

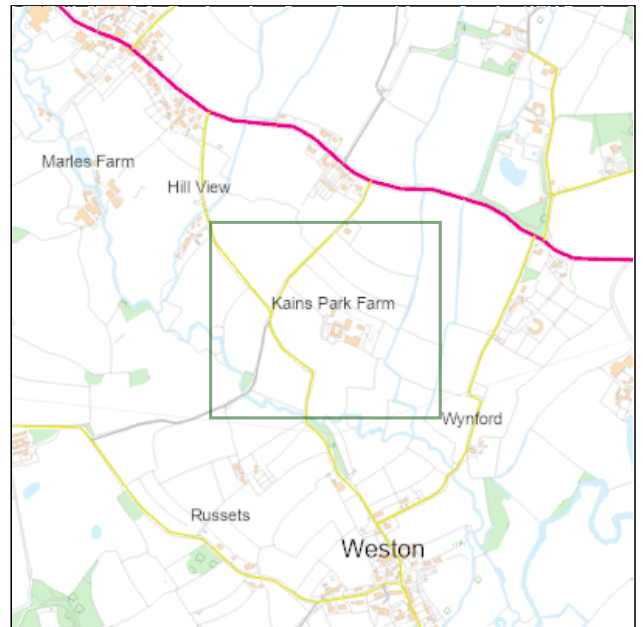
Ward Dunkeswell And Otterhead

Reference 23/2455/FUL

Applicant Mr & Mrs M & J Summers

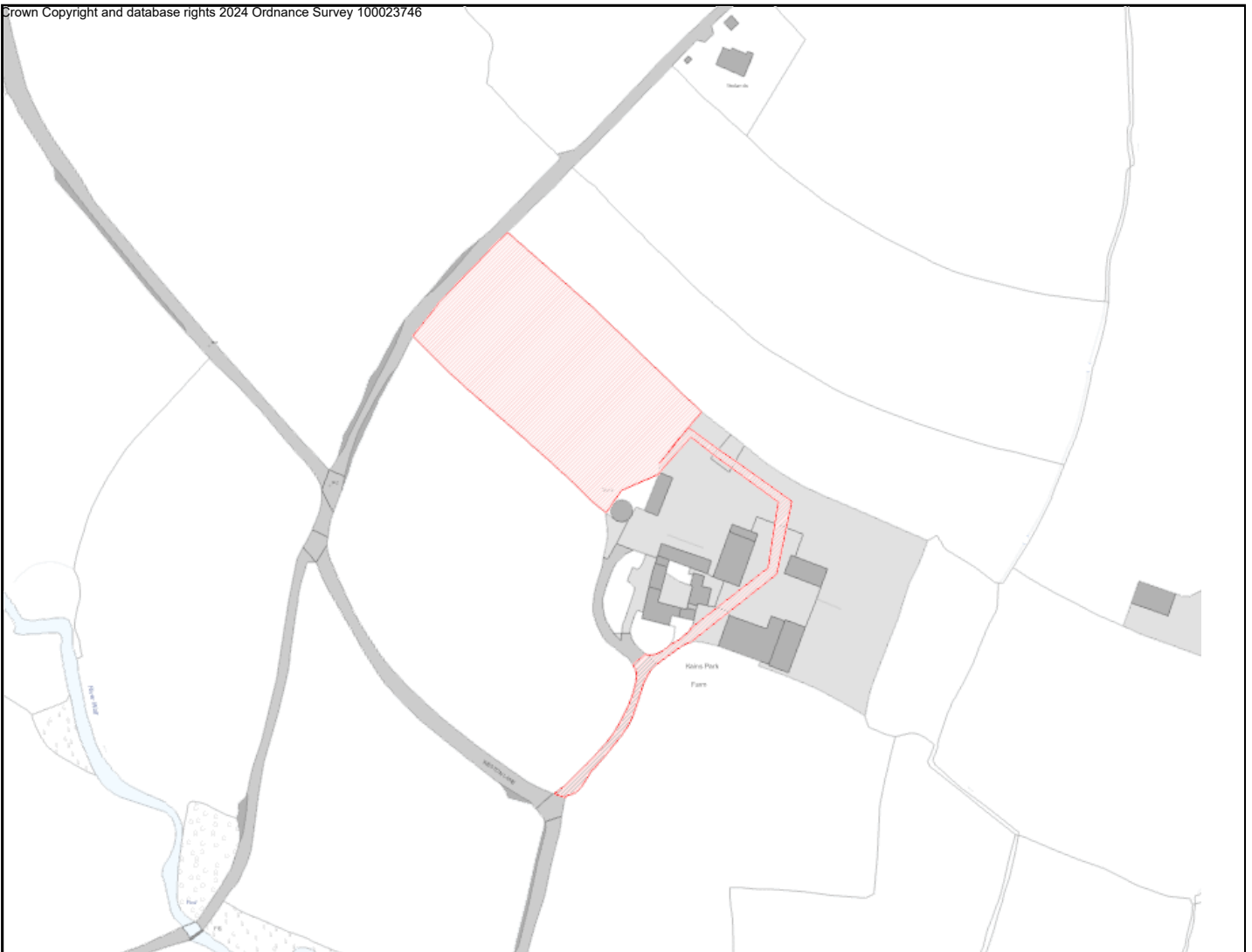
Location Kains Park Farm Kains Park Storage
Awliscombe EX14 3NN

