

**Ward** Budleigh And Raleigh

**Reference** 21/1392/FUL

**Applicant** Mr Neil Harris

**Location** Joneys Cross Car Park Hawkerland Colaton Raleigh

**Proposal** Car park improvements.



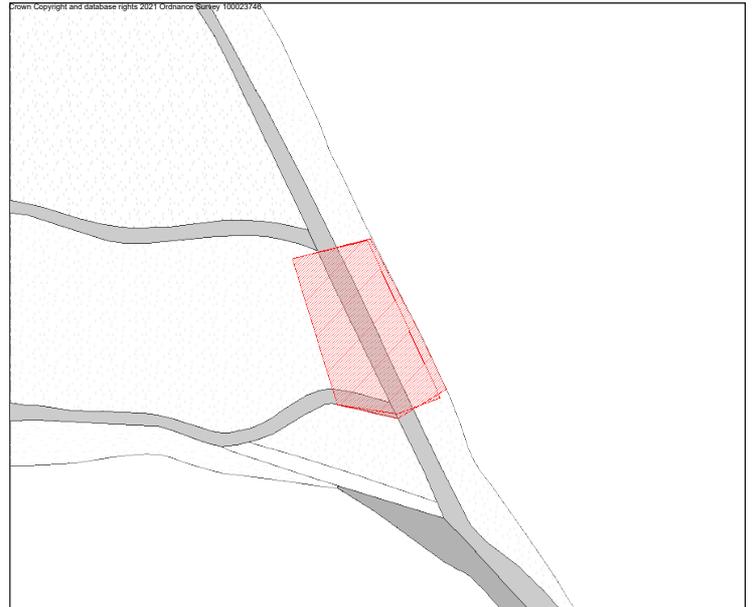
**RECOMMENDATION:**

- 1. Adopt the Appropriate Assessment forming part of this report; and**
- 2. Approve with conditions**

**Joneys Cross Car Park**



**Stowford Woods Car Park**



**Four Firs Car Park**



**Frying Pan Car Park**



		<b>Committee Date: 27th Oct 2021</b>
<b>Budleigh And Raleigh (Colaton Raleigh)</b>	<b>21/1392/FUL</b>	<b>Target Date: 17.08.2021</b>
<b>Applicant:</b>	<b>Mr Neil Harris</b>	
<b>Location:</b>	<b>Joneys Cross Car Park Hawkerland</b>	
<b>Proposal:</b>	<b>Car park improvements</b>	

**RECOMMENDATION:**

1. **Adopt the Appropriate Assessment forming part of this report; and**
2. **Approve with conditions**

**EXECUTIVE SUMMARY**

**This application is before Committee as the applicant is East Devon District Council.**

**The East Devon Pebblebed Heaths is a Site of Special Scientific Interest (SSSI) covering some 1,400 ha. and are designated a Special Area of Conservation (SAC) for the heathland habitat and Southern Damselfly and as a Special Conservation Area (SPA) for Nightjar and Dartford Warbler.**

**The proposal seeks planning consent for works to four different sites which provide parking accommodation for visitors of the Pebblebed Heaths. This has been submitted as one planning application, however due to the different constraints of each of the four sites and to make it clearer during the consultation process, each of the four sites within the application have been attributed their own planning references. These being;**

**21/1392/FUL – Joneys Cross Car Park, Hawkerland  
21/1442/FUL – Stowford Woods Car Park, Colaton Raleigh  
21/1443/FUL – Four Firs Car Park, Woodbury  
21/1444/FUL – Frying Pan Car Park, The Common**

**Together the works to each of these four sites provides a coherent strategy for updating the visitor experience and providing for increased visitor numbers. By increasing capacity at the larger car parks means that there would be an increased focus in these area with less harm likely to arise in other satellite car parking area, thereby reducing harm to the wider Pebblebed Heaths.**

All four proposals would lead to much needed improvements to the surfacing, configuration and drainage of the existing car parking. The increased functionality and expansion of the site would be justified due to the increased demand experienced.

The proposal at Frying Pan would improve an existing car parking facility in terms of an appropriate surface and barriers. However, this specific element of the overall strategy drawn has an objection from the Highway Authority due to the increased the likelihood of manoeuvring on this stretch of highway from a lack of turning provision. To address this, the applicant has removed the originally proposed parallel parking spaces from the proposal for this site, retaining the spaces that allow for off-road turning.

The application is therefore recommended for approval.

### **WARD MEMBER COMMENTS:**

Cllr Paul Jarvis – Budleigh and Raleigh

I am happy with the recommendations.

Cllr Alan Dent – Budleigh and Raleigh

Thank you for sight of this report and I confirm that I'm happy with the recommendations to:

1. Adopt the Appropriate Assessment forming part of this report; and
2. Approve with conditions

### **CONSULTATIONS IN RELATION TO JONEYS CROSS CAR PARK – 21/1392/FUL**

#### **Local Consultations**

##### Parish/Town Council

It is not clearly shown on the plans that the pathway proposed to be closed currently exits onto the safety of the grass verge alongside the A3052, whilst the bridleway exits onto a dangerous blind bend with no footpath and no view of oncoming traffic turning in from the Newton Poppleford direction. This path/track is currently used by people with children/dogs to cross the main road to the RSPB reserve. Local people also park here and use the path when catching a bus to Exeter. The proposal to reinstate/create a bridleway leading out onto a road with limited vision to oncoming traffic and no footpath is considered unacceptable and dangerous. The bridleway meets the road at a blind spot for both motorist and pedestrian. Any responsible horse-rider is unlikely to use it because of the danger already highlighted.

The Parish Council strongly objects to plans to block the existing pathway between the car park and A3052.

Clerk To Aylesbeare Parish Council

Aylesbeare Parish Council supports this application and looks forward to the improvements in this car park.

Please ensure that these comments are included as Consultee Comments as I am unable to make them using that process (again).

Jim Roberts

Clerk to Aylesbeare Parish Council

Further comments:

13.09.2021 - Aylesbeare Parish Council supports this application.

**Technical Consultations**

Devon County Highway Authority

The design and access statement is very comprehensive.

The new proposed access onto the A3052 had good visibility in both the east and west direction.

The surface and drainage works should help to preserve the maintenance of the HMPE carriageway and improve its safety during the colder months.

The improvements to disabled parking facilities should help ensure access to all on the common.

Recommendation:

THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, HAS NO OBJECTION TO THE PROPOSED DEVELOPMENT

EDDC Trees

No arboricultural concerns

Natural England

22/07/2021 –

Thank you for your consultations on the above four applications dated 23 June 2021. Natural England welcome these improvements to the Pebblebed Heaths car parks, which form a key part of the jointly agreed strategic mitigation strategy to manage recreational pressure on this internationally important site for wildlife. The proposals have the primary objective of safeguarding the European protected bird species and heathland habitat and have been developed through consultation with ourselves.

**SUMMARY OF NATURAL ENGLAND'S ADVICE  
DESIGNATED SITES [EUROPEAN] – HABITATS REGULATIONS ASSESSMENT**

The four application sites are within or in close proximity to a European designated site, and therefore has the potential to affect its interest features.

To demonstrate compliance with the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'), a Habitats Regulations Assessment should be undertaken.

Based on the plans submitted, Natural England considers that the proposed developments will not have significant adverse impacts on designated sites or protected landscapes and has **no objection**.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

### **European sites – East Devon Pebblebed Heaths SAC and East Devon Heaths SPA**

The application sites are within the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA), which are European sites afforded protection under the 'Habitats Regulations'. The consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Habitats Regulations have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment. Page 2 of 2

To assist you in screening for the likelihood of significant effects on European sites, Natural England offers the following advice, based on the information provided:

- the proposals are unlikely to have a significant effect on any European site, either alone or in-combination with other plans and projects, and can therefore be screened out from any requirement for further appropriate assessment.

### **East Devon Pebblebed Heaths Site of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed developments will not damage or destroy the interest features for which the site has been notified and has no objection.

### **Construction Ecological Management Plan (CEMP)**

The application documents confirm that the bird breeding season will be avoided. We suggest that a Construction Ecological Management Plan (CEMP) sets out for contractors which specific activities could disturb nesting birds and therefore need to be time limited. The dates can be tailored to avoid disturbance to the likely bird species near each car park.

Furthermore, to prevent any damage to protected site features during the works, measures should be adopted to ensure storage of materials or operation of machinery or plant only takes place within the application site boundary or existing hard surfaced area.

### **Protected Landscapes – East Devon AONB**

Based on the plans submitted, Natural England has no objection to the proposed developments. We do not consider that the proposed developments would compromise the purposes of designation or special qualities of the AONB. We would advise that the proposals are determined in line with relevant NPPF and development

plan policies, landscape and visual impacts are minimised as far as possible and landscape advice is obtained from the AONB Partnership.

## **Protected Species**

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species. The Standing Advice includes a decision checklist which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development.

