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Date: 31 March 2025
Our ref: 70370/01/NT/SRi/33622061v2

Dear Sir/Madam

East Devon Local Plan Regulation 19 Consultation

On behalf of our client, Mr M.J. Nancekivell and Mr R.P. Nancekivell ('the Landowner'), we set out representations to the East Devon Local Plan Regulation 19 Consultation (the 'Draft Plan') in relation to land at Barrack Farm, Ottery St Mary ('the Site')

The Site (Plan 1) is identified as a draft allocation (Otry_01b) for housing and employment development (70 homes and 1.25ha of employment land) in the Draft Plan.

Plan 1: The Site; The Richards Partnership Vision Document

The purpose of these representations is to:

1 Outline the need for additional housing numbers in the Draft Plan.

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2 Support the allocation of the Site for housing/employment and demonstrate the site is suitable, available and deliverable.

3 Demonstrate that the Site has capacity to deliver circa 90 homes (rather than 70) and 1.25ha of employment land, optimising its potential.

4 Comment on other policies in the plan insofar as they relate to the promotion of housing/employment development at the Site.

The Landowner has other land interests in Ottery St Mary and we have submitted separate representations in relation to land at Gerway Farm (draft allocation ref. Otry_21).

Strategic Overview and Housing Need

We have provided a full assessment of the Draft Plan's strategic policies and the approach to meeting District-wide housing need in our representations to Otry_21. We do not repeat those details here but note the following headlines, because they support the principle that the capacity of allocated sites should be maximised where possible:

1 EDDC is proposing to reduce its rate of housing delivery below that achieved over recent years;

2 The approach to the NPPF's 'transitional arrangements' is flawed and EDDC cannot simply plan for 80% of its up-to-date housing need. The Draft Plan must be revisited to plan for its full need i.e. 1,188 dwellings per annum, over the plan period;

3 The approach to a phased housing trajectory does not comply with national policy. Planned delivery must meet or exceed the annual housing need figure; EDDC cannot plan to underdeliver for the first 11 years of its Plan and then make up for this in the latter years – this has significant implications for social and economic growth and will have resultant impacts on, for example, affordable housing and the wider housing crisis;

4 The Draft Plan does not deliver a 5YHLS with requisite buffer (20%) and will therefore immediately fail NPPF para. 78(c); and

5 There is an overreliance on the large/complex sites, particularly the new settlement. This includes a flawed approach to its assumed delivery rates (too soon in plan period, with implications for 5YHLS, and overestimated total delivery across the plan period).

In conclusion, the Draft Plan is therefore not planning for sufficient housing across the full plan period and must be amended to plan for its full up-to-date housing need. There is a particular need to identify land to deliver additional housing numbers in the early-mid plan period and feed into 5YHLS.

Housing numbers to one side, the Landowner supports the spatial approach to housing delivery across the settlements in East Devon, including the recognition that Ottery St Mary as a Main Centre should support significant development over the Plan period. It is therefore well placed to deliver some of the additional housing need for East Devon.

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Policy SD04: Ottery St Mary and its development allocations

Land at Barrack Farm – Otry_01b

Our client supports the allocation of Barrack Farm (Policy SD04, Otry_01b) for housing and employment use; the Council clearly recognises that the Site is suitable and available.

In accordance with NPPF para. 130(a), however, policies should ensure that developments make optimal use of the potential of each site to meet as much of the identified housing need as possible. This also aligns with draft policy DS02 (efficient use of land).

These representations explain that, through technical assessment and initial design concept work, the Site has capacity to deliver circa 90 homes and 1.25ha of employment land. Policy SD04 (Otry_01b) should be redrafted to reflect this.

Housing Numbers

The accompanying Vision Document (VD) (Annex 1) sets out a summary of the preliminary technical work undertaken to assess the constraints/opportunities of the Site, followed by initial design concepts to inform an indicative framework plan with developable areas. Based on relatively low densities of circa 35 dwellings per hectare (suited to this context) this clearly demonstrates the Site has capacity to accommodate a further 20 homes (in addition to the 70 homes referenced in the current draft allocation), plus the 1.25ha of employment land. This will assist in supporting East Devon to meet its increased housing need.

The Site Selection Report (SSR) for Ottery St Mary states that the site is suitable for residential development at 30dpha, but no justification is given for the density stated, and the Methodology states that final allocation density will be determined in line with Stage 3: Site assessment:

"The yield shown at the start of the site assessment is calculated using the maximum in the HELAA methodology. The site assessment may indicate that this should be reduced, for example to take account of landscape, ecological, or historic environment features; to achieve a higher yield in particularly accessible locations; or to reflect Local Plan consultation responses. Where this is the case, the yield will be adjusted to ensure that the Local Plan reflects a realistic site potential, and commentary will highlight parts of the site where density should be lower or built development avoided." (para. 1.25).

For allocation ref. Otry_01b this must be adjusted to reflect the detailed technical work undertaken and optimise the potential of the Site. This would ensure draft Policy SD04 accords with the NPPF and draft policy DS02 (efficient use of land).

Summary of Technical Assessment

Landscape and Visual Impact

The accompanying VD includes a landscape and visual appraisal (pg. 10) which explains that the site:

1 Is of 'Medium Value' as *'an ordinary landscape which is appreciated by the community but has little or no wider recognition of its value'.*

2 While agricultural, it experiences urbanising influences including lit roads, built form and playing fields; and,

3 Has the capacity to successfully accommodate new development, with residential in the lower, eastern parts of the site opposite the existing urban edge, and employment land where the agricultural sheds are currently located.

Archaeology and Heritage

The draft allocation requires further archaeological assessment prior to development. The Landowner has undertaken an archaeological assessment of the full extent of their interest at land parcel ref. Otry_01 (i.e. the draft allocation plus the fields immediately to the west), which identifies a short-lived early 19th century infantry barracks on the Devon Historic Environment Record towards the eastern end. The exact siting is unknown, but this is not a constraint that would prevent the development of the site subject to the draft allocation (ref. Otry_01b), and as shown in the framework plan in the accompanying VD.

There are a number of listed buildings within 1km of the site and the Ottery St Mary Conservation Area covers the historic Town centre and lies 630m to the east of the site at its closest point. As a result of local topography and modern development activity, no potential impacts on the setting of designated or non-designated heritage assets have been identified.

Highways and Access

We support the approach to coordinating the access between the two allocations Otry_01b and Otry_09. However, the responsibility for delivery of an access to facilitate both allocations is only included within the wording of the Barrack Farm allocation (Otry_01b). This assumes responsibility of Otry_01b only, which is not justified, nor is this necessarily feasible. Draft Policy SD04 Otry_01b requires the site to 'provide a harmonized access and interaction with Land at Thorne Farm (Otry_09)'. It should simply be required to provide an access which does not fetter the potential for access to Otry_09, illustrating how both site entrances would work in harmony once both sites are delivered.

These representations are accompanied by a Highways and Transport Technical Note (Annex 2) (HTTN), which explains that the Site:

1 Is suitable for development for around 90 dwellings and 1.25ha of employment land because a range of facilities and services are readily accessible by walking, cycling and public transport, meeting the requirements of draft Strategic Policy TR01 (walking, wheeling, cycling and public transport).

2 Vehicular access can be achieved from the unnamed road to the east of the allocation.

3 A safe pedestrian route can be provided through the Site to accommodate connections to the proposed commercial units.

Detailed requirements for a travel plan/transport statements/transport assessments (draft Strategic Policy TR03) and regarding car/cycle parking and charging points can be addressed at the detailed design stage (draft Strategic Policy TR04: Parking standards - Residential).

The Transport Technical Note explains that analysis has been undertaken (using DataShine Commute) to establish the likely trip distribution for about 90 houses and 1.25ha of employment land. It confirms vehicles will disperse within the road network in Ottery St Mary and this is not likely to result in an unacceptable impact.

It is concluded that satisfactory access can be achieved and the Site is deliverable from a transport and movement perspective.

We are aware that the site is within the Aerodrome Safeguarding outline area. However, residential development will not exceed three storeys, nor will it have high structures, and it will therefore not interfere with radio signals or create bird strike hazards.

Flooding

The Technical Note on Flooding, Water Efficiency and Green & Blue Infrastructure at Annex 3 explains that:

1 The site is within fluvial Flood Zone 1 and is at very low risk of flooding, and therefore no flood mitigation is required;

2 A flood risk assessment will be prepared to support a planning application due to a site area of over 1ha, as per national requirements;

3 Surface water flooding can be accommodated through a comprehensive drainage network, including use of sustainable drainage systems; and,

4 Water efficiency can be addressed at the detailed design stage and can be achieved through the installation of reduced water fittings and water butts as needed.

There are no flood risk or drainage matters that would preclude development of the Site for about 90 houses/1.25ha of employment land and any proposal would accord with the requirements of draft Strategic Policy AR01 regarding Flooding.

Ecology

The accompanying Ecology Appraisal (EA) (Annex 4) confirms that the site is not affected by;

1 Any habitat designations; and,

2 Has limited ecological value.

The Site does provide suitable habitat for a range of species including protected species such as badgers and dormouse. Habitats of higher value are trees, hedges and the riparian corridor associated with the River Otter, which would be unaffected by the draft allocation.

Summary Amendments to Policy SD04

In light of the above, we propose that the wording of policy SD04 with respect to Barrack Farm be amended to (**bold** additions and ~~strikethrough~~ deletions):

"Barrack Farm (Otry_01b)

*This land at Barrack Farm~~, on the western side of Ottery St Mary,~~ is allocated for around **90** ~~70~~ new homes and **up to** 1.25 hectare of employment land provision**, to be provided in accordance with Strategic Policy SP04**. Archaeological assessment will be required prior to development commencing and will need to inform development proposals. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Development at this site should **not fetter the potential for access to Otry_09, illustrating how both site entrances would work in harmony once both sites are delivered** ~~provide a harmonized access and interaction with Land at Thorne Farm (Otry_09).~~"*

We also propose that the wording of policy SD04 regarding Land at Thorne Farm (Otry_09) is amended to reflect the need for joined up thinking in respect of access (**bold** additions and ~~strikethrough~~ deletions):

Land at Thorne Farm (Otry_09)

*This land, which lies west of the town and adjacent to the sports centre and school, will provide **around** 90 new homes as well as space for an educational facility. Further flood risk assessment is required and an undeveloped buffer should be maintained to protect the County Wildlife Site and Ancient Woodland to the north west of the site. **Development at this site should not fetter the potential for access to Otry_01b, illustrating how both site entrances would work in harmony once both sites are delivered".***

Other Policies

The Landowner has the following comments on the draft policies listed below:

Strategic Policy SP04: Employment provision

Whilst the Landowner is supportive in principle of delivering employment land within allocation Otry_01b, there must be flexibility in the draft policy to account for any changes to the market or changes in employment demand in the future. The following text should be added to Policy Sp04:

"If market testing for 12 months at an appropriate market rate demonstrates a lack of demand for the employment land then a revised scheme mix can be considered including the delivery of additional homes."

This is to ensure that sufficient flexibility is included within the draft policy.

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Policy HN03: Housing to meet the needs of older people

Draft Policy HN03 requires:

"All general housing proposals, subject to commercially viability, will be required to deliver specialist housing for older people as follows:

A: Schemes for 50 to 199 dwellings should include at least 10% of dwellings on-site as specialist older person dwellings (Use Class C3);

B: Schemes for 200 or more dwellings should include at least 10% as on-site as specialist older person dwellings as either C3 dwellings and/or C2 equivalents."

The NPPF explains that within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This includes housing for older people. In this case, no justification has been provided as to how the threshold or requirement has determined. Moreover, some sites may not be suitable for housing for older people and on other sites this type of housing will not be viable. The policy is also unclear as to how "*specialist older person dwellings"* is defined (beyond Use Class). On this basis, the policy is not considered to be sound as it is not effective or justified or consistent with national policy.

Policy HN05: Self-build and custom build housing.

Draft Policy HN05 states that on sites of 20 or more dwellings, 5% should be made available as serviced plots for self and custom build. Whilst the NPPF sets out that Council's should make provision for self-build and custom build housing (para. 73), the 20-dwelling threshold and 5% requirement is not justified and there is no evidence to explain what this is based on. Whilst the proportion of self-build and custom housing is considered by the Council to be viable within the Viability Appraisal, no justification is provided within the Viability Appraisal or Sustainability Appraisal as to why these thresholds have been set.

Moreover, the policy applies district-wide (with the exception of the Built-up Area Boundaries defined in the Cranbrook Plan), and does not allow for any flexibility to respond to local circumstances. The Landowner, therefore, objects to this policy.

Policy AR02: Water efficiency

Strategic Policy AR02 requires the 'optional' standard of 110 litres per person per day from Part G of the Building Regulations as the baseline figure to be applied to all development, as opposed to the baseline requirement of 125 litres per day, also within Part G of the Building Regulations.

The policy is not justified. The Draft Plan references a Water Cycle Study which provides evidence to justify the stricter requirements. This is not available in the evidence base. We request that this be provided so that an appropriate assessment of the 'sound-ness' of Policy AR02 can be undertaken. Should this not be justified through the Water Cycle Study, we propose the omission of this policy as the requirements are already established within Building Regulations. This would be in line with the sentiment of paragraphs 13 and 25 of the *Government response to the proposed plan-making reforms: consultation on implementation (27 February 2025) HSE*, which seeks to avoid 'unnecessary duplication' with national policy. The Landowner, therefore, objects to this policy.

Chapter 15: Our outstanding historic environment

The Landowner supports the preservation of archaeological and heritage assets.

Strategic Policy HE01 outlines requirements for preserving the historic environment and references the identification of heritage assets "through the planning application process". This is in conflict with the Planning Practice Guidance (PPG), which suggests that in most cases Non-Designated Heritage Assets should be identified and published by the LPA and only in rare cases, normally associated with archaeological discoveries, should they be identified through the Planning Application Process.

To ensure the policy is in keeping with PPG it should be amended (**bold** additions) as follows:

"Non-designated heritage assets, where identified through local or neighbourhood plan-making, the Local List119, Conservation Area Appraisal or review or through the planning application process ***(in exceptional circumstances)****, will be recognised as heritage assets in accordance with national guidance and any local criteria. Development proposals that directly or indirectly affect the significance of a non-designated heritage asset will be determined with regard to the scale of any harm or loss and the significance of the asset."*

Our client is broadly in support of Policy HE04, however the statement: *"development must protect the site and setting of Scheduled Monuments, designated or undesignated archaeological remains, including ancient routeways and milestones,"* is unclear on the degree to which undesignated archaeological remains are to be protected, and infers that all archaeological remains, whether designated or not, are to be protected in all circumstances which is contrary to National Policy. Given the sentiment behind the statement is repeated in the subsequent policy wording, which provides more clarity on how non-designated archaeological remains are to be considered, we propose that the first sentence of the policy be omitted to ensure soundness.

Strategic Policy PB05: Biodiversity Net Gain

The Landowner supports the objective to protect and enhance the natural environment and supports biodiversity net gain (BNG). However, our client objects to draft Strategic Policy PB05, which requires a minimum of 20% BNG for major development proposals. This is on the basis that:

1 The national legislative framework requires the provision of 10% BNG.

2 There is no justification for the increased requirement of 20% BNG.

This policy is therefore, not sound due to lack of justification and lack of positive preparation through lack of consideration of suitable alternatives. We propose that Policy PB05 be amended to accord with the national legislative requirement for delivery of 10% BNG for major development.

Strategic Policy PB06: Local Nature Recovery Strategy and Nature Recovery Network

Strategic Policy PB06 addresses the Local Nature Recovery Strategy and Nature Recovery Network (NRN).

The accompanying EA notes that the limitation of provision of off-site biodiversity provision within the NRN areas only could limit opportunities to deliver otherwise important ecology and biodiversity gains in alternative locations.

Supported Policies

Our Landowner supports the following policies:

1 Strategic Policy PB01: Protection of internationally important and nationally important wildlife sites.

2 Policy PB03: Protection of irreplaceable habitats and important features.

3 Strategic Policy PB04: Habitats Regulations Assessment.

4 Policy PB07: Ecological enhancement and biodiversity in the built environment.

5 Policy PB08: Tree, hedges and woodland on development sites.

6 Policy PB09: Monitoring requirements for new planting schemes.

7 Policy AR01: Flooding.

8 Policy TR03: Travel Plans, Transport Statements and Transport Assessments.

9 Policy TR04: Parking.

10 Policy HN01: Housing to address needs.

11 Policy HN02: Affordable Housing

Summary

Ottery St Mary is an inherently sustainable location for housing growth and the site is highly deliverable. It is anticipated to come forward in the early-mid Plan period.

The Landowner strongly supports the allocation of land at Barrack Farm under draft Policy SD04 (Otry_01b) and is committed to working collaboratively with EDDC to ensure a robust policy context that supports the delivery of housing and employment on the Site.

As is typical of a site subject to a draft allocation at Regulation 19 stage, there are some elements of the proposed land use quantums which require refinement; these are set out in the above representations and accompanying technical reports with the objective of ensuring the site's potential is optimised and contributes suitably to East Devons housing need.

We trust this assists in refining draft Policy SD04 (Otry_01b) and would welcome minor updates on this basis, in accordance with the NPPF and other policies of the Draft Plan.

Please do not hesitate to contact me or my colleague Sophie White should you require any clarification on points made.

Yours faithfully

[redacted]

Sophie Caton
Planning Director

Annex 1: Vision Document

Land at Barrack Farm, Ottery St Mary, East Devon

A Vision Document

Submission to the East Devon Local Plan 2020-2042 Regulation 19 Publication Draft - February 2025

March 2025

Land at Barrack Farm, Ottery St Mary, East Devon			Document Ref: 25-10-PL-CR01	
Revisions				
Revision	Date	Description	Prepared	Approved
0	24/03/2025	Document created	JBG	PJR

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Introduction

The Vision

The introduction of a new, high quality development on the western side of Ottery St Mary, which would respond positively to the intrinsic qualities of the site and surrounding area.

Objectives

The objective of this Vision Document is to promote the Land at Barrack Farm, Ottery St Mary, East Devon for a new residential and employment development as part of its representations to Emerging East Devon Local Plan 2020-2042 Regulation 19 Publication Draft - February 2025.

The site benefits from a draft allocation (Otry_01b) for 'around 70 new homes and 1.25 hectares of employment land provision' in the Emerging East Devon Local Plan 2020-2042. This document will demonstrate how this site might be brought forward to help deliver these much needed homes within an attractive landscaped framework.

This Vision Document has been prepared on behalf of Mr M J Nancekivell and Mr R P Nancekivell, by The Richards Partnership, with contributions from the project's consultant team.

The Vision Document sets out the policy context and provides an overview of the opportunities and constraints associated with the site as well as an analysis of the wider context. The analysis of these technical considerations have informed the Framework Plan which illustrates how the site provides an opportunity to deliver a new, high quality community at Ottery St Mary. Our work suggests that additional residential development can be accommodated on the site bringing the quantum up to c. 90 dwellings at c. 35 dph.

Land at Barrack Farm is within a single ownership and the owners would be in a position to bring the whole site forward for the provision of these homes and employment provision.

For this project an experienced consultant team has been assembled, comprising:

Planning -	Lichfields
Urban Design and Landscape -	The Richards Partnership
Highways -	Connect Consultants
Flood Risk and Drainage -	RLRE Consulting Engineers
Utilities -	Travis Baker
Ecology -	Bennu Environmental Ltd
Heritage and Archaeology -	Duncan Coe Heritage

Introduction to the Site

The site is located alongside and to the south of Exeter Road (B3174) as the road rises up on the western side of the River Otter valley. It is contained to the east by an unnamed road which connects Exeter Road with Strawberry Lane to the south, beyond which is a modern housing development which has been constructed within the last decade.

The site rises up from an elevation of c. 55m Above Ordnance Datum (AOD) along its eastern boundary to circa 68m AOD at its western edge. The north-eastern corner of the site is occupied by a number of large farm buildings, all of which are modern in nature and of no particular architectural note. The farm buildings remain in active use. Immediately to the south of the barns is a new (c. 2024) large, brick farmhouse, which is outside the site boundary, but currently accessed via the site.