Proposal Change of use of land for the storage of
caravans, motorhomes and boats (use class
B8) and associated works



RECOMMENDATION: Refusal

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		Committee Date: 21.05.2024
Dunkeswell and Otterhead (Awliscombe)	23/2455/FUL	Target Date: 17.01.2024
Applicant:	Mr & Mrs M & J Summers	
Location:	Kains Park Farm Kains Park Storage	
Proposal:	Change of use of land for the storage of caravans, motorhomes and boats (use class B8) and associated works	

RECOMMENDATION: Refusal

EXECUTIVE SUMMARY

This application is brought before the Planning Committee owing to a difference of opinion between officers and the commenting ward member.

In addition, one of the applicants is also an employee of the Council.

The application proposal involves the expansion of the Kains Park Storage complex, housed at Kains Park Farm, Awliscombe, which provides both short and long term secure container storage and external caravan, boat and motorhome storage for domestic and commercial customers. The complex, which currently extends to around 1 hectare in area, is set amidst the main farm dwelling and a number of farm buildings.

The proposal involves an extension of the facility into a field of around 0.82 hectares area to the north west of the complex together with the creation of access from the existing storage park area and tree and wildflower landscape planting, including the stopping up of an existing entrance to the field off an adjacent road with new hedging.

The proposal is intended to meet a stated demand for storage that cannot currently be met owing to the existing facility operating at capacity.

Relevant Local Plan policies that are permissive of rural diversification/business/economic development expansion proposals place an emphasis on the need for them to be small scale, proportionate to the size and scale of existing site operations and compatible with their landscape setting, avoid any detrimental impact or adverse effect upon the rural character and appearance of the surrounding area and provide employment.

In this case, the proposal would relate to an almost doubling in the area of the existing storage complex with the expansion taking place within an open field within which likely lightly coloured caravans, boats and motorhomes would appear visually prominent and intrusive, both in closer range and longer distance views from the public domain.

Although the service benefits of the proposed expansion of the storage facility to the local community in general are recognised, the development would not result in any significant employment gains or that would outweigh these fundamental policy conflicts in the overall planning balance.

Much of the comment received from interested third parties, many of whom use the facility, is expressed in support of the existing operation as opposed to providing detailed reasons to justify the proposed expansion. Whilst this, along with the absence of objection from the parish council and the commenting ward member, is acknowledged, it is considered that it is outweighed by the identified harm.

Refusal is therefore recommended.

CONSULTATIONS

Local Consultations

Parish/Town Council

The Parish Council have no objections and support this application.

Dunkeswell and Otterhead - Cllr Yehudi Levine

I have no objection to this application.

Dunkeswell and Otterhead - Cllr Yehudi Levine 3/5/24

To be honest, my 'no objection' comment meant I was sitting on the fence with no strong feelings either way. By the 21st May I will have left the Planning Committee for pastures new and am happy to leave Cllr Brown to pass judgement as the Ward Member on the committee.

Technical Consultations

County Highway Authority

The site already successfully carries out storage of Caravans, Boats and Motorhomes, our running road collision data, currently 2018-2022, shows no associated recorded collisions within the vicinity.

Storage of this type, tends to produce limited trip generation once in situ and the site is located near to the A373 for quick dispersion of traffic in a higher network road.

The access to be utilised is existing with acceptable visibility. The recent traffic survey in 2022 for the permitted storage showed between 3 - 7 trips per day, and the agricultural machinery former use of this site had between 8 - 20 trips per day, therefore from this precedent trip generation benchmark, I do not envisage a trip generation intensification.

Therefore the County Highway Authority (CHA) has no objection to this planning application.

EDDC Landscape Architect

Objection (Full consultation response at end of report)

EDDC District Ecologist

No objection subject to conditions to control external lighting and submission of a landscape and ecology management plan for approval
(Full consultation response at end of report)

Environmental Health

No objection subject to a planning condition to control lighting

Other Representations

16 representations of support have been received.

