending the urban settlement area south of the town has the potential to greatly increase the urban influence over the landscape with expansive views across the otherwise flat landform which are potentially difficult to mitigate.

LEGEND

- Historic Core
- Post War Growth
- Modern Development
- Area Identified for Organic Urban Growth
- Historic Direction of Urban Growth
- Direction of Organic Urban Growth

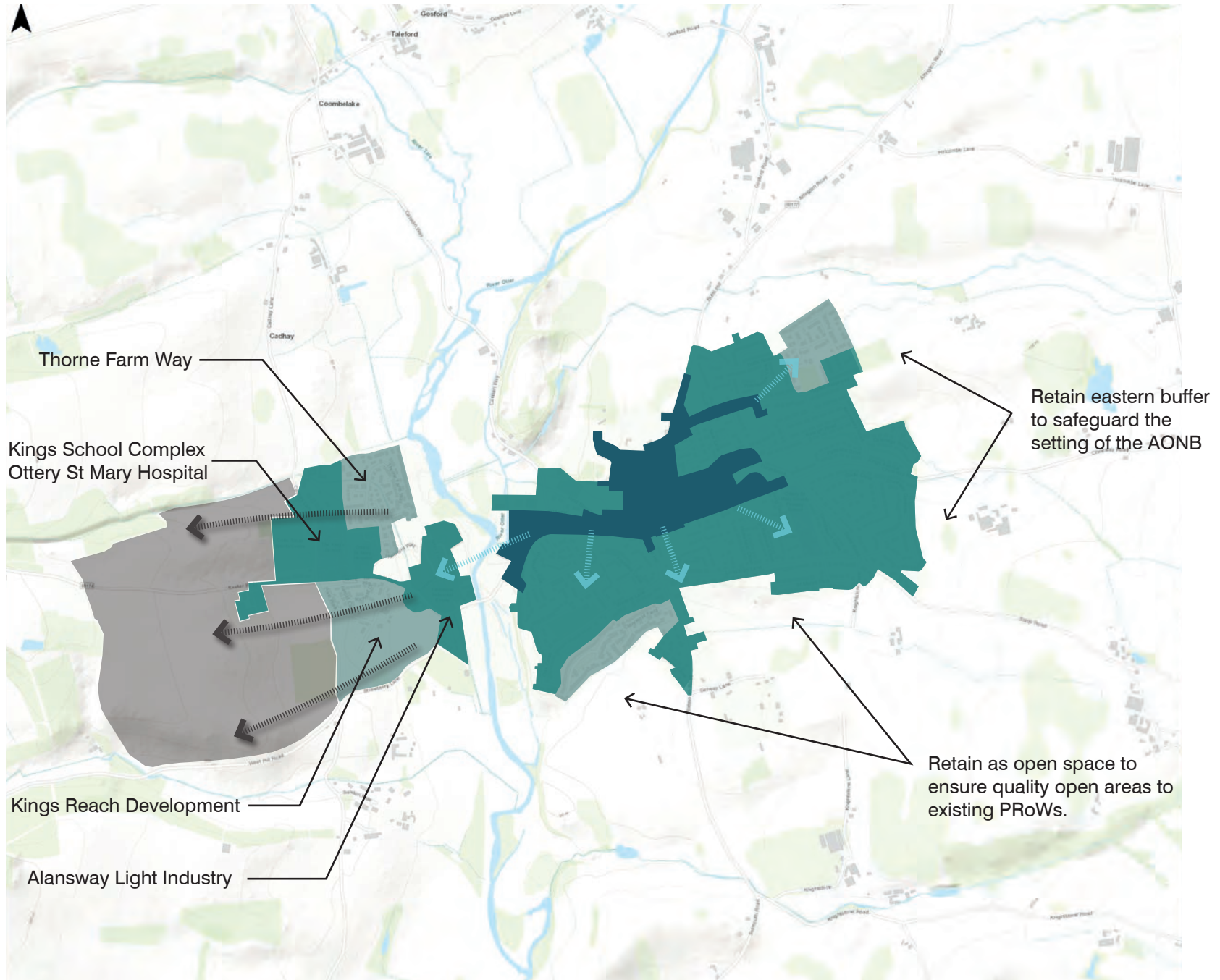


Figure 14: Urban Growth Plan

Deliverability

ALLOCATED SITES (2010-2018 East Devon Strategic Housing Land Availability Assessment (SHLAA))

- 5.14 The East Devon Strategic Housing Land Availability Assessment (SHLAA) identifies a supply of potentially suitable sites for housing. Figure 15 identifies all sites which have been considered for allocation. Part of the SHLAA process makes a judgement on their achievability. Figure 15 also represents this scoring process for sites considered achievable by the LCA.