The main part of the site appears to have been managed as pasture over the recent past. The site's northern, eastern and southern boundaries are formed by mature hedgerows with a number of mature trees along the southern and northern boundaries. The western boundary is largely open to the wider countryside.

There are a number of site accesses, including two off Exeter Road (including one into the barn area) and two from the eastern boundary. There is no public access onto the site.

The site is crossed by 33kV and 11kV power lines.

The site is partially contained by urban form. A secondary school occupies part of the land immediately to the north of Exeter Road; the school also owns the playing fields immediately to the south of the site, while the land to the east is occupied by housing and a large care home. The land to the north-east is also the subject of a draft allocation (Otry_09), for mixed use and education. The land to the west is farmland, punctuated by numerous small blocks of woodland.

Ottery St Mary lies approximately 2.5km to the south of the A303, one of the primary arterial links between London and the South-West. Exeter is approximately 17km to the west, with Honiton approximately 8km to the north-east and Sidmouth approximately 8km to the south.

The site amounts to an area of approximately 5.18 Ha (10.33 acres), of which 1.25 Ha would be utilised for employment, with the remaining 3.93 Ha comprising the remaining residential element.

Site Location

Introduction

Emerging East Devon Local Plan

The Local Plan identifies Ottery St Mary as a 'Tier 2 Settlement and, as such, an appropriate location for future growth and development'. Within Strategic Policy SD04: Ottery St Mary and its development allocations, the land is identified as Barrack Farm (Otry_01b) and notes:

This land at Barrack Farm, on the western side of Ottery St Mary, is allocated for around 70 new homes and 1.25 hectare of employment land provision. Archaeological assessment will be required prior to development commencing and will need to inform development proposals. The development will need to maximise opportunities for localised improvements/contributions to enhance sustainable travel modes. Development at this site should provide a harmonized access and interaction with Land at Thorne Farm (Otry_09).

This site offers a highly sustainable location to help meet Ottery St Mary's housing and employment requirements.

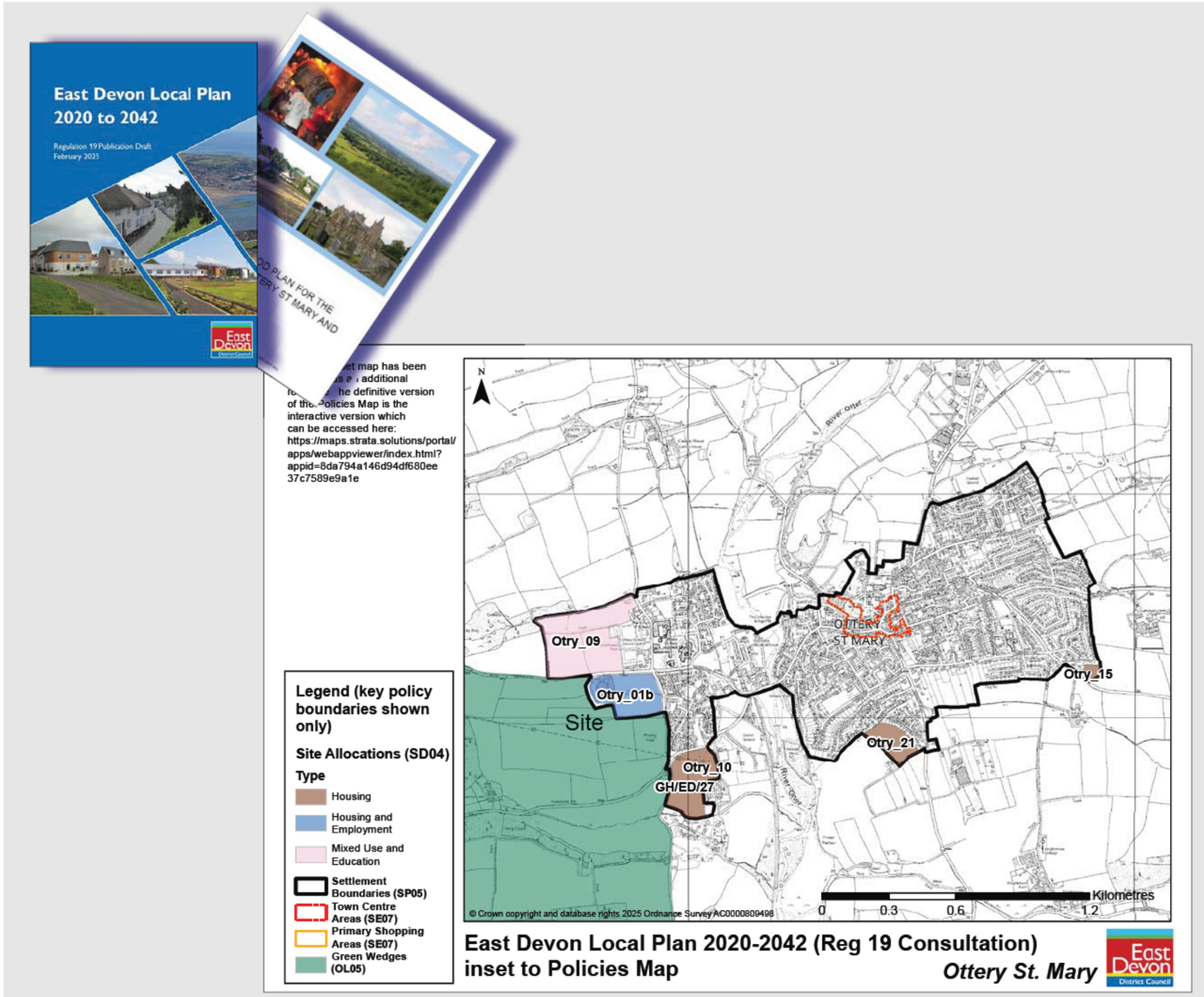
The Neighbourhood Plan for the Parishes of Ottery St Mary and West Hill (2017-2031) contains a Vision Statement for the parish. This notes:

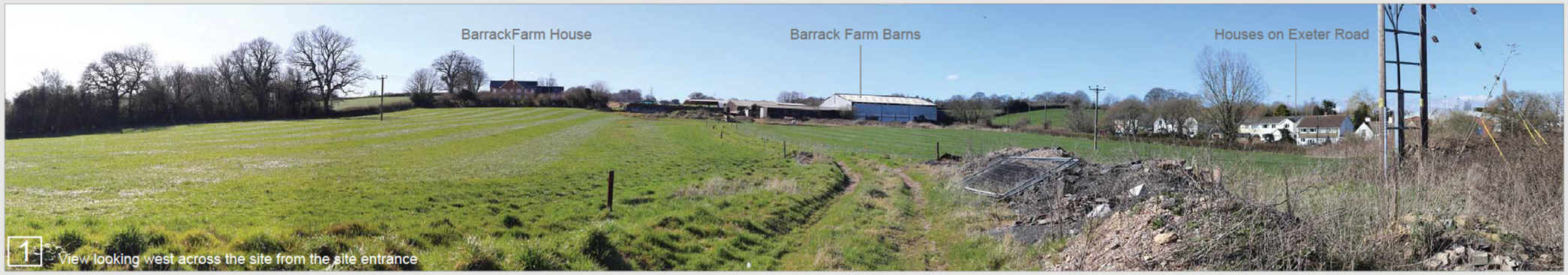
The Vision for the Neighbourhood Plan is to protect and enhance the special qualities of the Parishes of Ottery St Mary and West Hill and to provide a sustainable future for their economy, environment and communities.

The countryside of the Neighbourhood Plan Area is its crowning glory and will be protected for future generations.

The individual character and integrity of the town, villages and smaller settlements of the Parishes within this valued landscape will be supported and enhanced. Appropriately sited new development to support the communities and economy of the Parishes will be of a high quality, locally distinctive and well designed to make positive contributions to their surroundings.

We believe the site offers an opportunity to provide a well-integrated, high quality new community which will help to meet the town's housing needs, along with appropriately sited employment provision.





1 View looking west across the site from the site entrance

2 View looking north-east across the site towards the town centre

3 View looking north across the site from the south-eastern boundary

Please refer to P5 for viewpoint locations

Understanding the Site and its Wider Context

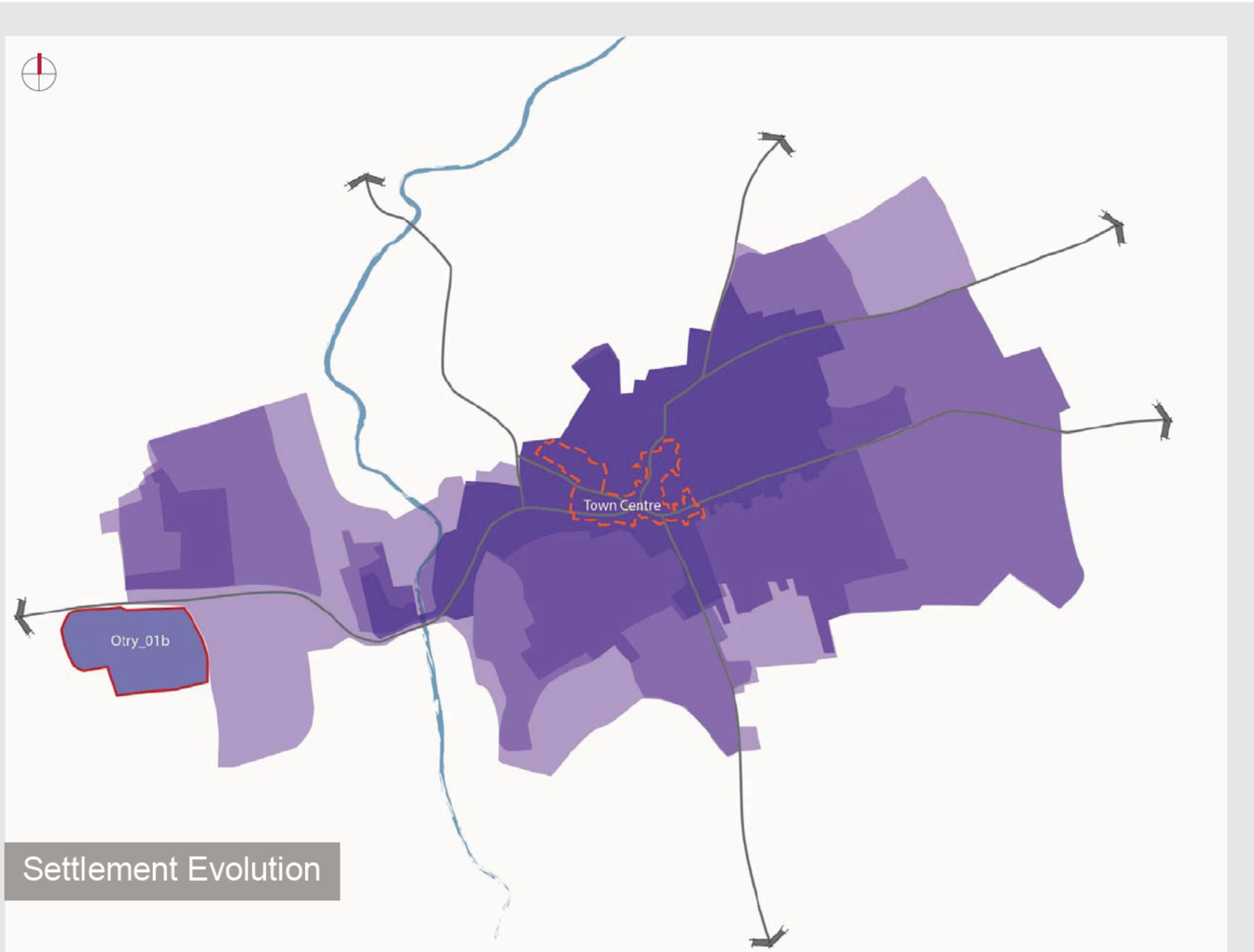
Settlement Evolution

The historic heart of Ottery St Mary is located on rising ground about 400m to the east of the River Otter, which flows southwards towards the coast some 9km distant.

Maps from the late Nineteenth Century show a densely packed settlement focussed around Saint Mary's Church and immediately to the south, with buildings extending eastwards along Mill Street towards the river crossing and westward along Sand Hill Street and Yonder Street. The town experienced minimal growth prior to the Second World War. However, by the late 1950s/early 1960s growth had begun to extend out from this central area. This settlement growth has continued into the Twenty-First Century and today the town extends circa 1.5km eastwards from the River Otter.

Historically there has been a school on the western side of the river, however in more recent years both commercial and residential development has begun to grow up on the western slopes towards the site.

Being located on Exeter Road, the site offers a logical and accessible location for a new area of employment as well as a sustainable location for new housing to help meet the town's requirements.



Settlement Evolution

Local Services and Access

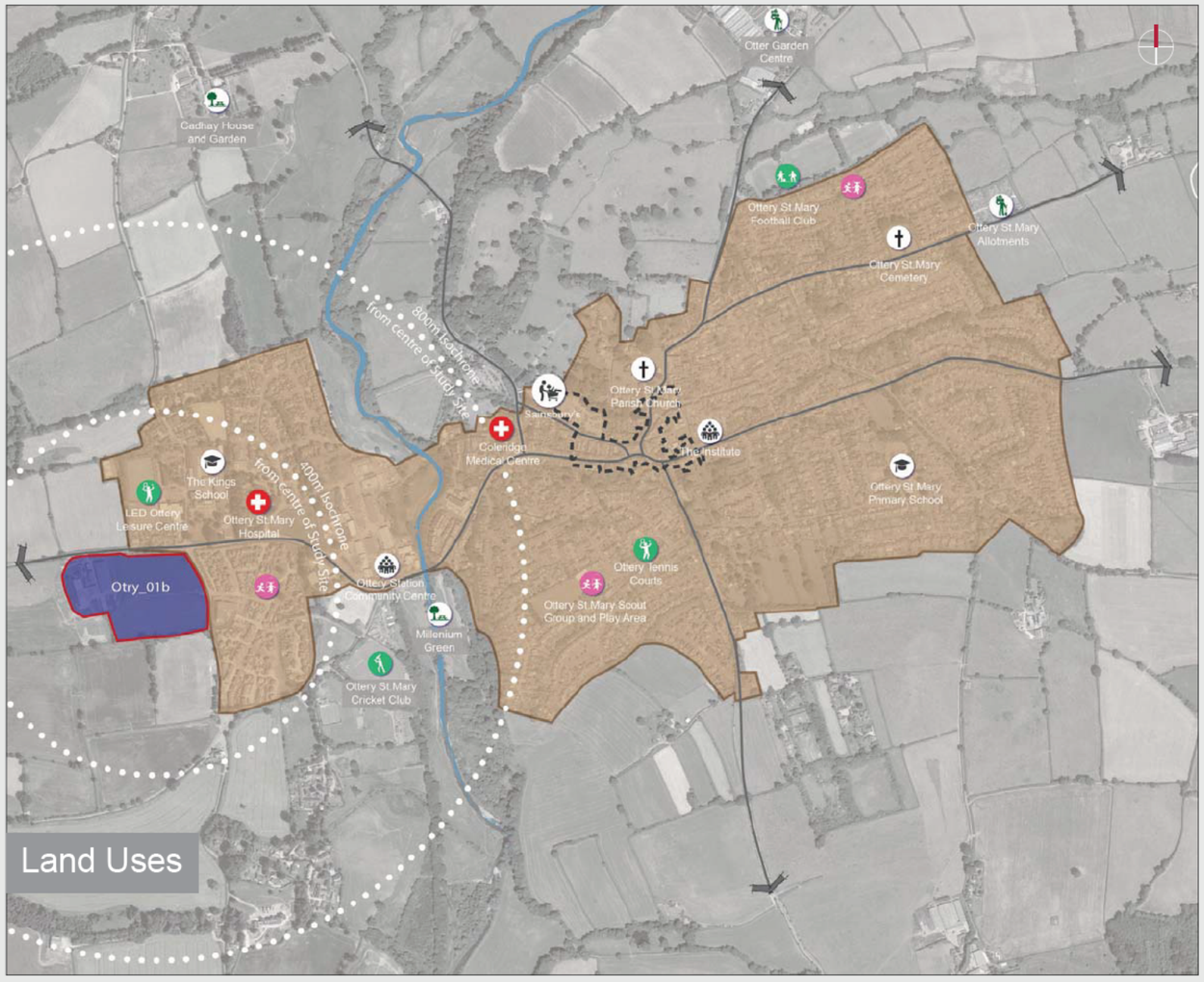
The town centre is located approximately 1km from the centre of the site and provides a range of everyday services and facilities. There is an existing pavement running alongside Exeter Road which connects with the town centre.

Ottery St Mary has a vibrant town centre with a number of independent shops and cafes, which appeared to be well used. In addition, the town benefits from a supermarket, medical centre, community hospital, a secondary school, primary school and nursery and early years provision. All of which would be easily accessed using the existing pedestrian network.

The town benefits from bus services to Exeter, Honiton, Axminster and Sidmouth. The nearest stop to the site is on Exeter Road approximately 180m to the east of the site.

The nearest railway station is Feniton which is 5.5km away, approximately a 20 minute cycle or a 10 minute drive.

In light of the numerous local facilities and connections to the local pedestrian and cycle network, the site is well-located with opportunities for future residents to make sustainable journeys to and from the site, meaning that development of the site would accord with the Emerging East Devon Local Plan - Strategic Policy TR01: Prioritising walking, wheeling cycling and public transport.



Understanding the Site and its Wider Context

Landscape and Visual Appraisal

Preliminary Landscape and Visual Appraisal work has been carried out and has fed into the emerging proposals. This work will be further refined and a full Landscape and Visual Impact Assessment would form part of a future planning application.

The site is not the subject of any landscape designations, albeit there is a visual relationship with East Hill some 3+km to the east which falls within the East Devon National Landscape. The Neighbourhood Plan has also emphasised the importance placed on the local landscape.

The Site

The site is located on the western slopes of the River Otter valley adjacent to the urban edge on ground which rises from east to west.

It is partially contained by urban form and there is an awareness of the busy Exeter Road which runs along the northern boundary.

The north-eastern part of the site is occupied by a series or large agricultural sheds. While these are not particularly attractive, they are typical of a farmland landscape.

The site is contained by mature hedgerows on its northern, eastern and southern boundaries which support a number of mature trees which positively contribute to the character of the area. The western boundary beyond the barns is largely open to the wider countryside.

The site is currently managed as pasture.

Character of the Wider Area

The ground to the west continues to rise steadily beyond the site, until it reaches an elevation of c. 160m close to the point where Exeter Road meets the A303. The wider landscape is farmed as a mixture of pasture and arable, with fields divided by mature hedgerows which support numerous mature trees. The wider hillside also contains many blocks of deciduous woodland.

A study of historic maps shows that field patterns have been degraded to some degree over the course of the last century; this has included the loss of a length of hedgerow within the site itself.

The site and the surrounding area are the subject of a number of different landscape character assessments. The most detailed of these is the East Devon and Blackdown Hills Landscape Character Assessment (March 2019), a document which has been drawn upon in the Emerging East Devon Local Plan 2020-2042 Site Selection Report Ottery St Mary (February 2025).

Within this document, the greater part of the site is identified as **Landscape Character Type 3B: Lower Rolling Farmland and Settled Valley Slopes.** The description of the area includes the following:

This is one of the most extensive LCTs and can be found throughout the Study Area. It occurs on the lower slopes of the valley sides, and is generally a medium scale landscape, often with long views. It is predominantly agricultural, with pastoral and arable land uses (associated with distinctive red soils in the west of the Study Area). Patches of woodland, copses, and hedgerow trees give the landscape a well-treed character. It is a well-settled landscape, with farms, hamlets and villages (some of which have expanded). Villages are often centred on river crossing points and contain numerous historic buildings, often constructed of stone, and with church towers as focal points. Some villages have expanded to become larger settlements.

When referencing 'What Makes this Landscape Special' the report lists:

- *An extensive LCT which forms the setting for many settlements, and also contributes to many expansive views from higher ground.*
- *A productive, working but still attractive landscape containing numerous historic and archaeological features.*
- *A diversity of settlements, with building materials and settlement pattern reflecting local geology.*

In the context of this report the Ottery St Mary Site Selection Report February 2025, produced as part of the evidence base for the Emerging Local Plan, notes that the site is of 'Medium Value' and goes on to describe it as ***'An ordinary landscape which is appreciated by the community, but has little or no wider recognition of its value'.***

This appraisal broadly accords with these conclusions. The site, while agricultural experiences a number of urbanising influences including lit roads, built form and playing fields.