Summary of Grounds of Support

1. Kains Park offer a very high quality of storage facility within easy reach of Honiton.
2. Site is not overlooked and is private and well screened.
3. Strong demand in the area for secure easily accessible storage.
4. Site is safe and secure with electric gate and CCTV.
5. In keeping with the area.
6. Lack of secure storage of this nature in the area.
7. Demand for the expansion which would benefit Honiton and surrounding area.
8. Expanding the site brings more business and tourism to the area which is good for the local economy.

PLANNING HISTORY

16/2551/FUL - Expansion of existing storage and distribution site including revisions to planning permission 07/1903/COU to allow storage of caravans, boats, trailers, machinery and vehicles ; caravan wash bay; 25no storage containers for self-store use; and associated works including re-cladding of existing storage building (Full). Approved 11/1/17.

07/1903/COU - Change of use of buildings to storage of agricultural machinery (Full). Approved 8/11/07.

POLICIES

Adopted East Devon Local Plan 2013-2031 Policies

Strategy 3 (Sustainable Development)

Strategy 5B (Sustainable Transport)

Strategy 7 (Development in the Countryside)

Strategy 46 (Landscape Conservation and Enhancement and AONBs)

Strategy 50 (Infrastructure Delivery)

D1 (Design and Local Distinctiveness)

D2 (Landscape Requirements)

EN5 (Wildlife Habitats and Features)

EN14 (Control of Pollution)

EN22 (Surface Run-Off Implications of New Development)

E4 (Rural Diversification)

E5 (Small Scale Economic Development in Rural Areas)

E7 (Extensions to Existing Employment Sites)

TC2 (Accessibility of New Development)

TC7 (Adequacy of Road Network and Site Access)

TC9 (Parking Provision in New Development)

(N.B.: There is no neighbourhood plan in force for Awliscombe parish.)

Government Planning Documents

NPPF (National Planning Policy Framework 2023)

ANALYSIS

Site Location and Description

The site comprises a field, laid to pasture at the time of the officer site visit, of broadly oblong configuration and approximately 0.82 hectares area located to the north west of Kains Park Farm.

The site and farm itself are located within open countryside around 1.2 km. to the north west of the nearest part of the built-up area of Honiton, 0.8 km. south east of Awliscombe and 0.7 km. north of Weston.

The farm is the base for Kains Park Storage, a business providing both short and long term secure container storage and external caravan/boat/motorhome storage for domestic and commercial customers.

Extending to around 15.8 hectares in area of owned land the farm holding, along with other rented land, is also used for growing grass that is sold for grazing and cutting.

The built complex within which the storage use is conducted comprises a farmhouse, range of buildings and yard areas amounting to around 1.07 hectares. It is served by a private driveway off of Weston Lane, a Class C highway that connects Weston and Awliscombe. An unclassified lane that connects this road with the A373 to the south east of Awliscombe borders the site at its north western end, off which there is a gated entrance into it positioned adjacent to its northern corner.

Background

In the past the farm has operated as a dairy unit alongside an agricultural contracting enterprise and a haulage business. However, by 2002 the haulage business and milk production had ceased and the scale of the contracting enterprise significantly reduced.

In 2003 the business diversified into storing agricultural machinery for a local agricultural farm machinery dealer, planning permission for which was granted in 2007 (application 07/1903/COU refers). Over time, this increased to what is described within the applicants' agents' supporting statement as around 250 items of machinery.

However, this itself ceased during 2017 and planning permission (application 16/2551/FUL refers) was granted for an expansion of the storage site to allow the storage of caravans, boats, trailers, machinery and vehicles.

The permission also authorised the provision of a caravan wash bay and the siting of 25no storage containers for self-storage use.

However, notwithstanding this proposal description, given that the siting of the containers represents a material change of use of the land (as opposed to operational development), and in the absence of any condition explicitly controlling the number of permitted storage containers, the site currently houses - again according to the submitted statement - 73 self-storage containers together with 89 caravans/motorhomes/boats.

Proposed Development

The current proposal involves an expansion of the storage complex into the application site through the change of use of the land to provide additional capacity

for the storage of caravans, motorhomes and boats (use class B8) together with various associated works comprising the following:

- the laying out of a permeable stone surface extending to around 5,900 square metres area to provide manoeuvring space for vehicles and storage space for caravans, motorhomes and boats
- landscaping works including tree planting and the establishment of flower rich margins around the perimeter of the extended storage site
- the removal of a length of approximately 20.4 metres of hedgerow along the south eastern boundary of the site with the existing complex to enable vehicular access between the two to be created
- the stopping up of the field gate entrance to the site off of the adjacent lane to the north west with a Devon bank with native species hedgerow planting translocated from the section of hedgerow to be removed.

It is anticipated that the proposed expansion would provide sufficient capacity for the storage of up to 68 additional caravans/motorhomes/boats, thereby increasing the overall storage capacity to up to around 157 caravans/motorhomes/boats.

