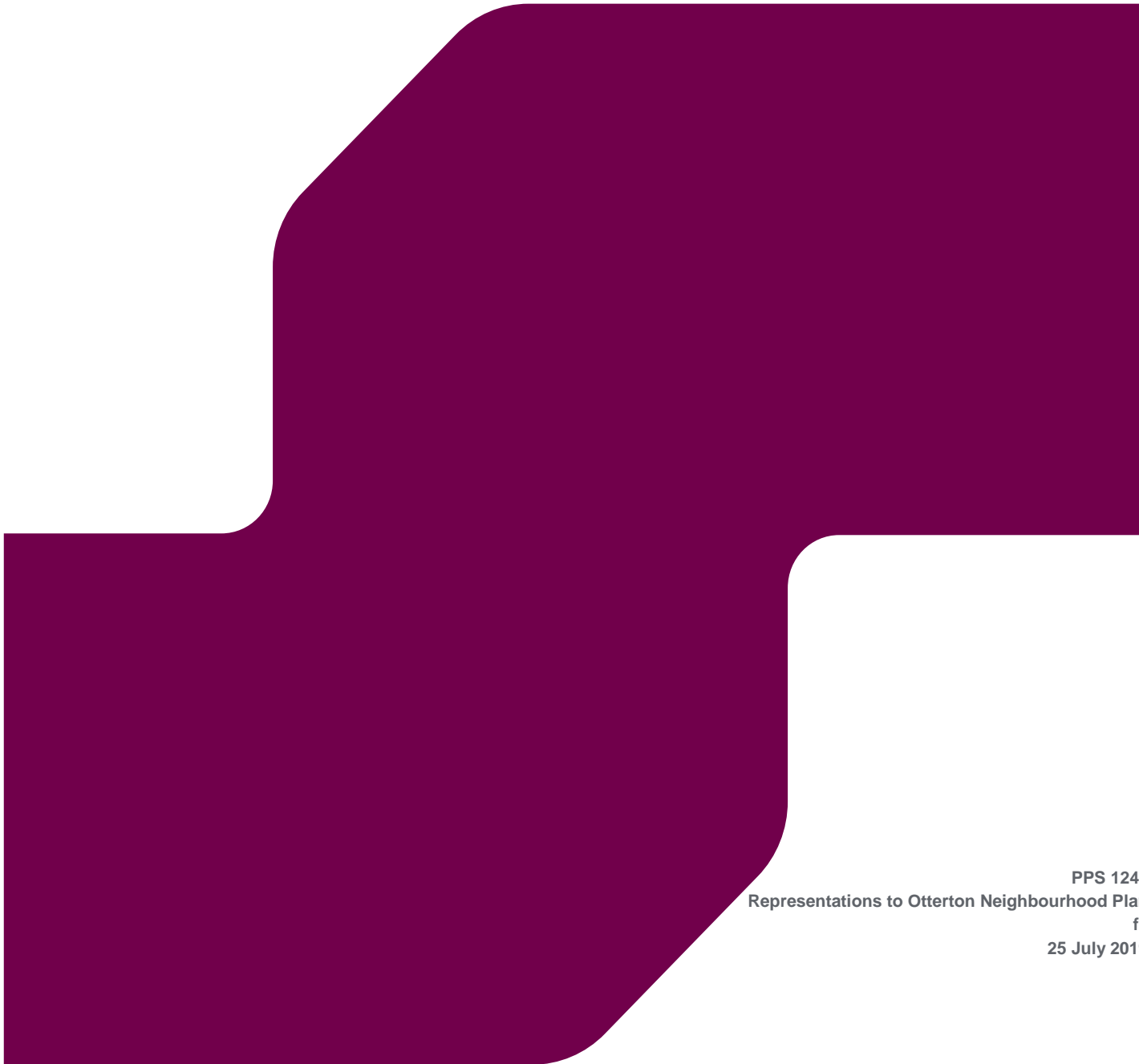


REPRESENTATIONS TO DRAFT OTTERTON NEIGHBOURHOOD PLAN

On behalf of Ladram Bay Holiday Park



PPS 1242
Representations to Otterton Neighbourhood Plan
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1 INTRODUCTION

