



Representations

Dartmoor Local Plan Review – Final Draft Local Plan
consultation

for Wainhomes (SW) Ltd

17-040



Project : 17-040
Consultation : Final Draft Local Plan
Client : Wainhomes (SW) Ltd
Date : October 2019
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1. Introduction

- 1.1 Emery Planning is instructed by Wainhomes (SW) Ltd (hereafter referred to as 'Wainhomes') to make representations to the current consultation on draft Local Plan.
- 1.2 Wainhomes' specific site interest is the land south of South Brent, known as Noland Park. For ease of reference a site location plan is attached at Appendix **EP1**.
- 1.3 Representations have previously been submitted to the Issues consultation and the Land Availability Assessment (LAA) call for sites in December 2016, and also the Draft Local Plan consultation in February 2019, proposing the site as an allocation for residential development. The site is considered to be suitable and deliverable now for residential development.
- 1.4 The site could be allocated in full or across part of the site only (and/or in phases), subject to the development requirements of the settlement. The proposed housing would include the full policy requirement of affordable housing, and as part of that our client could look to include an element of community-led custom/self-build housing on part of the site. A small quantum of employment land could also be delivered as part of a mixed-use development.
- 1.5 In addition, there are potential community benefits that could be achieved due to the scale of the land under the control of Wainhomes, for example the potential to deliver land for community use such as new playing fields or re-located allotments.
- 1.6 This report sets out our comments on the specific policies of the plan taking each policy in turn and, the Sustainability Appraisal. Finally the report sets out details of the land at Noland Park, South Brent as a proposed allocation for residential development.

2. National Planning Policy and Guidance

National Planning Policy Framework

- 2.1 The revised Framework was published in July 2018. It sets out the Government's planning policies for England and how these are expected to be applied. The purpose of the planning system is to contribute to the achievement of sustainable development. The Framework, taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system.
- 2.2 Paragraph 11 requires plans and decisions to apply a presumption in favour of sustainable development. For plan-making this means that:
- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;
 - b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
 - i. the application of policies in the Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 2.3 Footnote 6 clarifies that National Parks are exempt from the presumption in favour of sustainable development in terms of meeting objectively assessed needs.

National Planning Practice Guidance (PPG)

- 2.4 The PPG was launched in March 2014. It replaced a number of practice guidance documents that were deleted when the PPG was published. Local Plan making is addressed under Section 12.

3. Plan period

- 3.1 Paragraph 22 of the Framework, which states: *“Strategic policies should look ahead over a minimum 15 year period from adoption”*.
- 3.2 The draft plan proposes a plan period of 2018 to 2036. Provided that the plan is adopted before 1 April 2021, it will provide the minimum 15 year plan period from adoption. However if it transpires that the plan will not be adopted until after 1 April 2021, the plan period will need to be extended.

4. Strategic policies

Strategic Policy 1.4 (2) Spatial Strategy

- 4.1 The draft plan proposes to provide 60% of the housing in the Local Centres. We consider that this proportion should be increased, to provide the certainty of housing allocations in the most suitable and sustainable locations, with the least impact on the National Park. These settlements represent the logical locations to plan for meeting housing and economic development needs in the National Park.
- 4.2 In terms of the distribution of development across the Local Centres, the plan does not set specific housing and employment figures for each settlement. We consider that the amount of development to be delivered in each Local Centre should be set out in the plan. It would then also be possible to relate the quantum of development proposed in this plan to the commitment made Dartmoor's commitment through the Plymouth and South West Devon Joint Local Plan to deliver 600 dwellings within West Devon and South Hams (see our response to Policy 3.1 below). At present there does not appear to be any consideration as to how this commitment will be fulfilled.
- 4.3 Notwithstanding the above, allocations are made in the Local Centres in Section 7 of the draft plan. The distribution between the Local Centres appears to be broadly equal. However, in determining the distribution of development, neither the plan nor the evidence considers environmental constraints / capacity to accommodate development in determining the distribution of development between the Local Centres.
- 4.4 We consider that the Local Plan needs to carefully plan for development based upon the capacity of specific settlements to accommodate development, particularly in terms of the

impact on the National Park. Regard should be had to the availability of suitable sites to meet the need, which may be capable of addressing affordable housing needs extending beyond the particular settlement in question. The capacity to accommodate development in some of the Local Centres is significantly higher than in others. On the basis we propose that South Brent accommodates a higher proportion of development than currently proposed. In addition to having very high levels of unmet housing need, there is suitable land within the settlement which could be developed with the least impact upon the National Park. We set out our case on this matter in further detail in our response to Section 7 of the draft plan, which deals with the proposed allocations.

Strategic Policy 3.1 (2) Meeting Housing Need in Dartmoor National Park

Indicative housing delivery figure

- 4.5 The draft plan proposes an indicative housing delivery figure of 65 dwellings per annum. In principle, we support the identification of an indicative housing delivery figure in the plan. However we consider that the figure is not ambitious enough, and would make very little impact on addressing the key social issues affecting the National Park around retaining young people of working age, helping older people downsize and live independently for longer, and meeting the needs of farmers, farm workers, and other rural business.
- 4.6 Paragraph 11 of the Framework requires plans and decisions to apply a presumption in favour of sustainable development, which for plan-making this means positively seek opportunities to meet the development needs of their area, and providing for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas. However, footnote 6 clarifies that National Parks are exempt from the presumption in favour of sustainable development in terms of meeting objectively assessed needs.
- 4.7 The English National Parks and the Broads Vision and Circular 2010 sets out the following:

"The Government recognises that the Parks are not suitable locations for unrestricted housing and does not therefore provide general housing targets for them. The expectation is that new housing will be focused on meeting affordable housing requirements, supporting local employment opportunities and key services."

4.8 National Parks are therefore not bound to include a housing requirement within their Local Plan. However, where there are opportunities to meet development needs within the National Park, without significant harm to it, those opportunities should be taken. Our client has put forward one such opportunity in South Brent (see Section 6 of this statement).

4.9 Furthermore, Dartmoor has committed to delivering a significant quantum of development which will contribute to meeting requirements established in other Local Plans. For example the Plymouth and South West Devon Joint Local Plan (adopted in March 2019) expressly relies upon a contribution of 600 dwellings from the National Park for the period 2014 to 2034. Paragraph 3.22 of the Joint Local Plan states:

“Dartmoor National Park Authority has indicated that its contribution to meeting the needs of the HMA will be around 600 dwellings over the plan period, and is committed to delivering this figure through its Local Plan Review.”

4.10 We note that Plymouth City Council, West Devon Borough Council and South Hams District Council made joint representations at the Regulation 18 Stage of the Dartmoor Local Plan, setting out that they believed that the local plan should set out a housing requirement figure in order to provide certainty that commitments are fulfilled and that the needs of the HMA are met in full. Emery Planning participated in the examination of the Joint Local Plan, and in light of the commitments made in relation to Dartmoor we would wholly endorse the setting out of a housing requirement, and agree that much greater certainty should be provided in relation to a housing trajectory and monitoring of the 5 year housing land supply.

4.11 It is also important to note that a significant area of the National Park falls within Teignbridge (i.e. outside of the Plymouth and South West Devon Joint Local Plan area), including the Local Service Centres of Ashburton, Buckfastleigh and Moretonhampstead. Housing needs relating to the Exeter HMA (i.e. the part of the National Park that falls within Teignbridge) are additional to the 600 houses to be delivered within the Plymouth and South West Devon Joint Local Plan area, and also need to be considered.

4.12 Therefore the 600 dwellings is to be delivered only from the parts of the National Park that fall within South Hams and West Devon. Only 54% of past completions in the National Park over the past 10 years have been within South Hams and West Devon, and furthermore completion data

since 2014 suggests that delivery in Dartmoor to date has been below the quantum anticipated in the Plymouth and South West Devon Joint Local Plan¹.