It is advised that the business is currently operating at capacity and there is a demand locally for additional storage space for hire.

No changes to the present access arrangements off Weston Lane are proposed. In addition, no external lighting is envisaged.

Considerations/Assessment

The considerations that are material to the assessment of the proposal are discussed in turn as follows.

Principle of Development/Policy Assessment

The site is located within the countryside outside of any Built-up Area Boundaries as defined in either the adopted Local Plan or Villages Plan or any site-specific allocations shown on the Proposals Map that accompanies the former. As such, the provisions of Local Plan Strategy 7 (Development in the Countryside) apply. These only permit development in the countryside where it is in accordance with a specific local or neighbourhood plan policy and where it would not harm the area's distinctive landscape, amenity and environmental qualities including, among other things, land form, important natural features which contribute to local landscape character, including topography and traditional field boundaries, and public views that form part of the area's distinctive character or otherwise cause significant visual intrusion.

In the absence of any made or emerging neighbourhood plan for Awliscombe parish (in which the site is located), only the relevant adopted Local Plan policies are material to consideration of the proposal for the purposes of this strategy.

Strategy 46 (Landscape Conservation and Enhancement and AONBs) requires that development 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 the District. It only permits development where it conserves and enhances the area's landscape character, does not undermine landscape quality and is appropriate to the economic, social and well-being of the area.

These provisions are largely complemented by some of the criteria set out in Policy D1 (Design and Local Distinctiveness) which only permit proposals where they respect the key characteristics and special qualities of the area and do not adversely affect important landscape characteristics.

Policy D2 (Landscape Requirements) sets out a series of criteria that landscape schemes should meet, including the making of provision for the planting of trees, hedgerows, including the replacement of those of amenity value which have to be removed for safety or other reasons, and other soft landscaping.

Proposals to diversify and expand upon the range of traditional agricultural-related economic activities undertaken in rural areas are supported in the provisions of Policy E4 (Rural Diversification), a further criteria-based policy. Among these are requirements that proposals: are complementary to, or compatible with, the agricultural operations in the rural area or on a farm; are of a character, scale and location that are compatible with their landscape setting; and the likely amount of traffic generated by proposals could be accommodated on the local highway network without harming road safety whilst avoiding any adverse visual impact upon the surrounding countryside.

These are largely supplemented by those of Strategy 28 (Sustaining and Diversifying Rural Enterprises) which supports developments that sustain and diversify agricultural and traditional rural enterprises and add value to rural produce.

Policy E5 (Small Scale Economic Development in Rural Areas) permits small scale economic development and the expansion of existing businesses designed to provide jobs for local people where, if on a greenfield site, is well related in form and scale and in sustainability terms to the village and surrounding areas provided, among other things, a safe highway access can be achieved, the local highway network is capable of accommodating the forecast increase in traffic and there would be no detrimental impact upon landscape interests.

In addition, Policy E7 (Extensions to Existing Employment Sites) allows for the small scale expansion of business sites in a manner that is proportionate to the existing size and scale of site operations provided, again among other criteria, that the local highway network is capable of accommodating the forecast increase in traffic.

These local policy provisions are consistent with those set out in the National Planning Policy Framework (NPPF) which, at paragraph 88, states that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas as well as the development and diversification of agricultural and other land-based rural businesses.

Two key issues that are central to the provisions of each of Local Plan Policies E4, E5 and E7 are the scale of development and its impact upon the rural character and appearance of the surrounding area.

Policy E4 requires that the scale of rural diversification proposals should be compatible with their landscape setting while Policy E5 permits 'small scale economic development' where there would be no detrimental impact upon landscape interests. Policy E7 permits 'small scale expansion' of sites 'in a manner that is proportionate to the existing size and scale of site operations' provided that no environmental interests are adversely affected.

In this case the proposed expansion of the storage park would amount to an almost doubling of its present size/area, resulting in a complex that would extend to close to 2 hectares in area.

In the first instance therefore it is not accepted, particularly when assessed in tandem with the landscape impact issues that are discussed in the next section of the report, that the proposal would satisfy these fundamental policy provisions that all place emphasis upon permitting only 'small scale' expansion of existing businesses and sites within the open countryside.

Impact on Character and Appearance of Landscape

In terms of the effects of the proposal upon the rural character and appearance of the wider landscape, although not forming part of any designated landscape area the site is nevertheless within relatively close proximity of the Blackdown Hills National Landscape (NL) (formerly Area of Outstanding Natural Beauty) which, when the wider landscape views referenced below are factored into the assessment of the landscape impact of the development, forms part of its setting.