- 1.1 This report has been prepared by RPS Planning & Environment on behalf of the owners of Ladram Bay Holiday Park, Otterton, EX9 7BX, to set out our formal comments/representations to the draft Otterton Neighbourhood Plan ('DONP') dated May 2019, that has been published by Otterton Parish Council for consultation purposes until the 28 July 2019.
- 1.2 The East Devon Local Plan (2016) states that tourism and the visitor economy is an important contributor to vitality and vibrancy of the District's coastal and market towns and of its rural communities.
- 1.3 As recognised by the DONP itself, Ladram Bay Holiday Park is a successful 5-star award-winning holiday park. It provides a range of holiday accommodation, including holiday lodges, static caravans, touring caravans, glamping pods/tents and camping. It also contains various on-site facilities, such as a boat compound, adventure playground, adventure golf, shop, swimming pool and restaurant/pub. The swimming pool is also used and valued by the wider community, who are offered reduced membership fees. It provides economic and tourism benefits for the village of Otterton and the wider area, particularly through employment and tourism spend.
- 1.4 To remain a successful business in the future and compete with other caravan sites in the area, it is important that the holiday park is able to evolve and adapt to meet ever-changing customer demands and to improve the overall environment and holiday experience for visitors; for example, to replace older static and touring caravans with more attractive and higher specification holiday lodges integrated with improved landscaping; to potentially re-locate accommodation into new areas to reduce the density of existing development thereby providing further opportunities and space to improve the landscape setting of the park, to the benefit of the site and wider area. Improving the quality and, where appropriate, the quantity of holiday accommodation on offer would help to generate additional revenue for the business which, in turn, would help to fund such environmental improvements across the wider site as well as improvements and upgrades to facilities. It would also help to extend the holiday season of the park across the year, again to the benefit of the business and wider local economy.
- 1.5 Section 2 of our report summarises the key national and strategic planning policy context concerning tourism accommodation, particularly relating to development at holiday parks and caravan sites that has direct implications for Ladram Bay. Section 3 sets out our comments and concerns on various objectives and policies contained with the current DONP having regards to such national and strategic policies, procedural guidance for preparing neighbourhood plans and other relevant considerations. It also has regard to transport-related matters with reference to a technical note produced by RPS's accredited transport planners, as attached to **Appendix A**. Section 4 contains our suggestions and recommendations for revising various policies to address our concerns, whilst also seeking to address any valid planning issues raised by the Parish.

Basic Conditions relevant to Neighbourhood Plan

- 1.6 The National Planning Policy Framework (NPPF, February 2019) states that neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies, and should shape and direct development that is outside of these strategic policies (Paragraph 13).
- 1.7 Paragraph 37 of the NPPF states that neighbourhood plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These are laid out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, including in part the following:-

1. Having regard to national policies and advice contained in guidance issued by the Secretary of State.
2. The 'making' of the neighbourhood plan contributes to the achievement of sustainable development.
3. The 'making' of the neighbourhood plan is in general conformity with the strategic policies contained in the development plan for the area of the authority.

1.8 In relation to Point (3) above, Planning Practice Guidance advises that on 'general conformity' you need to consider the following:-

- a. Whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with;
- b. the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy;
- c. whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy;
- d. the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach.

2 POLICY CONTEXT

National Policy

- 2.1 The NPPF (2019) sets out the Government's planning policies for England and how these should be applied.
- 2.2 According to Paragraph 8, achieving sustainable development means that the planning system has three overarching objectives: economic, social and environmental.
- 2.3 Paragraph 11 states that plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change.
- 2.4 One of the over-arching policy themes of the NPPF is to build a strong, competitive economy. Here, Paragraph 80 states:-

“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.”

- 2.5 In seeking to support a prosperous rural economy, Paragraph 83 states that planning policies should 'enable', in part, sustainable rural tourism and leisure developments which respect the character of the countryside. Related to this, Paragraph 84 states that planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. It states that in these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable.
- 2.6 Therefore, in economic terms linked to sustainable development, the NPPF provides a positive policy framework for rural tourism development as a means of boosting the local economy, even within areas beyond settlements that might not be well served by public transport, provided that such development is carefully planned and respects the countryside, etc.
- 2.7 Paragraph 172 states that great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.

Development Plan

- 2.8 The East Devon Local Plan (Adopted January 2016) confirms that Ladram Bay Holiday Park and the surrounding area falls within a designated Area of Outstanding Natural Beauty (AONB) and Coastal Preservation Area.
- 2.9 Strategy 46 states that development within AONBs will only be permitted where it conserves and enhances the landscape character of the area; does not undermine landscape quality; and is appropriate to the economic, social and wellbeing of the area.
- 2.10 The Coastal Preservation Area is defined on the basis of visual openness and views to and from the sea. Strategy 44 of the Local Plan states that development or any change of use will not be allowed if it would damage the undeveloped/open status of the designated area or where visually connected to any adjoining areas.