Given the above, it is judged that this site has the capacity to successfully accommodate new development. The site lends itself to residential development in the lower, eastern parts of the site opposite the existing urban edge, with the employment land where the sheds are currently located.

See Inset
OTTERY ST MARY
OTTERY ST MARY CP
WEST HILL CP
East Devon National Landscape
9.
8.
Topographical Study

5.
4.
6.
7.
Barrack Farm
Island Farm
Salston Barton
Foxenholes
Inset

Understanding the Site and its Wider Context

Visual Appraisal

The site and the surrounding area were visited in February 2025 when the hedgerows had been cut back and the trees were out of leaf. In the summer months views across the landscape would be notably more contained, particularly from the lanes which are generally bounded by high hedgerows which, once grown, will preclude many views out.

There are a limited number of public rights of way (PRoW) in the vicinity of the site and, as a consequence, the majority of people who experience views of the site do so as the travel along Exeter Road or the unnamed road alongside the eastern boundary.

As Exeter Road crosses the bridge leaving the town centre and rises up the hillside, views are well channnelled by built form. As the road aligns with the site, as illustrated in View 4, the agricultural buildings begin to come into view and form an element of the skyline, albeit the greater part of the site remains concealed from view.

It is not until the road draws up to the south-eastern corner of the site that views open up more clearly as illustrated in View 5.

For those approaching from the west, views are well channelled by high roadside hedges and the site does not become apparent until the road draws alongside the barns.

There are also views towards the site from the road and buildings alongside the eastern boundary. View 6 illustrates the direct views that are available to those leaving this development as they walk or drive along Pixie Walk. The site is partially visible, with the barns just touching the skyline.

4 View looking west along Exeter Road as it leave the town

5 View looking south-west at the junction on the south-eastern corner of the site

6 View looking west along Pixie Walk towards the site

View 7 illustrates the views that are available across the school playing fields looking north-west towards the site. While there are filtered views through to the site in the winter months, in summer it is likely any development would be well screened from the outset.

While the site photographs demonstrate that there is a clear inter-visibility between the site and the wider landscape to the east, there were relatively few locations from which public views are available.

View 8 illustrates the view from the footslopes of East Hill on the edge of the National Landscape some 3+km from the site. In this view it is just possible to discern Ottery St Mary rising above the tree line in the foreground. It is also possible to discern Barrack Farm and the housing to the east of it in the distance, albeit this forms a very small part of this wide panorama.

View 9 is located on a footpath to the south of Ottery St Mary and shows that the site, including the barns, are briefly visible from this location and in the context of the existing town, before the footpath drops into a valley and the views are lost.

Technical Considerations

Flood Risk and Drainage

Environment Agency (EA) flood mapping identities that the site is entirely within Flood Zone 1. There are no areas within the site that are at risk of a yearly chance of flooding from surface water.

Access

Vehicular access to the residential part of the site would be provided via a new T-junction off the small unnamed road alongside the eastern boundary, while access to the employment land would be provided off Exeter Road in the same location as the current farm access.

Initial designs have been undertaken that show that both these accesses can be achieved along with the appropriate visibility splays.

Utilities

The site is crossed by both 33kV and 11kV overhead lines. The owners would engage with National Grid Electricity Distribution regarding their diversion.

No further constraints were identified and it is expected that connections for gas, telecommunications, water and sewage will be available.

Historic Environment/Heritage

Archaeological investigations in the area have produced evidence of activity within this landscape over several millennia.

About 400m to the north aerial photography has revealed evidence for at least one ring ditch, probably the remnants of a Bronze Age burial mound. Another possible ring ditch has been recorded 600m to the south east.

Cropmark features that appear in scale and form to be prehistoric enclosures have been recorded in the landscape to the west of the site.

Roman period activity is evident through the discovery of box-flue tile west of Kings School to the north of the site and finds of glass and tile approximately 350m to the south west.

In addition to the discoveries at Island Farm to the immediate east of the site, medieval settlement in the landscape is found at Salston Barton, first recorded in 1243, 400m to the south east, and a medieval farmstead 350m to the north of the site.

There are a number of listed buildings within 1km of the site and the Ottery St Mary Conservation Area covers the historic Town centre and lies 630m to the east of the site at its closest point.

As a result of local topography and modern development activity no potential impacts through a change to their setting on designated or locally important non-designated heritage assets have been identified.

The proposed development of the site will require detailed desk-based assessment and archaeological field evaluation, probably comprising geophysical survey and trial trench investigation. Whilst further archaeological fieldwork is required to provide more detail on the potential of the site, at the current time no heritage constraints have been identified that would prevent development on the land proposed.

Ecology

The site does not form part of any site designated for its nature conservation value, nor does any such designated site exist in the immediate vicinity of the site.

Broadly, the site comprises grassland under agricultural management, hedgerows and ruderal vegetation.

A future planning application would be supported by a range of detailed ecological surveys and assessments. However, it is evident that there is sufficient area available for ecological mitigation and enhancement to provide appropriate and proportionate ecological mitigation measures for faunal species within the site.

BNG requirements, as defined through statute and planning policy would be fully met by development proposals associated with the site.

Opportunities

- Provision of new, high quality open market and affordable homes;
- Provision of new area of employment;
- Opportunity to replace barns with more architecturally sympathetic buildings;
- Location within walking distance of town centre and everyday amenities and facilities;
- Opportunity to enhance and manage areas of open space through planting and the incorporation of sustainable drainage features for biodiversity;
- Opportunity to improve the urban/countryside interface at the west of the site; and
- Opportunity to reinforce Green Infrastructure network.

Constraints

- Existing trees and hedgerows to be protected and incorporated into the proposals;
- Electricity cables which would need to be re-routed and/or undergrounded; and
- Residential amenity of neighbouring properties.

Legend

Site Boundary

Existing Entrances

Existing Trees and Hedgerows

Publicly Available Views Into the Site

Privately Available Near Views Into the Site

Landscape Interrelationship with Otter Valley

Opportunities and Constraints

Design Concept

The design concept has evolved from the consultant team's findings and recommendations. The extent of development and the resulting Framework Plan are underpinned by a series of design principles and considerations. These principles and considerations are shown in the following diagrams:

1 Existing Features

The site rises in elevation from c. 55m AOD at its eastern boundary to circa 68m AOD at it's western boundary.

There are a large group of modern agricultural buildings at the north-west corner of the site which are accessed from Exeter Road. The remainder of the site is occupied by a single, agricultural field which has field gates from both Exeter Road and the unnamed road to the east.

The field is bounded by mature hedgerows on its northern, eastern and southern boundaries. There are a number of mature trees on the northern and southern boundaries. The western boundary is largely open to the wider countryside.

There is built form on the opposite side of Exeter Road and on the opposite side of the unnamed road to the east.

The site is crossed by a two lines of overhead power lines (33kV and 11 kV).

There is no public access onto the site.

2 Green Infrastructure

The Framework Plan has located the proposed area of employment land in the area currently occupied by the barns at the western edge of the site, with the housing area to the east.

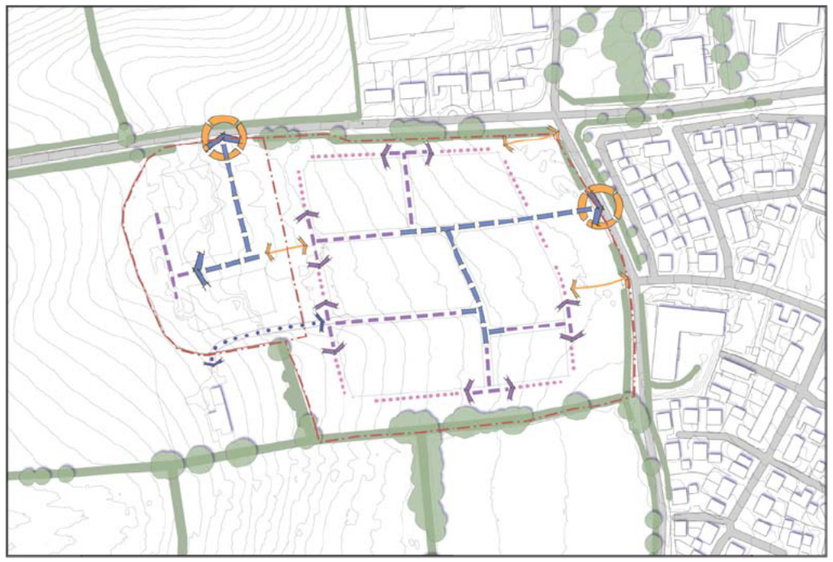
Development would be set within an area of open space with native tree planting. The western boundary would be planted with a belt of native structure planting which would improve green infrastructure links, enhance biodiversity and provide a good degree of visual containment along this urban/countryside interface.

The proposal would see the incorporation of an integrated sustainable drainage system (SuDS) comprising a series of open attenuation basins which would be designed and managed to encourage biodiversity. The employment land and the residential land would be served by separate attenuation areas.

Street tree planting would be incorporated throughout the development providing both green infrastructure linkages and helping to soften and assimilate the proposals into their wider surroundings over the long term.

The area of open space within which the development would be located would incorporate footpaths and linkages. Play provision would be sited towards the eastern part of the site close to Pixie Walk.

There is an opportunity to deliver significant enhancement over baseline conditions.



3 Access and Circulation

The employment land and the residential area would be served by dedicated, separate accesses and there would not be a vehicular connection between the two.

The employment land would be served by a junction off Exeter Road which would be located in the same place as the current farm access. The residential development would be served by a new access off the unnamed road to the east. Private vehicular access to Barrack Farm House would be maintained via the residential area.

The housing would be served by a hierarchy of primary and secondary streets linking to private/shared driveways.

The layout would be configured to provide pedestrian access throughout the site, linking to the open space, the employment land and the wider pedestrian network linking to the town.

4 Development

The preceding design considerations have been brought together to guide the disposition of dwellings, open space, buffer planting, SuDS, circulation and green infrastructure.

The development cells show how the site might be configured to provide an attractive residential development set within a framework of green infrastructure with a generous amount of open space. Housing would be designed to overlook the open space and thus provide a degree of natural surveillance. Alongside Exeter Road housing would be set back to replicate the existing housing immediately to the east and provide an active frontage overlooking the road as it enters the town.

A generous area of open space would be provided at the eastern edge of the site which would form the introduction to the development.

It is anticipated that the employment buildings would be located broadly within the footprint of the existing barns.

Design Concept

Framework Plan

The Framework Plan has been developed to demonstrate the deliverability of a new residential community at the western edge of Ottery St Mary, while at the same time also delivering an area of new employment land. The layout has evolved as a result of the opportunities and constraints presented by the site.

Emerging East Devon Local Plan 2020-2042 - Strategic Policy DS02: Housing density and efficient use of land notes:

Proposals for residential development should optimise the density of the site in a manner that conserves or enhances the character of the area and makes efficient use of land.

While allocated for 'around 70' houses, our studies demonstrate that the residential element of this allocation could provide c. 90 new homes. Provision will be made for affordable, accessible/adaptable housing and the potential for self-build/custom built housing.

It is proposed to site the employment element of the scheme in the location currently occupied by the large agricultural barns.

Residential Development would be accessed via a new, dedicated junction off the unnamed road to the east of the site, while access to the employment land would be at the existing entrance to the barn area. Access to Barrack Farm House would be maintained through the housing area. Pedestrian access to the employment land would be via the residential development.

The proposed housing would be set within a generous swathe of open space. The layout would be configured to present active frontages, overlooking these areas. This would include the easternmost part of the site which would contain the SuDS basins and would form the introduction to the site.

Emerging East Devon Local Plan 2020-2042 - Strategic Policy DS01: Design and local distinctiveness notes:

The layout and design of building curtilages, roads, parking, pavings, open space, site furniture footpaths and boundary treatments should make a positive contribution to the street scene / public realm and the integration of the development with its surroundings and setting. Recycling and waste storage facilities should be in locations well related to collection points. Particular care will need to be given to boundary treatments that abut public or communal areas in order to avoid adverse impacts.

The Framework Plan has been developed with these aspirations in mind and further, detailed work, would of course be undertaken in due course.

Emerging East Devon Local Plan 2020-2024 - Strategic Policy DS04: Green and blue Infrastructure notes:

Development in East Devon will deliver high quality multi-functional Green and Blue Infrastructure in accordance with Natural England's Green Infrastructure Framework.

The proposed new development would incorporate a comprehensive landscape strategy including sustainable urban drainage, new/reinforced wildlife habitats, native planting and an accessible area of open space.

The removal of hedgerows would be kept to a minimum and only undertaken where it would be required to facilitate connections and access.

A sustainable drainage system would be incorporated into the scheme, with organically designed basins which would be planted to encourage bio-diversity. The housing and the employment schemes would each be served by separate SuDS attenuation schemes.

Tree planting would be incorporated within the streetscape as well as around the site's peripheries. This would include a strong belt of structure planting around the western boundary of the employment land to help to provide a robust urban/countryside interface.

The Framework Plan opposite illustrates how the Land at Barrack Farm, could be developed to accommodate a new housing scheme and area of employment helping to meet the town's housing needs and requirement for new employment land.

When developing the scheme the project team have been mindful of the site's opportunities and constraints as well as existing and emerging policies. As a result, a proposal has been developed which successfully responds the site and its wider surroundings.

Framework Plan

Summary

This Vision Document has been prepared on behalf of Mr M J Nancekivell and Mr R P Nancekivell to promote the Land at Barrack Farm, Ottery St Mary for a new residential development of c.90 dwellings and 1.25 Ha of employment land.

The site is already benefits from a draft allocation for 70 dwellings and 1.25 Ha of employment land (Otry_01b) in the Emerging East Devon Local Plan 2020-2042 Regulation 19 Publication Draft - February 2025. However, our studies suggest that additional housing provision could be accommodated.

Given that the land is in one ownership, development could realistically be brought forward in the early-mid part of the plan period.

This Vision Document has been developed with the benefit of technical and design input from an experienced team who have demonstrated that the site presents a sustainable and deliverable opportunity to provide much needed homes and employment in the town.

The Framework Plan provided has evolved as a result of the consultant team's analysis of the site's opportunities and constraints.

The development has been configured to site both the housing and employment proposals within an enhanced network of green infrastructure comprising generous swathes of open space and structure planting which would provide a robust and considered urban/countryside interface as well as an attractive setting for the development itself.

Sustainable drainage systems for both elements of the scheme would be designed as organic shaped basins with planted edges that would be managed for ecological benefit.

New planting would be incorporated within the streetscape as well as around the site's peripheries, including a robust belt of structure planting along the western edge where the site would form the urban/countryside interface.

New vehicular access would be provided off the unnamed road to the east for the residential element and off Exeter Road for the employment element of the scheme. Pedestrian and cycle connections would also be provided to link to the existing network connecting to the town centre.

The development of the Land at Barrack Farm, Ottery St Mary would provide a range of attractive, good quality homes and new employment buildings. The development would be sensitively designed, responding positively to the intrinsic qualities of the site, the town and the wider landscape.

Annex 2: Highways and Transport Technical Note

MR M.J. NANCEKIVELL AND MR R.P. NANCEKIVELL

OTTERY ST MARY – LAND AT BARRACK FARM

TECHNICAL NOTE 1 – HIGHWAYS AND TRANSPORT

27TH MARCH 2025

1.0 Introduction

1.1 Connect Consultants Limited is a firm of transport planning and highway design consultants that have been instructed by Mr M.J. Nancekivell and Mr R.P. Nancekivell in relation to land at Barrack Farm, Ottery St Mary (hereinafter referred to as 'the Site').

1.2 This technical note has been written to accompany representations to East Devon District Council in response to the East Devon Local Plan (EDLP) 2020 to 2042 Regulation 19 Publication Draft February 2025.

1.3 The Site is identified in the 'East Devon Local Plan 2020 to 2042 Site Selection Report Ottery St Mary', dated February 2025, as comprising site Otry_1b.

1.4 This Technical Note (TN) considers the feasibility in highways and transport terms of developing the Site with around 90 dwellings and approximately 4,180sqm Gross Internal Area (GIA) of use E(g)(iii) (industrial uses suitable to be carried out in any residential area without causing detriment to the amenity of the area). This TN demonstrates that the surrounding area can support development on the Site, and that suitable access is available.

1.5 It considers the Site in the context of the relevant transport policies in the publication draft ELDP, and is structured as follows: section 2 outlines the site's transport context; section 3 considers the transport reports necessary to support a future planning application at the Site and includes some initial traffic analysis; section 4 considers the residential parking standards; section 5 discusses the aerodrome safeguarding area; and section 6 offers a summary and conclusion.

2.0 Site Transport Context

2.1 This section of the report considers the local strategic policies and analyses the accessibility of the Site in terms of walking, cycling, buses, and trains. It specifically examines how these modes of transport can be used by future residents to access key employment locations and essential amenities, as well as by future employees travelling to work at the Site.

EDLP Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport

> *"Walking, wheeling, cycling and public transport should be the natural first choice for short local journeys, or as part of a longer journey. Walking and cycling routes must be prioritised in new development (specifically including where land is allocated for development) – such routes should be coherent, direct, safe, comfortable, and attractive. Where appropriate, cycle paths should be segregated from pedestrians to reduce the potential for conflict (for example, where high usage levels are anticipated). Proposals for walking and cycling routes should be aligned with the Local Transport Plan and, where relevant, the Clyst Valley & New Communities and Countywide Local Cycling and Walking Infrastructure Plans.*
>
> *New development (specifically including where land is allocated for development) should facilitate access to high quality public transport through its location, layout, and, where necessary, contributions to public transport services and/or facilities (for example, bus services, bus stops, bus priority measures, rail infrastructure). In particular, development should be aligned with Devon County Council's Bus Services Improvement Plan.*
>
> *Where appropriate, development should provide, or otherwise make contributions to, an easy interchange between active and shared transport modes through the delivery of mobility hubs. Development which would result in the loss or reduce the convenience or attractiveness of an existing or proposed footpath, cycleway or bridleway, will not be permitted unless an acceptable alternative route is provided. This policy applies across the whole plan area including the Cranbrook Plan area."*

2.2 The justification for the policy refers to the CIHT document 'Planning for Walking' (April 2015), as follows:

> *"Studies suggest that most people prefer to walk if their destination is within 1.6 km (1 mile), typically 800m (0.5 miles). Factors such as topography, surveillance, directness, and attractiveness also influence walking choices. While it is unrealistic to require all new developments in rural East Devon to be within 800m of key services and facilities, this is feasible in larger settlements and developments."*

2.3 We acknowledge and support the principles of this policy, the section below shows how the Site is in a good location to encourage sustainable transport use for journeys by foot, bike, bus, and train.