The Council's Landscape Architect advises that "the existing field pattern surrounding the farm buildings comprises small irregular shaped fields of medieval origin and represent a remarkably high degree of survival. Although there are no landscape designations covering the site, it lies within an attractive and tranquil pastoral landscape in overall good condition with a strong sense of time-depth."

The surrounding area also lies within East Devon Landscape Character Type (LCT) 3B (Lower rolling farmed and settled slopes) as defined in the East Devon and Blackdown Hills Landscape Character Assessment 2019. Key characteristics for this LCT relevant to the site are:

- o Gently rolling landform, sloping up from valley floor.
- o Many hedgerow trees, copses and streamside tree rows. Oak and ash predominate, and there are small blocks of woodland.
- o Predominantly pastoral farmland, often with a wooded appearance. Variable sized fields with wide, low hedged boundaries and a mostly irregular pattern, reflecting different phases of enclosure.
- o Semi-natural habitats include streams and ditches, grassland, woodland and trees.
- o Numerous historic landscape features including farmsteads, lanes, villages and churches. Concentrations of Roman sites.

- o Settled, with various settlement sizes, building ages, patterns and styles. Various building materials, including stone, cob, whitewash/ render, slate, thatch and tile.
- o Winding, often narrow sunken lanes, with tall earth banks.
- o A relatively enclosed and sheltered landscape. Some parts of the LCT feel well settled, whilst others feel exceptionally remote, with very little traffic.
- o Views tend to occur across valleys, rather from within them. Higher land in other LCTs forms the backdrop to views

At a wider County level the site also falls within the Clyst Lowland Farmlands Landscape Character Area (LCA).

Key characteristics of this LCA relevant to the site are:

- o Lowland, undulating farmed landscape underlain by mudstones, siltstones and sandstones.
- o Landscape crossed by streams and meandering watercourses which feed into the more distinct valleys of the Clyst (a tributary to the Exe) and the Tale (a tributary to the Otter).
- o Generally well treed appearance due to significant numbers of hedgerow trees although few woodlands
- o Notable small orchards often on the outskirts of villages.
- o Mixture of small to medium scale fields often with curving boundaries reflecting medieval origin.
- o Mixed farming including arable and some pasture along watercourses where there is seasonal flooding, as well as areas of horsiculture and hobby farming.
- o Nature conservation interest provided by unimproved neutral grassland and marshy grassland, particularly fringing streams and plantation/ semi-natural and ancient woodland in the north-west.
- o Dispersed pattern of small villages (particularly along the watercourses many with 'Clyst' place names), dispersed farmsteads and town of Honiton.
- o Strong local vernacular of cob and thatch.
- o Overarching perceptions of tranquillity and quintessential English lowland farmland when away from infrastructure and communication corridors and a sense of isolation in parts.
- o Views to surrounding ridges of higher land. Relevant management guidelines for this LCA include:
 - o Protect the landscape's strong sense of tranquillity and remoteness with clustered villages and hamlets reinforcing a strong historic sense of place.
 - o Protect the sparse settlement pattern of clustered hamlets, villages and farmsteads, preventing the linear spread of development along river valleys and roads wherever possible.
 - o Protect the landscape's network of quiet lanes enclosed by woodland and species-rich hedge banks, resisting unsympathetic highways improvements or signage.
 - o Protect and repair characteristic built features such as stone hump-backed bridges.

Although not in the form of a fully detailed landscape visual impact assessment, the application is accompanied by a document that contains a series of photographs towards the site from particular medium and longer distance viewpoints, all of which are within a 4km. distance of it.

Whilst it is evident that the application site and prospective development would be less visible from some of these than others it is equally clear that they would be apparent from a number of the viewpoints that are identified. In particular they would be especially visible in views, at around a distance of approximately 800 metres to the west, from the more elevated parts of a public footpath (no. 1) that ascends Bushy Knap, a topographically distinct hill that separates Awliscombe and Buckerell. This would also be the case during the summer months when vegetative cover is more abundant.

Officers have also directly assessed the landscape visual impact of the proposal from these points of public vantage.

Of the other viewpoints photographed, the expansion of the complex would be evident in views from a section of the A375 (Sidmouth Road) where it descends/ascends the hill to/from Honiton close to Gobsore Copse and Plantation and Beech Walk, elevated land to the north east on the plateau of St. Cyres Hill and footpaths close to the A35 Trunk road and Tower Cross to the east of Honiton.

Whilst it is acknowledged that these are from longer distance with the site set amidst a much greater panorama across the surrounding landscape, they would nevertheless afford views of what would likely be an array of white coloured caravans, boats and motorhomes. It is also noticeable that within these views, including - for the most part - those from footpath no. 1, the existing complex appears largely well contained visually by established hedges and trees within the curtilage of and alongside the farm complex. By contrast, it is thought that the proposed expansion would read as a more significant intervention within the landscape.