Tourism

- 2.11 Tourism is identified as a key sector in the East Devon economy. Strategy 33 seeks to promote tourism in East Devon, and states that the Council will support and facilitate high quality tourism in East Devon that promotes a year-round industry that is responsive to changing visitor demands.
- 2.12 Policy E19 applies specifically to holiday accommodation parks. It states that outside of designated landscape areas, proposals for new sites and extensions of existing sites will be permitted where they meet the following six criteria:-
1. The proposal relates sensitively in scale and siting to the surroundings and includes extensive landscaping and visual screening to mitigate against adverse impacts. They do not affect habitats or protected species.
 2. They are within, or in close proximity, to an existing settlement but would not have an adverse impact on the character or setting of that settlement or the amenities of adjoining residents.
 3. They would not use the best and most versatile agricultural land.
 4. They will be provided with adequate services and utilities.
 5. Traffic generated by the proposal can be accommodated safely on the local highway network and safe highway access to the site can be achieved.
 6. The development will be subject to the provisions of plan policy in terms of sustainable construction and on site renewable energy production.
- 2.13 This same policy then goes on to state:-
- “Proposals for the extension of existing caravan and camping sites or the addition of related and ancillary facilities on existing sites, within designated landscapes, will only be permitted where they meet the above criteria in full and provide no new permanent structures or are replacement structures designed to blend into their surroundings.”*
- 2.14 This policy as a whole relates to development within Ladram Bay Holiday Park, that is situated within a designated landscape. As worded, it clearly allows for some development to extend the existing caravan site where these six policy criteria are complied with, provided that no new permanent structures are provided ‘or’ it provides replacement structures designed to blend into their surroundings. It does not seek to restrict the particular size or location of any new replacement structures within any extended areas, or even necessarily prevent existing structures within developed areas being replaced with slightly more new replacement units, provided importantly that these other environmental criteria are met (including providing new landscaping to help the development to blend into its surroundings).

3 COMMENTS ON THE DRAFT OTTERTON NEIGHBOURHOOD PLAN

3.1 This section of the report sets out our comments and concerns on the draft version of the DONP, addressing particular sections and policies of the plan in the order contained in the document.

Planning and Development Issues

Sections 4.7 & 4.8 – Ladram Bay Holiday Park (Pages 37 to 43)

- 3.2 Page 38 provides a summary of a traffic survey undertaken in 2017, during August and November.
- 3.3 It states that the traffic access route to Ladram Bay is seen as a very significant problem for the village, causing significant increase in traffic and congestion at times.
- 3.4 Page 39 of the DONP states that by far the biggest issue raised in the traffic part of the questionnaire concerned Ladram Bay. With reference to a small number of example quotes provided by respondents, it states that ***“there was a feeling that it had grown too big, that development had been unrestricted and that it needed to be prevented from growing any larger”***.
- 3.5 Consequently, it states that any planning application that might increase traffic volumes, noise or create further pollution, would not be acceptable.
- 3.6 We would question some of the assumptions and interpretations drawn from the evidence referred to in this section. Firstly, this statement that the park has reached its maximum size and cannot expand appears to be based on sentiment rather than technical work. We have seen no technical evidence that shows that the current level of development at Ladram Bay is the maximum that the road network can accommodate. It is therefore arbitrary. This is not a suitable basis on which to draft planning policies.
- 3.7 We understand from the DONP that a total of 209 questionnaires were received and analysed, out of a total permanent resident population of 743; this therefore represents only approximately 28% of the total population. We have not been able to scrutinise any individual questionnaires received from residents, which we understand have not been published in any form. Notwithstanding this, according to Appendix F of the DONP (Page 66), 48% of responses (less than half) wanted to reduce the number of visitors to Ladram; 30% wanted to keep them the same. Whilst not stated, we assume that up to 22% wanted to increase the number of visitors. The ‘feeling’ that Ladram Bay has grown too big would therefore seem to be misleading, and does not provide justification for preventing its growth.
- 3.8 We would also question the transport assumptions provided in the DONP, with reference to our accompanying technical note attached to **Appendix A**. This report shows that there are significant issues with the organisation of these surveys and that they do not meet normal industry guidelines and standards for undertaking traffic surveys. They should therefore carry little weight. In addition, the conclusions that have been drawn from these surveys are misleading and often incorrect.
- 3.9 We firstly highlight the following key concerns relating to the reliability of the traffic surveys:-
- Traffic surveys are used to consider the change in daily traffic levels at various points within Otterton between November (when Ladram Bay is closed during the off-season) and August (when Ladram Bay is traditionally at its peak occupancy). Typical traffic patterns vary between November and August, particularly in tourist areas, and therefore a comparison of these time periods can be misleading. There may be changes in traffic volumes as a result of tourist traffic, but there may also be changes to typical background traffic that occurs throughout the year as a result of the summer holiday period, which can also vary between these two periods.