Pedestrian Access

2.4 The Department for Transport's (DfT) document titled 'Manual for Streets' dated 2007 provides guidance in relation to walk distances. Section 4.4 gives the following advice:-

> *"Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot".*

2.5 The CIHT document 'Planning for Walking' (April 2015) reiterates the advice presented in 'Manual for Streets', Section 6.4 of 'Planning for Walking' states the following:

> *"Walking neighbourhoods are typically characterised as having a range of facilities within 10 minutes' walking distance (around 800 metres). However, the propensity to walk or cycle is not only influenced by distance but also the quality of the experience; people may be willing to walk or cycle further where their surroundings are more attractive, safe and stimulating. Developers should consider the safety of the routes (adequacy of surveillance, sight lines and appropriate lighting) as well as landscaping factors (indigenous planting, habitat creation) in their design."*

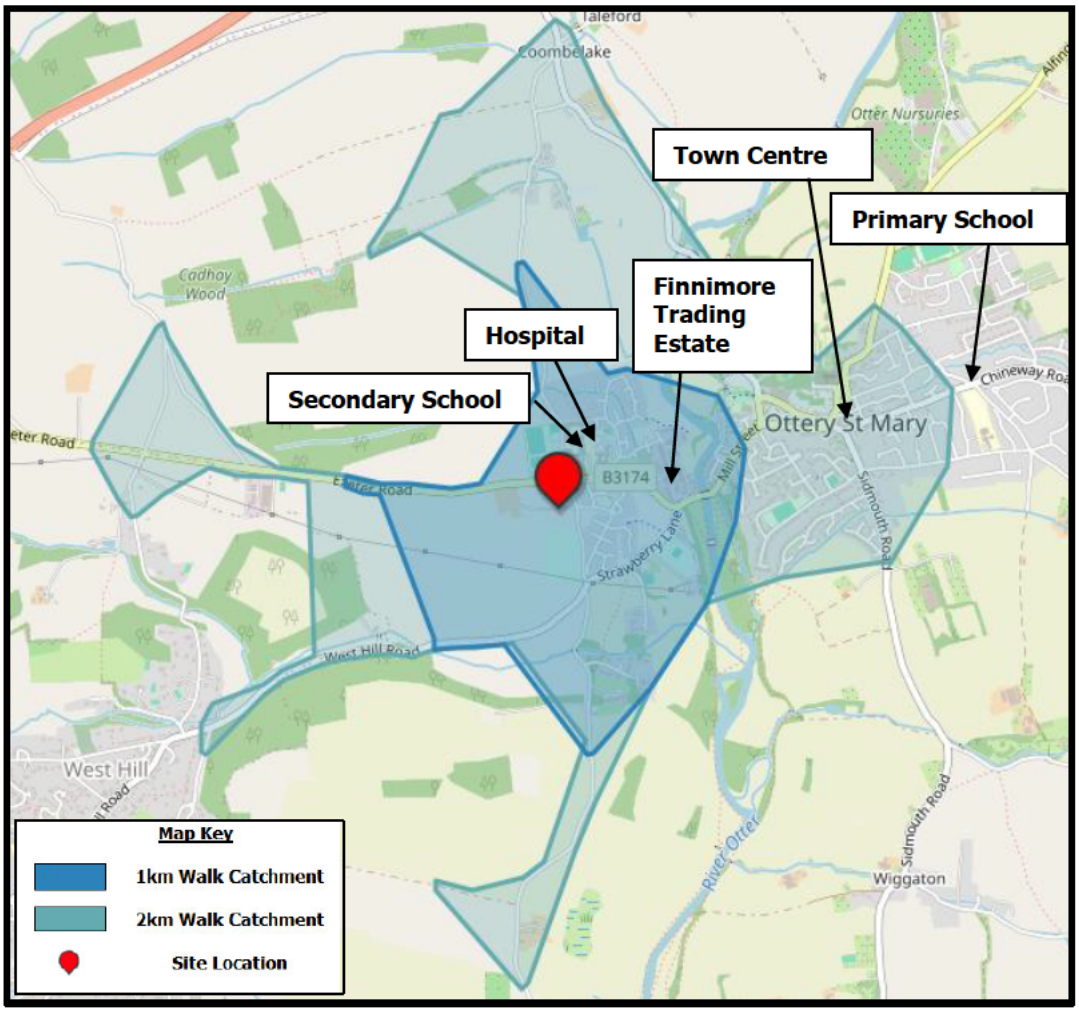
2.6 Furthermore, 'Planning for Walking' indicates that approximately 80% of journeys shorter than 1 mile (1.6km) are made wholly on foot.

2.7 Table 3.2 of The Institute of Highways and Transportation (IHT) guidance document titled 'Providing for Journeys on Foot' identifies a maximum walk distance of 2.0km for commuter, school and sightseeing walk trips, 800m for town centre walk trips and 1.2km for trips elsewhere.

2.8 The actual distance that people will be prepared to walk will vary depending on the trip purpose and other factors such as the presence of road crossings, terrain, and the attractiveness of the environment. For retail trips, the likely maximum walk distance is 800m due to the fact that shoppers will be carrying bags on their return journey, while for work-based / commuting trips, people are likely to be prepared to walk further.

2.9 Indicative walking catchments of the Site are shown at Figure 2.1 below. These have been shown as 1km and 2km isochrones.

Figure 2.1 – Indicative 1km and 2km Walking Catchments



Source: OpenRouteService.

2.10 The walk catchments above indicate that there are a range of facilities within a 1km walk of the Site including Ottery St Mary Hospital, Finnimore Trading Estate, and a Secondary School. Additionally, the town centre is within the 2km walk catchment and the Primary School falls only just outside of this catchment.

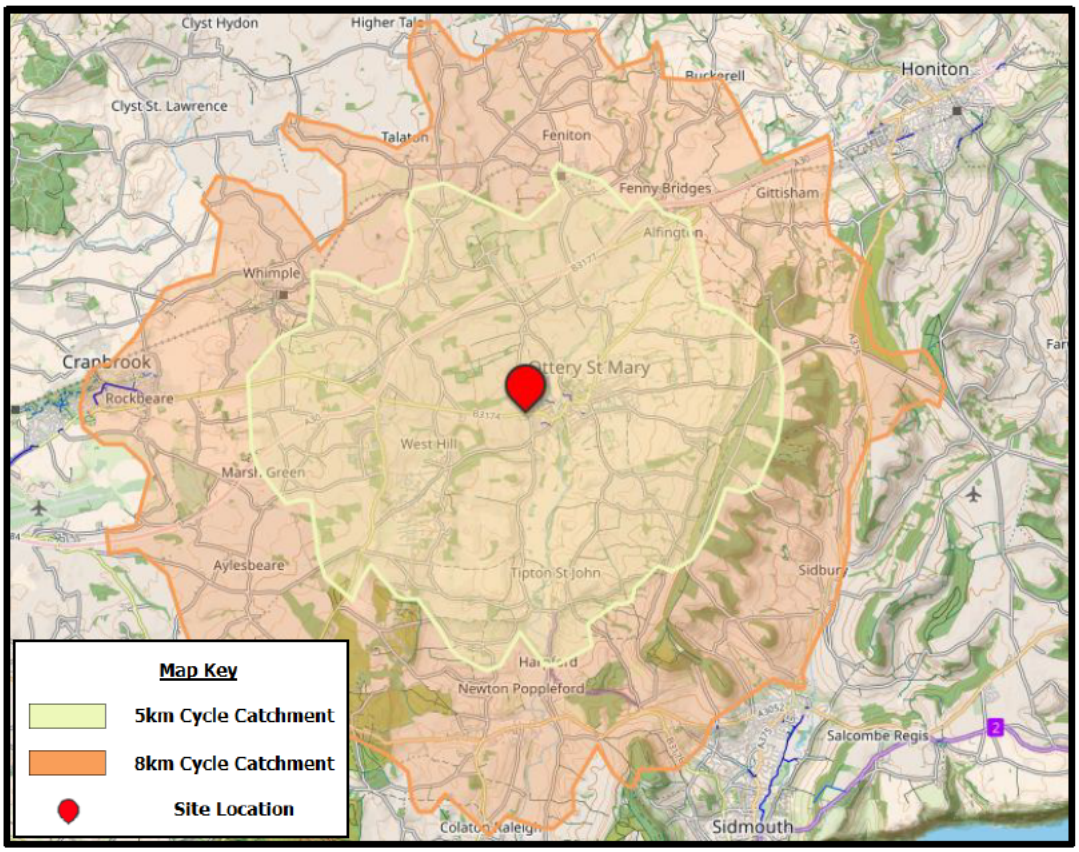
2.11 A pedestrian route exists between the Site and the town centre, via footways on Barrack Road (B3174) into the town centre. A signal-controlled pedestrian crossing facility with tactile paving is provided opposite the Secondary School c.100m to the east of the Site.

Access by Cycling

2.12 The 2023 National Travel Survey table NTS0303 identifies average journey lengths by cycle in England of c.4.8km. The CIHT document titled 'Planning for Cycling' (October 2014) indicates that 80% of cycling trips are up to five miles (8km) and 40% are less than two miles (3.2km). This suggests that cycling can offer an alternative to car travel particularly for trips of less than 8km.

2.13 Indicative cycle catchments are shown at Figure 2.2 below, being a 5km catchment (representing the 4.8km NTS average cycling distance) and an 8km catchment (being the distance of 80% of cycle trips).

Figure 2.2 – Cycle Catchment Area



Source: OpenRouteService.

2.14 The 5km cycle catchment includes all of Ottery St Mary, and the villages of Alfington, Tipton St John, and West Hill.

2.15 The 8km cycle catchment includes the villages of Buckerell, Fenny Bridges, Gittisham, Sidbury, the parts of Sidmouth and Colaton Raleigh, Newton Poppleford, Aylesbeare, Marsh Green, Whimple including the train station, and Feniton also including the train station.

2.16 There are therefore a number of destinations and residential areas within cycling distance of the Site.

2.17 Considering that the roads local to the Site are urban in character, and that the local topography is generally gentle, there are realistic and viable opportunities for future residents and employees at the Site to make trips by cycling.

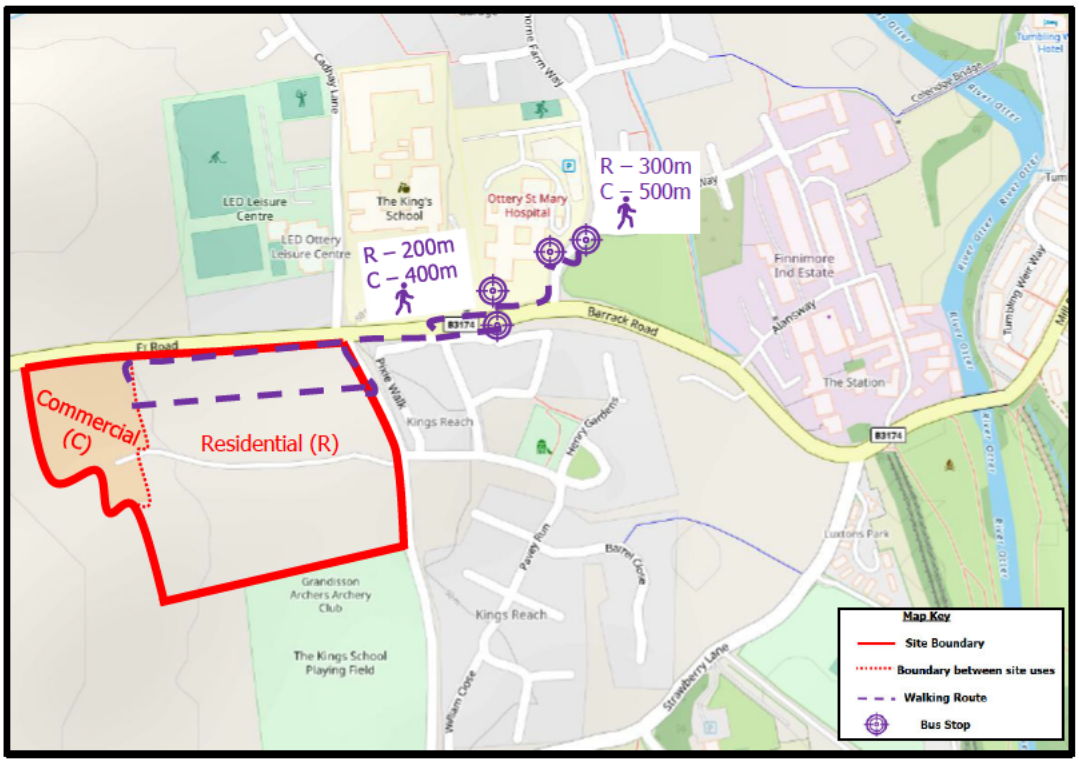
Access by Bus

2.18 The publication 'Planning for Public Transport in Developments' produced by the Institution of Highways and Transportation (IHT) specifies that new developments should be located within 400m of the nearest bus stop.

2.19 The nearest bus stops to the Site are located at Ottery St Mary Hospital; the walking distance from the commercial and residential parts of the Site ranges from 200m-500m.

2.20 The bus stops and the likely walking routes to/from the Site are shown at Figure 2.3 below.

Figure 2.3 – Bus stop locations



Source: Google. N.B All Distances, Locations and Areas approximate.

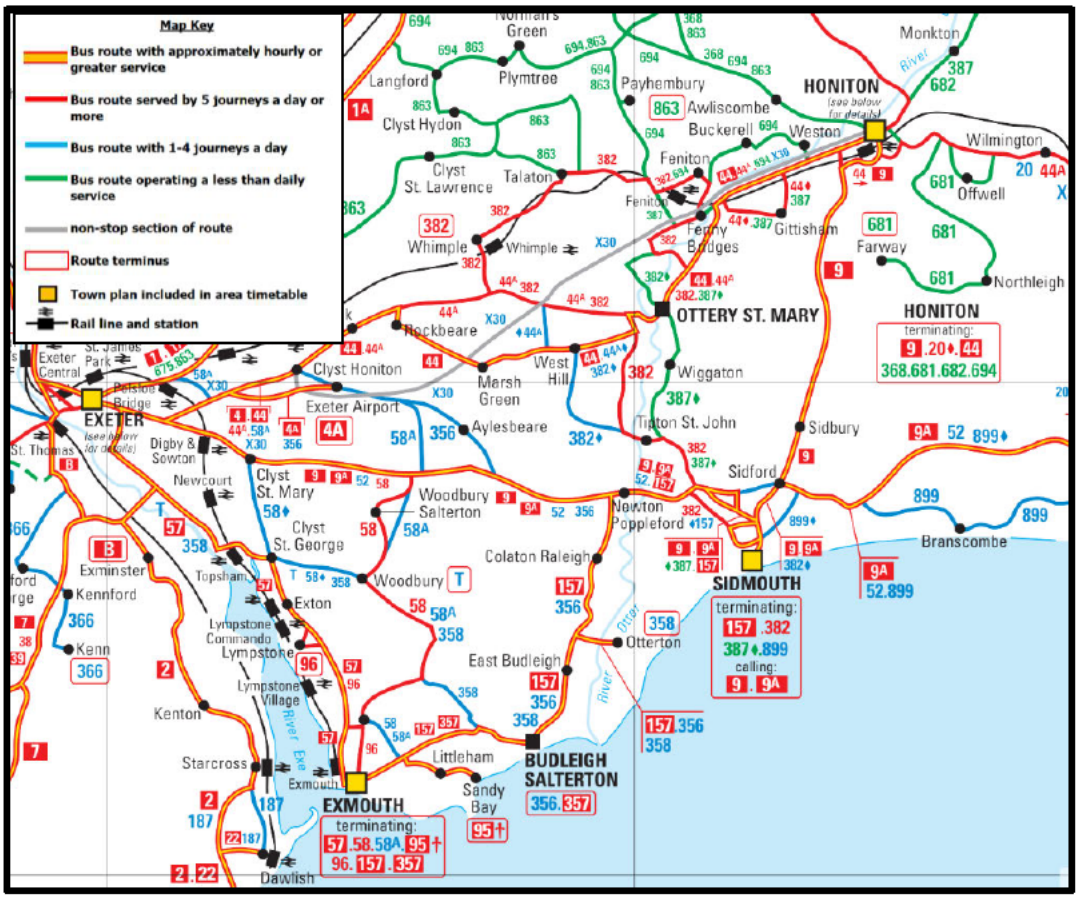
2.21 Table 2.1 below summarises the routes that serve the above bus stops, showing that there are regular and frequent buses between the Site and the local area.

Table 2.1 – Bus Service Details

Service	Bus Stop	Route	Approximate Peak Frequency / Period		
			Monday - Friday	Saturday	Sunday
44	Ottery St Mary Hospital (E and W-bound)	Honiton – Exeter City Centre	Once per hour	Once per hour	None
44A	Ottery St Mary Hospital (E and W-bound)	Axminster – Exeter City Centre	Every 1.5 hours	Every 1.5 hours	Two per day
381	Ottery St Mary Hospital (SW and N-bound)	Ottery Town Service Circular	5 on Mondays and 5 on Thursdays	None	None
382	Ottery St Mary Hospital (E and W-bound)	Whimple – Sidmouth	Every 2 hours	Every 2 hours	None

2.22 The bus routes serving Ottery St Mary are shown in Figure 2.4 below.

Figure 2.4 – Bus Routes Serving Ottery St Mary



Source: Devon County Council BSIP, 2024, 16.

2.23 It is important to note that 45% of parishes in Devon have bus services that are less frequent than daily, or in some cases, no service at all. In contrast, only 25% of Devon's parishes benefit from a bus service that operates on an hourly or more frequent basis (Devon County Council BSIP, 2024, 25). Ottery St Mary is among the top 25% of Devon's parishes in terms of bus service frequency. Additionally, as part of Devon's bus network planning and improvements to bus services, they aim to improve service frequencies from the main surrounding towns to Exeter, one of which is Ottery St Mary (Devon County Council BSIP, 2024, 69). This includes the following:

- *In the first phase to a minimum frequency of 20 minutes.*
- *In the second phase to a minimum frequency of 15 minutes.*
- *Introduce early journeys at 0500 to cater for work journeys.*
- *Later last buses at midnight to cater for shift workers and those working late.*
- *Improve Sunday buses to operate hourly.*
- *Improve Park & Ride Services in Exeter.*

2.24 Having regard to the proximity of the bus stops, the frequency of buses and the areas that the existing local buses serve and the targeted increased frequency of buses to and from Exeter (44/44A), the Site is accessible by public transport.

Access by Rail

2.25 The nearest train station to Ottery St Mary is Feniton which is 5.5km away, approximately a 20-minute cycle or a 10-minute drive.

2.26 Feniton Station has services to London Waterloo and Exeter Saint Davids.

2.27 It is therefore feasible that some longer journeys to/from the proposed development can be made by train, with the connection between the station and the site being made by bike, taxi, bus, or car-share.

Access to Facilities

2.28 This section considers the Site's accessibility to key services and facilities, in comparison to the national averages.

2.29 The Department for Transport (DfT) publish annual estimates of travel times from where people live to key local services including primary schools, secondary schools, GPs, hospitals, food stores, town centres and employment centres. These are known as the Journey Time Statistics (JTS) series, the latest set were recorded in 2019 (published in November 2021).

2.30 The statistics are published at national, regional, local authority and small area (Lower Super Output Area) level, for the eight key local services presented above, and for the following three modes of transport; public transport / walking, cycle and car.

2.31 The 2019 JTS "cycle time" has been converted to 'average distance' using the assumption that the average cycle speed is 16 km/h (the most common cycle speed input to the program used when calculating the JTS).

2.32 The average accessibility distance has been calculated by multiplying the average minimum cycle time (in minutes) presented at Table JTS0101 by 16 (km) and dividing by 60 (1 hour) to give the average distance.

Access to Employment

2.33 The national average accessibility distance to the nearest employment centre (one which provides 100-499 jobs) is 2.3 km.

2.34 The key employment destinations close to the Site are Ottery St Mary town centre and Finnimore Trading Estate. There will also be employment opportunities at the commercial units within the Site. This is closer than the national average accessibility distance; therefore, future residents of the proposed development will benefit from being closer to their nearest employment centre than the average resident of England.

Access to Education

2.35 The statutory maximum walking distance for primary school pupils to their school is two miles (3.2km); for secondary school pupils, the statutory distance is three miles (4.8km).

2.36 Data from the National Travel Survey[1] (NTS) shows that the proportion of primary pupils who walk to school decreases sharply as trip lengths exceed one mile (1.6km). This is shown in Table 2.2 which is a summary of NTS Table 0614, "trips to school by main mode, trip length and age".

Table 2.2 – NTS 0614 Trips to School; Summary Table

Age Group	Mode \ Distance	<1 mile (%)	1-2 miles (%)	2-5 miles (%)	5+ miles (%)
5-10 years	Walk	86	18	0	0
	Bicycle	1	2	0	0
	Car/van	12	78	77	72
	Bus	1	3	22	14
	Other	0	0	1	14
11-16 years	Walk	90	62	7	0
	Bicycle	1	7	11	0
	Car/van	5	19	42	37
	Bus	4	12	38	44
	Other	0	0	2	19

2.37 The JTS average accessibility distance to the nearest primary school is 2.3 km, and to the nearest secondary school the JTS average accessibility distance is 3.8 km.

2.38 The closest primary school to the Site is Ottery St Mary Primary School, c.2.1km walk distance from the centre of the Site.

[1] Table 0614 'trips to school by main mode, trip length and age', National Travel Survey, 2022.