It should also be recognised that the development would also be readily apparent in the much closer range views that are available from both Weston Lane and the unclassified lane that connects it to the A373 that immediately borders the site to the west. From the latter, in particular, the change in the character of the site, from a grass field to an extensive hard surfaced area with caravans, boats and motorhomes, would be strongly evident.

Although the proposed landscaping measures, including tree planting, would in the longer term help to some extent to mitigate the landscape impact of the development, it is likely that this would take a considerable time to establish and become effective in providing screening. In any event, there remains concern as to both its likely longer term effectiveness in screening the expanded complex from some of the other views identified above as well as the extent to which such screening would itself appear sympathetic to the landscape character of the surrounding area as defined by the landscape characteristics set out above.

Principle of Development – Overall Planning Balance

Taking all of these factors in combination, it is not accepted that the scale of the proposed expansion would be compatible with its landscape setting or the broader rural landscape character and appearance of the locality. It is considered that the

development would be out of keeping with the strongly rural setting and tranquillity of the surrounding landscape and would be likely to result in an unduly adverse, harmful and detrimental impact upon its character as well as that of the setting of the nearby designated NL.

However, it is accepted that these concerns need to be considered against any economic benefits that may arise from the proposed development in the overall Planning balance.

In this regard it is contended that, in addition to the benefits to the applicants from the ability to expand the business, the proposal would have a positive impact on rural employment/work opportunities for local people and on the operation of local businesses that require storage space.

The well-established nature of the existing storage business, its current operation at capacity and its relative proximity to Honiton and other rural villages within its hinterland are all recognised. However, set against the fundamental objective of Policy E5, namely the enablement of expansion of businesses in rural areas to provide additional employment opportunities, it would seem that the benefits would be rather more limited.

It is advised that the business currently provides employment for 1.5 full time equivalent (FTE) posts. It is anticipated that the proposed expansion would increase this to 2.5 FTE positions.

Notwithstanding the stated percentage of containers currently at the site that are used by local businesses and the advice that four businesses are used by customers to carry out maintenance and servicing of caravans stored at the park, the expansion of which would generate additional work for them, it is considered that these provide limited benefits when balanced against the landscape harm identified above on account of the scale of expansion being proposed.

In conclusion with regard to the principle of the development therefore, it is felt that the proposal would give rise to significant adverse landscape and visual impacts and would fail to enhance, or even conserve, the character of the landscape. As such, it would be contrary to the relevant provisions of paragraph 180 of the NPPF which require that planning decisions should contribute to and enhance the natural and local environment by, among other things, recognising the intrinsic character and beauty of the countryside. It would also be in conflict with paragraph 182 which states that development within the setting of NLS should be sensitively located to avoid or minimise adverse effects upon them.

In a more local context, the development would be contrary to Local Plan Strategies 7 and 46 and Policy D1 referred to above.

Highways

Each of Policies E4, E5 and E7 referenced earlier in the report also contains criteria requiring that the local highway network is capable of accommodating any forecast increase in traffic generation that would result from development proposals.

The applicants have carried out a traffic survey that has found that the existing storage site (caravans and containers) generates between around 7 and 16 trips per day, this having continued without any highway capacity problems. This compared with a corresponding daily trip generation of between 8 and 23 trips when the site was in use solely for agricultural machinery storage, including larger lorries and tractors.

It is estimated that as a result of the proposed expansion of the storage park traffic movement levels of between 9 and 21 daily trips would be generated., thereby comparing favourably with the historic trip generation levels set out above.

As such, it is contended that the development would not have a detrimental impact upon the capacity of the local highway network or the safety of motorists, pedestrians or cyclists.

Notwithstanding the mainly single width nature of, and absence of footways from, the network of rural lanes from which access to the storage park is derived, the findings of the applicants' survey effort and estimated future level of vehicle movement that would be generated by the expansion of the complex are accepted by the County Highway Authority. Its consultation comments also acknowledge the absence of any recorded collisions in the vicinity of the site during the past five or so years, the limited trip generation levels that the type of use proposed tends to produce and the proximity of the park to the A373.

In the circumstances, it is not considered that there would be any highway safety or capacity-related objections that would be capable of being readily substantiated.

Ecology

The application particulars include a Preliminary Ecological Appraisal report based upon a walkover survey of the site. Its main conclusions are that the removal of approximately 0.59 hectares of modified grassland and around a 20.4 metre length of hedgerow vegetation to create internal access between the existing complex and the site would result in a minor adverse ecological impact on a local scale.

The report also found no suitable habitat for bats, dormice, badgers, great crested newts and an absence of nesting birds.

Recommendations for mitigation of the impacts of the proposed development include biodiversity gain in the form of the creation of the species rich wildflower margins, native species tree planting and hedge planting to stop up the gateway onto the road bordering the site to the west referred to above.