You should apply our Standing Advice to these applications as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

### Historic England

JONEYS CROSS CAR PARK HAWKERLAND COLATON RALEIGH

Application No. 21/1392/FUL

Thank you for your letter of 23 June 2021 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

Phil McMahon  
Inspector of Ancient Monuments

### East Devon AONB

East Devon AONB Partnership consultation response

For time reasons our response is email only.

The East Devon Pebblebed Heaths is a significant area of Open Access Land to the western edge of the East Devon AONB which gets in excess of 400,000 annual visits, mostly by car. As well recreational and heritage significance, the area is an important wildlife habitat, with Sites of Scientific Interest, Special Areas of Conservation and SPA designations, and more recently, National Nature Reserve Status. As such, with a growing population and increasing interest in outdoor recreation, visitor management is critical to the site integrity.

A Visitor Management Plan was developed to provide a framework for delivery of mitigation for the Pebblebed Heaths to ensure they can cope with the increased levels of recreation in the future, and to give confidence that the expected growth in East Devon will not result in adverse impacts on designated features. The report was

commissioned by South East Devon Habitats Regulation Partnership to recommend a strategy for managing visitor numbers through car park space provision and distribution across the SPA/SAC. The report has been compiled analysing background reports and existing data and undertaking site surveys to prepare a plan depicting the Existing Arrangement and Habitat Context.

The primary objective of the Car Parking Strategy is to safeguard the SPA protected bird species (Nightjar and Dartford Warbler) and SAC heathland habitats from the adverse impacts and disturbance caused by people, particularly from dogs that are not on a lead.

Natural England and the AONB Partnership were represented on the officer working group developing the strategy on which the applications are based and for that reason we are supportive of the proposals at Joney's Cross (21/1392/FUL), Stowford Woods (21/1442/FUL), Four Firs (21/1443/FUL) and Frying Pans (21/1444/FUL),

East Devon AONB Partnership

#### Devon Countryside Access Forum

The Devon Countryside Access Forum (DCAF) is a local access forum under the Countryside and Rights of Way Act 2000 (CRoW Act). Its statutory remit is to give independent advice "as to the improvement of public access to land in the area for the purposes of open-air recreation and the enjoyment of the area..." Section 94(4) of the Act specifies bodies to whom the Forum has a statutory function to give advice and this list includes district councils.

The DCAF currently has fifteen members, appointed by Devon County Council, who represent the interests of landowners/managers, access users and other relevant areas of expertise such as conservation and tourism.

This response has been agreed by DCAF members and expands on comments made during the earlier consultation in November 2019. It will be put on the agenda for formal approval at the next meeting in September 2021.

The Devon Countryside Access Forum notes the planning application for works at Joney's Cross, Four Firs, Stowford Cross and Frying Pan car parks. The Forum supports this Phase 1 application for sympathetic improvements to the layout, entrance points and surfacing, particularly at Joney's Cross and Four Firs which are the two main car parks on the Pebblebed Heaths. The proposed works will encourage people to use those car parks. Having these car parks as 'hub' sites with interpretation boards and dog bins will enable responsible use of the heaths to be promoted. 2

In line with its Disability Access Position Statement, the Devon Countryside Access Forum welcomes the provision of designated disability parking spaces. Improved, regraded surfaces will also assist use by people with wheelchairs, pushchairs or motorised mobility scooters. Some access users use transit vans to transport mobility scooters and it is therefore important that the dimensions of the disabled bays accommodate such vehicles and allow side clearance to off-load a scooter. This could be achieved by allowing extra room on the end of row disabled parking space. The

Forum has previously made comments about earth bunds and advises that any exits from car parking areas to the heaths should not preclude disability use. Suitable gates, 1.5m wide, would allow easy access for all users.

In accordance with previous advice the Devon Countryside Access Forum has given, road safety for vulnerable access users is critically important. The drawings for Joney's Cross specify a 3m wide pavement and a visibility splay with drop kerbs. Improvements at Four Firs are also outlined. The Forum trusts that these will provide a safe refuge and good lines of sight of approaching traffic.

It would be helpful if signs from car parks could indicate the direction of key walk routes, with a wheelchair symbol to show whether they are suitable for such use. This is particularly important if a road crossing is needed to reach a route.

There appears to be a mismatch between the line of the bridleway (Newton Poppleford and Harpford bridleway 29) and where it exits the car park, shown on the Public Rights of Way Definitive Map ([www.devon.gov.uk/prow](http://www.devon.gov.uk/prow)) and the bridleway exit marked on 70079322-0100-007\_REV P04 (Joney's Cross Car Park General Arrangement). Extracts from these are shown in Appendix 1. It would be helpful if this could be clarified to ensure certainty and safety for equestrians (and cyclists and walkers using the route). Exiting as shown on the Plan, closer to the road junction, appears to pose road safety issues as access users using the minor road from Joney's car park, seeking to cross the A3052, could be at greater risk from vehicles and poor visibility on this section. The Car Parking Strategy states "retain this path", in other words the bridleway, "through gorse and along roadside for access to Aylesbeare Common and East Devon Way." It is also proposed to block an informal path nearby which exits onto the A3052 roadside grass verge and which currently provides a refuge with good visibility.

#### Devon County Archaeologist

Joneys Cross car park lies within an area of archaeological potential with regard to known prehistoric funerary activity in the surrounding landscape. The closest lies some 170m north-west of the carpark, while another prehistoric funerary monument that is protected as a scheduled monument is some 250m to the north-east. In addition, the Historic Environment Record indicates that road to the north of the carpark is on the putative alignment of the Roman road between Charmouth and Exeter, as well as the presence of probably WWII activity in the area.

Groundworks associated with the improvement to the carpark, including regrading of the existing ground, the creation of new drainage and excavations for new signage and other structures have the potential to expose and destroy archaeological and artefactual deposits associated with the known prehistoric and Roman activity in the immediate vicinity.

The Historic Environment Team therefore recommends that this application should be supported by the submission of a Written Scheme of Investigation (WSI) setting out a programme of archaeological work to be undertaken in mitigation for the loss of heritage assets with archaeological interest. The WSI should be based on national standards and guidance and be approved by the Historic Environment Team.

If a Written Scheme of Investigation is not submitted prior to determination the Historic Environment Team would advise, for the above reasons and in accordance with paragraph 199 of the National Planning Policy Framework (2019) and Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan, that any consent your Authority may be minded to issue should carry the condition as worded below, based on model Condition 55 as set out in Appendix A of Circular 11/95, whereby:

'No development shall take place until the developer has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation (WSI) which has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out at all times in accordance with the approved scheme, or such other details as may be subsequently agreed in writing by the Local Planning Authority.'

#### Reason

'To ensure, in accordance with Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan and paragraph 199 of the National Planning Policy Framework (2019), that an appropriate record is made of archaeological evidence that may be affected by the development'

This pre-commencement condition is required to ensure that the archaeological works are agreed and implemented prior to any disturbance of archaeological deposits by the commencement of preparatory and/or construction works.

I would envisage a suitable programme of work as taking the form of the archaeological monitoring and recording of all groundworks associated with the proposed car park improvements to allow for the identification, investigation and recording of any exposed archaeological or artefactual deposits. The results of the fieldwork and any post-excavation analysis undertaken would need to be presented in an appropriately detailed and illustrated report, and the finds and archive deposited in accordance

#### Other Representations

To date there have been one letter of objection received (in summary);

#### Representation

Comment: The comments below were approved by East Budleigh with Bicton Parish Council meeting on 29th June. The Parish Council was not forwarded the opportunity to comment on this application even though this was marked as the master car parking application, so as Chairman of the Parish Council, I am submitting the comments under the Contributor category.

I note that our Parish Council was consulted upon for Stowford and Frying Pans, but not Wheathill, Uphams, Squabmoor, which are all in our parish. Nor were we consulted upon for any others just outside our parish. Pebblebed Heaths Car Parking proposals

#### General

The Design & Access statement states that 40,000 new homes are to be built in the area by 2030, putting additional pressure on recreational facilities such as the Pebblebed Heaths with an

estimated 400,000 visits pa.. Car journeys are essential to reach the Heaths, but the response here is to reduce parking, especially in the small informal areas (153 spaces reduced to 119). As has been shown during Covid, lack of provided car parking does not stop visitors coming and they simply park elsewhere often inconsiderately or causing obstruction (e.g. Fire Access blocked, farm access / gateways blocked, passing places blocked) and damage to the environment. Such ad hoc parking is far more of a health & safety / highway hazard than formal parking. Irresponsible parking leads to anger when motorists cannot pass on blocked single-track roads and when farmers remove vehicles by force from blocked gateways. Most of the Heaths' parking facilities have existed for many years and environmental damage is likely to be less than the damage caused by ad hoc parking elsewhere on the Heaths - the law of unintended consequences. Covid has also encouraged more dog ownership and the Heaths are a favoured dog walking area. People are also encouraged to walk in open areas such as these for health reasons. Dog walking on the Heaths is the only exercise that many elderly people have. If fly tipping is a problem, then closing a car park (Frying Pans) is probably not the best solution as

the waste will be simply tipped elsewhere. It may be more productive to consider abolishing waste charges. It is difficult to see what problems existed with Uphams car park to warrant closure, it certainly is not evident. The military has private use of the Heath beyond and it works well. Removing roadside parking from the very wide hard surface road edges at Wheathill is simply a waste of money as cars are not doing any damage whatsoever. The parking situation with regard to the Bystock Nature Reserve is lamentable and to reduce the Squabmoor parking further exacerbates an already acute problem. This is clearly a favoured site for family visits and for children's educational experience, which is now being discouraged. Fire access barriers in this area are often blocked by vehicles and this could get worse.