2.39 The closest primary school is therefore within the national average distance and the statutory maximum walking distance for children of primary school age. As shown in Table 2.2, 23% of journeys made by 5-10 year olds to schools between one and two miles away are made by non-car modes.

2.40 The closest secondary school to the proposal site is The King's School, c.100m from the Site.

2.41 This is within the statutory walking distance for children over the age of eight, and shorter than the average accessibility distance. As shown in Table 2.2, for school journeys of less than a mile being undertaken by 11-16 year olds, 95% are undertaken using non-car modes.

Access to Other Facilities

2.42 The 2019 JTS average accessibility distance to the nearest town centre is 4.6km. The centre of Ottery St Mary, which contains a variety of retail attractions in addition to a range of restaurants and other facilities, is closer than the national average at c.1.3km from the Site.

2.43 The 2019 JTS average accessibility distance to the nearest food store is 2.3km. The Sainsbury's Superstore is located c.1.4km from the Site and is therefore closer than the national average distance.

2.44 The 2019 JTS average accessibility distance to the nearest GP surgery is 3.0km; the Coleridge Medical Centre is c.1.1km from the Site and is therefore closer than the national average distance.

2.45 The 2019 JTS average accessibility distance to the nearest hospital is 10.0km; Ottery St Mary Hospital is c.200m from the Site, again, considerably closer than the national average distance.

2.46 Table 2.3 summarises the relevant accessibility distances set out above.

Table 2.3 – Accessibility Distance Summary

Destination / Purpose	2019 JTS	Distance from Site	Destination Name
Employment (100 – 499 Jobs)	2.3km	c.500m – 1.3km	Ottery St Mary Town Centre and Finnimore Industrial Estate
Primary School	2.3km	c.2.1m	Ottery St Mary Primary School
Secondary School	3.8km	c.100m	The King's School
Hospital	10.0km	c.200m	Ottery St Mary Hospital
GP Surgery	3.0km	c.1.1km	Coleridge Medical Centre
Town Centre	4.6km	c.1.3km	Ottery St Mary Town Centre
Foodstore	2.3km	c.1.4km	Sainsbury's
Leisure Facilities	9.8km*	c.50m	LED Leisure Centre

Summary

2.47 In light of the numerous local facilities and with the connections to the local pedestrian and cycle network, the Site is well located with opportunities for future residents and employees to make sustainable journeys to and from the Site.

2.47.1 The Site therefore satisfies EDLP Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport.

3.0 Travel plans, transport statements and transport assessment

Strategic Policy TR03: Travel plans, transport statements and transport assessments

> *Where development is likely to generate significant amounts of vehicle movements, planning permission will not be granted unless they are supported by a transport statement or transport assessment, and subsequent travel plan, that identifies measures to secure new sustainable travel arrangements, taking into account:*
>
> *A. The scale of the development; and*
>
> *B. The availability of public transport, walking and cycling opportunities; and*
>
> *C. Proximity to environmental designations; and*
>
> *D. Cumulative impacts of other development in the area; and*
>
> *E. Whether there are particular types of impacts that require further evaluation.*
>
> *This policy applies across the whole plan area including the Cranbrook Plan area.*

3.1 We acknowledge and wholly support this policy, and any future planning application for development of the Site will be supported by a Transport Assessment / Statement and Travel Plan as appropriate.

3.2 The following section outlines the proposed Site access arrangements and includes some initial analysis of the potential vehicle trip generation of the Site.

Proposed Development Pedestrian Access

3.3 The proposed residential part of the Site will be served from a proposed new access on the (unnamed) road on the Site's eastern boundary.

3.4 The proposed Site access junction will include a pedestrian footway which will connect to the existing pedestrian footway on the unnamed road, from where there is a continuous pedestrian route into Ottery St Mary.

3.5 A pedestrian route will be provided through the Site to connect to the proposed commercial units.

Proposed Development Vehicle Access Arrangements

3.6 As noted above, the proposed residential development will be served from a proposed new access on the unnamed road on the Site's eastern boundary.

3.7 The proposed commercial development will have a separate access via an upgraded form of the existing farm access on the south side of the B3174 Barrack Road.

3.8 Approximately 50m north of the proposed residential access junction, the unnamed road connects to the B3174 Barrack Road / Exeter Road at a 4-way cross roads with Cadhay Lane.

3.9 To the east, the B3174 Barrack Road leads to Mill Street and on to Ottery St Mary town centre.

3.10 To the west, the B3174 Exeter Road leads to the Daisymount Junction providing access to the A30.

3.11 Cadhay Lane leads to Fairmile with onward routes to Feniton, which has a train station with services to London and Exeter.

3.12 Figure 3.1 below shows the Site location in the local highway context

Figure 3.1 – Local Highway Network

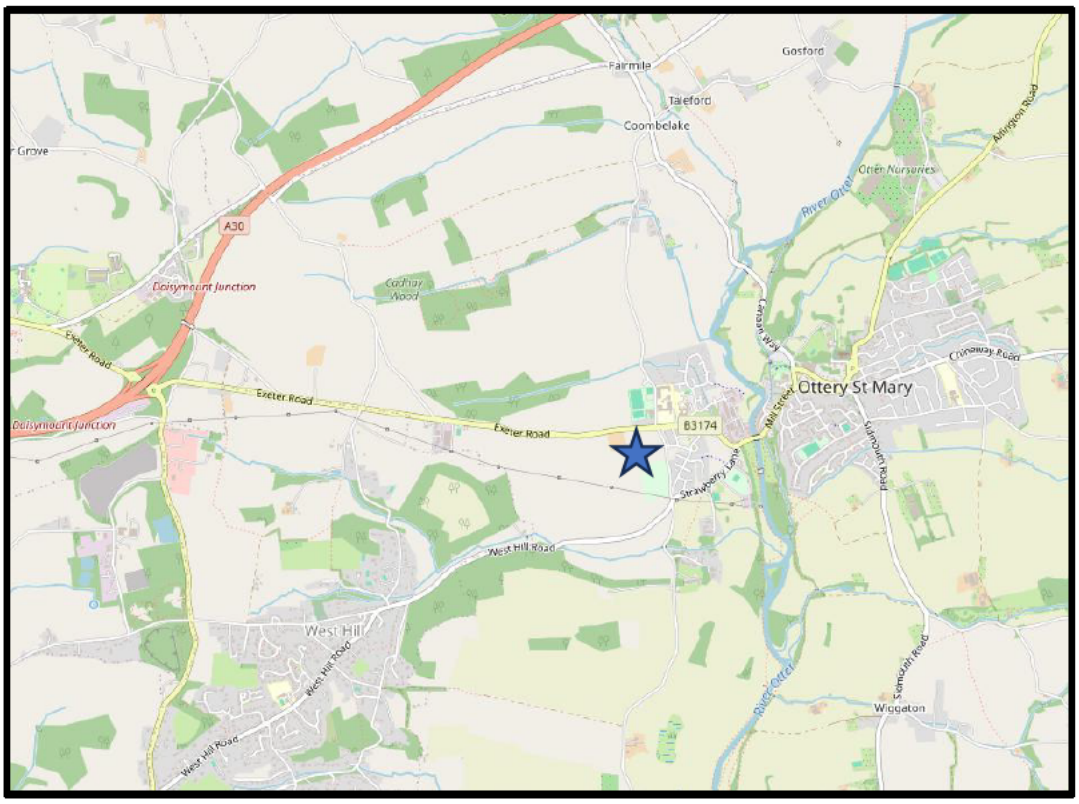


Image Source: OpenStreetMap. N.B. The Site is denoted by a blue star.

3.13 The unnamed road on the Site's eastern boundary is a single carriageway road of approximately 6m width, with a footway and streetlighting. It is subject to a 30mph speed limit.

3.14 The B3174 is a single carriageway road with width varying between c.6m-7m in the vicinity of the proposed commercial access. In the vicinity of the proposed commercial access it is subject to a 40mph speed limit.

3.15 Initial designs of the two proposed access junctions have been produced, in the form of simple T-junctions.

3.16 Both proposed accesses are shown with 6.0m kerb radii. The residential access road is shown at 5.5m wide and is shown to provide 2.4m x 43m visibility splays in accordance with the 30mph speed limit; the commercial access road is 6.1m wide and provides 2.4m x 120m visibility splays in accordance with the 40mph speed limit.

3.17 The residential access is designed to accommodate 11.2m refuse/recycling trucks turning in and out of the Site, being the largest vehicles that are likely to visit. The commercial access is designed to accommodate 10m rigid delivery trucks.

3.18 Drawings of the initial designs of the Site access junctions are provided at Appendix 1.

Vehicle Trip Generation and Attraction

3.19 The industry-standard TRICS database (version 7.11.4) has been used to identify the average trip generation/attraction of residential and commercial developments with comparable characteristics to the proposed development.

3.20 The TRICS database is an industry-standard collection of traffic surveys, detailing hourly trip arrivals and departures, recorded from a variety of existing development sites using a standardised methodology.

Residential Trip Generation

3.21 The full TRICS outputs are provided at Appendix 2; summaries of the resultant vehicular trip rates (per dwelling) during the weekday AM and PM peak hours are set out at Table 3.1, alongside the equivalent vehicle trip numbers for the proposed development of 90 houses.

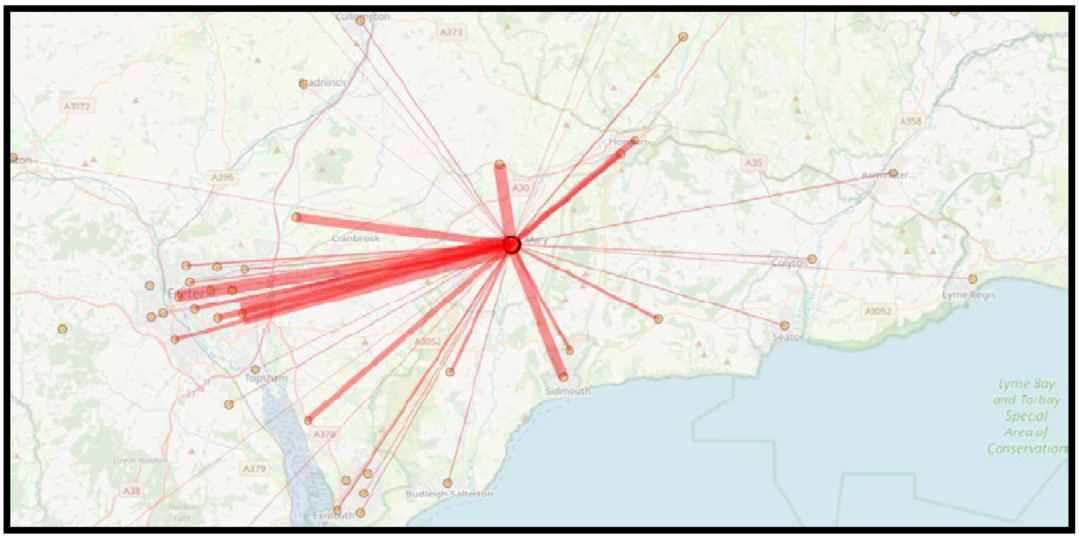
Table 3.1 – TRICS Vehicle Trip Rate Data – Residential

	Average Vehicle Trip Rates (per unit)			Vehicle Trip Numbers (90 houses)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
08:00 – 09:00	0.140	0.351	0.491	13	32	44
17:00 – 18:00	0.326	0.153	0.479	29	14	43
Daily	2.166	2.199	4.365	195	198	393

Residential Vehicle Trip Distribution

3.22 An analysis using DataShine Commute has been conducted to understand where residents of Ottery St Mary travel to work including all transport modes. This provides insight into the prevailing distribution of commuting trips made by local residents, which can be used as an indication of the likely distribution of the proposed development traffic during the weekday AM and PM peak hours. Figure 3.2 below provides a visual representation of these commuting journeys from Ottery St Mary, while the data is set out in percentage terms in Table 3.2.

Figure 3.2 – Ottery St Mary Travel to Work Destinations



Source: DataShine Commute. Data is from the ONS 2011 Census.

Table 3.2 – Percentages of the Primary Work Locations

Location	Percentage
At home	18%
Ottery St Mary	13%
No fixed place	10%
Sownton Industrial Park, Middlemoor, Exeter	10%
Feniton	6%
Exeter City Centre	5%
Sidmouth Town Centre	4%
Broadclyst	4%
Honiton	3%
Wonford, Exeter	3%
Royal Marines Training Centre, Exton	3%
Littletown, Honiton	2%
Marsh Barton Trading Estate and Matford Business Park, Alphington, Exeter	2%
St Leonards, Exeter	2%
Sidford, Sidmouth	2%
Across the South West	14%

3.23 Table 3.2 shows that 13% of the journeys to work are within Ottery St Mary. It is anticipated that many of these journeys would be made either by foot or cycle.

3.24 Based on the geographical distribution of the workplace locations, it is expected that some of the remining commuting journeys will travel north from the Site access to the B3174 junction, and some will travel south from the access.

3.25 Any future planning application for development of the Site will include detailed traffic analysis and capacity assessment to ensure that the anticipated numbers of vehicle movement can be accommodated.

Commercial Vehicle Trip Attraction

3.26 The full TRICS outputs are provided at Appendix 2; summaries of the resultant vehicular trip rates (per 100sqm) during the weekday AM and PM peak hours are set out at Table 3.3, alongside the equivalent vehicle trip numbers for the proposed 4,180sqm.

Table 3.3 – TRICS Vehicle Trip Rate Data – Industrial Estate

	Average Vehicle Trip Rates (per 100sqm)			Vehicle Trip Numbers (4,180sqm)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
08:00 – 09:00	0.629	0.308	0.937	26	13	39
17:00 – 18:00	0.185	0.466	0.651	8	19	27
Daily	4.977	5.086	10.063	208	213	421

Staff Vehicle Trip Distribution

3.27 An analysis using DataShine Commute has been conducted to understand where people working in Ottery St Mary travel from, including all transport modes. This provides insight into the prevailing distribution of commuting trips made to the local area, which can be used as an indication of the likely distribution of the proposed commercial development traffic during the weekday AM and PM peak hours. Figure 3.3 below provides a visual representation of these commuting journeys to Ottery St Mary, while the data is set out in percentage terms in Table 3.4.

Figure 3.3 – Commuting Journeys to Ottery St Mary

Source: DataShine Commute. Data is from the ONS 2011 Census.

Table 3.4 – Percentages of Residential Addresses for Commuters to Ottery St Mary

Location	Percentage
Ottery St Mary	18%
Feniton	13%
Littletown, Honiton	10%
Honiton	10%
Villages west of Sidmouth	6%
Sidford, Sidmouth	5%
Villages east of Ottery St Mary	4%
Colyton	4%
Broadclyst	3%
Sidmouth Town Centre	3%
Villages north of Honiton	3%
Exmouth	2%
Across East and Mid Devon	21%

3.28 Table 3.4 shows that 18% of people working in Ottery St Marys also live there. It is anticipated that many of these journeys would be made either by foot or cycle.

3.29 Based on the geographical distribution of the home locations, the remaining commuting trips to the commercial units are expected to approach the Site access on the B3174 from both the east and west.

3.30 Again, any future planning application for development of the Site will include detailed traffic analysis and capacity assessment to ensure that the anticipated numbers of vehicle movement can be accommodated.

4.0 Parking Standards

Strategic Policy TR04: Parking standards (Residential)

> *Parking in new residential development should provide the following minimum parking provision, unless evidence shows that a different provision is more appropriate based on public transport accessibility, the nature of occupants of dwellings or presence of locally available off-road car parking provision.*
>
> *Car parking spaces must be of an adequate size to accommodate vehicle parking and have sufficient width to the sides for pedestrian access and egress of vehicles taking account of the location of the parking space and whether or not spaces also serve as access to a property and whether there are adjacent obstructions.*
>
> *Garage spaces will not count toward the overall quantum of car parking spaces.*
>
> *…*
>
> *All new parking provision must provide provision of charging points to charge electric vehicles and electric bikes.*

4.1 Figure 4.1 below shows these requirements.

Figure 4.1 – Residential Car and Cycle Parking Requirements

Type/Use	Car Parking Requirements	Cycle Parking Requirements (Secure and Undercover)
Residential Dwelling	Average of 1.7 spaces per dwelling (rounded up to the nearest whole number in individual applications).	1 space per Bedroom

Source: EDLP, 2025.

Strategic Policy TR04: Parking standards (Employment and other development)

> *Car parking provision to serve new employment and other developments should meet the standards set out below, unless it is demonstrated through robust assessment that alternative levels are more desirable and appropriate.*
>
> *…*

All new parking provision must provide provision of charging points to charge electric vehicles and electric bikes.

4.2 Figure 4.2 below shows these requirements.

Figure 4.2 – Employment and other development Car and Cycle Parking Requirements

Type/Use	Car Parking	Short Stay Cycle Parking (obvious, easily accessed and close to destination)	Long Stay Cycle Parking (secure and ideally covered)
Class B2/E(g)	1 per 30 sqm	1 per 1,000m^2	1 per 500m^2
Class B8	1 per 200 sqm	1 per 1,000m^2	1 per 500m^2
Class E(a) Non-food retail and general retail	1 per 20 sqm	1 per 6 staff	1 per 200 sqm
Class E(a)Supermarket/ Food retail	1 per 14 sqm	1 per 6 staff	1 per 200 sqm
Class E(b)/ Sui Generis Hot food takeaways (including drive throughs)	1 per 25 sqm	2 per establishment	1 per 8 staff

Source: EDLP, 2025.

4.3 We acknowledge and wholly support this policy, and any future planning application for development of the Site will include the appropriate number of car and cycle parking spaces with accessible charging points in accordance with the adopted policy at that time.

5.0 Aerodromes and safeguarding

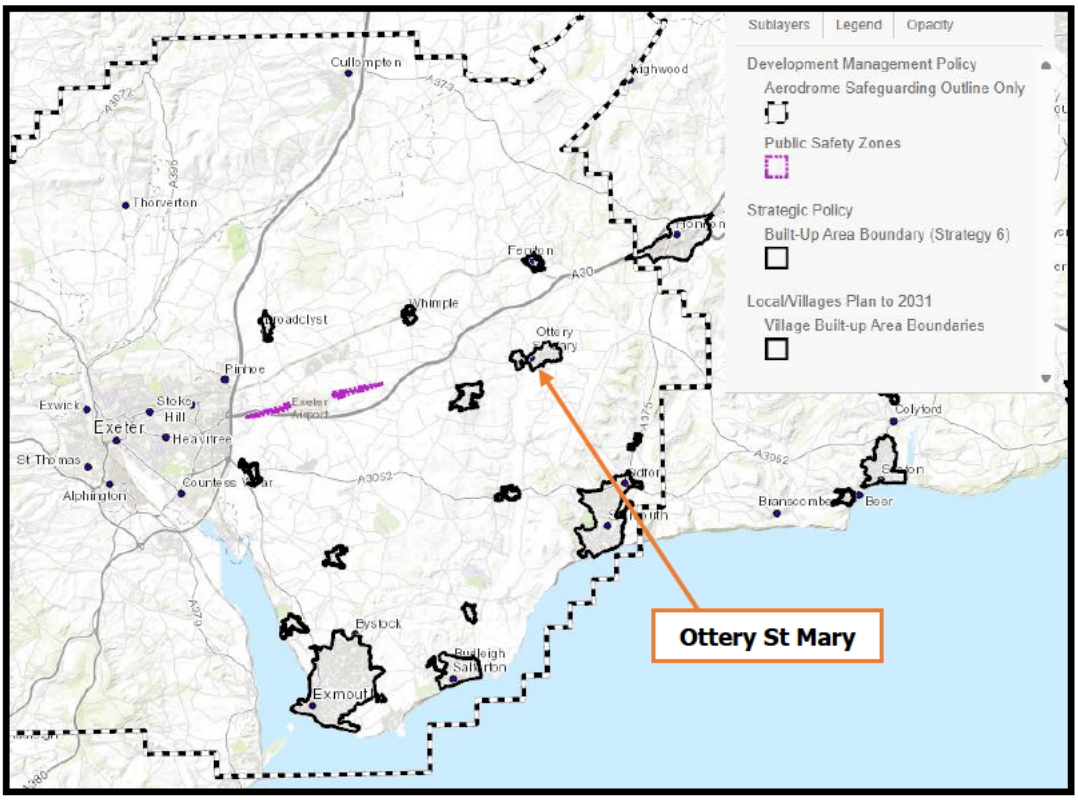
Policy TR05: Aerodrome safeguarded areas and Public Safety Zones

Within aerodrome safeguarded areas and the Public Safety Zones for Exeter Airport, planning permission will not be granted for development that would prejudice the safe operation of protected aerodromes or give rise to public safety concerns. There is a general presumption against new or replacement development or changes of use of existing buildings within Public Safety Zones. In particular, no new or replacement dwellings, mobile homes, caravan sites or other residential buildings will be permitted within a Public Safety Zone. Other forms of development will be acceptable, provided they do not reasonably expect to increase the number of people living, working or congregating in the area. Development that could have an adverse impact on the operation or safety or navigational systems at the Airport will not be permitted unless they provide suitable mitigation to address adverse impacts arising (for example, funding for system upgrades). This policy applies across the whole plan area including the Cranbrook Plan area.