The report has been reviewed by the Council's Ecologist who raises no objection to the proposals subject to control being retained over external lighting and the submission for approval of a landscape and ecological management plan in the interests of the avoidance of any adverse effects upon protected species and the provision of appropriate ecological mitigation and enhancement measures.

On this basis, there are no objections to the proposal on the grounds of any adverse impacts upon the nature conservation value of wildlife habitats or features.

Conclusion

In concluding, it is considered that the proposed scale of expansion of the existing storage park would not align with Local Plan Policies E4, E5 and E7 which, read together, only permit 'small scale' development that is proportionate to the existing size and scale of site operations and where it would be compatible with its landscape setting.

RECOMMENDATION

REFUSE for the following reason:

1. The proposed development would involve an expansion of the existing storage park and associated use of land for caravan, boat and motorhome storage purposes that would be of a scale that would not be permitted by policy and would appear unduly visually intrusive within the surrounding open countryside to the detriment of the rural landscape character and appearance of the area and the landscape character of the setting of the nearby designated Blackdown Hills National Landscape. As a consequence, and in the absence of any demonstrable significant employment or other benefits that outweigh this harm, the proposal would be contrary to the provisions of Strategy 46 (Landscape Conservation and Enhancement and AONBs) and Policies D1 (Design and Local Distinctiveness) E4 (Rural Diversification), E5 (Small Scale Economic Development in Rural Areas) and E7 (Extensions to Existing Employment Sites) of the adopted East Devon Local Plan 2013-2031 and guidance as set out in paragraphs 180 and 182 of the National Planning Policy Framework (2023). Furthermore, in the absence of policy support or any other material considerations weighing in favour of the development and justifying a departure from the above policies and guidance, the proposal would also constitute unjustified non-sustainable development within the countryside contrary to the provisions of Strategy 7 (Development in the Countryside) of the adopted East Devon Local Plan 2013-2031.

Informative:

In accordance with the aims of Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 East Devon District Council seeks to work positively with applicants to try and ensure that all relevant planning concerns have been appropriately resolved; however, in this case the development is considered to be fundamentally unacceptable such that the Council's concerns could not be overcome through negotiation.

Plans relating to this application:

ARPC3 REV A	Proposed Site Plan	22.11.23
ARCP1	Location Plan	16.11.23

List of Background Papers

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

Statement on Human Rights and Equality Issues

Human Rights Act:

The development has been assessed against the provisions of the Human Rights Act 1998, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equality Act:

In arriving at this recommendation, due regard has been given to the provisions of the Equality Act 2010, particularly the Public Sector Equality Duty and Section 149. The Equality Act 2010 requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities. Protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race/ethnicity, religion or belief (or lack of), sex and sexual orientation.

APPENDIX – Technical Consultations - Full consultation comments

EDDC Landscape Architect

1 INTRODUCTION

This report forms the EDDC's landscape response to the full application for the above site.

The report provides a review of landscape related information submitted with the application in relation to adopted policy, relevant guidance, current best practice and existing site context and should be read in conjunction with the submitted information.

2 POLICY CONTEXT, LANDSCAPE CHARACTER AND LANDSCAPE AND VISUAL IMPACT

2.1 Landscape Policy Context

There are no landscape or conservation designations within the site but the Blackdown Hills AONB boundary lies immediately to the north of the A373. The site itself is a green field surrounded by other fields outside of the BUAB and as such is considered to be countryside as defined in the Local Plan.

2.2 Landscape character

The site lies within East Devon Landscape Character Type (LCT) 3B - Lower rolling farmed and settled slopes as defined in the East Devon and Blackdown Hills Landscape Character Assessment 2019. Key characteristics for this LCT relevant to the site are:

- o Gently rolling landform, sloping up from valley floor.
- o Many hedgerow trees, copses and streamside tree rows. Oak and ash predominate, and there are small blocks of woodland.
- o Predominantly pastoral farmland, often with a wooded appearance. Variable sized fields with wide, low hedged boundaries and a mostly irregular pattern, reflecting different phases of enclosure.
- o Semi-natural habitats include streams and ditches, grassland, woodland and trees.
- o Numerous historic landscape features including farmsteads, lanes, villages and churches. Concentrations of Roman sites.
- o Settled, with various settlement sizes, building ages, patterns and styles. Various building materials, including stone, cob, whitewash/ render, slate, thatch and tile.
- o Winding, often narrow sunken lanes, with tall earth banks.
- o A relatively enclosed and sheltered landscape. Some parts of the LCT feel well settled, whilst others feel exceptionally remote, with very little traffic.
- o Views tend to occur across valleys, rather from within them. Higher land in other LCTs forms the backdrop to views

At county level the site falls within the Clyst Lowland Farmlands Landscape Character Area (LCA).