Summary

- 5.15 The SHLAA sites overleaf are located broadly in same areas identified within this report as being suitable, or having sufficient landscape capacity for residential development.
- 5.16 Sites C105, C310 and C111 fall within the area shown as Site A.
- 5.17 Conclusions on page 42 refines the findings of this report with the inclusion of sites allocated through the East Devon SHLAA. This combination then highlights residential options that will contribute towards achieving the housing needs of the district, allow the town of Ottery to grow organically, with the minimal level of impact on landscape character and visual resources.

LEGEND

- Ottery St Mary Urban Extent
- SHLAA - Not considered achievable by District Council
- SHLAA - Considered achievable by District Council

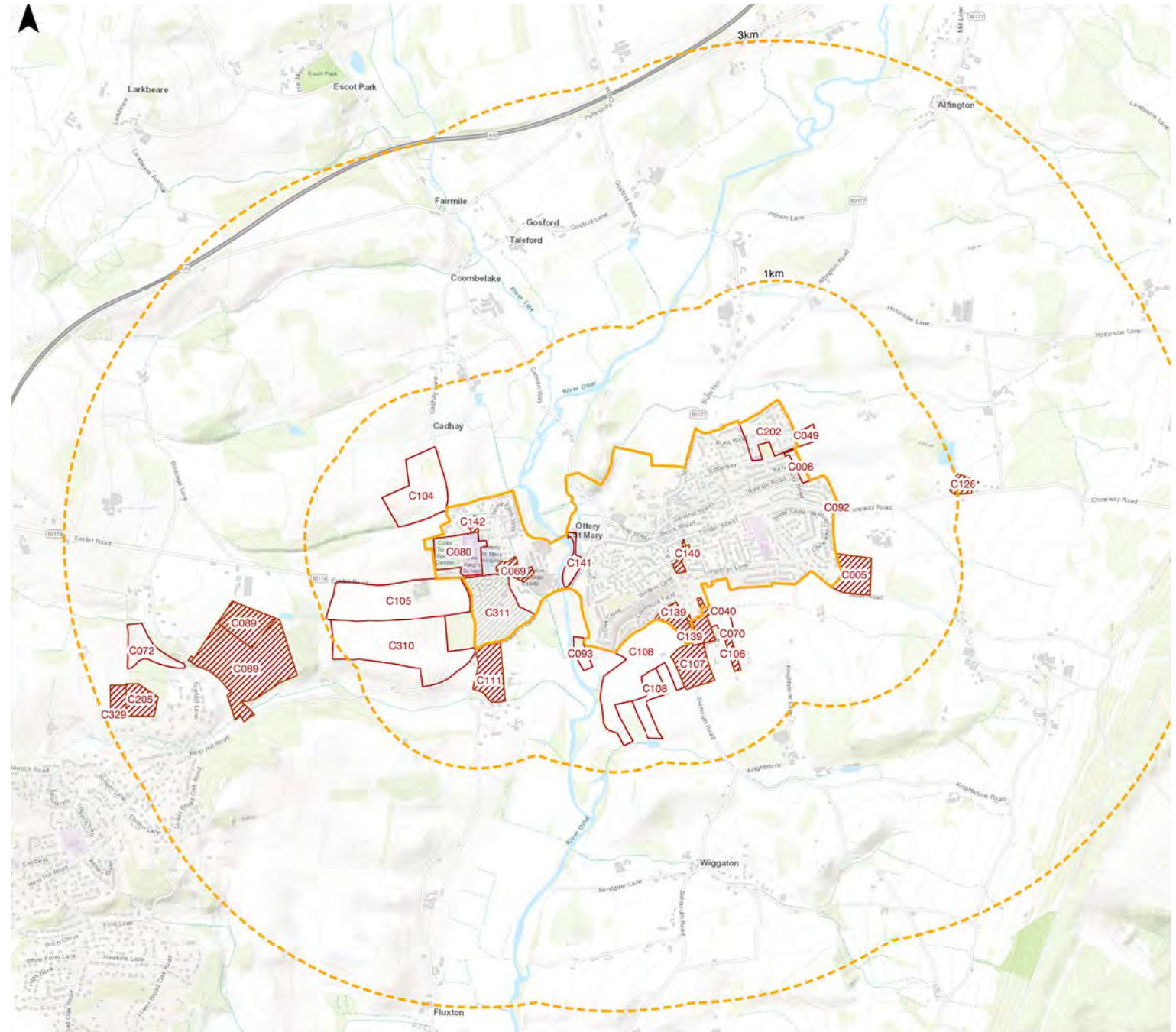
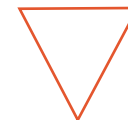