5.1 This policy is justified by the Civil Aviation Authority which is concerned with planning applications that could impact airfield operation and safety following ODPM Circular 1/2003 (developments with high structures, those that may interfere with radio signals, or create bird strike hazards).

5.2 Figure 5.1 below shows a map of the outlined aerodrome safeguarded area in East Devon.

Figure 5.1 – Map of the Aerodrome Safeguarding Outlined Area



Source: Source: EDLP, 2025.

5.3 The Site is within the Aerodrome Safeguarding outline area. However, the development is for residential dwellings and for a commercial development which will not exceed three storeys, nor will it have high structures and it will not likely interfere with radio signals or create bird strike hazards.

6.0 Conclusion

6.1 This Highways and Transport Technical Note appraises a proposed residential development of around 90 dwellings and a commercial development (use E(g)(iii)) of 4,180sqm on the Site at Barrack Farm and demonstrates that the surrounding area can support development on the Site, and that suitable access is available.

6.2 The Site is shown to meet the requirements of the proposed *EDLP Strategic Policy TR01: Prioritising walking, wheeling, cycling, and public transport*, with a range of local services and facilities that are accessible by walking, cycling, and public transport.

6.3 Initial analysis has demonstrated that a new residential access junction and a new commercial access are achievable, providing appropriate visibility and accommodating pedestrian movements and the anticipated vehicle movements. The Site will comply with the proposed *ELDP Strategic Policy TR03: Travel plans, transport statements and transport assessments*.

6.4 Any future planning application at the Site will include the appropriate number of car and cycle parking spaces with accessible charging points in accordance with the adopted policy at that time, thereby complying with the proposed *EDLP Strategic Policy TR04: Parking standards (Residential)*.

6.5 The Site is within the Aerodrome Safeguarding outline area. However, the proposal will be for residential dwellings which will not exceed three storeys, nor will it have high structures and it will therefore not likely interfere with radio signals or create bird strike hazards.

APPENDIX 1 – PROPOSED SITE ACCESS JUNCTIONS

A3

ER ROAD

50.1m

2.4M X 43M VISIBILITY SPLAY

PIXIE WALK

3

53.0m

2.4M X 43M VISIBILITY SPLAY

LEGEND

HIGHWAY BOUNDARY

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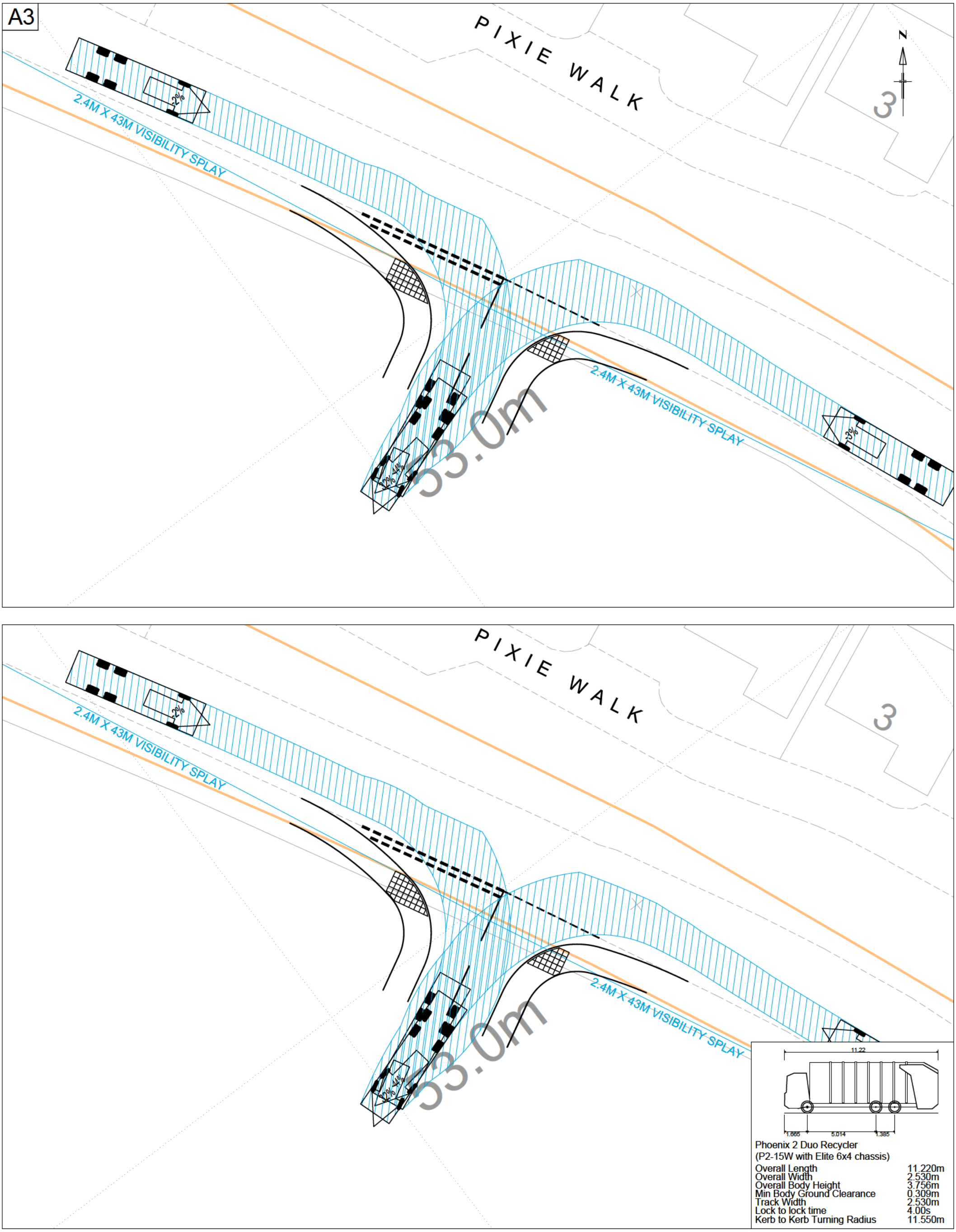
QUALITY MANAGEMENT SYSTEM
ISO 9001 : 2015 FS 594947

client	MR M.J. NANCEKIVELL AND MR R.P. NANCEKIVELL
project	BARRACK FARM OTTERY ST MARY
title	PROPOSED RESIDENTIAL SITE ACCESS
scale	N.T.S
date	MARCH 2025
drawn by	T.A.S
checked by	T.B
drawing number	250573-SK20250318.1
status	PLANNING
rev.	

A3



Phoenix 2 Duo Recycler
(P2-15W with Elite 6x4 chassis)

Overall Length	11.220m
Overall Width	2.530m
Overall Body Height	3.756m
Min Body Ground Clearance	0.309m
Track Width	2.530m
Lock to lock time	4.00s
Kerb to Kerb Turning Radius	11.550m

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bsi. UKAS MANAGEMENT SYSTEMS
QUALITY MANAGEMENT SYSTEM
ISO 9001 : 2015 FS 594947

client
MR M.J. NANCEKIVELL AND MR R.P. NANCEKIVELL

project
BARRACK FARM
OTTERY ST MARY

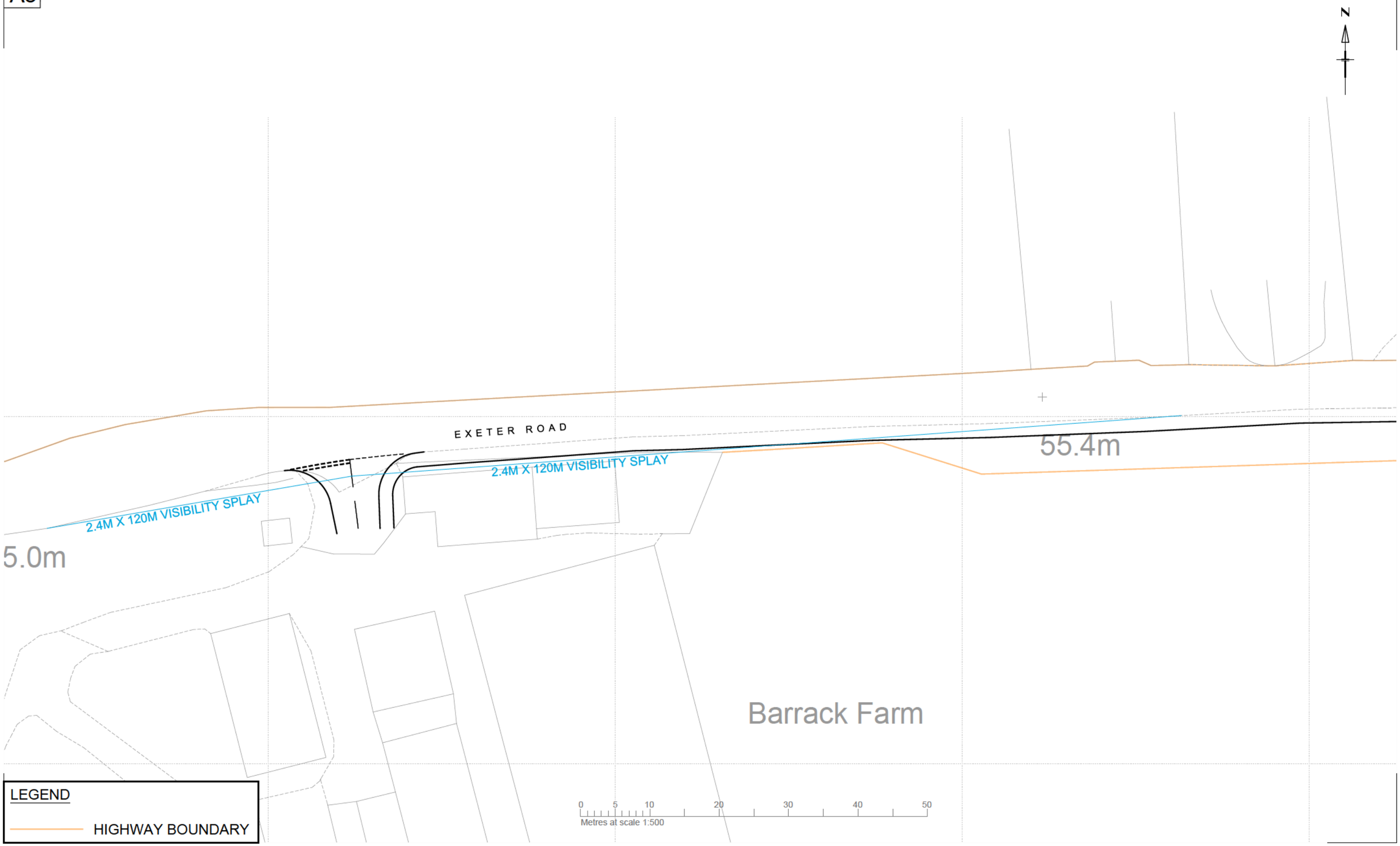
title
PROPOSED RESIDENTIAL SITE ACCESS
SWEPT PATH ANALYSIS
REFUSE VEHICLE

scale	date
N.T.S	MARCH 2025
drawn by	checked by
T.A.S	T.B

drawing number
250573-SK20250318.2

status	rev.
PLANNING	

A3



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QUALITY MANAGEMENT SYSTEM ISO 9001 : 2015 FS 594947

client: MR M.J. NANCEKIVELL AND MR R.P. NANCEKIVELL

project: OTTERY ST MARY
BARRACK FARM

title: PROPOSED COMMERCIAL SITE ACCESS

date	drawn by	checked by
MARCH 2025	T.A.S	T.B

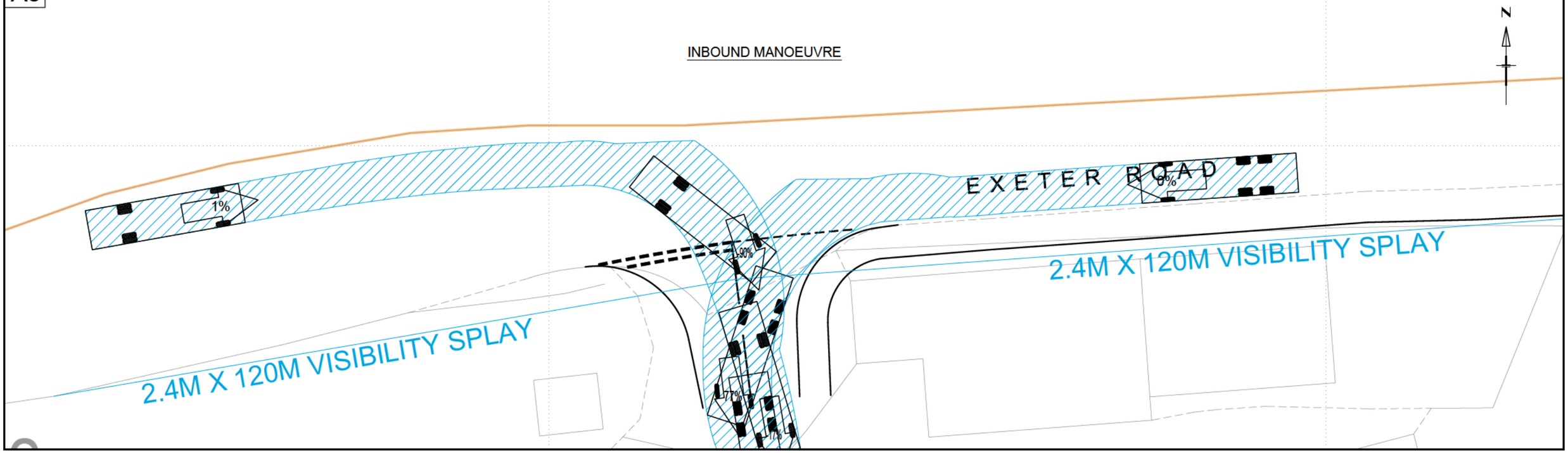
scale	status
1:500	PLANNING

drawing number: 250573-SK20250321.1A

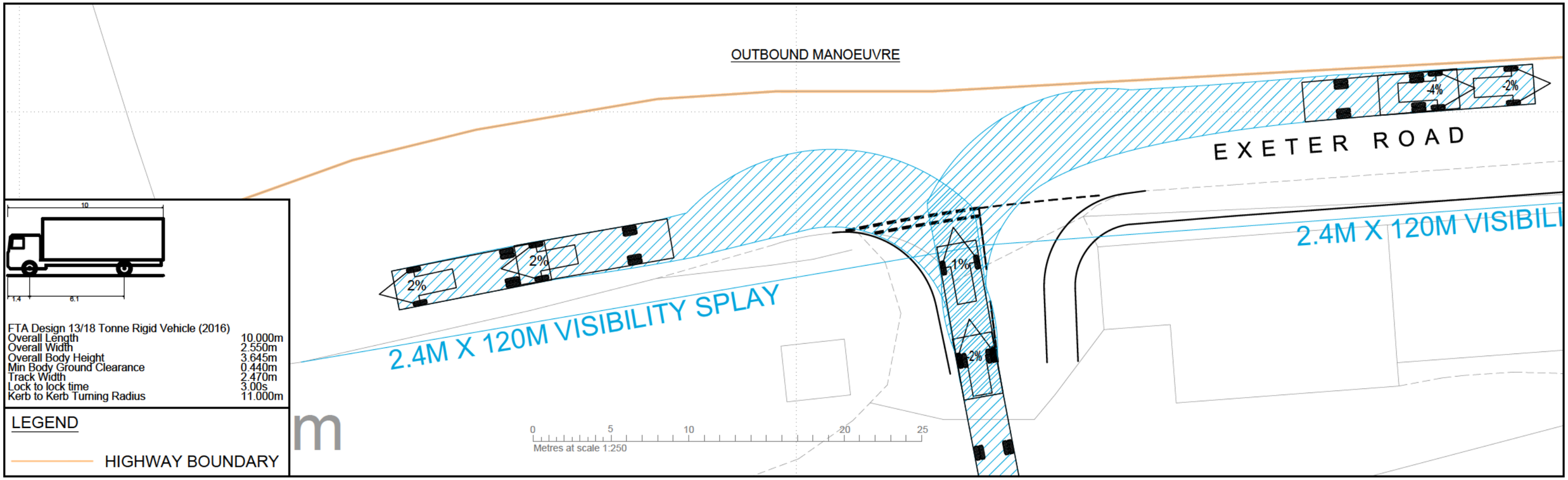
rev.

A3

INBOUND MANOEUVRE



OUTBOUND MANOEUVRE



FTA Design 13/18 Tonne Rigid Vehicle (2016)	
Overall Length	10.000m
Overall Width	2.550m
Overall Body Height	3.645m
Min Body Ground Clearance	0.440m
Track Width	2.470m
Lock to lock time	3.00s
Kerb to Kerb Turning Radius	11.000m

LEGEND

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QUALITY MANAGEMENT SYSTEM
ISO 9001 : 2015 FS 594947

client
MR M.J. NANCEKIVELL AND MR R.P. NANCEKIVELL

project
OTTERY ST MARY
BARRACK FARM

title
SWEPT PATH ANALYSIS
FTA DESIGN 10M RIGID VEHICLE

date	drawn by	checked by
MARCH 2025	F.R	T.B
scale: 1:250	status: PLANNING	
drawing number: 250573-SK20250321.1B		rev.