4.13 Consequently, a commitment has been made and must be fulfilled through this plan to deliver 600 dwellings within the boundaries of West Devon and South Hams. The allocations must be sufficient and deliverable to meet the quantum of housing planned for. At present there is no evidence to demonstrate how this will be achieved.

4.14 The proposed indicative housing delivery figure of 65 dwellings per annum is not significantly different from the figure in the current adopted Local Plan, which is 50 dwellings per annum. The level of delivery achieved through the existing Local Plan has only perpetuated the adverse social and economic issues to which the NPA claims to be addressing through the Local Plan Review. Paragraph 3.1.2 of the draft plan specifically identifies the following adverse trends, which have been experienced in the context of the adopted Local Plan (and preceding that a figure of 60 dwellings per annum in the Devon Structure Plan):

- High housing unaffordability making it difficult for local people and workers to live locally
- A reduction in the working age population, making it increasingly difficult for local businesses to recruit and retain staff, and reducing the sustainability of communities and local services
- Continued or increasing under-occupancy of homes by older people or individuals, which runs at odds with the aim of making the best use of the housing stock
- A greater demand for services and facilities to meet the needs of older people, some of which may be difficult to deliver in deeply rural areas (for example home care)
- A decreasing demand for services and facilities for younger people, including schools, making them increasingly difficult to sustain in smaller communities

4.15 It is therefore clear that a step change in deliver is required in order to halt, let alone reverse, these adverse trends.

4.16 Crucially, affordable housing delivery should remain a key objective in the National Park. However it is apparent that affordable housing needs are not currently being met. Of the 490

¹ See Housing Topic Paper, Table 1 (page 15)

completions between 2007/08 and 2017/18, only 207 have been for affordable homes². This equates to an annual average of just 19 per annum. Furthermore the Issues consultation document (October 2016, page 12) specifically acknowledged that funding to deliver affordable housing does not exist in the same way it used to, and this is also detailed within the Housing Topic Paper at paragraph 2.6.2. There will need to be an increasing reliance upon market housing to cross-subsidise affordable housing. There is clear justification in Dartmoor for establishing a housing requirement, and identifying deliverable and viable sites which can cross-subsidise and meet the need for affordable housing.

- 4.17 The 2013 SHMNA identified a net annual need for 83 affordable houses per annum in Dartmoor. Subsequent assessments indicate that the need remains extremely high, and the existing shortfall alone is very significant³. These are households in need and every effort should be made to address this as soon as possible. Whilst delivering this requirement in full would require a drastic change in housing delivery in the National Park, there are available sites such as our client's at Noland Park which can contribute to meeting this requirement at least in part, with minimal environmental impact. We therefore consider a significantly higher indicative housing figure could be pursued without resorting to the development of unsuitable sites which would have a significant harmful impact on the National Park.

Housing land supply

- 4.18 Given the compelling social and economic reasons for identifying an indicative housing figure and site allocations, the plan should seek to ensure that the figure is met. This is particularly important given that the NPA has committed to delivering a level of development that will contribute to meeting housing requirements established in other Local Plans, as made clear through the consultation response from Plymouth City Council, West Devon Borough Council and South Hams District Council to the previous consultation stage.
- 4.19 In addition, the plan period has been extended from 2033 in the First Draft consultation to 2036 in this draft. However, it is not clear how the housing land supply has demonstrably increased to meet the need arising from 3 additional years of the plan period.

² Housing Topic Paper, Table 6, page 38

³ Housing Topic Paper, Table 11, page 99

- 4.20 Section 8 of Topic Paper 6 provides the Council's position in relation to housing land supply. However, we have numerous concerns in relation to the position as summarised in Tables 9 and 10 of the Topic Paper.
- 4.21 Firstly, the plan period is 2018-2036. Table 9 erroneously identifies that the housing requirement for the period 2018-2021 is 50 dwellings per annum based upon the current Local Plan figure.
- 4.22 Secondly, the Table 9 provides no information on supply for the first 3 years of the plan period. The allocations are only added to the supply from 2021 onwards. This conflicts with Table 10 which shows that several allocations are expected to deliver between 2018 and 2021. Consequently Table 9 is not providing a full or accurate picture of supply over the plan period.
- 4.23 Thirdly, the Local Plan is heavily reliant upon a large windfall allowance. This appears to have been derived by looking at past rates, and only excludes garden land and site of over 20 dwellings. As far as we are aware affordable housing exception sites have been included. Affordable housing exception sites are exceptions to policy that are only required if planning policy fails to deliver the quantum of affordable housing needed. They should not be included within the forward supply and should instead be viewed as additional to it.
- 4.24 Fourthly, Table 9 does not appear to correlate with Table 10. The total supply identified at Table 10 is 1,155 dwellings for the period 2019-2036. According to Table 6 there were 56 completions during 2018/19. Therefore, the total supply would be 1,211 dwellings, which is only very marginally above the total requirement.
- 4.25 Fifthly, and notwithstanding the issues identified above, Table 9 identifies a flexibility margin of only 131 dwellings. Against the total requirement of 1,170 dwellings (65 x 18), this would equate to a flexibility factor of just 11%, which we would consider to be inadequate, particularly as significant issues are identified for several sites within the supply⁴.
- 4.26 We therefore propose that greater certainty and flexibility should be introduced into the housing land supply through the allocation of further sites, in order to provide a realistic prospect of meeting the overall housing figure.

⁴ See the site commentary at Table 10 of Topic Paper 6

Strategic Policy 3.3 (2) Housing in Local Centres

4.27 Part 4 of Policy 3.3 states:

"Exceptionally, where there is an identified need for affordable housing which cannot be met within the settlement boundary new housing development will be approved on suitable sites which are adjoining the settlement boundary. Development on these sites must comprise 100% affordable housing. This may be varied only where:

a) it is proven essential for the viability of the development and comprises not less than 75% affordable housing; or

b) a development is providing community infrastructure which is proven necessary within the wider settlement, that any reduction in affordable housing is proportionate to the infrastructure provided and the development comprises not less than 45% affordable housing."

4.28 The policy is supported in principle. As set out elsewhere within these representations, our client controls a significant area of land to the south of at South Brent which has the potential to deliver significant community benefits as part of a residential development.

4.29 However in relation criterion a) of the policy, we consider that a greater proportion of market housing should be allowed. This would provide a greater degree of flexibility and scope to deliver affordable housing in areas of significant need. Of note the Cornwall Local Plan: Strategic Policies (Policy 9) includes a rural exception policy with an allowance of up to 50% market housing. In our view this is a more appropriate balance where the mix can be justified by viability evidence.

5. Section 7: Towns, Villages and Development Sites

South Brent

- 5.1 South Brent is identified as a Local Centre alongside Ashburton, Buckfastleigh, Chagford, Horrabridge, Moretonhampstead, Princetown, and Yelverton. This is the highest tier in the settlement hierarchy, and is supported. However, a broadly similar distribution is proposed between these settlements.
- 5.2 As per our response to Spatial Policy 1.4 (2), we consider that the Local Plan should plan for development based upon the capacity of specific settlements to accommodate development, particularly in terms of the impact on the National Park. Regard should be had to the availability of suitable sites to meet the need, which may be capable of addressing affordable housing needs extending beyond the particular settlement in question. We therefore consider that a higher level of growth should be apportioned to South Brent.
- 5.3 There are significant affordable housing needs in the village and its hinterland. A housing need assessment for South Brent was carried out in 2009. It identified a demand for 28 affordable homes within the village. That assessment underpinned the allocation of the site at Fairfield for residential development (ref: 7.16(2)). Revisions to the housing need assessment were undertaken in 2014, in advance of the Fairfield planning application (application reference: 0354/14). The update report concluded that there is a need to provide for 53 affordable homes for local people in housing need within South Brent over the 5 year period of 2014 to 2019.
- 5.4 The committed Fairfield site (ref: 7.16(2)) will fall some way short of meeting local the affordable housing needs. Of the 40 dwellings consented under application 0354/14, only 14 were affordable. Therefore there is a shortfall of affordable housing in the village of some 39 units at 2019, which is in addition to further need that will arise during the plan period. The allocated sites will fall someway short of meeting the requirement over the next 5 years, let alone the plan period.
- 5.5 New development at South Brent could also enable the delivery of other infrastructure. For example, there have been a number of previous proposals to re-open South Brent railway station. Indeed land for the railway station and car park is allocated in the adopted Local Plan (Proposals SBR2 and SBR3) and is proposed to be retained as an allocation in the Local Plan Review (Proposal 7.17(2)). However as far as we are aware the proposals do not benefit from funding. The allocation of additional housing land in South Brent could contribute planning contributions / CIL

towards the re-opening of the railway station. Clearly the level of any contribution would depend upon the scale of development allocated and the level of other required contributions, and external funding would almost certainly still be required. Nevertheless, the Local Plan Review presents the opportunity to identify sites to fund this significant opportunity.