The improvement works to the car parks, particularly relating to surfacing, is most welcome, but reducing parking capacity whilst visits are increasing is likely to lead to more severe environmental damage consequences than the status quo and is therefore counter-productive.

Previously closed car parks

DWT car park by Bystock meadow

Car park near B3179 opposite top of Hulham Rd

Yettington and historically, many more

Proposed Closures

Uphams

Frying Pans

Woodbury Castle / Estuary View

Many informal parking places

Previously Reduced

Woodbury Castle

X roads Tuckers Plantation

Proposed Reduction

Squabmoor

Stowford

Numerous part barrier closures (74 spaces)  
Many informal parking places (34 spaces)

## **CONSULTATIONS IN RELATION TO STOWFORD WOODS CAR PARK – 21/1442/FUL**

### **Local Consultations**

Parish/Town Council  
21/1442/FUL Stowford Car Park improvements

It is proposed to close the parking area on the East side of the road and allow spaces on the West side. The car parking strategy states that 10 existing spaces will be cut to 5 new spaces whereas the Design and Access statement states 7 existing and 7 new spaces. Either way the numbers are incorrect. There are currently 6 spaces available on the East side and around 9 on the West side. All these spaces are often occupied, especially at weekends, when mountain bikers visit.

As has been pointed out in the general comments, reducing the number of spaces by more than half will simply cause people to park in an ad hoc manner close by, thus causing environmental damage and obstruction. The East side is also the better parking facility currently.

EDDC installed two dog waste bins in this car parking area. One assumes that the Council expected more people to be visiting and parking than is now being envisaged? This area is too remote to reach by walking and car visits are the norm."

### **Technical Consultations**

#### EDDC Trees

The proposal is considered acceptable in principle however the impact on existing trees should be assessed.

I would therefore like to see a tree survey to British Standard 5837 submitted.

I have no objection but recommend the following condition.

(a) Prior to the commencement of any works on site (including demolition and site clearance or tree works), a scheme for the protection of the retained trees, hedges and shrubs shall be produced in accordance with the principles embodied in BS5837 :2012, which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site, [including trees which are the subject of a Tree Preservation Order currently in force], shall be submitted to and approved in writing by the Local Planning Authority. No development or other operations shall take place except in complete accordance with the approved protection scheme.

(b) No operations shall be undertaken on site in connection with the development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and / or widening or any operations involving

the use of motorised vehicles or construction machinery) until the protection works required by the approved protection scheme are in place.

(c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within any area designated as being fenced off or otherwise protected in the approved protection scheme.

(d) Protective fencing shall be retained intact for the full duration of the development hereby approved and shall not be removed or repositioned without the prior written approval of the Local Planning Authority.

Reason: To ensure the continued wellbeing of the trees in the interests of the amenity of the locality.

### East Devon AONB

#### East Devon AONB Partnership consultation response

The East Devon Pebblebed Heaths is a significant area of Open Access Land to the western edge of the East Devon AONB which gets in excess of 400,000 annual visits, mostly by car. As well recreational and heritage significance, the area is an important wildlife habitat, with Sites of Scientific Interest, Special Areas of Conservation and SPA designations, and more recently, National Nature Reserve Status. As such, with a growing population and increasing interest in outdoor recreation, visitor management is critical to the site integrity.

A Visitor Management Plan was developed to provide a framework for delivery of mitigation for the Pebblebed Heaths to ensure they can cope with the increased levels of recreation in the future, and to give confidence that the expected growth in East Devon will not result in adverse impacts on designated features. The report was commissioned by South East Devon Habitats Regulation Partnership to recommend a strategy for managing visitor numbers through car park space provision and distribution across the SPA/SAC. The report has been compiled analysing background reports and existing data and undertaking site surveys to prepare a plan depicting the Existing Arrangement and Habitat Context.

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### Natural England

22/07/2021 –

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## **SUMMARY OF NATURAL ENGLAND'S ADVICE DESIGNATED SITES [EUROPEAN] – HABITATS REGULATIONS ASSESSMENT**

The four application sites are within or in close proximity to a European designated site, and therefore has the potential to affect its interest features.

To demonstrate compliance with the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'), a Habitats Regulations Assessment should be undertaken.

Based on the plans submitted, Natural England considers that the proposed developments will not have significant adverse impacts on designated sites or protected landscapes and has **no objection**.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

### **European sites – East Devon Pebblebed Heaths SAC and East Devon Heaths SPA**

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### **East Devon Pebblebed Heaths Site of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed developments will not damage or destroy the interest features for which the site has been notified and has no objection.

### **Construction Ecological Management Plan (CEMP)**

The application documents confirm that the bird breeding season will be avoided. We suggest that a Construction Ecological Management Plan (CEMP) sets out for contractors which specific activities could disturb nesting birds and therefore need to

be time limited. The dates can be tailored to avoid disturbance to the likely bird species near each car park.

Furthermore, to prevent any damage to protected site features during the works, measures should be adopted to ensure storage of materials or operation of machinery or plant only takes place within the application site boundary or existing hard surfaced area.

### **Protected Landscapes – East Devon AONB**

Based on the plans submitted, Natural England has no objection to the proposed developments. We do not consider that the proposed developments would compromise the purposes of designation or special qualities of the AONB. We would advise that the proposals are determined in line with relevant NPPF and development plan policies, landscape and visual impacts are minimised as far as possible and landscape advice is obtained from the AONB Partnership.

### **Protected Species**

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species. The Standing Advice includes a decision checklist which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development.

You should apply our Standing Advice to these applications as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

### Devon County Archaeologist

The Historic Environment Team has no comments to make on this planning application.

### Other Representations

Two letters of objection have been received to date;

#### Representation

Comment: The comments below were approved by East Budleigh with Bicton Parish Council meeting on 29th June. The Parish Council was not forwarded the opportunity to comment on this application even though this was marked as the master car parking application, so as Chairman of the Parish Council, I am submitting the comments under the Contributor category.

I note that our Parish Council was consulted upon for Stowford and Frying Pans, but not Wheathill, Uphams, Squabmoor, which are all in our parish. Nor were we consulted upon for any others just outside our parish. Pebblebed Heaths Car Parking proposals

#### General

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estimated 400,000 visits pa.. Car journeys are essential to reach the Heaths, but the response here is to reduce parking, especially in the small informal areas (153 spaces reduced to 119). As has been shown during Covid, lack of provided car parking does not stop visitors coming and they simply park elsewhere often inconsiderately or causing obstruction (e.g. Fire Access blocked, farm access / gateways blocked, passing places blocked) and damage to the environment. Such ad hoc parking is far more of a health & safety / highway hazard than formal parking. Irresponsible parking leads to anger when motorists cannot pass on blocked single-track roads and when farmers remove vehicles by force from blocked gateways. Most of the Heaths' parking facilities have existed for many years and environmental damage is likely to be less than the damage caused by ad hoc parking elsewhere on the Heaths - the law of unintended consequences. Covid has also encouraged more dog ownership and the Heaths are a favoured dog walking area. People are also encouraged to walk in open areas such as these for health reasons. Dog walking on the Heaths is the only exercise that many elderly people have. If fly tipping is a problem, then closing a car park (Frying Pans) is probably not the best solution as

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The improvement works to the car parks, particularly relating to surfacing, is most welcome, but reducing parking capacity whilst visits are increasing is likely to lead to more severe environmental damage consequences than the status quo and is therefore counter-productive.

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Many informal parking places (34 spaces)

It is proposed to close the parking area on the East side of the road and allow spaces on the West side. The car parking strategy states that 10 existing spaces will be cut to 5 new spaces whereas the Design and Access statement states 7 existing and 7 new spaces. Either way the numbers are incorrect. There are currently 6 spaces available on the East side and around 9 on the West side.

All these spaces are often occupied, especially at weekends, when mountain bikers visit. As has been pointed out in the general comments, reducing the number of spaces by more than half will simply cause people to park in an ad hoc manner close by, thus causing environmental damage and obstruction. The East side is also the better parking facility currently. EDDC installed two dog waste bins in this car parking area. One assumes that the Council expected more people to be visiting and parking than is now being envisaged? This area is too remote to reach by walking and car visits are the norm.

and

- Object to removal of Oak Tree
- Potential impact on root protection area

and

- support the restriction of parking to the eastern side of the carriageway to protect the roots of those oak trees, with the placement of logs along the verge.