APPENDIX 2 – TRICS OUPUT REPORTS

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL
Category : A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST		
	ES	EAST SUSSEX	3 days
	HC	HAMPSHIRE	2 days
	KC	KENT	1 days
	SC	SURREY	1 days
	WS	WEST SUSSEX	3 days
03	SOUTH WEST		
	DC	DORSET	1 days
04	EAST ANGLIA		
	CA	CAMBRIDGESHIRE	1 days
	NF	NORFOLK	7 days
05	EAST MIDLANDS		
	LE	LEICESTERSHIRE	1 days
09	NORTH		
	DH	DURHAM	1 days
	IM	ISLE OF MAN	3 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	No of Dwellings
Actual Range:	57 to 143 (units:)
Range Selected by User:	50 to 150 (units:)

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/16 to 18/09/24

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	3 days
Tuesday	8 days
Wednesday	3 days
Thursday	9 days
Friday	1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	21 days
Directional ATC Count	3 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	2
Edge of Town	12
Neighbourhood Centre (PPS6 Local Centre)	10

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone	12
Village	9
Out of Town	1
No Sub Category	2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	9 days - Selected
Servicing vehicles Excluded	60 days - Selected

Secondary Filtering selection:

Use Class:

C3	24 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

1,001 to 5,000	10 days
5,001 to 10,000	11 days
10,001 to 15,000	3 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	9 days
25,001 to 50,000	10 days
50,001 to 75,000	5 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	1 days
1.1 to 1.5	17 days
1.6 to 2.0	6 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

Yes	18 days
No	6 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	24 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 CA-03-A-08 DETACHED & SEMI-DETACHED CAMBRIDGESHIRE
GIDDING ROAD
SAWTRY

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 83
Survey date: THURSDAY *13/10/22* *Survey Type: MANUAL*

2 DC-03-A-11 MIXED HOUSES DORSET
A350
SHAFTESBURY

Edge of Town
No Sub Category
Total No of Dwellings: 141
Survey date: TUESDAY *31/10/23* *Survey Type: MANUAL*

3 DH-03-A-02 MIXED HOUSES DURHAM
LEAZES LANE
BISHOP AUCKLAND
ST HELEN AUCKLAND
Neighbourhood Centre (PPS6 Local Centre)
Residential Zone
Total No of Dwellings: 125
Survey date: MONDAY *27/03/17* *Survey Type: MANUAL*

4 ES-03-A-07 MIXED HOUSES & FLATS EAST SUSSEX
NEW ROAD
HAILSHAM
HELLINGLY
Edge of Town
Residential Zone
Total No of Dwellings: 91
Survey date: THURSDAY *07/11/19* *Survey Type: MANUAL*

5 ES-03-A-11 MIXED HOUSES EAST SUSSEX
BISHOPS LANE
RINGMER

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 105
Survey date: THURSDAY *28/09/23* *Survey Type: MANUAL*

6 ES-03-A-12 MIXED HOUSES & FLATS EAST SUSSEX
HOREBEECH LANE
HORAM

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 123
Survey date: TUESDAY *03/10/23* *Survey Type: MANUAL*

7 HC-03-A-23 HOUSES & FLATS HAMPSHIRE
CANADA WAY
LIPHOOK

Suburban Area (PPS6 Out of Centre)
Residential Zone
Total No of Dwellings: 62
Survey date: TUESDAY *19/11/19* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

8 HC-03-A-27 MIXED HOUSES HAMPSHIRE
DAIRY ROAD
ANDOVER

Edge of Town
Residential Zone
Total No of Dwellings: 73
Survey date: TUESDAY *16/11/21* *Survey Type: MANUAL*

9 IM-03-A-03 MIXED HOUSES ISLE OF MAN
MAIN ROAD
COLBY

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 111
Survey date: TUESDAY *21/05/24* *Survey Type: MANUAL*

10 IM-03-A-04 MIXED HOUSES ISLE OF MAN
NEW CASTLETOWN ROAD
DOUGLAS

Suburban Area (PPS6 Out of Centre)
Residential Zone
Total No of Dwellings: 73
Survey date: MONDAY *20/05/24* *Survey Type: MANUAL*

11 IM-03-A-06 MIXED HOUSES ISLE OF MAN
MOORAGH PROMENADE
RAMSEY

Edge of Town
Residential Zone
Total No of Dwellings: 129
Survey date: THURSDAY *23/05/24* *Survey Type: MANUAL*

12 KC-03-A-10 MIXED HOUSES KENT
HEADCORN ROAD
STAPLEHURST

Edge of Town
Residential Zone
Total No of Dwellings: 106
Survey date: TUESDAY *09/05/23* *Survey Type: MANUAL*

13 LE-03-A-02 DETACHED & OTHERS LEICESTERSHIRE
MELBOURNE ROAD
IBSTOCK

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 85
Survey date: THURSDAY *28/06/18* *Survey Type: MANUAL*

14 NF-03-A-24 MIXED HOUSES & FLATS NORFOLK
HUNSTANTON ROAD
HUNSTANTON

Edge of Town
Residential Zone
Total No of Dwellings: 127
Survey date: WEDNESDAY *22/09/21* *Survey Type: DIRECTIONAL ATC COUNT*

15 NF-03-A-26 MIXED HOUSES NORFOLK
HEATH DRIVE
HOLT

Edge of Town
Residential Zone
Total No of Dwellings: 91
Survey date: WEDNESDAY *22/09/21* *Survey Type: DIRECTIONAL ATC COUNT*

LIST OF SITES relevant to selection parameters (Cont.)

16 NF-03-A-27 MIXED HOUSES & FLATS NORFOLK
YARMOUTH ROAD
NEAR NORWICH
BLOFIELD
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 93
Survey date: THURSDAY *16/09/21* *Survey Type: MANUAL*

17 NF-03-A-33 MIXED HOUSES NORFOLK
LONDON ROAD
ATTLEBOROUGH

Edge of Town
Residential Zone
Total No of Dwellings: 143
Survey date: THURSDAY *29/09/22* *Survey Type: MANUAL*

18 NF-03-A-34 MIXED HOUSES NORFOLK
NORWICH ROAD
SWAFFHAM

Edge of Town
Out of Town
Total No of Dwellings: 80
Survey date: TUESDAY *27/09/22* *Survey Type: MANUAL*

19 NF-03-A-36 MIXED HOUSES NORFOLK
LONDON ROAD
WYMONDHAM

Edge of Town
No Sub Category
Total No of Dwellings: 75
Survey date: THURSDAY *29/09/22* *Survey Type: MANUAL*

20 NF-03-A-49 MIXED HOUSES NORFOLK
BRANDON ROAD
SWAFFHAM

Edge of Town
Residential Zone
Total No of Dwellings: 141
Survey date: FRIDAY *14/09/18* *Survey Type: DIRECTIONAL ATC COUNT*

21 SC-03-A-09 MIXED HOUSES & FLATS SURREY
AMLETS LANE
CRANLEIGH

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 136
Survey date: TUESDAY *24/05/22* *Survey Type: MANUAL*

22 WS-03-A-07 BUNGALOWS WEST SUSSEX
EMMS LANE
NEAR HORSHAM
BROOKS GREEN
Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 57
Survey date: THURSDAY *19/10/17* *Survey Type: MANUAL*

23 WS-03-A-16 DETACHED & SEMI-DETACHED WEST SUSSEX
BRACKLESHAM LANE
BRACKLESHAM BAY

Neighbourhood Centre (PPS6 Local Centre)
Village
Total No of Dwellings: 58
Survey date: WEDNESDAY *09/11/22* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

24 WS-03-A-19 MIXED HOUSES & FLATS WEST SUSSEX
TURNERS HILL ROAD
EAST GRINSTEAD

Edge of Town
Residential Zone
Total No of Dwellings: 92
Survey date: MONDAY *15/05/23* *Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 03 - RESIDENTIAL/A - HOUSES PRIVATELY OWNED
TOTAL VEHICLES
Calculation factor: 1 DWELLS
BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES			TOTALS		
Time Range	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate	No. Days	Ave. DWELLS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	24	100	0.081	24	100	0.279	24	100	0.360
08:00 - 09:00	24	100	0.140	24	100	0.351	24	100	0.491
09:00 - 10:00	24	100	0.134	24	100	0.167	24	100	0.301
10:00 - 11:00	24	100	0.120	24	100	0.157	24	100	0.277
11:00 - 12:00	24	100	0.133	24	100	0.152	24	100	0.285
12:00 - 13:00	24	100	0.151	24	100	0.152	24	100	0.303
13:00 - 14:00	24	100	0.164	24	100	0.153	24	100	0.317
14:00 - 15:00	24	100	0.157	24	100	0.166	24	100	0.323
15:00 - 16:00	24	100	0.252	24	100	0.173	24	100	0.425
16:00 - 17:00	24	100	0.256	24	100	0.165	24	100	0.421
17:00 - 18:00	24	100	0.326	24	100	0.153	24	100	0.479
18:00 - 19:00	24	100	0.252	24	100	0.131	24	100	0.383
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.166			2.199			4.365

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	57 - 143 (units:)
Survey date date range:	01/01/16 - 18/09/24
Number of weekdays (Monday-Friday):	24
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	6
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

Connect Consultants 78 Broad Street Chipping Sodbury Licence No: 142301

Calculation Reference: AUDIT-142301-250325-0329

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 02 - EMPLOYMENT
Category : D - INDUSTRIAL ESTATE
TOTAL VEHICLES

Selected regions and areas:

02	SOUTH EAST		
	BU	BUCKINGHAMSHIRE	1 days
	EX	ESSEX	2 days
03	SOUTH WEST		
	DV	DEVON	1 days
	SD	SWINDON	1 days
05	EAST MIDLANDS		
	DY	DERBY	1 days
	LN	LINCOLNSHIRE	3 days
06	WEST MIDLANDS		
	WM	WEST MIDLANDS	1 days
	WO	WORCESTERSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE		
	AK	WAKEFIELD	3 days
	DR	DONCASTER	1 days
	NY	NORTH YORKSHIRE	1 days
08	NORTH WEST		
	GM	GREATER MANCHESTER	1 days
	LC	LANCASHIRE	3 days
09	NORTH		
	TW	TYNE & WEAR	2 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter:	Gross floor area
Actual Range:	1138 to 10000 (units: sqm)
Range Selected by User:	708 to 10000 (units: sqm)

Parking Spaces Range: All Surveys Included

Public Transport Provision:
Selection by: Include all surveys

Date Range: 01/01/16 to 30/04/24

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Monday	6 days
Tuesday	7 days
Wednesday	1 days
Thursday	2 days
Friday	6 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count	22 days
Directional ATC Count	0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

Selected Locations:

Suburban Area (PPS6 Out of Centre)	6
Edge of Town	15
Neighbourhood Centre (PPS6 Local Centre)	1

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Industrial Zone	12
Development Zone	2
Residential Zone	5
No Sub Category	3

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included	8 days - Selected
Servicing vehicles Excluded	15 days - Selected

Secondary Filtering selection:

Use Class:
Not Known 22 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Filter by Site Operations Breakdown:
All Surveys Included

Population within 500m Range:
All Surveys Included

Secondary Filtering selection (Cont.):

Population within 1 mile:

1,001 to 5,000	1 days
5,001 to 10,000	4 days
10,001 to 15,000	6 days
15,001 to 20,000	5 days
20,001 to 25,000	1 days
25,001 to 50,000	4 days
50,001 to 100,000	1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Population within 5 miles:

5,001 to 25,000	3 days
100,001 to 125,000	1 days
125,001 to 250,000	14 days
250,001 to 500,000	4 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

0.6 to 1.0	12 days
1.1 to 1.5	9 days
1.6 to 2.0	1 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No	22 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present	22 days

This data displays the number of selected surveys with PTAL Ratings.

LIST OF SITES relevant to selection parameters

1 AK-02-D-01 INDUSTRIAL ESTATE WAKEFIELD
CARR WOOD ROAD
CASTLEFORD

Edge of Town
Development Zone
Total Gross floor area: 1776 sqm
Survey date: MONDAY *22/05/17* *Survey Type: MANUAL*

2 AK-02-D-02 INDUSTRIAL ESTATE (PART) WAKEFIELD
PIONEER WAY
CASTLEFORD

Edge of Town
Industrial Zone
Total Gross floor area: 4328 sqm
Survey date: TUESDAY *23/05/17* *Survey Type: MANUAL*

3 AK-02-D-03 INDUSTRIAL ESTATE WAKEFIELD
THUNDERHEAD RIDGE RD
CASTLEFORD
GLASSHOUGHTON
Edge of Town
No Sub Category
Total Gross floor area: 3191 sqm
Survey date: MONDAY *15/05/17* *Survey Type: MANUAL*

4 BU-02-D-01 INDUSTRIAL ESTATE BUCKINGHAMSHIRE
BEECH ROAD
HIGH WYCOMBE

Edge of Town
Residential Zone
Total Gross floor area: 6460 sqm
Survey date: MONDAY *06/11/23* *Survey Type: MANUAL*

5 DR-02-D-03 INDUSTRIAL ESTATE DONCASTER
MIDDLE BANK
DONCASTER

Suburban Area (PPS6 Out of Centre)
Industrial Zone
Total Gross floor area: 6737 sqm
Survey date: TUESDAY *21/09/21* *Survey Type: MANUAL*

6 DV-02-D-07 INDUSTRIAL ESTATE DEVON
BITTERN ROAD
EXETER
SOWTON IND. ESTATE
Edge of Town
Industrial Zone
Total Gross floor area: 3600 sqm
Survey date: MONDAY *03/07/17* *Survey Type: MANUAL*

7 DY-02-D-02 INDUSTRIAL ESTATE DERBY
SHAFTESBURY STREET
DERBY
ROSE HILL
Suburban Area (PPS6 Out of Centre)
No Sub Category
Total Gross floor area: 8400 sqm
Survey date: FRIDAY *06/10/23* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

8 EX-02-D-03 INDUSTRIAL ESTATE ESSEX
WYNCOLLS ROAD
COLCHESTER
SEVERALLS INDUSTRIAL PK
Edge of Town
Industrial Zone
Total Gross floor area: 4876 sqm
Survey date: FRIDAY *18/05/18* *Survey Type: MANUAL*

9 EX-02-D-05 INDUSTRIAL ESTATE ESSEX
HECKWORTH CLOSE
COLCHESTER
SEVERALLS INDUSTRIAL PK
Edge of Town
Industrial Zone
Total Gross floor area: 7280 sqm
Survey date: FRIDAY *18/05/18* *Survey Type: MANUAL*

10 GM-02-D-08 INDUSTRIAL ESTATE GREATER MANCHESTER
WINSTANLEY ROAD
NEAR WIGAN
ORRELL
Neighbourhood Centre (PPS6 Local Centre)
Residential Zone
Total Gross floor area: 7000 sqm
Survey date: FRIDAY *29/04/22* *Survey Type: MANUAL*

11 LC-02-D-06 INDUSTRIAL ESTATE LANCASHIRE
SMALLSHAW LANE
BURNLEY

Suburban Area (PPS6 Out of Centre)
Industrial Zone
Total Gross floor area: 7383 sqm
Survey date: THURSDAY *29/09/16* *Survey Type: MANUAL*

12 LC-02-D-07 INDUSTRIAL ESTATE LANCASHIRE
CHAIN CAUL WAY
PRESTON
ASHTON-ON-RIBBLE
Edge of Town
Industrial Zone
Total Gross floor area: 4700 sqm
Survey date: FRIDAY *17/11/17* *Survey Type: MANUAL*

13 LC-02-D-08 INDUSTRIAL ESTATE LANCASHIRE
NOOK LANE
BAMBER BRIDGE

Edge of Town
Industrial Zone
Total Gross floor area: 4000 sqm
Survey date: TUESDAY *06/11/18* *Survey Type: MANUAL*

14 LN-02-D-04 INDUSTRIAL ESTATE LINCOLNSHIRE
TATTERSHALL WAY
LOUTH

Edge of Town
Industrial Zone
Total Gross floor area: 1506 sqm
Survey date: MONDAY *22/04/24* *Survey Type: MANUAL*

15 LN-02-D-05 INDUSTRIAL ESTATE LINCOLNSHIRE
BELVOIR WAY
LOUTH

Edge of Town
Industrial Zone
Total Gross floor area: 2176 sqm
Survey date: THURSDAY *18/04/24* *Survey Type: MANUAL*

LIST OF SITES relevant to selection parameters (Cont.)

16 LN-02-D-06 INDUSTRIAL ESTATE LINCOLNSHIRE
RICHMOND ROAD
LOUTH

Edge of Town
Industrial Zone
Total Gross floor area: 1470 sqm
Survey date: TUESDAY *30/04/24* *Survey Type: MANUAL*

17 NY-02-D-04 INDUSTRIAL ESTATE NORTH YORKSHIRE
GRIMBALD CRAG CLOSE
KNARESBOROUGH

Edge of Town
Industrial Zone
Total Gross floor area: 1660 sqm
Survey date: FRIDAY *30/06/23* *Survey Type: MANUAL*

18 SD-02-D-01 INDUSTRIAL ESTATE SWINDON
HEADLANDS GROVE
SWINDON

Suburban Area (PPS6 Out of Centre)
Residential Zone
Total Gross floor area: 10000 sqm
Survey date: TUESDAY *20/09/16* *Survey Type: MANUAL*

19 TW-02-D-08 INDUSTRIAL ESTATE TYNE & WEAR
NORTH HYLTON ROAD
SUNDERLAND
SOUTHWICK
Suburban Area (PPS6 Out of Centre)
Development Zone
Total Gross floor area: 8310 sqm
Survey date: TUESDAY *04/04/17* *Survey Type: MANUAL*

20 TW-02-D-09 INDUSTRIAL ESTATE TYNE & WEAR
ELEVENTH AVENUE
GATESHEAD
TEAM VALLEY
Edge of Town
No Sub Category
Total Gross floor area: 6200 sqm
Survey date: WEDNESDAY *18/05/22* *Survey Type: MANUAL*

21 WM-02-D-03 INDUSTRIAL ESTATE WEST MIDLANDS
JUNCTION ROAD
STOURBRIDGE
AUDNAM
Suburban Area (PPS6 Out of Centre)
Residential Zone
Total Gross floor area: 1138 sqm
Survey date: TUESDAY *28/11/17* *Survey Type: MANUAL*

22 WO-02-D-02 INDUSTRIAL ESTATE WORCESTERSHIRE
WEIR LANE
WORCESTER

Edge of Town
Residential Zone
Total Gross floor area: 9500 sqm
Survey date: MONDAY *14/11/16* *Survey Type: MANUAL*

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

MANUALLY DESELECTED SITES

Site Ref	Reason for Deselection
SF-02-D-03	Covid

TRIP RATE for Land Use 02 - EMPLOYMENT/D - INDUSTRIAL ESTATE
TOTAL VEHICLES
Calculation factor: 100 sqm
BOLD print indicates peak (busiest) period

	ARRIVALS			DEPARTURES			TOTALS		
Time Range	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate	No. Days	Ave. GFA	Trip Rate
00:00 - 00:30									
00:30 - 01:00									
01:00 - 01:30									
01:30 - 02:00									
02:00 - 02:30									
02:30 - 03:00									
03:00 - 03:30									
03:30 - 04:00									
04:00 - 04:30									
04:30 - 05:00									
05:00 - 05:30	8	4326	0.049	8	4326	0.003	8	4326	0.052
05:30 - 06:00	8	4326	0.081	8	4326	0.012	8	4326	0.093
06:00 - 06:30	8	4326	0.066	8	4326	0.043	8	4326	0.109
06:30 - 07:00	8	4326	0.069	8	4326	0.029	8	4326	0.098
07:00 - 07:30	22	5077	0.152	22	5077	0.056	22	5077	0.208
07:30 - 08:00	22	5077	0.233	22	5077	0.083	22	5077	0.316
08:00 - 08:30	22	5077	0.317	22	5077	0.147	22	5077	0.464
08:30 - 09:00	22	5077	0.312	22	5077	0.161	22	5077	0.473
09:00 - 09:30	22	5077	0.279	22	5077	0.213	22	5077	0.492
09:30 - 10:00	22	5077	0.235	22	5077	0.193	22	5077	0.428
10:00 - 10:30	22	5077	0.208	22	5077	0.188	22	5077	0.396
10:30 - 11:00	22	5077	0.232	22	5077	0.195	22	5077	0.427
11:00 - 11:30	22	5077	0.221	22	5077	0.227	22	5077	0.448
11:30 - 12:00	22	5077	0.230	22	5077	0.244	22	5077	0.474
12:00 - 12:30	22	5077	0.219	22	5077	0.248	22	5077	0.467
12:30 - 13:00	22	5077	0.245	22	5077	0.264	22	5077	0.509
13:00 - 13:30	22	5077	0.230	22	5077	0.244	22	5077	0.474
13:30 - 14:00	22	5077	0.243	22	5077	0.252	22	5077	0.495
14:00 - 14:30	22	5077	0.201	22	5077	0.228	22	5077	0.429
14:30 - 15:00	22	5077	0.192	22	5077	0.225	22	5077	0.417
15:00 - 15:30	22	5077	0.175	22	5077	0.203	22	5077	0.378
15:30 - 16:00	22	5077	0.192	22	5077	0.201	22	5077	0.393
16:00 - 16:30	22	5077	0.181	22	5077	0.239	22	5077	0.420
16:30 - 17:00	22	5077	0.135	22	5077	0.288	22	5077	0.423
17:00 - 17:30	22	5077	0.116	22	5077	0.314	22	5077	0.430
17:30 - 18:00	22	5077	0.069	22	5077	0.152	22	5077	0.221
18:00 - 18:30	22	5077	0.033	22	5077	0.098	22	5077	0.131
18:30 - 19:00	22	5077	0.025	22	5077	0.064	22	5077	0.089
19:00 - 19:30	8	4326	0.014	8	4326	0.101	8	4326	0.115
19:30 - 20:00	8	4326	0.014	8	4326	0.078	8	4326	0.092
20:00 - 20:30	8	4326	0.003	8	4326	0.055	8	4326	0.058
20:30 - 21:00	8	4326	0.006	8	4326	0.038	8	4326	0.044
21:00 - 21:30									
21:30 - 22:00									
22:00 - 22:30									
22:30 - 23:00									
23:00 - 23:30									
23:30 - 24:00									
Total Rates:			4.977			5.086			10.063

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

*To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP*FACT. Trip rates are then rounded to 3 decimal places.*

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Parameter summary

Trip rate parameter range selected:	1138 - 10000 (units: sqm)
Survey date date range:	01/01/16 - 30/04/24
Number of weekdays (Monday-Friday):	22
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	1

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

LICHFIELDS

Annex 3: Technical Note on Flooding, Water Efficiency and Green & Blue Infrastructure

Technical Note

Project:	Land at Barrack Farm, Ottery st Mary		
Subject:	Technical Note – Flooding, Water Efficiency, Green & Blue Infrastructure		
Prepared by:	Dave Bathurst – Regional Director	**Date:**	26/03/25
Authorised by:	Dave Bathurst - Regional Director	**Status:**	S2 - Information
Document Ref:	25254-RLL-25-XX-TN-C-0001	**Revision:**	P01

1 Introduction

1.1 Document Purpose

The purpose of this document is to explain the approach to flood mitigation, and to demonstrate that the site is deliverable.