- 5.6 Our client is promoting the land south of South Brent for residential development. We have put forward details of the site in Section 6 of these representations. We consider that the site offers a deliverable option which could deliver much needed market and affordable housing, with negligible impact upon the National Park owing to the location and characteristics of the site. It would therefore be logical for South Brent to accommodate a higher proportion of development, on the basis that housing needs can be met in this location with minimal impact upon the National Park.

Proposal 7.14 (2) Land at Palstone Lane(a), South Brent

- 5.7 We understand that the site is under option to South Hams District Council and is proposed for development by a Community Land Trust. A planning application has been submitted (LPA ref: 0147/19). The application is set to be determined at committee on 1 November 2019, with an officer recommendation of approval. In respect of the principle of development, the published committed report states:

"Whilst this is an exception site, the application has been 'caught up' by the review of the Local Plan, which identifies this site and an adjoining parcel of land for housing development. Whilst the emerging Local Plan does not at this point carry any notable weight, it would be unreasonable to ignore the emerging intentions of the Plan in this area.

This is therefore being treated as an exception site to meet an identified need for custom/selfbuild housing, in the context of an emerging allocation."

- 5.8 The justification for allocating the site in Topic Paper 9 is that the site:

"presents an opportunity for community-led custom/self-build housing on the northern portion of the site and discussions with landowners have advanced."

- 5.9 As we set out below, our client could look to include an element of community-led custom/self-build housing on part of the site at Noland Park. Consequently, we do not consider that the land ownership is a fair or reasonable reason to allocate this site in advance of our client's. Despite this, an application is being progressed and officers are giving weight to the emerging Local Plan.

- 5.10 It is also apparent that the allocation of the site does not accord with the available evidence base. Firstly, the selection of the site does not follow a logical and robust site selection process, as 16/078 was specifically discounted by the LAA on the grounds that access cannot be achieved. Paragraph 10.3 of Topic Paper 9 claims that “*subsequent site visits and completion of the Cavanna site have established that access could be achieved.*” However, as we pointed out to previous consultation stages, access was not retained through the completed Cavanna development, and third-party land was required (and thus the site was not deliverable). Consequently, in the planning application for the site (LPA ref: 0147/19) access is taken directly from Palstone Lane, which is extremely narrow.
- 5.11 Secondly, the Landscape Sensitivity Assessment (LSA) 2017 assesses 3 parcels around South Brent. The land at Palstone Lane falls under parcel S2, which is deemed to have lower sensitivity for accommodating development than the parcels S1 & S2. The overall assessment states:
- “The pockets of valued semi-natural wet grassland and woodland habitats, remnant medieval field patterns, and views across the landscape to Beara Common and the Dartmoor uplands increase sensitivity. However the gentle landform, large-scale field pattern, low density of overlying landscape features, lack of traditional field boundaries and the presence of modern development on the settlement edge, visual and auditory disturbance from the A38 reduces sensitivity to **moderate-high** overall. The fields to the south of the settlement/north of the A38 have lower sensitivity.” (our emphasis)*
- 5.12 The Council's own evidence base on a an issue of critical importance to the National Park is therefore indicating that development to the south of the village would have less impact, and is therefore more suitable. Land to the south of the settlement also lies between the urban edge of South Brent and the A38, which forms the National Park boundary, whereas in comparison the Palstone Lane sites represent a prominent incursion into the wider countryside.
- 5.13 The only logical conclusion is that development to the south of South Brent would have the least impact on the National Park. It is therefore not clear justification there is for an allocation at Palstone Lane, which is not as well contained by the land to the south and would have a greater impact upon the National Park.
- 5.14 Notwithstanding the above, we consider that the land at Noland Park should come forward in addition to the Palstone Lane site, as it is evident that the proposed allocations at Fairfield and Palstone Lane fall significantly short of meeting identified needs within the settlement.

Proposal 7.15 (2) Land at Palstone Lane(b), South Brent

5.15 We refer to our comments in relation to Proposal 7.14 (1). Part (b) forms an extension to part (a). It is possible that part a will be committed by the time that the Local Plan is examined. However, Part b will not be, and as set out above the evidence base does not support the allocation of the site, particularly in relation to landscape harm.

5.16 In addition, the policy states that the development of sites 7.14 and 7.15 must provide highway access in conjunction with each site. The evidence base clearly refers to access being taken from the Cavanna site to the north (i.e. via Middle Green). Table 24 of Topic Paper 9 summarises the LAA, and states in relation to the land west of Palstone Lane:

"Palstone Lane is inappropriate for use as access to the site to any significant extent. Any access should be routed through the Cavanna site in the longer term, if site considered suitable, or there should be significant improvements to Palstone Lane"

5.17 The recommendations at paragraph 10.4 of Topic Paper 9 state:

"Long term access should be through the adjoining housing, and not via Palstone Lane."

5.18 However, the planning application in relation to Site 7.14 involves access being taken directly from the narrow Palstone Lane, with no access through to the land to the south (i.e. Site 7.15) and no connectivity with the Cavanna site. This part of the policy cannot now be complied with, and it is unclear how a further 34 homes can be accessed directly from Palstone Lane.

5.19 We consider that this allocation should be deleted. Our client's land at Noland's Park is proposed as an alternative allocation.

Proposal 7.17 (2) Land at Station Yard

5.20 We support the proposed allocation. However we question whether there is any realistic prospect of the rail station being re-opened on the basis of the plan as currently drafted. We have previously suggested that options are explored for increasing the quantum of development in South Brent with a view to attracting S106 or CIL contributions towards delivering the re-opening of the rail station.

6. Proposed allocation: Noland Park, South Brent

- 6.1 Wainhomes is proposing the land at Noland Park as an allocation for residential development, either across part or the whole of the site. The proposed housing would include the full policy requirement of affordable housing, and as part of that our client could look to include an element of community-led custom/self-build housing on part of the site. A small quantum of employment land could also be delivered as part of a mixed-use development.
- 6.2 In addition, there are potential community benefits that could be achieved due to the scale of the land under the control of Wainhomes, for example the potential to deliver land for community use such as new playing fields or re-located allotments.
- 6.3 We set out further details of the site and respond to the Council's evidence base below.

The site

- 6.4 The site is located to the south of South Brent, north of the A38. A site location plan is appended at **EP1**. The site is under the control of Wainhomes, and is being promoted for residential development.
- 6.5 The site comprises approximately 12ha. It is bounded by residential development to the north, Kerries Road to the east, the A38 to the south, and the South Brent Waste Water Treatment Works to the east. The site is very well contained by the village to the north and the A38 to the south.
- 6.6 The site itself comprises 5 fields which appear to be used for agriculture (grazing). The fields are subdivided by hedgerows. There is a frame structure which can be seen looking west from Kerries Road, but the majority of the site is undeveloped.
- 6.7 The site is assessed within the LAA under 2 parcels:
- Land at Corn Park and Crowder Park, South Brent (ref: DNP14/078) – The site is identified as suitable, available and achievable, with a capacity of approximately 125 dwellings including 63 dwellings in years 1-5. In terms of constraints, the only issue identified is the need for noise mitigation due to the presence of the A38.
 - Roseland, Corn Park, South Brent (ref: DNP14/079) – This site forms part of DNP14/078 (the second most westerly field). The capacity of this site is identified as 12 dwellings.