## **CONSULTATIONS IN RELATION TO FOUR FIRS CAR PARK – 21/1443/FUL**

### **Local Consultation**

Woodbury And Lympstone - Cllr Geoff Jung

25/06/21 - 21/1443/FUL

I have viewed the documents for 21/1443/FUL for Car Park improvements (see parent application number 21/1392/FUL) at Four Firs Car Park (Woodbury Common) Woodbury.

As a committee member for Habitat Regulations Executive committee which is a body that oversees the mitigation measures for the Pebblebed heaths, and I am also a committee member for the Pebblebed Heaths National Nature Reserve Board, I need to declare a personal interest.

There has already been a consultation on the Carpark strategy which was supportive and therefore I support these improvements for the benefit of providing safe and appropriate parking for the public to enable them to visit the common by car.

I reserve my final views on this application until I am in full possession of all the relevant arguments for and against.

## Technical Consultation

### EDDC Trees

15/07/21 - Overall, I have no objection to the proposal at Four Firs.

However, there are trees located adjacent to the entrance which are not shown on any plans. The proposal is to remove the curb stones. If not done appropriately this could lead to damage to significant roots of nearby trees which are within falling distance of the road. An appropriate TPP and AMS is required to show how the curbs are to be removed without damaging the trees either before the determination of the applications or as or as a condition such as that below

#### Construction Specification / Arboricultural Method Statement

Prior to the commencement of any works on site (including demolition and site clearance or tree works), a detailed Construction Specification / Arboricultural Method Statement for the removal of the curbs shall be submitted to and approved in writing by the Local Planning Authority. This shall provide for the long term retention of the trees and detail the means by which any necessary root severance and soil disturbance is minimised by providing a specification for root pruning in accordance with BS 3998: 2010. No development or other operations shall take place except in complete accordance with the approved Construction Specification / Method Statement.

Reason: To ensure the continued wellbeing of the trees in the interests of the amenity of the area.

### Natural England

22/07/21 –

Natural England welcome these improvements to the Pebblebed Heaths cark parks, which form a key part of the jointly agreed strategic mitigation strategy to manage recreational pressure on this internationally important site for wildlife. The proposals have the primary objective of safeguarding the European protected bird species and heathland habitat and have been developed through consultation with ourselves.

#### **SUMMARY OF NATURAL ENGLAND'S ADVICE**

##### **DESIGNATED SITES [EUROPEAN] – HABITATS REGULATIONS ASSESSMENT**

The four application sites are within or in close proximity to a European designated site, and therefore has the potential to affect its interest features.

To demonstrate compliance with the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'), a Habitats Regulations Assessment should be undertaken.

Based on the plans submitted, Natural England considers that the proposed developments will not have significant adverse impacts on designated sites or protected landscapes and has **no objection**.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

## **European sites – East Devon Pebblebed Heaths SAC and East Devon Heaths SPA**

The application sites are within the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA), which are European sites afforded protection under the 'Habitats Regulations'. The consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Habitats Regulations have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment. Page 2 of 2

To assist you in screening for the likelihood of significant effects on European sites, Natural England offers the following advice, based on the information provided:

- the proposals are unlikely to have a significant effect on any European site, either alone or in-combination with other plans and projects, and can therefore be screened out from any requirement for further appropriate assessment.

### **East Devon Pebblebed Heaths Site of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed developments will not damage or destroy the interest features for which the site has been notified and has no objection.

### **Construction Ecological Management Plan (CEMP)**

The application documents confirm that the bird breeding season will be avoided. We suggest that a Construction Ecological Management Plan (CEMP) sets out for contractors which specific activities could disturb nesting birds and therefore need to be time limited. The dates can be tailored to avoid disturbance to the likely bird species near each car park.

Furthermore, to prevent any damage to protected site features during the works, measures should be adopted to ensure storage of materials or operation of machinery or plant only takes place within the application site boundary or existing hard surfaced area.

### **Protected Landscapes – East Devon AONB**

Based on the plans submitted, Natural England has no objection to the proposed developments. We do not consider that the proposed developments would compromise the purposes of designation or special qualities of the AONB. We would advise that the proposals are determined in line with relevant NPPF and development plan policies, landscape and visual impacts are minimised as far as possible and landscape advice is obtained from the AONB Partnership.

### **Protected Species**

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species. The Standing Advice includes a decision checklist which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development.

You should apply our Standing Advice to these applications as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

### East Devon AONB

14/07/21 - East Devon AONB Partnership consultation response

For time reasons our response is email only.

The East Devon Pebblebed Heaths is a significant area of Open Access Land to the western edge of the East Devon AONB which gets in excess of 400,000 annual visits, mostly by car. As well recreational and heritage significance, the area is an important wildlife habitat, with Sites of Scientific Interest, Special Areas of Conservation and SPA designations, and more recently, National Nature Reserve Status. As such, with a growing population and increasing interest in outdoor recreation, visitor management is critical to the site integrity.

A Visitor Management Plan was developed to provide a framework for delivery of mitigation for the Pebblebed Heaths to ensure they can cope with the increased levels of recreation in the future, and to give confidence that the expected growth in East Devon will not result in adverse impacts on designated features. The report was commissioned by South East Devon Habitats Regulation Partnership to recommend a strategy for managing visitor numbers through car park space provision and distribution across the SPA/SAC. The report has been compiled analysing background reports and existing data and undertaking site surveys to prepare a plan depicting the Existing Arrangement and Habitat Context.

The primary objective of the Car Parking Strategy is to safeguard the SPA protected bird species (Nightjar and Dartford Warbler) and SAC heathland habitats from the adverse impacts and disturbance caused by people, particularly from dogs that are not on a lead.

Natural England and the AONB Partnership were represented on the officer working group developing the strategy on which the applications are based and for that reason we are supportive of the proposals at Joney's Cross (21/1392/FUL), Stowford Woods (21/1442/FUL), Four Firs (21/1443/FUL) and Frying Pans (21/1444/FUL),

East Devon AONB Partnership

### Historic England

12/07/21 - Dear Sir/Madam Planning Team

T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

FOUR FIRS CAR PARK (WOODBURY COMMON) WOODBURY  
Application No. 21/1443/FUL

Thank you for your letter of 23 June 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

#### Historic England Advice

The proposed work lie relatively close to, but outside of, the Scheduled Monument No 1018052, Four bowl barrows at Four Firs on Woodbury Common. Whilst it is not envisaged that the proposed works would result in an adverse impact upon the setting of the scheduled barrows, the proximity of the work gives rise to the potential for the groundworks to impact upon undesignated archaeological remains that may be associated with the barrows. Your authority should seek the advice of Devon County Council's Historic Environment Service (DCCHEs) in respect of these potential impacts.

#### Recommendation

Historic England has no objection to the application on heritage grounds.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us. Please advise us of the decision in due course.

Yours sincerely

Phil McMahon

#### Devon County Highway Authority

21/07/21 - The design and access statement is very comprehensive.

I believe the delineation of the MOD, rangers and maintenance vehicle will help improve the safety of the visiting public.

I believe the increase in sustainable travel facilities, will help encourage sustainable travel and reduce vehicular trip generation from this sensitive site.

#### Recommendation:

THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, HAS NO OBJECTION TO THE PROPOSED DEVELOPMENT

#### Devon County Archaeologist

08/07/21 - The carpark at Four Firs lies in an area of high archaeological potential and within 12m of four prehistoric funerary monuments that are protected as scheduled monuments, while another two scheduled burial site sites lies some 230m to the east. The Historic Environment Record also records the site of another, an unscheduled, burial mound some 180m to the east.

Given the proximity to the nationally important and designated heritage assets that are the burial mounds at Four Firs Cross the Historic Environment Team would advise in the first instance that Historic England are consulted with regard to any comments they may have of the scheme and the impact upon the setting of these monuments.

The following comments are made without prejudice to any comments made by Historic England.

Groundworks associated with the construction of the pavement, new carpark surface, drainage and kerbs have the potential to expose archaeological and artefactual deposits associated with the nearby nationally important designated heritage assets.

The Historic Environment Team therefore recommends that this application should be supported by the submission of a Written Scheme of Investigation (WSI) setting out a programme of archaeological work to be undertaken in mitigation for the loss of heritage assets with archaeological interest. The WSI should be based on national standards and guidance and be approved by the Historic Environment Team.

If a Written Scheme of Investigation is not submitted prior to determination the Historic Environment Team would advise, for the above reasons and in accordance with paragraph 199 of the National Planning Policy Framework (2019) and Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan, that any consent your Authority may be minded to issue should carry the condition as worded below, based on model Condition 55 as set out in Appendix A of Circular 11/95, whereby:

'No development shall take place until the developer has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation (WSI) which has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out at all times in accordance with the approved scheme, or such other details as may be subsequently agreed in writing by the Local Planning Authority.'