- The precise location of the traffic surveys is not clear.
- The methodology used for the surveys is not provided, and the manual surveys (if indeed they were manual) was not supplemented by two-week automatic traffic counts in line with current Department for Transport guidance.
- The comparison of traffic surveys between 2017 and 2012 or 2013 set out at Appendix I does not follow industry standards and does not appear to provide any meaningful conclusions.
- Undertaking traffic surveys on only one day does not make any allowance for day-to-day variance in traffic flows. This affects the confidence interval of the traffic survey being representative of average conditions during that period.

3.10 Notwithstanding our concerns about the methods of the surveys undertaken, we draw attention to the following points contained in our note:-

- The comparison in traffic surveys between November and August 2017 show an increase in traffic in all three survey locations. Not all of the increases are as a result of Ladram Bay. DONP states that Otterton is also used as a 'rat run' between Budleigh/Exmouth and Sidmouth via Ottery Street. The location of the traffic surveys, although the precise locations are not known, will include such 'rat run' traffic, which can be expected to increase in August in comparison to November.
- Not all of the traffic generated from Ladram Bay will travel outside of Otterton. We have undertaken an assessment to consider the actual movement of traffic from Ladram Bay. The RPS calculations demonstrate that of the total increase in traffic flows in August, only 52% to 53% of this is generated by Ladram Bay. This essentially means that the traffic generated by Ladram Bay during August increases the November daily traffic flows by only approximately 25%.
- Although there is a perception that the increase in traffic is as a result of Ladram Bay, this is not the case. It forms a proportion of other tourist traffic which cumulatively increases traffic.
- The DONP refers to car parking problems through Otterton. It is our view that it is this which creates delay to vehicles. Questionnaire responses suggest that residents may not be making the best use of existing car parking and inadvertently creating delay to vehicles, particularly during summer months. We also note that 78% of respondents state they want a car park.
- The traffic flows experienced are not at a level that would create congestion on their own accord. The total carriageway width of Fore Street generally exceeds the width requirement for this type of road, where 1,250 vehicle movements per hour (750 vehicle movements per hour in the busiest direction) is a conservative indication of the capacity of Fore Street. Fore Street operates at approximately 32% of capacity. It is therefore evident that the car parking is the cause of delay to vehicles.

Planning Objectives

PO.4 – Economy/Business/Employment (Page 44)

3.11 PO.4 states that **“small”** businesses including home working, **“small scale tourism”** and farming will be supported as the main economic activities in the parish, where there is no detrimental effect on the natural or the built environment. Whilst 'small' is not defined in this context, this objective implicitly excludes Ladram Bay Holiday Park, where elsewhere the ONP states (on Page 37) that Ladram has grown into a **“very large”** holiday park (a term that is also subjective).

3.12 Ladram Bay Holiday Park is one of the main employers in the local area which, as stated on Page 37 of the DONP, is used by the local community, as well as contributing as a business to various projects within the village. As currently worded, in not expressing support for larger businesses such as Ladram Bay (that would not necessarily mean supporting unrestricted expansion), PO.4 will not help the community or such businesses to thrive economically. It does not have regard to the NPPF, particularly Paragraphs 83 and 84, which states that policies should 'enable' sustainable rural tourism, and recognise that sites to meet local business and community needs in rural areas may have to be found beyond settlements and in locations not served by public transport. Similarly, it does not conform with Local Plan objectives, where particularly Strategy 33 of the Local Plan seeks to support and facilitate high quality tourism in East Devon. Furthermore, we are not aware of any clear evidence as part of the DONP plan-making process which indicates that any larger-scale businesses that contribute to the local economy should not be supported. As with the arbitrary cap on traffic growth, this decision appears to have no basis in planning policy. We therefore object to the wording of the first sentence of PO.4.

PO.5 – Ladram Bay Holiday Park (Page 45)

3.13 We also object to the wording of the first part of PO.5, which states that the further expansion of the Ladram Bay Holiday Park site should be resisted, where development should be encouraged instead within the site provided it would not increase the number of vehicles through the village.