Impact on the landscape / National Park

- 6.8 The National Park boundary runs along the A38. The site lies just within the National Park, but is enclosed by permanent development and road infrastructure on all sides. As such the site makes very little contribution to the landscape and scenic beauty of the wider National Park to the north of the A38.
- 6.9 As set out in our response to the proposed allocations at Palstone Lane, the LSA 2017 assesses 3 parcels around South Brent. The land at Palstone Lane falls under parcel S2, which is deemed to have lower sensitivity for accommodating development than the parcels S1 & S2. The overall assessment states:

*"The pockets of valued semi-natural wet grassland and woodland habitats, remnant medieval field patterns, and views across the landscape to Beara Common and the Dartmoor uplands increase sensitivity. However the gentle landform, large-scale field pattern, low density of overlying landscape features, lack of traditional field boundaries and the presence of modern development on the settlement edge, visual and auditory disturbance from the A38 reduces sensitivity to **moderate-high** overall. The fields to the south of the settlement/north of the A38 have lower sensitivity." (our emphasis)*

- 6.10 The LSA therefore clearly identifies that the fields to the south of the village (i.e. Noland Park, site refs: DNP14/078 & DNP14/079) have lower sensitivity and are therefore more suitable for accommodating development.
- 6.11 Land to the south of the settlement also lies between the urban edge of South Brent and the A38, which forms the National Park boundary. The only logical conclusion is that development to the south of South Brent would have the least impact on landscape and also the National Park. This should have been a critical consideration in determining which sites to allocate in the plan.

Scale of development / local character

- 6.12 Section 10.4 of Topic Paper 9 sets out the following in relation to the site:

"The scale and extent of the areas put forward is out-of-keeping with the local growth requirements for South Brent, and delivery of SBR1 has substantially addressed local housing need. Development here would would [sic] not reinforce the local character of the town, and a large new estate in this area would add further suburban character."

- 6.13 There is no justification for this conclusion. Taking each point in turn:

- The need for affordable housing in South Brent is at least 50 units over the period 2014-2019 alone. The proposed allocations would not meet this need. In fact, there would be a substantial shortfall.
- Any concerns in relation to the scale of the site could be overcome through a smaller allocation of part of the site only, potentially alongside land which would be set aside for community benefit.
- Wainhomes is committed to achieving exemplary design and would consider bespoke design options for the development of this site to complement and reinforce local character. As set out above, our client could look to include an element of community-led custom/self-build housing on part of the site.
- It is not clear why these negative impacts would be realised if the land at Noland Park was developed in comparison to other options.

6.14 We also note the comment at page 47 of Topic Paper 9 that:

"The SEA noted that Corn Park sites would alone or in combination bring the settlement to the A38 which will negatively impact the village's identity."

6.15 As we have set out in our response to the Sustainability Appraisal in Section 7 below, it is not clear why the 'erosion of the gap' between the settlement and the A38 is considered to have a negative effect on the settlement's character or identity, when the Sustainability Appraisal acknowledges that *"the identity of South Brent is defined by the A38 to the south..."*

Potential community benefits

- 6.16 As set out above, the proposed housing would include the full policy requirement of affordable housing, and as part of that our client could look to include an element of community-led custom/self-build housing on part of the site.
- 6.17 In addition, there are potential community benefits that could be achieved due to the scale of the land under the control of Wainhomes, for example the potential to deliver land for community

use such as new open space or re-located allotments. There is very little open space in the south of the settlement⁵, and this site could help to address this spatial imbalance.

Site capacity

- 6.18 The LAA indicates a capacity of 125 units. The LAA identifies a minimum yield of 92 units, and a maximum yield of 157 units. We are advised that the capacity of the site could be up to approximately 300 dwellings, with potential for employment land. However subject to the amount of housing to be distributed to South Brent, the site could be brought forward in part or in different phases, with the eastern-most fields accessed off Kerries Road forming a potential allocation in the Local Plan. As set out above, other parts of the site could be brought forward for community uses such as playing fields.

Delivery

- 6.19 The site is under the control of a housebuilder with a track record of delivery in the local. The site is viable and could be delivered in the early years of the plan period. We consider that there is significantly less certainty around the Palstone Lane site, as third party land may be required for access, and funding sources for the Community Land Trust are not known.
- 6.20 Topic Paper 9 states the following in relation to delivery on the site:

"The Corn Park sites north of the A38 appear to form part of a single farming operation (grazing) in multiple ownerships and it is not clear how development on part of the area will impact agricultural use."

- 6.21 In response, there are presently two access to the site. If only part of the site is developed (and the remainder is not used for community uses) it would be relatively straight forward to retain an access, or incorporate a new agricultural agricultural access through to land, which would remain viable for grazing.

Highways and transportation

- 6.22 We have previously provided a Technical Note on highways to the Council. This is appended at **EP2**. This addresses highway and transportation matters related to the proposed development of the site, including detailed plans setting out potential access arrangements. The report

⁵ See South Brent Settlement Profile, Map 2

concludes that there are no highways or transportation issues that would prevent the site being developed. The site is very well located to access employment, schools and local facilities.

Ecology

- 6.23 An Extended Phase 1 Habitat Survey was undertaken in May 2017. This has informed the preparation of an Ecological Constraints and Opportunities Plan, a copy of which is appended at **EP3**. The document is advisory and recommends that further survey work is undertaken to inform a planning application. However, no significant constraints are identified which could not be considered, addressed and mitigated at the planning application stage.

Affordable housing / viability

- 6.24 We note that the land at Palstone Lane has the involvement of a Community Land Trust. The site at South Brent would include the full policy requirement of affordable housing, and as part of that our client could look to include an element of community-led custom/self-build housing on part of the site. Indeed such a solution may be eminently more deliverable given the comparative lack of constraints and the backing of an experienced developer.
- 6.25 There will clearly be concern as to whether site allocations can deliver the full policy requirement for affordable housing, given that site SBR1 in South Brent was allocated on the basis of it providing 50% affordable housing, but only 35% was provided through application 0354/14. Wainhomes has undertaken an internal development appraisal which confirms that the full level of affordable housing provision is viable. We would be happy to provide further financial information confidentially to prove that this is the case, and to provide security that affordable housing contributions will not be contested in the future. Wainhomes would also consider emerging models of housing delivery on the site, such as starter homes.
- 6.26 In conclusion, we consider that the site offers a deliverable option which could deliver much needed market and affordable housing, with the least amount of impact upon the National Park owing to the location and characteristics of the site.

7. Sustainability Appraisal

- 7.1 It should be noted from the outset that the Sustainability Appraisal process is a numerical exercise which fulfils a legal requirement to assess reasonable alternatives. It cannot replicate a planning balance exercise, which involves the weighing of numerous quantitative and qualitative planning considerations, and should not be used as the sole or main methodology for the selection of policies or site allocations in the emerging plan. Assessing matters such as accessibility to services or landscape sensitivity requires a far more considered appraisal than a simple scoring based upon proximity to certain features.
- 7.2 Notwithstanding the above, we note that the Sustainability Appraisal is used to justify the NPA's selection of sites in the Development Sites Topic Paper 9, and consequently it is important that the Sustainability Appraisal correctly assesses each site. In relation to the assessment of development site options at South Brent (Appendix V of the Sustainability Appraisal), we raise the following concerns:
- Despite noting that the LSA 2017 specifically identifies that the fields to the south of the village have a lower sensitivity, this is not reflected within the scoring of sites 14/078 and 14/079 in Category 1 (landscape and settlement character). Sites 4/078 and 14/079 erroneously receive the same score as other sites which the LSA 2017 clearly identifies as being of higher sensitivity.
 - When assessing site 14/078 undue reliance appears to have been placed upon the scale of the site, without due regard to the fact that part of the site could be allocated. For example in relation to maintain and enhance community and settlement identities, the appraisal claims that the site would form a *"large extension which could have a significant effect on the settlement's identity"*. The site receives a negative assessment in this category. However the Council is aware that the site has been put forward as an allocation potentially across part of the site only, and it appears that assessing a smaller parcel would have resulted in a different score.
 - It is also not clear why the 'erosion of the gap' between the settlement and the A38 is considered to have a significant effect on the settlement's identity (Part 8 of the South Brent assessment table), when in the opening to the paragraph of part 8 it is correctly stated that *"the identity of South Brent is defined by the A38 to the south..."* This is a significant and important flaw because the Development Sites Topic Paper then relies upon this as justification for discounting the site as a potential allocation.