#### Reason

'To ensure, in accordance with Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan and paragraph 199 of the National Planning Policy Framework (2019), that an appropriate record is made of archaeological evidence that may be affected by the development'

This pre-commencement condition is required to ensure that the archaeological works are agreed and implemented prior to any disturbance of archaeological deposits by the commencement of preparatory and/or construction works.

I would envisage a suitable programme of work as taking the form of the archaeological monitoring and recording of all groundworks associated with the proposed car park improvements to allow for the identification, investigation and recording of any exposed archaeological or artefactual deposits. The results of the fieldwork and any post-excavation analysis undertaken would need to be presented in an appropriately detailed and illustrated report, and the finds and archive deposited in accordance with relevant national and local guidelines.

In addition, the Historic Environment Team would recommend - because of the location of the site within an area of known prehistoric activity and the visibility of surviving prehistoric funerary monuments - that consideration is given, as part of this

scheme, to the provision of public interpretation boards here to enhance and better reveal the significance of the nearby prehistoric heritage assets. This would be in accordance with paragraph 200 of the National Planning Policy Framework (2019).

The provision of an interpretation board could be achieved through the application of an appropriately worded condition to any consent that may be granted by your Authority, as below:

'Within three months of the completion of the works a public interpretation board shall be erected in an agreed location that explains the heritage of the surrounding prehistoric funerary landscape. The text and illustrations for the board shall be agreed in writing with the Local Planning Authority and the Devon County Historic Environment Team (as archaeological advisors to the Planning Authority) prior to erection.'

#### Reason

'To enhance and better reveal the significance of the heritage assets associated with the prehistoric funerary activity in the immediate vicinity of the car park, in accordance with paragraph 200 of the National Planning Policy Framework (2019).'

#### Other Representations

None received to date.

### **CONSULTATIONS IN RELATION TO FRYING PAN CAR PARK - 21/1444/FUL**

#### **Local Consultations**

##### Parish/Town Council

East Budleigh with Bicton Parish Council have the following comments  
Pebblebed Heaths Car Parking proposals

##### General

The Design & Access statement states that 40,000 new homes are to be built in the area by 2030, putting additional pressure on recreational facilities such as the Pebblebed Heaths with an estimated 400,000 visits pa.. Car journeys are essential to reach the Heaths, but the response here is to reduce parking, especially in the small informal areas (153 spaces reduced to 119). As has been shown during Covid, lack of provided car parking does not stop visitors coming and they simply park elsewhere often inconsiderately or causing obstruction (e.g. Fire Access blocked, farm access / gateways blocked, passing places blocked) and damage to the environment. Such ad hoc parking is far more of a health & safety / highway hazard than formal parking. Irresponsible parking leads to anger when motorists cannot pass on blocked single-track roads and when farmers remove vehicles by force from blocked gateways. Most of the Heaths' parking facilities have existed for many years and environmental damage is likely to be less than the damage caused by ad hoc parking elsewhere on the Heaths ' the law of unintended consequences.

Covid has also encouraged more dog ownership and the Heaths are a favoured dog walking area. People are also encouraged to walk in open areas such as these for

health reasons. Dog walking on the Heaths is the only exercise that many elderly people have.

If fly tipping is a problem, then closing a car park (Frying Pans) is probably not the best solution as the waste will be simply tipped elsewhere. It may be more productive to consider abolishing waste charges. It is difficult to see what problems existed with Uphams car park to warrant closure, it certainly is not evident. The military has private use of the Heath beyond and it works well. Removing roadside parking from the very wide hard surface road edges at Wheathill is simply a waste of money as cars are not doing any damage whatsoever.

The parking situation with regard to the Bystock Nature Reserve is lamentable and to reduce the Squabmoor parking further exacerbates an already acute problem. This is clearly a favoured site for family visits and for children's educational experience, which is now being discouraged. Fire access barriers in this area are often blocked by vehicles and this could get worse.

The improvement works to the car parks, particularly relating to surfacing, is most welcome, but reducing parking capacity whilst visits are increasing is likely to lead to more severe environmental damage consequences than the status quo and is therefore counter-productive.

#### Previously closed car parks

DWT car park by Bystock meadow

Car park near B3179 opposite top of Hulham Rd

Yettington

and historically, many more

#### Proposed Closures

Uphams

Frying Pans

Woodbury Castle / Estuary View

Many informal parking places

#### Previously Reduced

Woodbury Castle

X roads Tuckers Plantation

#### Proposed Reduction

Squabmoor

Stowford

Numerous part barrier closures (74 spaces)

Many informal parking places (34 spaces)

#### 21/1444/FUL Frying Pan Car Park improvements

As per the general comments, closure of the car park because of fly tipping is not a solution to fly tipping or parking arrangements. It is interesting to note that EDDC and Highways appear to prefer roadside parking to an off-road carpark in this case, but the opposite is the case at Wheathill?

### **Technical Consultations**

## Natural England

22/07/21 – Natural England welcome these improvements to the Pebblebed Heaths car parks, which form a key part of the jointly agreed strategic mitigation strategy to manage recreational pressure on this internationally important site for wildlife. The proposals have the primary objective of safeguarding the European protected bird species and heathland habitat and have been developed through consultation with ourselves.

### **SUMMARY OF NATURAL ENGLAND'S ADVICE DESIGNATED SITES [EUROPEAN] – HABITATS REGULATIONS ASSESSMENT**

The four application sites are within or in close proximity to a European designated site, and therefore has the potential to affect its interest features.

To demonstrate compliance with the Conservation of Habitats and Species Regulations 2017, as amended (the 'Habitats Regulations'), a Habitats Regulations Assessment should be undertaken.

Based on the plans submitted, Natural England considers that the proposed developments will not have significant adverse impacts on designated sites or protected landscapes and has **no objection**.

Natural England's further advice on designated sites/landscapes and advice on other natural environment issues is set out below.

### **European sites – East Devon Pebblebed Heaths SAC and East Devon Heaths SPA**

The application sites are within the East Devon Pebblebed Heaths Special Area of Conservation (SAC) and East Devon Heaths Special Protection Area (SPA), which are European sites afforded protection under the 'Habitats Regulations'. The consultation documents provided do not include information to demonstrate that the requirements of regulation 63 of the Habitats Regulations have been considered by your authority, i.e. the consultation does not include a Habitats Regulations Assessment. Page 2 of 2

To assist you in screening for the likelihood of significant effects on European sites, Natural England offers the following advice, based on the information provided:

- the proposals are unlikely to have a significant effect on any European site, either alone or in-combination with other plans and projects, and can therefore be screened out from any requirement for further appropriate assessment.

### **East Devon Pebblebed Heaths Site of Special Scientific Interest**

Based on the plans submitted, Natural England considers that the proposed developments will not damage or destroy the interest features for which the site has been notified and has no objection.

### **Construction Ecological Management Plan (CEMP)**

The application documents confirm that the bird breeding season will be avoided. We suggest that a Construction Ecological Management Plan (CEMP) sets out for contractors which specific activities could disturb nesting birds and therefore need to

be time limited. The dates can be tailored to avoid disturbance to the likely bird species near each car park.

Furthermore, to prevent any damage to protected site features during the works, measures should be adopted to ensure storage of materials or operation of machinery or plant only takes place within the application site boundary or existing hard surfaced area.

### **Protected Landscapes – East Devon AONB**

Based on the plans submitted, Natural England has no objection to the proposed developments. We do not consider that the proposed developments would compromise the purposes of designation or special qualities of the AONB. We would advise that the proposals are determined in line with relevant NPPF and development plan policies, landscape and visual impacts are minimised as far as possible and landscape advice is obtained from the AONB Partnership.

### **Protected Species**

We have not assessed this application and associated documents for impacts on protected species.

Natural England has published Standing Advice on protected species. The Standing Advice includes a decision checklist which provides advice to planners on deciding if there is a 'reasonable likelihood' of protected species being present. It also provides detailed advice on the protected species most often affected by development.

You should apply our Standing Advice to these applications as it is a material consideration in the determination of applications in the same way as any individual response received from Natural England following consultation.

### EDDC Trees

At present I currently object to the proposal. No information is provided on how trees are to be protected during construction, or how construction will take place without damage being caused to the trees. Required information - tree survey (BS5837:2012) with tree constraints plan, arb impact statement, tree protection plan and arb method statement.

If consent is granted the following condition should be included:

(a) Prior to the commencement of any works on site (including demolition and site clearance or tree works), a scheme for the protection of the retained trees, hedges and shrubs shall be produced in accordance with the principles embodied in BS5837:2012, which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site, [including trees which are the subject of a Tree Preservation Order currently in force], shall be submitted to and approved in writing by the Local Planning Authority. No development or other operations shall take place except in complete accordance with the approved protection scheme.

(b) No operations shall be undertaken on site in connection with the development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and / or widening or any operations involving

the use of motorised vehicles or construction machinery) until the protection works required by the approved protection scheme are in place.