3.14 As mentioned previously, Section 4.7 states that any planning application at Ladram Bay that might increase traffic volumes, noise or create further pollution, would not be acceptable. There are a number of issues with this, and we deal with each below:

- As stated in Paragraphs 3.6 to 3.9, this statement appears to be arbitrary and not based on technical transport work on, for example, capacity of roads or junctions.
- As set out in Appendix A, the traffic surveys that have been undertaken are not robust and cannot be relied upon for policy formulation. Our own analysis suggests a very different situation, which would not justify a cap on any further development at Ladram Bay that could increase traffic flows.
- There is a significant issue with the effectiveness of this policy in achieving what the authors of the Plan want to achieve, which is no increase, or a reduction in, traffic flows from Ladram Bay. Further expansion of Ladram would not in all circumstances increase traffic and these related impacts, where for example no additional accommodation units were proposed, such as to relocate units or to replace units elsewhere within the site.
- Furthermore, notwithstanding our expressed view that car parking problems are the major contributor to traffic congestion in the wider village, rather than traffic generated from Ladram per se, any future development that would theoretically increase traffic (whether within the site or immediately adjacent) might be modest in scale and not cause any significant adverse impact upon traffic levels, provided that it was properly planned with traffic management measures put in place where appropriate.

3.15 As currently worded, this part of the policy objective does not have regard to Paragraphs 83 and 84 of the NPPF. It is also not in general conformity with the Local Plan that promotes high quality tourism, including supporting the principle of extensions to existing caravan parks within designated landscapes (Policy E19).

3.16 However, we have no objections in principle to the second part of PO.5 which states that development should: have no further impact on the AONB, World Heritage Site and Coastal Protection Zone; require traffic management plans to be implemented to reduce the traffic impact of the site on the local roads. Indeed with these controls in place that seek to safeguard the natural

environment, manage traffic and reduce congestion, this reinforces our argument that it is not necessary to have such negative wording at the start of PO.5 which is unnecessarily anti development scenarios which might cause no material adverse planning or environmental harm.

Development Management Policies

Policy ONP5 – Encouraging Small Business and Agriculture (Page 49)

- 3.17 This policy seeks to support the development of sustainable small scale businesses in certain circumstances. We object to the reference to “**small scale**” here, for the same reasons as given in response to PO.4, which implicitly excludes important larger local businesses such as Ladram Holiday Bay Holiday Park.

Policy ONP6 – Control of Ladram Bay Holiday Park Development (Page 50)

- 3.18 We fundamentally object to this policy on a number of planning grounds. This policy currently reads:-

“Development will only be permitted if it is for the replacement of an existing structure (to the same size or smaller), is designed to be sustainable and does not intrude on the AONB or WHS. No new development of any kind will be permitted anywhere outside the established site boundaries, unless it is to improve the approaching road infrastructure to the site, reduce the flow of traffic by improving infrastructure for walking and cycling, and includes a Traffic Management and Travel Plan.”

- 3.19 The stated ‘justification’ for the policy states:-

“The Holiday Park has grown to its maximum size, and has a harmful impact on the Jurassic Coast World Heritage Site, the AONB and a detrimental impact on the village in terms of excess traffic, congestion and the accompanying pollution that cars, delivery vans, lorries and caravans bring. The access road is totally inadequate to serve such a large site, and vehicles coming to and from the site must be properly controlled to prevent congestion.”

- 3.20 Firstly, the justification for the policy is filled with a number of superlative and subjective statements, that do not appear to be backed up by hard evidence contained within the DONP or elsewhere. No reasons or technical analysis is provided as to why the park might have grown to its maximum size, have a harmful impact on the AONB, etc, generate excessive traffic and congestion, or why the access road is totally inadequate to serve such a large site. We refute many of these claims, particularly relating to the size of the park and it causing excessive traffic and congestion, for reasons previously stated.
- 3.21 The DONP states that the policy meets planning objectives PO.1, PO.3 and PO.4. It does not refer to PO.5 that applies specifically to Ladram (part of which we object to), which is presumably a typing error.
- 3.22 The policy itself is overly restrictive and does not provide a positive framework for the park to evolve and adapt to meet customer demands, that would help facilitate and fund wider environmental improvements to the benefit of visitors and the local community. As stated at the outset, such improvements are necessary to enable the business to remain successful and ensure its long-term success. If anything, the policy relates to the ‘managed decline’ of the holiday park, rather than addressing traffic.

