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Otterton NPSG

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Otterton Neighbourhood Plan: Regulation 14 consultation feedback

I would like to stress at the outset that this letter provides informal officer comments only that relate to matters that you may feel warrant attention or consideration. We have not had the opportunity to seek member opinion or views on your consultation plan and these views are expressed without prejudice to any officer or Council opinion (including potential formal or informal objections) that may be made at a later date. We are seeking to be helpful and constructive in views expressed but it is important to recognise that it is your plan and the clear onus will be on you justifying plan content and satisfying yourselves that through your work you have followed correct procedures as applicable to your role in Neighbourhood Plan production. Advice is provided in relation to conformity with the adopted Local Plan 2013-2031.

Our comments are included below and in a separate attachment for your consideration.

Otterton NP Reg. 14 Response – EDDC

Com ment Num ber	Plan Reference	Comment
1	4.4.1 p26	The East Devon and Blackdown Hills Landscape Character Assessment was adopted in March, 2019. Text should be updated to reflect this.
2	p 37	Third line from the bottom 'Questionnaires' capital Q – suggest change to lower case. Mix of lower case and upper case in subsequent paragraphs.
3	Page 45	<i>'The Neighbourhood Plan is part of the statutory development plan, which comprises in addition the National Planning Policy Framework (NPPF) and the EDDC Local Plan.'</i> The sentence isn't clear as it is written.
4	Page 46 / Policy ONP1	This policy contains some broad statements that are a repeat of policy contained in the Local Plan (a, b, d, e, g). There is no criterion 'c' at present. Suggest an additional criterion be added to specify that provision of affordable housing to meet a local need must be physically very well related to the built form of Otterton Village. Strategy 35 is the key policy related to exception sites for affordable houses outside of BUABs and should be referenced.
5	Page 47 / Policy ONP2	What local distinction does this add above and beyond the Local Plan?
6	Page 49 / Policy ONP5	<p>Is it the intention of the group to allow far more development than the Local Plan permits? ONP5 would supersede 'non-strategic' policies D7 and D8 of the Local Plan. In doing so ONP5 would strip out many of the comprehensive protections in place with regard to agricultural buildings and the re-use of rural buildings outside of settlements.</p> <p>In addition, we have some concerns with the text below:</p> <p><i>'Proposals must not have a detrimental impact on the streetscene, flooding, residential amenity, access, traffic, and car parking. Noise, chemical, water and light pollution should be strictly controlled.'</i></p> <p>Development will always have some impact, suggest this text is revised to:</p> <p><i>Proposals must not have a significant detrimental impact on the street scene, flooding, residential amenity, access, traffic, and car parking. Noise, chemical, water and light pollution should be strictly controlled.</i></p>
7	Page 50 / Policy ONP6	<p>The restrictions on development inside the established park seem onerous:</p> <p><i>'Development will only be permitted if it is for the replacement of an existing structure (to the same size or smaller), ...'</i></p>

		<p>If a holiday lodge is considered to be a structure, consider that some lodge holiday centres are replacing their ageing stock with a smaller number of larger, higher specification lodges that can appeal to new markets and can command a higher rental fee. The draft policy, as currently written, may inadvertently restrict future development that has the potential to reduce the density of the development on the site that could result in fewer but higher paying guests.</p> <p>Is ONP6 based on a subjective assessment of the Holiday Park, having 'grown to its maximum size'? Have the business operators been consulted / share this view?</p>
8	Page 50 / Policy ONP7	<p><i>'Traffic management schemes that increase safety for all road users in the Parish and are proven to have the backing of the community will be required from development proposals.'</i></p> <p>Although policy is not applicable to small scale development, such as residential extensions, it still places an excessive burden on developers to demand <u>increased safety for all road users</u>.</p>
9	Page 171	<p>Local Green Spaces. We'd suggest placing this directly after the policy for clarity. We'd also suggest that each area is mapped in detail to allow the examiner to assess each site and for future management clarity. We can supply plans of all spaces.</p>
10	All	<p>Please see additional attachment for further suggested revisions received from the Development Management team.</p>

Yours sincerely

Phil Twamley
Neighbourhood Planning Officer