Figure 15: SHLAA Allocated Sites Plan



6. CONCLUSIONS



Conclusions

2.11 Taking into account the findings from the Landscape Evaluation, Visual Evaluation and Townscape Study, the following conclusions have been reached:

Landscape

2.12 A number of landscape constraints have been identified and mapped in order to gain an understanding of their location across the study area. The main findings from the landscape evaluation are that:

- East Devon AONB and its landscape setting account for large areas of the eastern section of the study area;
- A number of heritage assets are located within and around the main Ottery St Mary urban area including the Grade I Listed Ottery St Mary Parish Church, Grade II* Listed the Chanters House, and the Grade II Listed Manor House and Garden Wall;
- A substantial area of the valley floor surrounding the River Otter is located within Flood Zone 3.
- The valley landform is a key characteristic which helps define the landscape setting of the AONB and also provides opportunities for long range views from elevated locations.

Visual

2.13 In broad terms, the visual evaluation concludes that development of areas to the east and west will amount to the least amount of visual intrusion, whilst development south of Ottery St Mary will give rise more significant visual impacts. This is, in parts due to the nature of the valley topography which gives rise to views to and from the AONB.

2.14 Generally, obtainable views to the east are considered the most sensitive as the rising landform is clearly visible and forms the setting to the AONB.

2.15 Land surrounding the identified Site D is considered to be sensitive in visual terms due to the sensitivity of the surrounding receptors which include users of PRow which currently experience rural, undeveloped views to the AONB. This area is also overlooked by a high number of residential receptors and also has potential views from the Grade II listed Salston Lodge and Salston Hotel.

Townscape







2.16 The recent Kings Reach development has established new precedents in urban growth patterns. By establishing a substantial residential area west of the River Otter, the imbalance of the town's historic eastern growth has started to be addressed. To extend the town further westwards (below the 90m contour line) would create a natural, organic urban pattern and a logical planning strategy in terms of access to local facilities. This would continue the linear form of the town, mirror existing characteristics east of the river and focus the town either side of the River Otter.

Deliverability

2.17 Figure 16 removes SHLAA sites surrounding of Ottery St Mary deemed least appropriate for the purpose of large scale residential development.

2.18 Following the evaluation of landscape, visual and townscape constraints, it is considered that through this process of elimination, the combined area of SHLAA sites C105, C310 and C111 pose the most deliverable option for the development of c.700 new homes as identified by Site A within this report.

LEGEND

-  Ottery St Mary Urban Extent
-  90m Contours
-  C105
-  C111
-  C310
-  Area Identified for Organic Urban Growth