(c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within any area designated as being fenced off or otherwise protected in the approved protection scheme.

(d) Protective fencing shall be retained intact for the full duration of the development hereby approved and shall not be removed or repositioned without the prior written approval of the Local Planning Authority.

Reason: To ensure the continued wellbeing of the trees in the interests of the amenity of the locality.

### East Devon AONB

East Devon AONB Partnership consultation response

For time reasons our response is email only.

The East Devon Pebblebed Heaths is a significant area of Open Access Land to the western edge of the East Devon AONB which gets in excess of 400,000 annual visits, mostly by car. As well recreational and heritage significance, the area is an important wildlife habitat, with Sites of Scientific Interest, Special Areas of Conservation and SPA designations, and more recently, National Nature Reserve Status. As such, with a growing population and increasing interest in outdoor recreation, visitor management is critical to the site integrity.

A Visitor Management Plan was developed to provide a framework for delivery of mitigation for the Pebblebed Heaths to ensure they can cope with the increased levels of recreation in the future, and to give confidence that the expected growth in East Devon will not result in adverse impacts on designated features. The report was commissioned by South East Devon Habitats Regulation Partnership to recommend a strategy for managing visitor numbers through car park space provision and distribution across the SPA/SAC. The report has been compiled analysing background reports and existing data and undertaking site surveys to prepare a plan depicting the Existing Arrangement and Habitat Context.

The primary objective of the Car Parking Strategy is to safeguard the SPA protected bird species (Nightjar and Dartford Warbler) and SAC heathland habitats from the adverse impacts and disturbance caused by people, particularly from dogs that are not on a lead.

Natural England and the AONB Partnership were represented on the officer working group developing the strategy on which the applications are based and for that reason we are supportive of the proposals at Joney's Cross (21/1392/FUL), Stowford Woods (21/1442/FUL), Four Firs (21/1443/FUL) and Frying Pans (21/1444/FUL),

East Devon AONB Partnership

## Devon County Highway Authority

### Observations:

Of all of the proposals under the parent application, this is the only one in which I have a concern with due to the inability for vehicles to turn off-carriageway in a forward facing motion, especially as the majority for people utilising this parking will be returning in the same direction they came from, i.e either from Exmouth or from Exeter. This road is a C-road so it is under our policy that all new parking off A, B and C roads have the ability to turn off-carriageway, in order to allow safe access and egress in addition to reduce traffic disruption on the highway network.

### Recommendation:

THE HEAD OF PLANNING, TRANSPORTATION AND ENVIRONMENT, ON BEHALF OF DEVON COUNTY COUNCIL, AS LOCAL HIGHWAY AUTHORITY, IS LIKELY TO RECOMMEND REFUSAL OF PLANNING PERMISSION, IN THE ABSENCE OF FURTHER INFORMATION

Officer authorised to

sign on behalf of the County Council 27 July 2021

## Devon County Archaeologist

The car park known as Frying Pan car park lies within the site of the extensive WWII Dalditch army training camp. The positions of some of the former structures can still be seen as earthworks within the area around the car park. The Historic Environment Team would therefore recommend that consideration is given, as part of this scheme, to the provision of public interpretation boards here to enhance and better reveal the significance of the WWII camp as a heritage asset. This would be in accordance with paragraph 200 of the National Planning Policy Framework (2019).

The provision of an interpretation board could be achieved through the application of an appropriately worded condition to any consent that may be granted by your Authority, as below:

'Within three months of the completion of the works a public interpretation board shall be erected in an agreed location that explains the heritage of the surrounding landscape associated with the WWII Dalditch army camp. The text and illustrations for the board shall be agreed in writing with the Local Planning Authority and the Devon County Historic Environment Team (as archaeological advisors to the Planning Authority) prior to erection.'

### Reason

'To enhance and better reveal the significance of the WWII Dalditch army camp as a heritage asset, in accordance with paragraph 200 of the National Planning Policy Framework (2019).'

## Other Representations

None received to date.

### **RELEVANT PLANNING HISTORY**

<b>Reference</b>	<b>Description</b>	<b>Decision</b>	<b>Date</b>
21/1442/FUL	Car park improvements (see parent application number 21/1392/FUL).	Pending	
21/1444/FUL	Car park improvements (see parent application number 21/1392/FUL).	Pending	
21/1443/FUL	Car park improvements (see parent application number 21/1392/FUL).	Pending	

### **POLICIES**

Adopted East Devon Local Plan 2013-2031 Policies  
D1 (Design and Local Distinctiveness)

TC2 (Accessibility of New Development)

TC7 (Adequacy of Road Network and Site Access)

TC9 (Parking Provision in New Development)

Strategy 7 (Development in the Countryside)

Strategy 5 (Environment)

Strategy 47 (Nature Conservation and Geology)

Strategy 46 (Landscape Conservation and Enhancement and AONBs)

TC4 (Footpaths, Bridleways and Cycleways)

Government Planning Documents

NPPF (National Planning Policy Framework 2019)

### **Site Location and Description**

The car park at Joneys Cross – Hawkerland - lies just the south of an existing set of crossroads. The car park is situated on a plateau as the land slopes steeply up from Newton Poppleford. The existing car park is surrounded by a heath bund and hedging. The ground conditions are variable with severe potholes punctuating the ground conditions meaning collection of water pools is not uncommon.

Stowford Woods Car Park – Colaton Raleigh - The existing car parking area straddles either side of the highway and is situated within a wooded area. Car parking spaces are informally arranged and typically positioned under the canopy of adjacent trees.

The Four Firs is an existing car park site situated in close proximity to the Yettington/Woodbury crossroad. There is an existing access which winds from the road around to the parking area and as such the existing car park area is not overly visible from the adjacent highway. The existing car parking has an uneven surface and overall lack a regularised shape

The Frying Pan Car Park – The Common - concerns two informal parking area adjacent to a narrow but straight portion of the highway. The works concern an area where the entrance to an existing car park (Frying Pans) is situated (to the south of the road). There are existing areas of land adjacent to the highway where visitors appear to park in an ad hoc manner. Comparative to some of the other car parking areas concerned with these changes this one is more remotely positioned.

### **Proposed Development**

Joneys Cross Car Park:

The proposal involves the creation of separate access and exits for the car park to accommodate a flow of traffic. The proposal involves formalising the existing car parking spaces and resurfacing. Also provides a series of drainage channels in order to better deal with surface water drainage. Soft landscaping alterations are also proposed to harmonise with the proposed changes. In addition to these changes installation of information signs and bins are to be provided.

Stowford Woods Car Park:

The proposal seeks planning consent for the alteration to an existing car park;

- Provision of a new parking area adjacent to the carriageway.
- Provision of logs to block existing unofficial parking area.
- Provision of earth bund to demark to parking area.
- Vegetation clearance.

Four Firs Car Park:

The proposal seek to increase the car parking area to formalise existing car parking with resurfacing. The proposal would also include installation of appropriate drainage channels to deal with surface water drainage. Earth bunds would encapsulate this parking area. Interpretation signage is also proposed.

The proposal would result in the formalization of the existing layout to a broad rectangular shape. Around the south and east perimeter a soakaway ditch is proposed. Along the centre of the proposed car park would be a filter drain with carrier pipe. The car park is very level, which causes ponding of water making soft conditions that result in potholes. These have been historically filled and over-laid with

inappropriate material that has resulted in a poor-quality surface that needs regularly repairing/replacing.

The rearrangement of Four Firs will be contained within the fenced extent of the car park. To achieve the proposed layout, areas of low conservation value shrub within the existing car park footprint will be removed to expose the Pebblebed gravel which will be compacted to create a suitable car park surface. The vegetation will be removed from site and the topsoil shall be reused on the proposed earth bunds.

The proposed works (in summary);

- The existing surface is to be regraded and compacted with existing material from site to create a consistent surface that drains efficiently into a filter drain and reduce the potential for the surface to degrade.
- Entrance from B3179 to be resurfaced and vehicle counter system installed.
- A separate entrance with a lockable vehicle barrier for Ranger vehicles and Royal Marines to be created for their exclusive use.
- A 2.2m high vehicle height barrier to be installed at the entry point to the public carpark
- Provision is to be made for a signed parking area for disabled visitors
- Edge protection in the form of drainage ditches or earth bunds coupled with logs to be provided to maintain the proposed carparking boundaries.
- Dog waste bins and information boards to be relocated.

Frying Pan Car Park:

The proposal seeks planning consent for the creation of a single parking area situated just off the highway. This scheme forms one of four concurrent planning application currently pending determination which seeks to improve visitor accommodation for the Pebblebed Heaths. The proposal seeks to implement a parking area with car positioned perpendicular to the highway. The originally proposed parallel car parking arrangement has been removed from the proposal to address the highway concerns received.

## **ANALYSIS**

The main issues concerning this proposal is justification for the proposals, the impact on the character and appearance of the area, the impact on highways and then impact on the Pebblebed Heaths themselves.