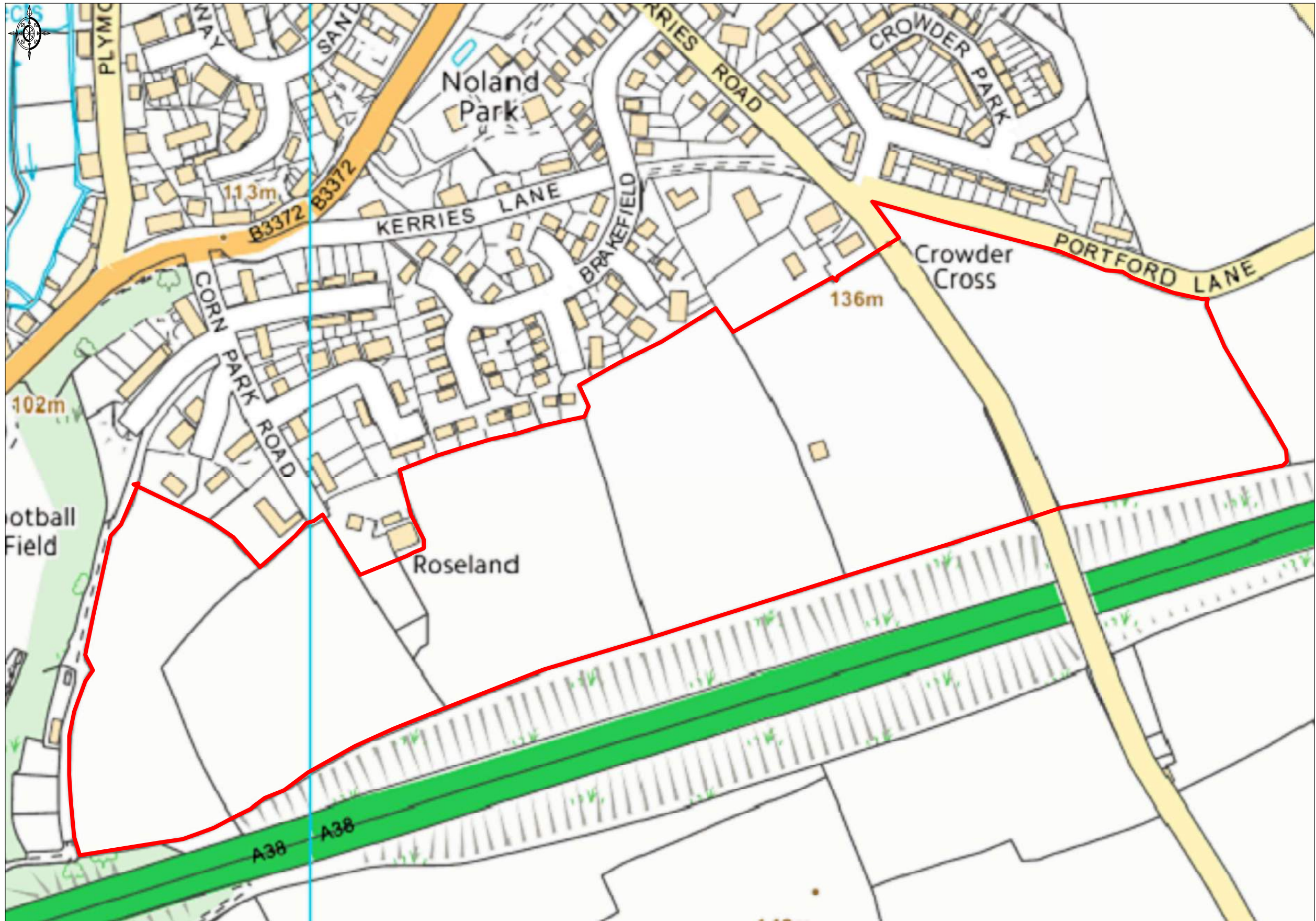
8. Summary and conclusions

- 8.1 Wainhomes is proposing the land at Noland Park as an allocation for residential development, either across part or the whole of the site. The proposed housing would include the full policy requirement of affordable housing, and as part of that our client could look to include an element of community-led custom/self-build housing on part of the site. A small quantum of employment land could also be delivered as part of a mixed-use development. In addition, there are potential community benefits that could be achieved due to the scale of the land under the control of Wainhomes, for example the potential to deliver land for community use such as new playing fields or re-located allotments.
- 8.2 We consider that the Local Plan should plan for development based upon the capacity of specific settlements to accommodate development, particularly in terms of the impact on the National Park. We therefore consider that a higher level of growth should be apportioned to South Brent, where suitable sites have been identified to the south of the village that could be brought forward with the least amount of impact on the National Park.
- 8.3 The NPA has chosen to allocate an alternative site at Palstone Lane (parts a and b). However, the proposed allocation is at odds with the evidence base, specifically in terms of landscape and highways. In relation to highways, the evidence base is clear that access to the Palstone Lane site should be taken from the Cavanna site to the north (Middle Green). However, third party land is required and the planning application for part a of the site relies upon access from Palstone Lane. It is not clear how part b, for a further 34 dwellings, can be delivered.
- 8.4 In relation to landscape, the LSA 2017 assesses 3 parcels around South Brent. The LSA clearly identifies that the fields to the south of the village (i.e. Noland Park, site refs: DNP14/078 & DNP14/079) have lower landscape sensitivity to all other options in the village. The only logical conclusion is that development to the south of South Brent would have the least impact on landscape and also the National Park. This should have been a critical consideration in determining which sites to allocate in the plan.
- 8.5 In conclusion, we consider that the land at Noland Park offers a deliverable option which could deliver much needed market and affordable housing, with the least amount of impact upon the National Park owing to the location and characteristics of the site. We therefore propose that the site is allocated for residential development in the plan, either in full or in part.

9. Appendices

- EP1. Site Location Plan
- EP2. Technical Note – Highways and Transportation
- EP3. Ecological Constraints and Opportunities Plan

EP1



EP2



Technical Note

Kensington Court
Woodwater Park
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Land South of Noland Park, South Brent

Dartmoor Local Plan Review

Technical Representations on Transportation

Project No.	0444
Revision	Initial Issue
Date	28 March 2018
Client	Wainhomes (SW Holdings) Ltd
Prepared	S Davenport
Checked	A Wozniczko
Authorised	I Awcock
File Ref.	p:\0444 land south of noland park, south brent\c documents\reports\0444 - land south of noland park, south brent - technical representation note.docx

1 Introduction

- 1.1 This Technical Note (TN) has been prepared in response to Dartmoor National Park Authority's Call for Land within the review of its Local Plan.
- 1.2 The site is located within the southern part of the Village. It is bounded to the south by the A38(T) and on its northern boundary by existing residential development.
- 1.3 The site that is discussed within this Technical Note has been identified as deliverable land within the Land Availability Assessment for South Brent dated July 2017 (site ref: DNP14/078). The Review Panel considered the site to have a yield of between 92-157 dwellings on the land.
- 1.4 This TN sets out the highway and transportation matters related to the proposed development land.