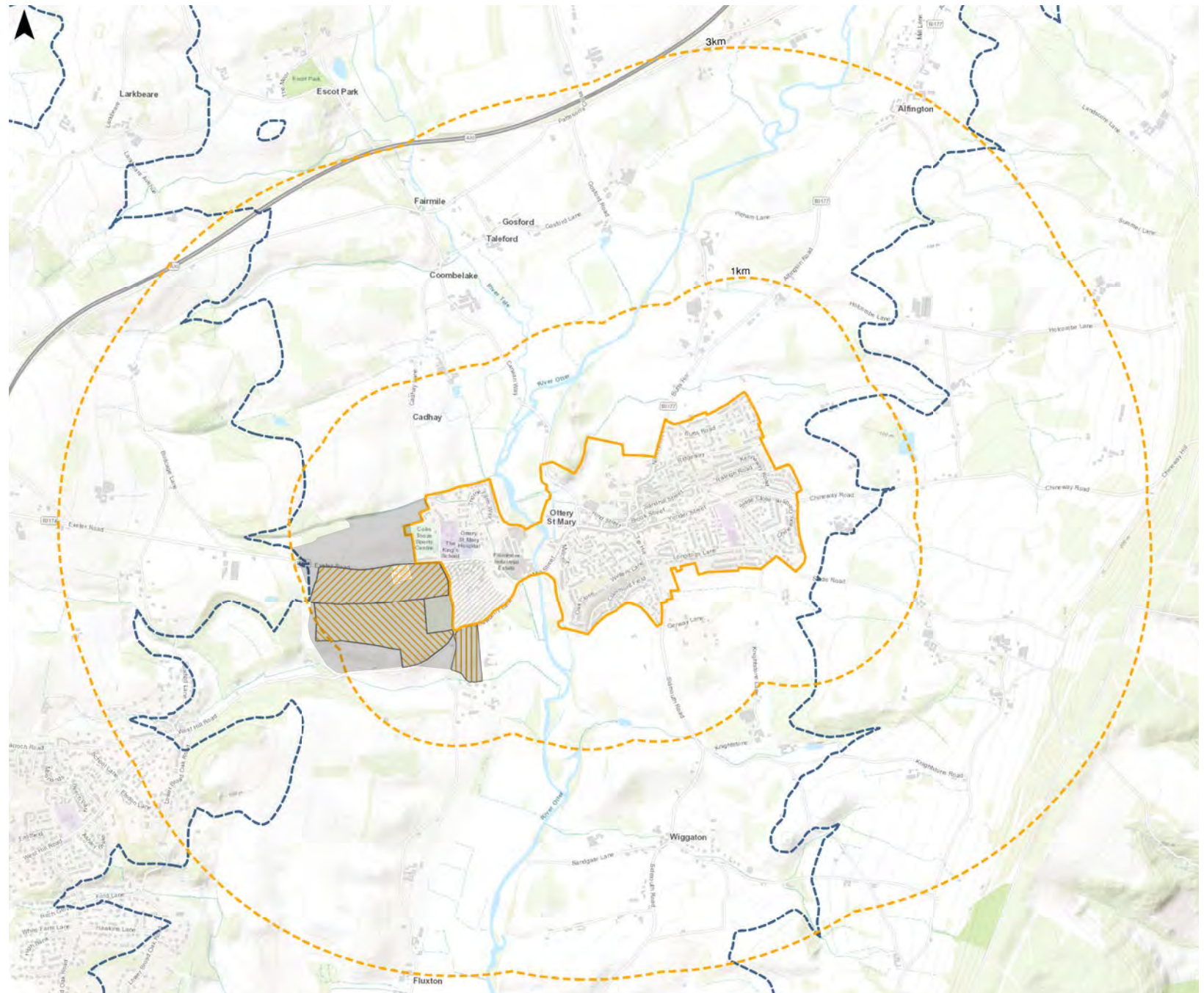


Figure 16: Conclusions Plan



APPENDIX A

APPENDIX A

Sensitivity to Change of Landscape and Visual Receptors

Sensitivity	Description
High	A landscape or visual receptor considered to be highly sensitive to change of the type proposed and or with particularly distinctive characteristics. A highly valued landscape or visual receptor with little or no capacity to accommodate change of the type proposed.
Medium	A landscape or visual receptor which is considered to be potentially tolerant to change of the type proposed and which have less obvious or partially degraded characteristics. A landscape or visual receptor with some capacity to accommodate change of the type proposed.
Low	A landscape or visual receptor considered to be tolerant to change of the type proposed and or with particularly distinctive characteristics. A landscape or visual receptor with capacity to accommodate change of the type proposed.

Receptor sensitivity is applicable to landscape character areas as whole, designated areas, individual characteristics that contribute to the overall landscape as well as to visual receptors. Susceptibility can relate to particular aesthetic or perceptual aspects or the compliance or otherwise to current landscape planning policy / strategy. .

Magnitude of Change experienced by Landscape and Visual Receptors

Magnitude	Description
High	A considerable variance to the landscape, or view thereof, degrading it's integrity
Medium	A noticeable variance to the landscape, or view thereof, which is at odds with the defined baseline
Low	A barely perceptible change to the landscape, or view thereof, which is slightly at odds with the defined baseline
No Change	No discernible change in the landscape, or view thereof

The Magnitude of Change predicted is determined by the size and scale of effects on the landscape. With regard to visual receptors the magnitude of effects are considered in relation to the degree of change in the view, change in the composition of a view, the manner to which the proposed development visually integrates with its surrounds.