### **Principle and Justification**

The current Local Plan identifies a requirement to build over 40,000 new homes in the East Devon, Exeter and Teignbridge districts by 2030. This level of growth has implications for recreation sites in the area, with significant increases in visitor pressure expected. There is a requirement under the Habitat Regulations to protect European conservation sites, including SPAs and SACs from the negative impacts of development.

The East Devon Pebblebed Heaths are Open Access Land under the Countryside and Rights of Way Act 2000 with an estimation that 400,000+ visits are made annually by local people mostly travelling to the site by car (East Devon Pebblebed Heaths Visitor Management Plan. Liley et al, 2016). The Visitor Management Plan was developed to provide a framework for delivery of mitigation for the Pebblebed Heaths to ensure they can cope with the increased levels of recreation in the future, and to give confidence that the expected growth will not result in adverse impacts on designated features.

The principles applied to the car parking strategy seek to achieve this through: -

- o gathering' visitors towards car parks that are away from sensitive locations and towards those that have less impact on protected habitats and species.
- o retaining and developing the formal car parks that are as close as possible to the points of entry on to the Heaths, adjacent to the principal roads where the car parks are easy to find and easy to sign (e.g. car park name signs) thereby reducing car movements across the heaths and the scattered informal parking that occurs consequentially.
- o maintaining the current number of car parking spaces across the heaths.
- o establishing nodes as the starting point for promoted trails, to direct people away from sensitive areas at key times of the year and to create welcoming, attractive locations where visitors can engage with interpretation, messaging and wardens about the nature, value and significance of the Pebblebed Heaths and particularly about responsible dog walking.

As the works are part of the wide Visitor Management Plan in the interests of protecting and better managing the use of the Pebblebed Heaths, the proposal are welcomed, justified, and acceptable in principle.

### **Character and appearance of the area (AONB countryside)**

Joneys Cross Car Park:

The car park as it stands today is well screened from the highway and surrounding network of footpaths due to the screening in place with earth bunds and hedging.

The installation of a second vehicular access point, to the south east of the existing vehicular access would open up the site somewhat. However it was acknowledged that there is a narrower pedestrian access point in the approximate location and given the surrounding topography any impact would be from immediate receptor points. Given this and balancing the improvements to vehicular safety this is not considered to harm the wider qualities of the AONB countryside.

There is an existing gap along the east perimeter of the car park which allows pedestrian access to the heaths beyond. This area would be formalised with a footpath and resurfacing. Around this are an interpretation board and relocated do bins would be placed given rise to other benefits in re-organising this area.

Therefore the proposal meet the criteria to both preserve and enhance the qualities of the AONB landscape.

### Stowford Woods Car Park:

The purpose of creating a designated area for parking at this location is to encourage users of the Heathland to park at larger, more formal car parks such as Four Firs and Joney's Cross, which will be easier to maintain and reduce the impact of vehicles parking on the Heathland. Ad hoc parking will be discouraged using logs at the roadside. The eastern parking will be removed to provide protection to existing trees at the roadside. Due to the proximity of parked vehicles the existing trees are suffering from root compaction. Trees in the vicinity of the new designated area will be felled if required after an assessment by a licensed arboriculturist.

Maintenance of the screening would protect the visual impact of the remediation works proposed.

### Four Firs Car Park:

The proposal takes place within the designated AONB landscape. Development will need to be undertaken in a manner that is sympathetic to, and helps conserve and enhance the quality and local distinctiveness of, the natural and historic landscape character of East Devon, in particular in Areas of Outstanding Natural Beauty.

The existing car park area is relatively self-contained within the wider landscape. There is decent natural screening around the site perimeter which prevent immediate views of parked cars. The existing car park has been constructed with a 'light touch' meaning that earth bunds and natural ground surfaces are used. The existing configuration provides a base point for evaluation.

The works effecting the entrance would be visible from immediate public vantage points – however these works represent a visual betterment with much needed resurfacing and regrading. A soft touch along the perimeter with logs also means that the rural character is respected. Deeper into the site the alterations to the car park would formalise the existing area, but again this would lead to a betterment in terms of visual impact with a more organised approach to parking.

With regards to the impact on the character and appearance of the area this can be evaluated in terms of direct impact on the site and its immediate surrounds (see above). But also the strategic importance in consolidating parking area with a focus at this site. The development would reduce pressures on other surrounding parking area which would also result in improvements to other areas of the AONB.

### Frying Pan Car Park:

The proposal would bring about an engineered aesthetic to the lane which at the moment has a distinctly unfinished rural character. However, this impact would be limited in terms of its scope and the screening of the adjacent trees means the visual impact would be screened to a large extent. Moreover the car parking bays, seen in the context of the adjacent highway, would not be an untypical feature. Gravel surfaces, which would also be used the other car parking surfaces would not detract from the rural setting.

## Impact on highway safety

### Joneys Cross Car Park:

The proposal would reconfigure the existing area to purposely allocated specific parking area, as opposed to the existing ad hoc configuration. Resurfacing and regarding of the caring area with gravel would be carried out with soakaway ditches installed. This would all be to the benefit of the existing area which make the parking area difficult to transverse and allows for pooling of water.

No objection has been made by DCC highways and indeed having separate access thereby reducing conflict is likely to improve the existing highway situation.

### Footpath issues

There appears to be a mismatch between the line of the Bridleway (Newton Poppleford and Harpford bridleway 29) and where it exits the car park, shown on the Public Rights of Way Definitive The proposal to reinstate/create a bridleway leading out onto a road with limited vision to oncoming traffic and no footpath is considered unacceptable and dangerous. The bridleway meets the road at a blind spot for both motorist and pedestrians.

In response the applicant has recognised that the path proposed to be blocked is the current pedestrian desire line. The DCC PRoW Team have highlighted inconsistencies with their maps regarding the definitive line of Bridleway 29. It should be noted that to better manage access and the car park the preference is to have a singular access point. Since this is outside of the scope of this planning application, both paths shall remain open and the DCC PRoW team and EDDC will resolve the issue separately.

### Stowford Woods Car Park:

A series of parallel parking area are proposed on one side of the highway. The proposal purposefully reduces the number of parking spaces to focus visitors on the larger parking areas, thereby reducing the dispersal of the impact on the Pebblebed Heaths.

Traffic movements, for example reversing onto the road, would be likely to occur as a result of this layout. However, no objection has been forthcoming from DCC highways. The road appeared to be lightly trafficked and so conflict with the flow of traffic would appear to be minimal.

### Four Firs Car Park:

A robust traffic assessment has been submitted as part of this planning application. In terms of traffic the scheme would;

- Improved vehicular access to the car park by removing the existing earth bund within the car park entrance and resurfacing the entrance of the car park.
- Vegetation clearance on the car park access to improve visibility.
- Provision of a 2.0m high height restriction at the car park entry.

- Reconfiguration of the car park internal layout.

The highway authority have not raised any objections to this and indeed the proposal would lead to a better layout, protect against large vehicles and improve visibility. Accordingly there are no reason to object on highway grounds.

Frying Pan Car Park:

During pre-application discussions for this element of the proposal it was advised by the Local Planning Authority that;

*County highways have stated that they were not content with the proposed perpendicular parking section - the road is narrow and parallel parkers would have to make several forward and back movements to exit in the opposite direction, also parallel parked drivers do not always look behind them when moving off in the same direction - it would therefore be advisable to consider 90 degree parking.*

DCC have continued to raise an objection with concern due to the inability of vehicles to turn off-carriageway in a forward-facing motion, especially as the majority of people utilising this parking will be returning in the same direction they came from, i.e., from Exmouth or Exeter. This road is a C-road, and so under highways policy, all new parking off A, B and C roads require the ability to turn off-carriageway to allow safe access and egress and reduce traffic disruption on the highway network.

These points were put to the applicant and they have now removed the parallel parking bays from the proposal addressing the objection from Devon County Highways.

### **The impact on the Pebblebed Heaths and Appropriate Assessment**

The Local Planning Authority has a duty under Regulation 9 (5) of the Conservation of Habitats and Species Regulations 2010 ("2010 Regulations"). This duty is for all "competent authorities" (including Local Planning Authorities and other public bodies) to "have regard to the Habitats Directive in the exercise of its functions".

Regulation 61 (1) of the Habitats Regulations requires consideration of whether a development proposal, is likely to give rise to significant effects on a European site or a European offshore marine site (either alone or in combination with other plans or projects), in view of that site's conservation objectives.

The East Devon Pebblebed Heaths, Site of Special Scientific Interest (SSSI) cover some 1,400 ha. and are designated a Special Area of Conservation (SAC) for the heathland habitat and Southern Damselfly and as a Special Conservation Area (SPA) for Nightjar and Dartford Warbler.