2 Access Strategy

- 2.1 The site is bisected by an unnamed road, which forms an extension of Kerries Roads. To the north the road runs into the centre of the Village, and to the south it provides access to a small number of isolated dwellings and beyond to Avonwick. This is a single-track route with a number of passing places along its length. The road is currently subject to the national speed limit through the site, although speeds are anticipated to be significantly lower.
- 2.2 Access arrangements to the proposed allocation site would be from two simple priority junctions to the east and west of this route. The indicative access arrangements, shown on SK-01 contained within Appendix A, demonstrate that access could be easily achieved into both the eastern and western parcels of land on the site. The accesses would be 5.5m wide with a 2m footway on either side and uncontrolled crossings with tactile paving and dropped kerbs to facilitate pedestrian movement. The existing highway would also be widened between the proposed site access and the junction of Kerries Road and Crowder Road, to 5.5m to improve the current layout.
- 2.3 The indicative arrangements also incorporate a new 2m footway to the north, tying into the existing pedestrian footway provision to the centre of the Village. To further increase the pedestrian provision of the area a number of off-site highway alterations could be made. These improvements, including measures to rationalise the junction of Crowder Park/Portford Lane/ Kerries Road, are shown in SK-01 contained in Appendix A. This would add to the pedestrian provision in the area, by reducing road crossing distance and providing more formalised crossing locations.
- 2.4 At the northern end of Kerries Road, there is a narrowing of the carriageway over a 40m length of the route. This localised narrowing would be considered in more detail at the planning stage, should the land come forward for development. However, potential improvements could include a formalised priority working arrangement to better manage the flow of traffic.
- 2.5 It is envisaged that the 30mph speed limit would be extended along the entire frontage of the site.
- 2.6 There is also potential for a second active travel access into the western parcel of land at Corn Park. This would be limited to use by pedestrian and cyclists only, with the potential for emergency access. This link would further improve the connection to the wider neighbourhood and provide an additional choice for active travel modes into the site.

3 Site Accessibility

3.1 The proposed allocation site is in a highly accessible location. Appendix B contains a site accessibility plan for the area.

3.2 The plan shows that within South Brent there are a number of facilities all within 800m of the proposed allocated land. The distance of 800m has been chosen as “Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes’ (up to about 800m) walking distance of residential areas which residents may access comfortably on foot.” (Manual for Streets, 2007).

3.3 The liveability of an area is influenced by the range of services that can be accessed easily from a development. The proposed allocation land at South Brent provides a very wide range of choices, these include

- Retail Facilities;
- Health Centre;
- Primary School;
- Library; and
- Post Office.

3.1 As shown there is a very wide range of services within the recommended distance. There would therefore be good opportunities for residents to access local facilities by foot for their everyday needs.

3.2 The provision of public transport within South Brent is also excellent. As shown on the accessibility plan contained in Appendix B, there are two bus stops located within 400 metres (approx. 5 minutes’ walk) from the proposed allocated land.

3.3 In conclusion the location of the proposed allocation land within South Brent provides excellent links into the centre of the Village where a wide range of local facilities are available. It is therefore considered to provide a sustainable location for residential development as required by the NPPF. The close positioning of these services improves the potential liveability of any development and further strengthens the case for allocation.

4 Sustainable Transport

4.1 South Brent is a highly connected village to major population and employment centres within the region.

- 4.2 As shown within Chapter 3 of this TN, the proposed allocation land is within 400 metres/or around 5 minutes walk of two bus stops. These stops provide good quality and frequent services into the major employment and population centres of Plymouth and Ivybridge. The frequency of the services is shown in Table 4.1 below:

Table 4.1: Existing Bus Services from South Brent

Service Number	Operator	Destinations	Typical Frequency		
			Mon - Fri	Sat	Sun
GOLD	Stagecoach South West	Plymouth City Centre – Efford – Ivybridge – Bittaford – South Brent – Rattery – Dartington – Totnes	Every 30 mins	Every 30 mins	Hourly
X38	Stagecoach South West	Plymouth City Centre – Cattledown – Efford – Ivybridge – Bittaford – South Brent – Buckfastleigh	Every 3 hours	Every 3 hours	Twice daily
913	Country Bus (Newton Abbot)	Ashburton – South Brent – Rattery – Tigley – Dartington – Swallowfields – Totnes	Daily*	-	-
*Only runs on Monday, Tuesday, Wednesday			Date: 15.02.2018		
Sources: travelinesw.com					

- 4.3 The Stagecoach GOLD bus service provides a frequent and quick link into Ivybridge and Plymouth City Centre. There are a number of services that arrive in Plymouth before 9am and leave after 5pm, enabling the service to be used as a commuter link. Combining active travel with the Stagecoach GOLD service, the journey time to Plymouth is approx. 40 minutes. This provides a highly sustainable commuter service.
- 4.4 Ivybridge is the location of the nearest railway station. It is a 20 minute bus journey from South Brent and provides opportunities for travel further afield to destinations including Plymouth, Exeter and Bristol throughout the day.
- 4.5 It is understood that there is an aspiration for the reopening of South Brent railway station. This is obviously a long process but clearly this opportunity would not be present in other settlements within the district.
- 4.6 With the additional dwellings from the proposed allocation land, the population density of the surrounding area would be increased. Academic studies have shown that the higher the population density of an area, the higher the ridership of rail systems. The allocation of this land could therefore help to make the reopening of South Brent Railway Station a viable undertaking.
- 4.7 National Cycle Network 2 runs within 400m of the proposed allocation land this provides a sustainable active travel route into the major population centres of the region. Ivybridge can be reached in under half an hour by bike, further increase the sustainable modes of transport from the site.

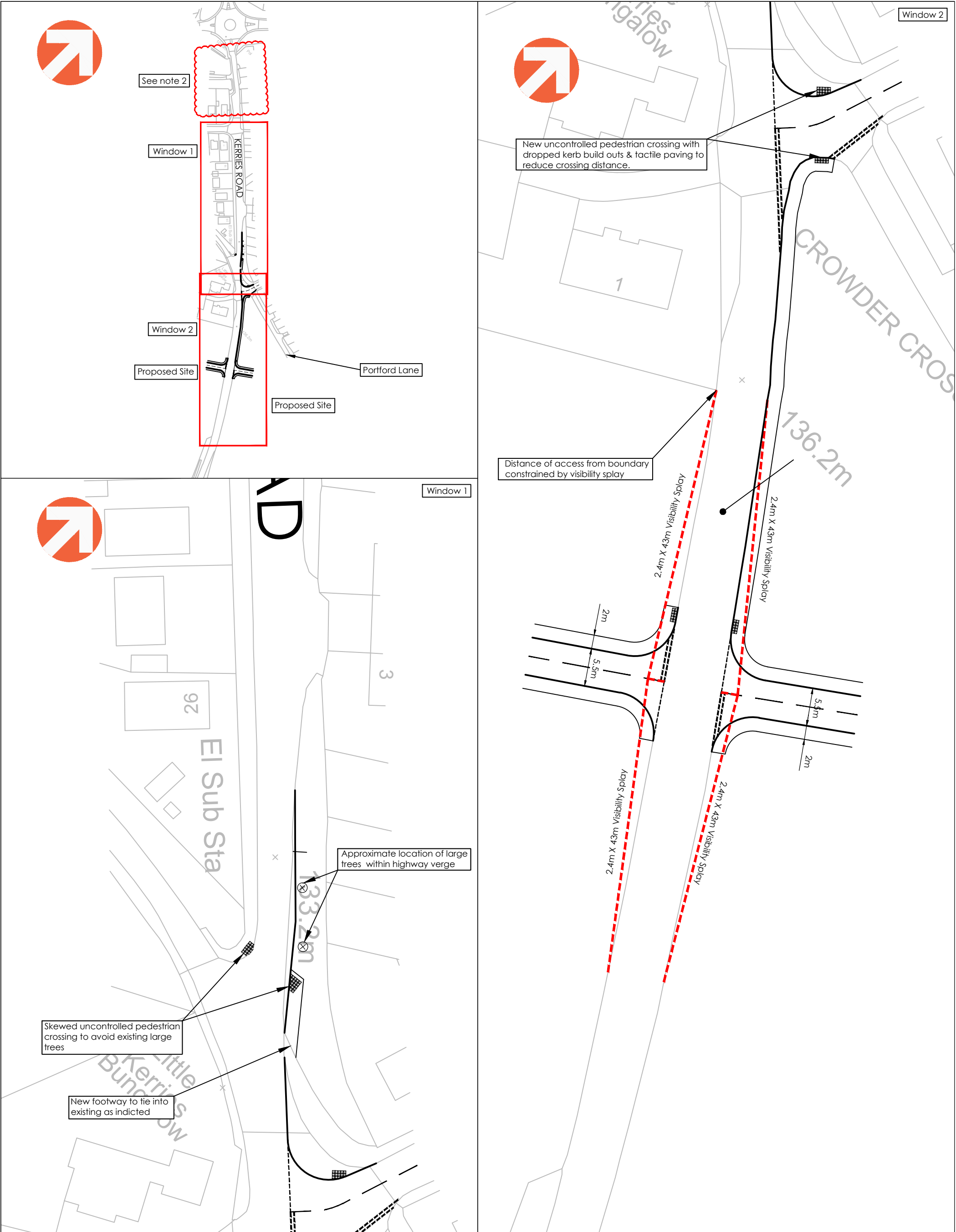
- 4.8 South Brent is within 1km of the A38(T) Devon Expressway, this is a major trunk road that connects Plymouth and South Devon with the M5 and Exeter.
- 4.9 The accessibility and sustainability of the site is excellent. The opportunities for sustainable travel from the proposed allocated land are numerous, with multiple facilities and amenities being within 800m/10 minutes walk. There are excellent public transport links enabling many different trip types to be undertaken to the major population centres of the area.