Significance of Change as Defined by Sensitivity and Magnitude

Significance of Effects					
		Magnitude of Effects			
		No Change	Low	Medium	High
Sensitivity	Low	Negligible	Slight	Slight	Moderate
	Medium	Negligible	Slight	Moderate	Moderate / Substantial
	High	Negligible	Moderate / Slight	Substantial / Moderate	Substantial

The assessment of significance is derived by combining the judgements made about landscape and / or visual receptor sensitivity and the magnitude of change within the landscape and or for each receptor.

The above matrix identifies the correlation between receptor sensitivity and the anticipated magnitude of change exerted upon the receptor by the proposed development. This determines the significance of any identified effects upon a receptor.

Revision History

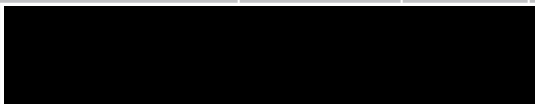
Rev	Issue	Reviewed	Approved	Date
-	1st Issue	CH	TBR	25 Jan 19
A	2nd Draft	CH	TBR	01 Feb 19
B	Final	CH	TBR	04 Feb 19



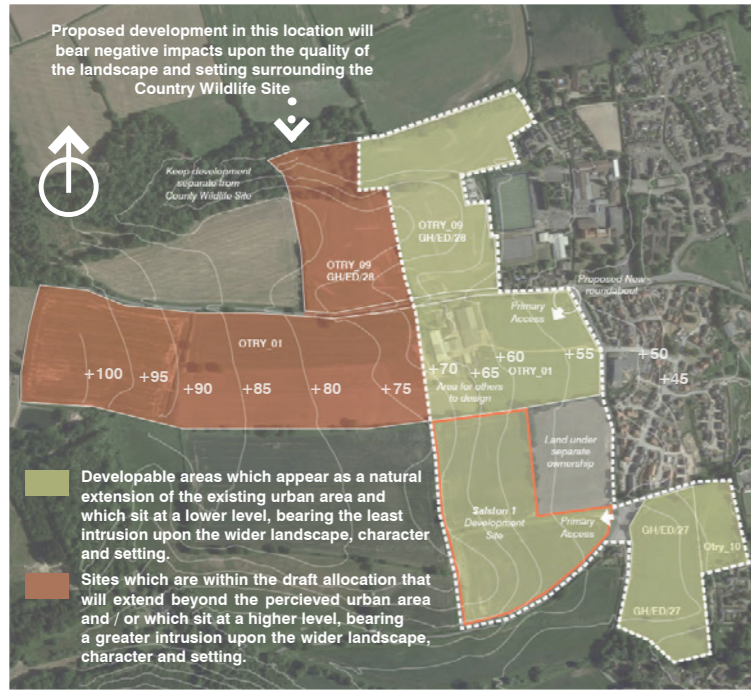
Prepared by:

Urban Wilderness

7 Saw Mill Yard | Water Lane | Holbeck | Leeds | LS11 5WH



The Site within the context of the other Allocated sites



LEGEND

- Site Boundary [6.87ha]
- Residential Development [3.86 ha - 135 homes at 35DPH]
- Vehicular Access [Taken from Strawberry Lane]
- Pedestrian / Cycle Access [Taken from Strawberry Lane]
- Potential Sustainable Link [To OTRY_0, Exeter Road and Hospital]
- Indicative Internal Road Infrastructure
Primary
Secondary / Semi Private
- Off Road Footpaths
- Existing Trees [All Retained]
- Existing Hedgerows [All Retained]
- Proposed Native Boundary Planting
- Proposed Indicative Internal Tree Planting
- Sustainable Drainage [SUDS]
Swales and Attenuation Ponds
- Meadow
Species Rich Grassland / Wet Meadow
- Open Space [circa 1.5 ha]
- Natural Play Area
- Elevated Viewpoint
- Overhead Power Cables [5.3m safety clearances to be maintained in accordance to Electricity Safety, Quality and Continuity Regulations 2002].

Rev Details Date

- First Issue 14 Sept 22



7 Saw Mill Yard, Water Lane, Holbeck, Leeds LS11 5WH
www.urbanwilderness.co.uk

registered in Scotland SC371979

client
KCS Development Ltd

project
Land adjacent to Strawberry Lane, Salston

drawing title
Constrains and Opportunities Plan

drawing status
DRAFT: FOR INFORMATION

drawn by	checked by	date
CH	TBR	14/9/22

scale	paper size
N/A	A3

job/dwg no.	rev
236-UW-SK-010	-