1.2 Flooding Context

Figure 1 shows an extract from Environment Agency flood mapping. It demonstrates that the site is entirely within Flood Zone 1.

According to the UK Government Check Your Long Term Flood Risk service, there no areas of the site at risk from a yearly chance of flooding from surface water.

Table 1 summarises the flood risk associated with the following site address according to the Long Term Flood Risk service:

Exeter Road, Ottery St Mary, EX11 1RB:

Type of Flooding	**Risk**
Surface water:	
Yearly chance of flooding	Very low
Yearly chance of flooding between 2040 and 2060	Very low
Rivers and the sea:	
Yearly chance of flooding	Very low
Yearly chance of flooding between 2036 and 2069	Very low
Groundwater	Unlikely
Reservoirs	Unlikely

Table 1 – Summary of Flood Risks

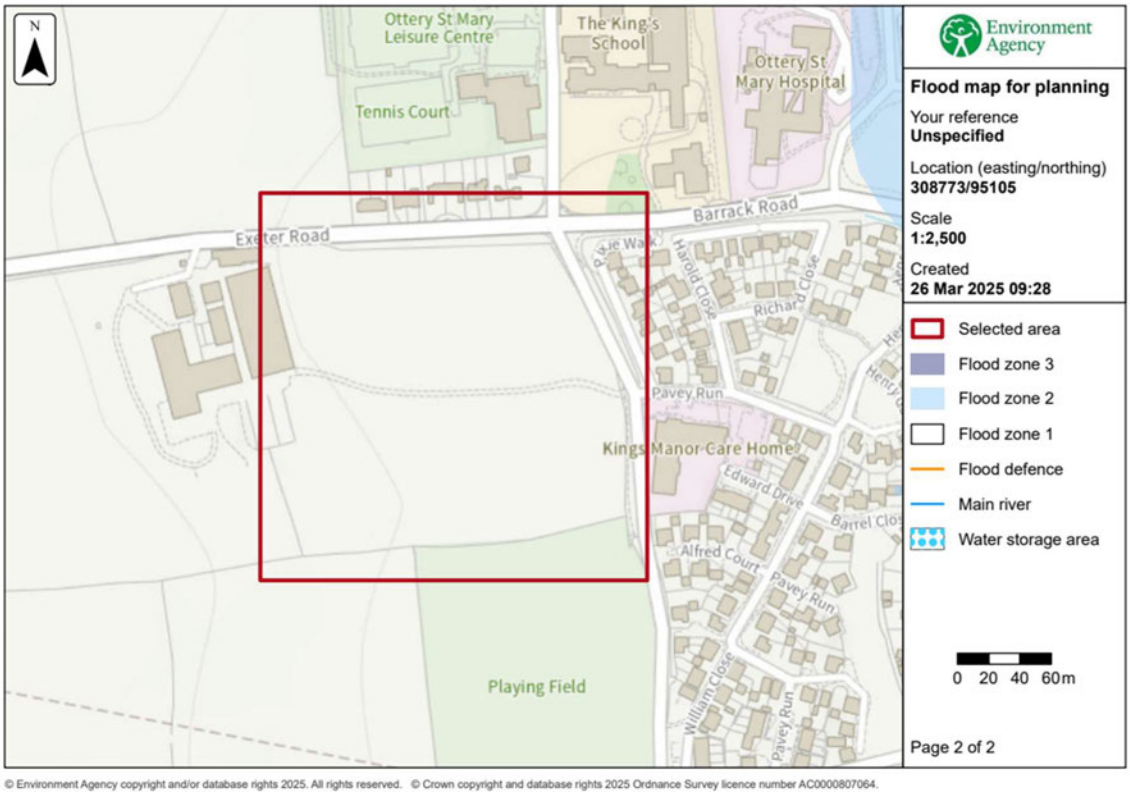

Figure 1 – Extract from EA Flood Map

2 Flooding

2.1 Strategic Policy AR01

The East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft from February 2025 includes Strategic Policy AR01 on flooding.

The policy is aimed at minimising the impact and likely effects of climate change through the delivery of developments which are resistant and resilient to future floods.

2.2 Approach to Flood Mitigation

As described above, the site is entirely within Flood Zone 1 and is at very low risk of flooding, therefore no flood mitigation measures are required.

A Flood Risk Assessment to support a planning application, which is required because the site area is greater than 1 hectare, is expected to confirm that the site is not at risk from flooding, including access and egress, and will be safe for its lifetime.

2.3 Surface Water Drainage

To resist the impacts of surface water flooding and to avoid exacerbating flood risk elsewhere, a comprehensive drainage network will be introduced to manage run-off from new development.

Sustainable drainage systems (SuDS) will be utilised to control the quantity of water that will discharge from the development to the nearest surface water sewer or to ground if a ground investigation confirms that infiltration rates are suitable. It is anticipated that open water systems such as ponds and swales will be utilised for this purpose in conjunction with a flow control device that will restrict flows to match natural 'greenfield' run-off rates.

SuDS techniques will also be utilised to address the need to uphold water quality and support biodiversity, and the integration of these techniques within a wider green and blue infrastructure strategy will add amenity value.

Source control techniques such as permeable block paved driveways and rain gardens will also reduce pollution risks and contribute to the conservation and enhancement of biodiversity and green infrastructure.

3 Water Efficiency

3.1 Strategic Policy AR02

The East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft from February 2025 includes Strategic Policy AR02 on water efficiency.

The policy is aimed at minimising the impact on the water environment by setting the standard for water efficiency at 110 litres per day per person in accordance with Building Regulation G2.

3.2 Approach to Water Efficiency

110 litres per day per person is the Optional Technical Housing Standard described in the Building Regulations to encourage greater water efficiency. This can be addressed at the detailed design stage and can be achieved through the installation of reduces water fittings (table 2) as needed.

Water Fitting	Maximum consumption
WC	4/2.6 litres dual flush
Shower	8 litres per minute

Bath	170 litres
Basin taps	5 litres per minute
Sink taps	1.25 litres per place setting
Washing machine	8.17 l/kilogram

Table 2 - Water Fittings to achieve 110 litres per person per day standard

In addition to water efficient fittings within each home, water butts attached to roof water systems will be considered as a means of recycling rainwater for garden irrigation purposes.

4 Green and Blue Infrastructure

4.1 Policy DS04

The East Devon Local Plan 2020 to 2042 Regulation 19 Publication Draft from February 2025 includes Policy DS04 on Green and Blue Infrastructure.

The policy is aimed at delivering high quality multi-functional Green and Blue Infrastructure in accordance with Natural England's Green Infrastructure Framework.

4.2 Approach to Incorporation of SuDS

As part of a wider strategy for green and blue infrastructure, sustainable drainage systems will be introduced that capture surface water run-off and store it in a way that helps to enhance the ecological status of the site and adjoining water systems.

Open water systems such as swales and ponds will be utilised for conveyance and storage of surface water. Planting can be introduced to these features to help with pollution control and support biodiversity.

So that development benefits from the presence of water as well as high quality landscaping, SuDS features will be multi-functional. They will deliver effective drainage but will have an inherent amenity value. By incorporating a network of footpaths and trails, some of which run alongside SuDS features, they can be put to a recreational use for walking and cycling. SuDS features will also help to enhance the visual character of the development.

Annex 4: Ecology Appraisal

Bennu Environmental Limited

Mr M.J. Nancekivell and
Mr R.P. Nancekivell

LAND AT BARRACK FARM
OTTERY ST MARY
EAST DEVON

ECOLOGY APPRAISAL

REGULATION 19 PACKAGE

March 2025
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APPENDICES

APPENDIX 1 Information downloaded from MAGIC regarding statutory designated sites

1. INTRODUCTION

1.1 Bennu Environmental Limited was commissioned by Mr M.J. Nancekivell and Mr R.P. Nancekivell in February 2025, to produce an ecological appraisal in respect of land at Barrack Farm, East Devon (the "Site"). The report is to be submitted as part of a Regulation 19 package of information, promoting the site for residential development as part of the emerging local development plan.

1.2 This report describes the ecological baseline associated with the Site and its immediate surrounds. It describes the likely impacts of the development proposals, with reference to the illustrative masterplan and it also describes the detailed survey work which will support any forthcoming planning application together with confirming how the proposals can integrate appropriate and proportionate ecological mitigation and enhancement measures.

2. SUMMARY ECOLOGICAL BASELINE

Designated sites

2.1 The Site does not form part of any site designated for its nature conservation value, nor does any such designated site exist in the immediate vicinity of the Site.

2.2 The closest Habitats Sites are the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA) which are contiguous at their closest point to the Site. These sites are located approximately 3.6km southwest of the Site and are underpinned by the East Devon Pebblebed Heaths SSSI. For clarity, the Site is located within the Zone of Influence for the Pebblebed Heath Habitats Site. In addition, the Pebblebed Heaths are further designated as the Pebblebed Heaths National Nature Reserve NNR. The locations of these designated sites are shown at Appendix 1.

2.3 The next nearest designated sites are Ladram Bay to Sidmouth SSSI, Sidmouth to Beer Coast SSSI, Sidmouth to West Bay SAC, Otter Estuary SSSI and Budleigh Salterton Cliffs SSSI. All of these designated sites are in excess of 8.5km from the Site.

2.4 There is no Ancient Woodland located within or adjacent to the Site. The closest such woodland is located approximately 400m northwest of the Site. Some areas of woodland in the local area (none of which are located adjacent to the site) are classified as being UK Priority Habitat – Deciduous Woodland. The closest such woodland is located approximately 300m northwest of the Site. The River Otter and its riparian corridor with includes a matrix of woodland and grassland is located approximately 800m to the east. Parts of this corridor comprise the UK Priority Habitats – Deciduous Woodland and Coastal and Floodplain Grazing Marsh.

2.5 In relation to non-statutory designated sites, there are no such designated sites located within, or adjacent to the Site. Several County Wildlife Sites (CWSs) are located in the wider area.

Habitats

2.6 Broadly, the Site comprises grassland under agricultural management (pasture), hedgerows, trees and ruderal vegetation.

2.7 The Site is dominated by improved (modified) grassland which has limited ecological value. The hedgerows and trees are of greatest ecological value in the context of the Site.

2.8 To the east of the Site (800m) lies the River Otter and its riparian corridor which is dominated by a mix of woodland, scrub and grassland. The river and associated riparian corridor would be unaffected by the proposals.

Faunal Species

2.9 From a desk study review, which included reference to European Protected Species License returns, the following protected species are known from the local area:

- Common pipistrelle bat *Pipistrellus pipistrellus*,
- Lesser Horseshoe bat *Rhinolophus hipposideros*,
- Serotine bat Eptesicus serotinus;
- Soprano pipistrelle bat Pipistrellus pygmaeus
- Brown Long-eared Bat *Plecotus auritus;*
- Daubenton's Bat *Myotis daubentoniid;*
- Nathusius's Pipistrelle bat *Pipistrellus nathusii*
- Noctule bat *Nyctalus noctula*
- Badger *Meles meles*;
- Otter *Lutra lutra*;
- Dormouse *Muscardinus avellanarius;*
- Great Crested Newts *Triturus cristatus;*
- Common reptile species,
- Western European Hedgehog *Erinaceus europaeus*
- A range of bird species, including Barn Owl *Tyto alba*, Kingfisher *Alcedo atthis* and others of conservation concern (e.g. Red list); and
- A range of notable invertebrates.

2.10 It is also noted that the River Otter supports populations of Eurasian Beavers. It is understood that the origins of the initial individuals present are unknown, but since breeding was recorded several years ago, the populations are now part of a monitored reintroduction programme. The River Otter would be unaffected by the proposals.

2.11 It is expected that the Site will be of some value to local bat populations as a foraging resource although roosting opportunities are limited, with more mature boundary trees potentially offering such opportunities.

2.12 The Site offers foraging and sett building opportunities for Badgers, nesting and foraging opportunities for a range of bird species and opportunities for common reptiles, Hedgehog.

2.13 The hedgerows within the Site may offer opportunities for Dormouse.

2.14 Given the habitats present it is unlikely that the Site will be of significant value to invertebrate species of conservation concern.

3. SUMMARY EVALUATION

3.1 The proposed development would seek to retain and enhance habitats of higher ecological value wherever possible. Losses to (e.g. modified) grassland would be mitigated through enhancements to retained grassland.

3.2 The draft Framework plan shows how habitat can be retained and enhanced in order to deliver any required mitigation and also form part of an overall enhancement package.

3.3 Grassland and new tree / shrub planting will be of value to a range of protected species known from the local area, including bat species and potentially Dormice.

3.4 Whilst it will be necessary for any planning application to be supported by a range of detailed ecological surveys and assessments, it is clear that the area available for ecological mitigation and enhancement, means that appropriate and proportionate ecological mitigation measures for faunal species can be effectively delivered within the Site.

3.5 Further, BNG requirements, as defined through statute and planning policy will be fully met by development proposals associated with the Site.

3.6 The site falls within the zone of influence relating to increased recreational pressure on the Pebblebed Heaths Habitats Site. There is an adopted strategic mitigation solution associated with such impacts, which involve financial contributions towards visitor access and management, together with habitat management initiatives. Any relevant obligations in this regard would be met in respect of the development proposals. In addition, it is noted that emerging guidance is focussed upon vehicle emission impacts on the Pebblebed Heaths Habitats Sites. This is a matter which would be fully addressed within any planning application.

3.7 No other potential impacts on designated sites have been identified.

3.8 The Site is not affected by any habitat designations and has limited ecological value. It does however, provide suitable habitat for a range of species including protected species. Habitats of higher ecological value are trees and hedges. The proposed Framework Plan shows that appropriate mitigation can be designed into the development. The detail regarding mitigation and enhancements, can be addressed at the planning application stage. Consequently, from an ecological perspective, there are no issues that would preclude housing development on the site.

4. POLICY CONSIDERATIONS

4.1 Specific consideration has been given to:

1) Strategic Policy PB01: Protection of internationally and nationally important wildlife sites;
2) Policy PB03: Protection of irreplaceable habitats and important features;
3) Strategic Policy PB04: Habitats Regulations Assessment;
4) Strategic Policy PB05: Biodiversity Net Gain The Spatial Strategy;
5) Strategic Policy PB06: Local Nature Recovery Strategy and Nature Recovery Network;
6) Policy PB07: Ecological enhancement and biodiversity in the built environment;
7) Policy PB08: Tree, hedges and woodland on development sites; and
8) Policy PB09: Monitoring requirements for new planting schemes;

4.2 The above policies are discussed below.

Strategic Policy PB01

4.3 This policy confirms the Councils commitment to protecting sites of international and national nature conservation importance. Broadly, the policy confirms that unless Habitats Regulations Assessment work confirms that a safe conclusion of 'no adverse affect on Integrity' can be reached, then the derogation tests associated with the Habitats Regulations are invoked, with those being summarised.

4.4 In the case of development proposals associated with the Site, a clear conclusion of no adverse effect on Integrity in relation to any such relevant site, can be reached with the adoption of mitigation. The mechanisms for securing and delivering such mitigation is already in place in relation to recreational pressure at the Pebblebed Heaths. Proposals would be fully compliant with this policy.

Policy PB03

4.5 This policy cites specific habitats / habitat features which are to be afforded particular significance in decision making, with reference to their conservation value. The cited habitats are, ancient woodland, ancient / veteran trees, mature trees, 'important' hedgerows, Priority Habitats and habitats which support (the functionality) of Priority Species (e.g. bat foraging and commuting habitats and Cirl bunting nesting and foraging habitat). The policy sets out the need to strictly apply the mitigation hierarchy in determining impacts and appropriate mitigation or compensatory measures as part of a planning strategy.

4.6 The development proposals would have full regard to these policy requirements and appropriate and proportionate mitigation and enhancement measures can be delivered, noting the significant quantum of semi-natural habitat to be retained, protected and enhanced.

Strategic Policy PB04

4.7 This policy highlights the types of designated site to which the policy applies, together with a summary of legislative requirements (with reference also to policy PB01). Specific reference is made to adopted and proposed guidance and mitigation strategies, notably in respect of increased recreation and vehicle related air quality impacts at the Pebblebed Heaths Habitats Site.

4.8 With the adoption of any necessary mitigation measures, safe conclusions can be drawn in relation to no adverse effect on Integrity arising in respect of any / all Habitats Sites.

Strategic Policy PB05

4.9 This policy confirms the Council's commitment to securing biodiversity gains through the planning application process. The policy sets out a requirement to achieve and demonstrate a minimum 20% biodiversity net gain. It also confirms the information required by the Council in determining that the proposals are policy compliant.

4.10 The justifications given for requiring 20% net gain are noted, however, the policy is considered out of step with the legislative framework, which mandates that a minimum 10% net gain is appropriate, this being devised following a review of evidence and after significant consultation. The mandatory 10% gain, in tandem with the securing of other necessary ecological mitigation as relevant to a development proposal, avoids harm to protected / notable species and also ensures that gains in terms of habitat quality are achieved.

Policy PB06

4.11 This policy concerns the Local Nature Recovery Strategy and notably, matters concerning the Nature Recovery Network (NRN).

4.12 The aims of the strategy are noted, as are the references to the aspirations and requirements regarding furthering the aims of the NRN within this policy.

4.13 The aspirations of the policy, regarding enhancing the NRN are understandable and appear grounded in sound ecological principles. However, it is considered that incorporating a policy requirement which means that any, 'off-site biodiversity net gain', should be located "*inside, or adjacent to or otherwise contribute to the overall NRN and its biodiversity importance*", is unnecessary and in fact could give rise to missed opportunities in terms of delivering otherwise important ecological / biodiversity gains in the county.

4.14 The policy could reflect a preference for off-site biodiversity net gain to be delivered at or adjacent to, or otherwise contribute to the NRM, but as worded the policy could be interpreted as meaning that other options, which may deliver equally important gains for biodiversity, would be precluded. Whilst NRNs are, as cited in the policy, identified as being of strategic significance within the Statutory Biodiversity Metric Calculation

Tool, that should not preclude other gains coming forward, or prejudge the value which could be delivered through a different approach.

Policy PB07

4.15 This policy describes a range of ecological enhancement measures which will be expected to be delivered through new developments.

4.16 All of the cited measures could easily be delivered within the development proposals associated with the Site.

Policy PB08

4.17 This policy requires that good quality trees and woodland are retained, or that any losses to trees, woodland or hedges are fully justified and appropriately compensated for. Requirements in relation to new planting are also stipulated.

4.18 The development proposals associated with the Site would fully accord with the policy requirements set out. Indeed, the proposals give rise to the possibility of enhancements in relation to tree cover at the Site.

Policy PB09

4.19 This policy is designed to deliver security in relation to the landscape planting strategy, through the use of a financial bond system and a need for the submission of monitoring reports. Insofar as ecological matters are concerned, the policy will likely help to ensure that all necessary mitigation and enhancement measures are delivered and continue to be managed appropriately.

4.20 Development proposals at the Site would fully accord with this policy if adopted.

APPANDIX 1

Information downloaded from MAGIC

Information downloaded from MAGIC