5 Conclusion

- 5.1 In conclusion, the proposed site is highly accessible to a wide range of local facilities and public transport opportunities. These factors would enable the delivery of sustainable development in transport terms, as required by the NPPF.
- 5.2 There are a number of opportunities to provide access to the site for sustainable modes and general vehicular traffic. Local improvements on pedestrian footpath provision can form part of the development proposals. It is therefore considered that a safe and sustainable access can be achieved as required by the NPPF.
- 5.3 An access strategy for development at the site has been identified and this would be agreed with Devon County Council as part of the normal Transport Assessment process. It is not anticipated that there will be any severe traffic impacts on the wider network associated with the levels of development proposed at the site.
- 5.4 In conclusion, therefore, there are not considered to be any highways or, transportation issues that should prevent the 'Land South of Noland Park, South Brent' forming part of the adopted Dartmoor National Park Local Plan. The site is very well located to access employment, schools and local facilities and so in accordance with NPPF should be brought forward for development without delay.

AWP

Appendix A SK-01




Note 1:

30mph speed limit to be extended south in line with extent of development.

Note 2:

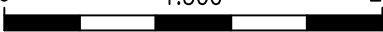
Widths to be confirmed. Traffic calming / on way workings may be required


C	28.03.2018	TEXT AMENDED	SD	AJW	AJW
B	16.02.2018	TEXT AMENDED	IW	SD	AJW
A	20.02.2016	INITIAL ISSUES	TMR	AJH	AJW
REV	DATE	DESCRIPTION	BY	CHK	APD
CLIENT:  WAINHOMES (SOUTH WEST) HOLDINGS LTD					
DRAWING STATUS: FOR INFORMATION ONLY					

PROJECT:
LAND SOUTH OF NOLAND PARK, SOUTH BRENT

TITLE:
INDICATIVE ACCESS ARRANGEMENTS

PROJECT No: 0444	DRAWING No: SK-01	REV: C
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SCALE @ A0
 **1:500** **25** metres

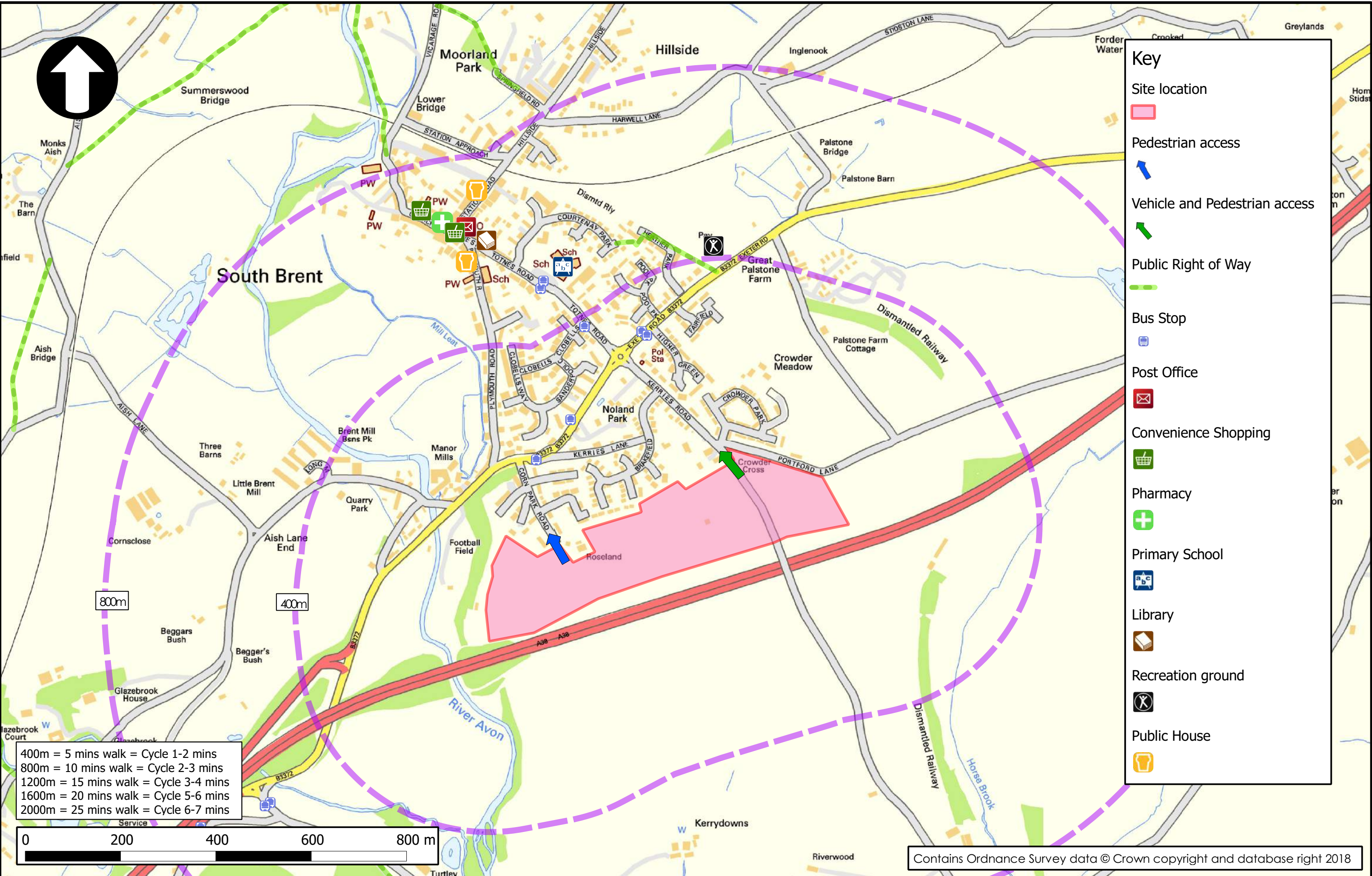


awcockward
partnership

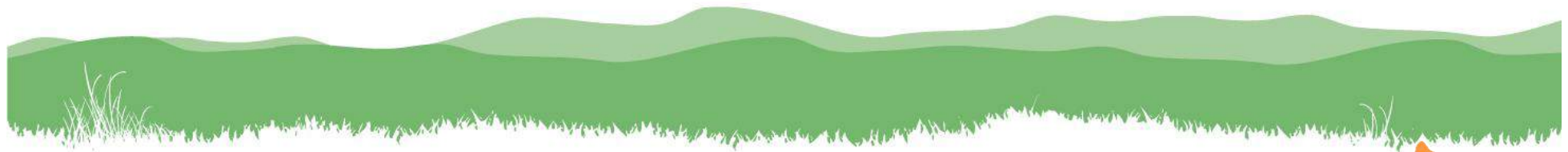
Awcock Ward Partnership, Kensington Court, Woodwater Park, Pynes Hill, Exeter, EX2 5TY
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Appendix B Site Accessibility Diagram