- 3.23 We are also concerned that, as well as allowing for development that can bring about overall environmental improvement of the site, the policy will not actually achieve what is intended, i.e. a reduction in traffic. Indeed, it could have the opposite effect. As worded, for example, it would prevent modern holiday lodges (that tend to be larger than traditional static caravans, higher specification and commonly constitute twin-unit caravans in planning terms) being sited in place of existing smaller touring caravans and older more unsightly static caravans within established site boundaries, that would be more sustainable, attractive and (due to the spatial siting requirements of lodges in comparison with smaller units) would potentially reduce the number of overall units within the site and resulting traffic levels.
- 3.24 The policy would also prevent such new replacement lodges and other replacement development potentially re-locating anywhere outside the established site boundaries, that could provide an opportunity to reduce the overall density of development across the entire site and provide additional space for landscape planting to help reduce the overall harm caused to the AONB by the site.
- 3.25 It is also illogical to only allow development outside the existing park boundaries where it is to improve the approaching road infrastructure to the site, reduce the flow of traffic by improving infrastructure for walking and cycling, and includes a Traffic Management and Travel Plan. It is unlikely that this type of development could be funded without additional caravan or lodge development, so again the policy is counter-productive.
- 3.26 The current policy clearly does not have regard to Paragraphs 83 and 84 (Section 6) the NPPF, where we note that only Section 15 of the NPPF is stated as being relevant in the DONP text accompanying the policy. It is also not in general conformity with Strategy 33 and Policy E19 of the Local Plan, the latter which provides a more positive framework for supporting the extension of caravan sites, including covering our potential development scenarios mentioned above.

Summary

- 3.27 In summary, we object to the following sections or policies contained in the DONP, in part or whole, for reasons stated in this section:-
- Sections 4.7 & 4.8 – Ladram Bay Holiday Park (Pages 37 to 43).
 - PO.4 – Economy/Business/Employment (Page 44) – first sentence.
 - PO.5 – Ladram Bay Holiday Park (Page 45) – first part.
 - Policy ONP5 – Encouraging Small Business and Agriculture (Page 49) – first sentence.
 - Policy ONP6 – Control of Ladram Bay Holiday Park Development (Page 50).
- 3.28 Overall these parts of the DONP do not support the delivery of strategic policies contained in the Local Plan, contrary to Paragraph 13 of the NPPF.
- 3.29 Furthermore, they fail to meet the ‘basic conditions’ prescribed by Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. In particular, they do not have sufficient regard to the national policies contained in the NPPF. They will not contribute to the achievement of sustainable development, due to unnecessarily (and seemingly arbitrarily) restricting the economic growth, evolution and development of a successful tourism business. They are also not in general conformity with the strategic policies contained in the Local Plan, due to conflict with general principles contained in the Local Plan and lack of evidence to justify the approach advocated in the DONP.

4 RECOMMENDATIONS

4.1 We do not necessarily object to the inclusion of a policy to guide and manage development at Ladram Bay, but it needs to be a sound policy, compliant with national policy and the Local Plan, based on robust evidence and one that will allow for economic growth, balanced with concern for the AONB. We would respectfully suggest that our concerns could be overcome, and the DONP made more compliant with strategic and national planning policies, if the planning objectives and development management policies in question were revised as outlined in this section.

4.2 Firstly, the words 'small' and 'small scale' should be omitted from the first sentence of PO.4, so that this planning objective relating to the economy and business would initially state instead: **“Support businesses including home working, tourism and farming as the main economic activities in the parish”**.

4.3 Similarly, the words 'small scale' should be omitted from the first sentence of Policy ONP5, whereby this policy would state:-

“Development of sustainable businesses will be supported where they comprise the conversion of existing buildings, or extensions for home working, or the diversification of existing rural enterprises, provided they do not have a negative impact on the peaceful environment of the AONB or harm the rural character of the landscape.”

4.4 As regards the planning objective relating to Ladram Bay Holiday Park (PO.5), the first sentence should be omitted, that currently states that the further expansion of the park site should be resisted. Furthermore, the second sentence should seek to encourage development 'at' the site, whether within the site or immediately adjoining as an extension, which does not 'significantly' increase the number of vehicles, noting that the wording of the latter part of the objective as currently drafted seeks to prevent any overall adverse traffic or environmental impact. Consequently, this planning objective would be revised to state as a whole:-

“Support development at Ladram Bay, but only where such development would not significantly increase the number of private or commercial vehicles through the village and would provide environmental improvements to site which would improve its setting in the AONB, World Heritage Site and Coastal Protection Zone.

Require traffic management plans to be implemented to reduce the traffic impact of the site on the local roads.”

4.5 The first sentence of Policy ONP6 relating to Ladram should also be revised to allow for replacement structures to be provided within established site boundaries of the park, with the restriction removed which states that this should only be for the same size or smaller structures to enable a move towards fewer, higher specification units. A new sentence should be added to support any extensions to the park outside the site boundaries, where this enables structures to be replaced and re-located to potentially less sensitive areas adjoining the existing site, provided that there would be overall landscape/environmental benefits. Finally, the last sentence of the policy that seeks to address traffic should only apply to any new development that has the potential to materially increase traffic levels. As such, the revised policy could state:-

“Development will be permitted within established site boundaries if it is for the replacement of an existing structure or pitch, is designed to be sustainable and does not intrude on the AONB or WHS. Outside the established site boundaries, replacement structures/pitches will be permitted to enable the relocation of structures/pitches from sensitive areas to potentially less sensitive areas adjoining

the existing site, provided that there would be overall landscape/environmental benefits. No new development will be permitted that will significantly increase traffic levels, unless it is to improve the approaching road infrastructure to the site, and includes a Traffic Management and Travel Plan.”