Lowland heaths are some of the most important habitats in Europe due to the rarity of species they support. The East Devon Pebblebed Heaths, Site of Special Scientific Interest (SSSI) cover some 1,400 ha, and comprises the single largest area (1,112ha) of lowland heath in Devon (where there are 4,000ha). A biodiversity audit of the East Devon Pebblebed Heaths was undertaken in 2016 with over 3,000 species

documented, 10% of which have conservation significance. (Bridgewater, S & Lesley, K. 2016. East Devon Pebblebed Heaths: Providing Space for Nature. Biodiversity Audit 2016. Pebblebed Heaths Conservation Trust.)

The first stage of Habitats Regulations Assessment is to screen development to identify whether any development proposals are likely to give rise to a 'significant effect'. The scale and nature of the application, which involves controlled public access where public access is already available to an extent, together with mitigation measures incorporated as part of any planning consent is unlikely to affect the associated designations.

Natural England have been consulted on the proposal and have stated that;

Natural England welcome these improvements to the Pebblebed Heaths car parks, which form a key part of the jointly agreed strategic mitigation strategy to manage recreational pressure on this internationally important site for wildlife. The proposals have the primary objective of safeguarding the European protected bird species and heathland habitat and have been developed through consultation with ourselves.

Based on the plans submitted, Natural England considers that the proposed developments will not have significant adverse impacts on designated sites or protected landscapes and has no objection.

and further that;

the proposals are unlikely to have a significant effect on any European site, either alone or in-combination with other plans and projects, and can therefore be screened out from any requirement for further appropriate assessment.

The works are clearly intended to be to the benefit of wider ecology by focusing visitors to this site. As such this proposal is not considered to give rise to 'significant effects'.

### **Impact on site specific wildlife**

The majority of the site is already in use as a car park to serve visitors to the Pebblebed Heaths. Therefore, aside from the potential connectivity of the earth bunds to provide foraging;

Natural England have stated in this regard that;

*The application documents confirm that the bird breeding season will be avoided. We suggest that a Construction Ecological Management Plan (CEMP) sets out for contractors which specific activities could disturb nesting birds and therefore need to be time limited. The dates can be tailored to avoid disturbance to the likely bird species near each car park.*

*Furthermore, to prevent any damage to protected site features during the works, measures should be adopted to ensure storage of materials or operation of machinery or plant only takes place within the application site boundary or existing hard surfaced area.*

Therefore a CEMP condition shall be imposed in order to protect species potentially affected by the development in accordance with the comments of Natural England.

### **Impact on heritage assets**

Four Firs Car Park:

The proposed works lie relatively close to, but outside of, the Scheduled Monument No 1018052, Four bowl barrows at Four Firs on Woodbury Common. Whilst it is not envisaged that the proposed works would result in an adverse impact upon the setting of the scheduled barrows, the proximity of the work gives rise to the potential for the groundworks to impact upon undesignated archaeological remains that may be associated with the barrows. Historic England has no objection to the application on heritage grounds.

DCC archaeology have recommended a condition for an investigative programme.

### **CONCLUSION**

The proposal would lead to much needed improvements to the surfacing, configuration and drainage of the existing car parking. The increased functionality the site would be justified due to the increased demand experienced. This planning application is part and parcel of an overall strategy to focus visitors to this main car park, thereby relieving pressures on smaller satellite parking areas and preventing wider ecological disturbance. It would provide for a central location to provide information, dog bins and a site warden presence. The proposal is therefore welcomed and supported for these reasons.

The proposal for the Frying Pan Car Park drew an objection from the highway authority due to the increased likelihood of manoeuvring on this stretch of highway. However, this has been addressed by the applicant through the removal of the parallel parking spaces from this site.

Therefore, subject to conditions, the proposal is recommended for approval.

### **RECOMMENDATION**

- 1) To adopt the Appropriate Assessment (above); and
- 2) APPROVE subject to the following conditions:
  1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission and shall be carried out as approved. (Reason - To comply with section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004).
  2. The development hereby permitted shall be carried out in accordance with the approved plans listed at the end of this decision notice.

(Reason - For the avoidance of doubt.)

3. No development shall take place until the developer has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation (WSI) which has been submitted to and approved in writing by the Local Planning Authority. The development shall be carried out at all times in accordance with the approved scheme, or such other details as may be subsequently agreed in writing by the Local Planning Authority. (Reason - To ensure, in accordance with Policy EN6 (Nationally and Locally Important Archaeological Sites) of the East Devon Local Plan and paragraph 199 of the National Planning Policy Framework (2019), that an appropriate record is made of archaeological evidence that may be affected by the development).
4. Prior to the commencement of any works on the site a Construction Ecological Management Plan (CEMP) setting out the following shall be submitted to and approved by the Local Planning Authority;

- (a) the timetable of the works to avoided disturbance to bird species;
- (b) daily hours of construction;
- (c) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:00am and 6pm Mondays to Fridays inc.; 9.00am to 1.00pm Saturdays, and no such vehicular movements taking place on Sundays and Bank/Public Holidays unless agreed by the planning Authority in advance;
- (d) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
- (e) the compound/location where all building materials, finished or unfinished products, parts, crates, packing materials and waste will be stored during the demolition and construction phases;
- (f) areas on-site where delivery vehicles and construction traffic will load or unload building materials, finished or unfinished products, parts, crates, packing materials and waste with confirmation that no construction traffic; unless prior written agreement has been given by the Local Planning Authority;
- (g) hours during which no construction traffic will be present at the site;

The development shall be carried out in accordance with the agreed CEMP.

(Reason - To ensure that species within and around the site are protected during the construction phase, in accordance with Policy EN5 (Wildlife and habitat Features) and Strategy 47 (Nature Conservation and Geology) of the East Devon Local Plan).

5. Prior to the commencement of any works on site (including demolition and site clearance or tree works), a scheme for the protection of the retained trees, hedges and shrubs shall be produced in accordance with the principles embodied in BS5837 :2012, which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site, [including trees

which are the subject of a Tree Preservation Order currently in force], shall be submitted to and approved in writing by the Local Planning Authority. No development or other operations shall take place except in complete accordance with the approved protection scheme.

(b) No operations shall be undertaken on site in connection with the development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and / or widening or any operations involving the use of motorised vehicles or construction machinery) until the protection works required by the approved protection scheme are in place.

(c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within any area designated as being fenced off or otherwise protected in the approved protection scheme.

(d) Protective fencing shall be retained intact for the full duration of the development hereby approved and shall not be removed or repositioned without the prior written approval of the Local Planning Authority.

(Reason: To ensure the continued wellbeing of the trees in the interests of the amenity of the locality, in accordance with policy D3 (Trees and Development) of the adopted East Devon Local Plan).

6. Prior to commencement of any works on the Four Firs Car Park site, (including demolition and site clearance or tree works), a detailed Construction Specification / Arboricultural Method Statement for the removal of the curbs shall be submitted to and approved in writing by the Local Planning Authority. This shall provide for the long term retention of the trees and detail the means by which any necessary root severance and soil disturbance is minimised by providing a specification for root pruning in accordance with BS 3998: 2010. No development or other operations shall take place except in complete accordance with the approved Construction Specification / Method Statement.

(Reason: To ensure the continued wellbeing of the trees in the interests of the amenity of the area, in accordance with policy D3 (Trees and Development) of the East Devon Local Plan).

Plans relating to this application:

0100-008 P01	Location Plan	22.06.21
0100-004 REV P07 : frying pan car park	Other Plans	12.10.21
0200-002 REV P01 : Joneys Cross Phase 1	Other Plans	18.05.21

0500-002 rev P03 : Joneys Cross drainage	Other Plans	03.06.21
100-100 REV P01 : standard details 1 of 2	Other Plans	18.05.21
100-101 REV P02 : standard details 2 of 2	Other Plans	18.05.21
100-100 REV P01 PEBBLEBED STANDARD DETAILS SHEET 1	Other Plans	18.05.21
100-101 REV P02 PEBBLEBED STANDARD DETAILS SHEET 2	Other Plans	18.05.21
0100-003 REV 04	Other Plans	03.06.21
01-001 rev P01	Location Plan	22.06.21
0100-003 REV P04 STOWFORD WOODS CROSS_CONST RUCTION PLAN	Other Plans	03.06.21
0100-006 REV P04 FOUR FIRS CAR PARK GA	Other Plans	03.06.21
0200-001 REV P03 FOUR FIRS CAR PARK SITE CLEARANCE	Other Plans	03.06.21

0200-002 P01 CLEARANCE	REV SITE	Other Plans	18.05.21
0500-002 P03 EARTHWORKS KERBS AND PAVEMENT P...	REV	Other Plans	03.06.21
0500-003 P02 JONEYS CROSS CAR PARK TYPICAL ...	REV	Other Plans	03.06.21
0100-009 P01		Location Plan	22.06.21
0500-003 P01 FIRS JONEYS CROSS CAR PARK TYPICAL ...	REV	Other Plans	03.06.21
100-011 rev P02		Location Plan	22.06.21
0100-004 P04 FRYING PAN CONSTRUCTIO N PLAN	REV	Other Plans	03.06.21

#### List of Background Papers

Application file, consultations and policy documents referred to in the report.