EP3



Ecological Constraints and Opportunities Plan



Land at South Brent, Dartmoor National Park, Devon (central OS grid reference: SX 701 594)

This document has been produced by Green Ecology on behalf of Wainhomes to provide an outline of the ecological constraints identified at the above site and identify opportunities for incorporating biodiversity enhancements into future development proposals. Note that this document aims to provide design and planning advice, and it is not intended to be submitted with a planning application to develop the Site. However, recommendations have been provided below with a view to support and enhance any future applications.

Site Survey

The survey comprised an Extended Phase 1 Habitat Survey undertaken on 11 May 2017, supplemented by a desk-based study, whereby biological data was obtained from the Devon Biodiversity Records Centre (DBRC). **Figure 1** below shows the survey area and identifies key constraints and opportunities to avoid, mitigate and enhance key ecological features. **Table 1** following the Figure provides more detail of issues for consideration.

Further Survey Work

The timeline below shows the further ecological survey work that would be expected to accompany a planning application and to inform suitable mitigation. Many of these surveys are seasonally constrained and therefore ecological advice early in the project programme is always recommended.

TASK	May	June	July	August	Sept	Oct	Nov		April
Consultation with LPA/ Natural England									
Communing/ foraging bat survey – (1 transect per month April – October & 4 automated bat detectors per visit for 5 nights)									
Dormouse survey (100 tubes, set up in May, complete by end of September)									
Reptile survey (optimal survey period April-May and September, although summer months can also be acceptable)									
Breeding bird survey (3 visits March – May)									
Ecological Appraisal Report									



Table 1: Potential Constraints and Opportunities Related to Development of Site

Map Ref	Ecological Receptor	Constraints/ Issues for Consideration	Opportunities
Designated Sites			
n/a	Natura 2000 sites within 10km: South Hams Special Area of Conservation (SAC), Dartmoor SAC, South Dartmoor Woods	<ul style="list-style-type: none"> The LPA is likely to be required to undertake a Habitats Regulations Assessment, for which information on mitigation will need to be provided within the planning application – this normally takes the form of a 'Shadow HRA' produced by the applicant. Mitigation will need to ensure no adverse effects as a result of air pollution, water pollution, recreational disturbance and impacts to greater horseshoe bats. 	<ul style="list-style-type: none"> Recommend that pre-application advice / consultation with the LPA ecologist and Natural England is undertaken. Ensure that no impacts arise during construction (e.g. through Construction Environmental Management Plan (CEMP)). Include Public Open Space (POS) in design to provide alternative recreational space for residents.
n/a	Statutory sites within 2km: Lady's Wood and Viaduct Meadow Site of Special Scientific Interest (SSSI) notified for woodland and grassland habitats.	<ul style="list-style-type: none"> The SSSI is not considered likely to be a constraint. 	<ul style="list-style-type: none"> N/A.
1	Non-statutory sites within 2km: Spriggsmoor County Wildlife Site (CWS) 1.1km north. The western field is within 'Living Dartmoor's' Habitat Link – areas identified at the local level which join two or more larger blocks of wildlife habitat.	<ul style="list-style-type: none"> Core Policy 7 of the Core Strategy states that 'opportunities will be sought to restore or re-create habitats or enhance the linkages between them'. Therefore consultation recommended with LPA as to how the Habitat Link should be incorporated into the proposal. 	<ul style="list-style-type: none"> There may be opportunities to enhance habitat links through the creation of multi-functional green infrastructure.
Habitats			
2	Semi-improved grassland	<ul style="list-style-type: none"> Some compensation should be provided in new development e.g. species-rich or tussocky grassland. 	<ul style="list-style-type: none"> Create linked-up public open space with wildlife areas such as species-rich grassland, with scattered trees/ scrub; this could provide semi-

Map Ref	Ecological Receptor	Constraints/ Issues for Consideration	Opportunities
			<ul style="list-style-type: none"> natural multi-functional green infrastructure. Plant buffers adjacent to hedgerow bases and road verges with species-rich grassland.
3	Hedgerows	<ul style="list-style-type: none"> All hedgerows on site are Habitats of Principal Importance (S41 of NERC Act) and some are 'Important' under the Hedgerow Regulations 1997 (see map). It is highly recommended that all hedgerows are retained and buffered. Any losses will need to be compensated for. Hedgerows should be outside the curtilage of individual properties where feasible. 	<ul style="list-style-type: none"> Replace any losses with equivalent or greater length and incorporate new native hedges throughout development i.e. as 'wildlife corridors/ green infrastructure'. Gaps should be planted up to enhance connectivity around the site.
4	Buildings	<ul style="list-style-type: none"> None identified. 	<ul style="list-style-type: none"> N/A
Fauna			
5	Breeding birds	<ul style="list-style-type: none"> Protected under Wildlife and Countryside Act (WCA) 1981. Potential for offence to be committed by damaging/ destroying active birds' nests if removal of hedgerows or trees required. The Site may support a notable farmland bird assemblage. <u>Surveys required</u> to establish presence and inform development/ mitigation. The site is <u>outside</u> the curtilage consultation zone (therefore no constraints regarding this species). 	<ul style="list-style-type: none"> Plan work programme to avoid removing suitable habitat in the bird breeding season (March – August inclusive) or with a check for active birds' nests prior to vegetation clearance. Retain habitats that provide nesting habitat. Enhance site by providing new nesting opportunities e.g. place nest boxes on retained trees and incorporate nest boxes into new buildings.
6	Bats	<ul style="list-style-type: none"> European Protected Species and records of important species nearby. Site boundaries may be important commuting/ foraging routes. <u>Bat activity surveys required</u> to establish presence and inform development. 	<ul style="list-style-type: none"> Identify key areas for bats, retain these habitats where possible as 'wildlife corridors'. Avoid direct lighting of key areas during construction and operation. Enhance site with additional roosting opportunities, new hedgerows and network of connected semi-natural habitats.
7	Dormouse	<ul style="list-style-type: none"> European Protected Species. Hedgerow loss may result in an offence. <u>Further surveys required</u> to establish presence. 	<ul style="list-style-type: none"> Retain hedgerows where possible. Incorporate additional native tree/shrub planting to maintain/ enhance habitat extent and connectivity with wider landscape. Enhance hedgerows by planting up gaps and undertaking sensitive management regime.

Map Ref	Ecological Receptor	Constraints/ Issues for Consideration	Opportunities
8	Reptiles	<ul style="list-style-type: none">Protected under WCA 1981. <u>Surveys required</u> to establish presence.Potential for offence to be committed during site clearance through killing/ injury if hedgerows removed, therefore recommend that hedgerows are retained with a buffer area of long grass. A translocation exercise may also be required depending layout.	<ul style="list-style-type: none">Retain key habitats for reptiles, e.g. hedgerows.Enhance site with habitat for reptiles such as log piles and pond in public open space or 'wildlife areas'.

www.green-ecology.co.uk - 0845 474 8774 - info@green-ecology.co.uk