Appendix A

RPS Technical Note on Transport

TECHNICAL NOTE

Project Title: Ladram Bay

Report Reference: JNY10242-01A

Date: 17 July 2019

Transport Comments on Draft Otterton Neighbourhood Plan

- 1.1 This Note has been prepared on behalf of the operators of Ladram Bay and sets out initial comments on transport related matters of the Draft Otterton Neighbourhood Plan (DONP) v0.17 dated 21 May 2019.
- 1.2 The DONP provides a useful summary of the existing situation, including the results of a questionnaire survey of parishioners. A key theme of the DONP is traffic through Otterton with various references to Ladram Bay and the traffic it generates causing a perceived concern to Otterton residents.
- 1.3 Traffic surveys are used to consider the change in daily traffic levels at various points within Otterton between November (when Ladram Bay is closed during the off-season) and August (when Ladram Bay is traditionally at its peak occupancy).
- 1.4 Typical traffic patterns vary between November and August, particularly in tourist areas, and therefore a comparison of these time periods may be quite misleading. There may be changes in traffic volumes as a result of tourist traffic, but there may also be changes to typical background traffic that occurs throughout the year as a result of the summer holiday period, which can also vary between these two periods.
- 1.5 In terms of the surveys, the precise locations of some are not clear, however, those undertaken in 2017 were as follows:
- Ladram Road. The precise location is not stated and it may be in the built up area of Otterton, or to the east of this, which would effectively be the access road to Ladram Bay given this section of the road only provides access to a farm and Ladram Bay.
 - White Lodge. This appears to be located on Fore Street to the west of the built up area.
 - Ottery Street. The precise location is not stated and it is not clear if this is within the built up area or to the east of the built up area.
- 1.6 Although it is not set out in any current guidance, it is industry standard within the transport profession that traffic surveys are typically considered to be representative for a period of up to three years. The comparison of traffic surveys between 2017 and 2012 or 2013 set out at Appendix I should therefore be taken lightly. Notwithstanding, these comparisons do not appear to provide any meaningful conclusions.

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- 1.7 The 2017 traffic surveys that are compared against one another have been undertaken for a one day period on a Tuesday in November and August and a one period on a Saturday in November and August.
 - 1.8 Undertaking traffic surveys on only one day does not make any allowance for day-to-day variance in traffic flows. This affects the confidence interval of the traffic survey being representative of average conditions during that period.
 - 1.9 The methodology for undertaking the traffic surveys is not provided; it is assumed they are Manual Classified Counts. Current Department for Transport (DfT) guidance on traffic appraisal advises that Manual Classified Counts should be supplemented by two-week Automatic Traffic Counts to increase their usefulness.
 - 1.10 In this instance, there is only one day traffic surveys. The confidence interval of the traffic survey cannot be substantiated as being representative of average conditions during the periods considered.
 - 1.11 It should also be noted that the comparison of November with August compares the quietest period (November) with the busiest period (August). This is misleading as it calculates the range and it does not account for the average traffic flow or the variance from that average.
 - 1.12 The comparison of a peak August should be made against the Annual Average Daily Traffic flows (AADT) to determine the variance above the average.
 - 1.13 The traffic surveys have formed part of the evidence base to DONP, however, as above, there are concerns with these.
 - 1.14 Notwithstanding these concerns, the comparison in traffic surveys between November and August 2017 show an increase in traffic in all three survey locations. It should be noted that not all of the increases are as a result of Ladram Bay.
 - 1.15 There will be other tourist traffic travelling to / from Otterton. The traffic generated from Ladram Bay will only form a proportion of that increase.
 - 1.16 Indeed, DONP states that Otterton is also used as a 'rat run' between Budleigh/Exmouth and Sidmouth via Ottery Street. The location of the traffic surveys, although the precise locations are not known, will include such 'rat run' traffic, which can be expected to increase in August in comparison to November.
 - 1.17 It should also be noted that not all of the traffic generated from Ladram Bay will travel outside of Otterton; some will drive to / from facilities within Otterton, for example, the pub, the mill or the local shop.
 - 1.18 Section 4.7 and 4.8 of DONP provide some calculations of traffic increases at the above three locations and conclude that there is an increase of approximately 50% in daily traffic flows into Otterton during August in comparison to November.
 - 1.19 Appendix I of DONP provides more details on the traffic surveys, particularly its final two (unnumbered) Tables. These Tables provide the daily traffic flows at the three locations. These can be analysed further to establish the increase in traffic that is generated from Ladram Bay.
 - 1.20 As above, not all the daily traffic generated by Ladram Bay will travel outside of Otterton and some will stay within Otterton. RPS has undertaken an assessment to consider the actual

movement of traffic from Ladram Bay. For assessment purposes, RPS has assumed that 10% of the traffic generated from Ladram Bay stays within Otterton. For the remaining traffic generated from Ladram Bay, a proportion will travel along Fore Street to the west out of the village via the B3178 and a proportion will travel along Ottery Street to the east out of the village via Sidmouth. These proportions have been estimated based upon the observed traffic flows on each.

- 1.21 RPS have undertaken these calculations based on arrivals into Otterton for consistency with the remainder of DONP and are set out in Table 1.

Table 1: Calculation of Traffic Increases from Ladram Bay

Location	Saturday		Tuesday	
	Total Increase Nov-Aug	Proportion from Ladram Bay	Total Increase Nov-Aug	Proportion from Ladram Bay
White Lodge	657	53.4%	612	52.8%
Ottery Street	210	53.3%	197	52.8%

- 1.22 As can be seen, the RPS calculations demonstrate that of the total increase in traffic flows in August, only 52% to 53% of this is generated by Ladram Bay. This essentially means that the traffic generated by Ladrum Bay during August, increases the November daily traffic flows by only approximately 25%.
- 1.23 Although there is a perception that the increase in traffic is as a result of Ladram Bay, this is not the case. It forms a proportion of other tourist traffic which cumulatively increases traffic.
- 1.24 Notwithstanding the above, DONP refers to car parking problems through Otterton. It is RPS' view that it is this which creates delay to vehicles.
- 1.25 Appendix F: Main Questionnaire Outcomes, paragraph 3.3 of DONP sets out that 'only 9% [of residents] had no spaces' and '34% [of residents] had more than 2 spaces'. This suggests that residents may not be making the best use of existing car parking and inadvertently creating delay to vehicles, particularly during summer months.
- 1.26 Appendix F: Main Questionnaire Outcomes, paragraph 3.4 of DONP sets out that 78% of respondents say they want a car park. Planning objective 6 includes resolving parking, however, the construction of the text loses the focus of this and resolving car parking appears to be overshadowed by reducing traffic congestion. Resolving car parking will reduce delay to vehicles and more should be made of that.
- 1.27 Indeed, the Development Management Policies in Section 6 do not contain proposals to resolve car parking. Policy ONP7 is 'Traffic and Travel around the Parish', however, there are no policy proposals for improving car parking as part of this.
- 1.28 RPS considers that the traffic flows experienced are not at a level that would create congestion on their own accord.
- 1.29 Estimates of the capacity of urban roads is set out TA79/99 Traffic Capacity of Urban Roads, contained in Volume 5, Section 1, Chapter 3 of the Design Manual for Roads and Bridges (DMRB). Although this document is designed for the appraisal of new trunk roads, it sets out

that it may also be used as a guide to the capacity of existing urban roads (the DMRB defines an 'urban' road as one which has a local speed limit, which Fore Street does) and therefore forms a useful guide. TA79/99 gives the maximum hourly vehicle capacity for various types of road.

- 1.30 The road type UAP4 has the lowest capacity of all urban roads and is described in TA79/99 as a busy high street carrying predominantly local traffic with frontage activity including loading and unloading and unrestricted parking i.e. activities that hinder and delay the movement of traffic along it.
- 1.31 TA79/99 provides an hourly capacity for such roads for various carriageway widths, the lowest being 6.1m wide, which is 1,250 vehicle movements per hour (750 vehicle movements per hour in the busiest direction).
- 1.32 The total carriageway width of Fore Street generally exceeds this width. Therefore 1,250 vehicle movements per hour (750 vehicle movements per hour in the busiest direction) is a conservative indication of the capacity of Fore Street.
- 1.33 Inspection of Appendix I of DONP shows that the highest traffic flow recorded is approximately 400 vehicle movements per hour (approximately 200 vehicle movements per hour in the busiest direction). This is significantly below its capacity.
- 1.34 RPS has therefore calculated that Fore Street operates at approximately 32% of its capacity. It is therefore evident that it is the car parking which is the cause of the delay to vehicles. However, this appears to have been overlooked by DONP.
- 1.35 It is suggested that the policies in relation to traffic within Otterton should seek to resolve the car parking rather by the means in which they are currently drafted.