Key characteristics of this LCA relevant to the site are:

- o Lowland, undulating farmed landscape underlain by mudstones, siltstones and sandstones.
- o Landscape crossed by streams and meandering watercourses which feed into the more distinct valleys of the Clyst (a tributary to the Exe) and the Tale (a tributary to the Otter).
- o Generally well treed appearance due to significant numbers of hedgerow trees although few woodlands
- o Notable small orchards often on the outskirts of villages.
- o Mixture of small to medium scale fields often with curving boundaries reflecting medieval origin.
- o Mixed farming including arable and some pasture along watercourses where there is seasonal flooding, as well as areas of horsiculture and hobby farming.
- o Nature conservation interest provided by unimproved neutral grassland and marshy grassland, particularly fringing streams and plantation/ semi-natural and ancient woodland in the north-west.
- o Dispersed pattern of small villages (particularly along the watercourses many with 'Clyst' place names), dispersed farmsteads and town of Honiton.
- o Strong local vernacular of cob and thatch.
- o Overarching perceptions of tranquillity and quintessential English lowland farmland when away from infrastructure and communication corridors and a sense of isolation in parts.
- o Views to surrounding ridges of higher land. Relevant management guidelines for this LCA include:

- o Protect the landscape's strong sense of tranquillity and remoteness with clustered villages and hamlets reinforcing a strong historic sense of place.
- o Protect the sparse settlement pattern of clustered hamlets, villages and farmsteads, preventing the linear spread of development along river valleys and roads wherever possible.
- o Protect the landscape's network of quiet lanes enclosed by woodland and species-rich hedge banks, resisting unsympathetic highways improvements or signage.
- o Protect and repair characteristic built features such as stone hump-backed bridges.

2.3

Local landscape character of site and its environs

The site and its immediate surroundings generally reflect the LCT and LCA descriptions and form part of the setting to the Blackdown Hills AONB. Modern development influences are limited but there are high voltage transmission lines to the west and the Heath Park industrial estate on the western edge of Honiton is visible in the mid-distance to the south.

The existing field pattern surrounding the farm buildings comprises small irregular shaped fields of medieval origin and represent a remarkably high degree of survival. Although there are no landscape designations covering the site, it lies within an attractive and tranquil pastoral landscape in overall good condition with a strong sense of time-depth,

2.4 Landscape and visual impact of the proposed development

The present storage facilities are located within the curtilages of the existing building complex. The proposal extends the operation into an undeveloped field up to 130m to the northeast.

The proposal will result in the loss of most of the existing grassland within the site boundaries, its replacement with hard surfacing and the introduction of caravans and other equipment, the majority of which will be white and therefore particularly noticeable where views permit.

The adjacent quiet single-track lanes with high hedge banks by which the site is accessed are not suitable for motor homes or towing caravans. The proposed development is likely to lead to a significant increase in traffic along them with resultant damage to adjacent hedge banks and potentially the narrow hump-back bridge to the southwest of the site, as motorists seek to manoeuvre and pass each other.

The proposed development is out of keeping with the strongly rural setting and tranquillity of the surrounding landscape and is likely to result in adverse impact on its character and the setting of the AONB.

A visual assessment has been submitted with the application. It is accepted that the site itself is relatively well screened by a combination of vegetation cover and landform but there are views afforded over it from Awliscombe footpath 2 within the

AONB as identified in the submitted visual appraisal (VP10). It is likely that the development would be visible in partial especially in winter from viewpoint 2 (Awliscombe footpath 1) and viewpoint 9. Key visual receptors in these instances will be walkers on the public rights of way network who are likely to have a high sensitivity to change of the type proposed giving rise to moderate to low adverse visual effects at a number of locations.

The increase in vehicular traffic and especially caravans would also increase the danger to cyclists and pedestrians who regularly use the surrounding minor lanes.

3 CONCLUSION AND RECOMMENDATIONS

The proposals would give rise to notable adverse landscape and visual effects and cannot be said to enhance or conserve landscape character contrary to NPPF para 180a and 182 and Local Plan strategies 5, 7 and 46 and policy D1. The proposal also fails to meet sustainable development objectives set out in Strategy 5 of the Local Plan. As such the application should be refused.

EDDC District Ecologist

The application is supported by a Preliminary Ecological Appraisal (PEA) with a walkover survey of the site undertaken in April 2023. The proposal would result in the loss of 20 m of species-poor hedgerow, (a Habitat of Principal Importance), and loss of approximately 0.6 ha of modified grassland, considered to result in a minor adverse impact on a local scale.

Recommendations are made for provision of new hedgerow habitat, wildflower planting, and other avoidance measures, such as hedge removal outside of the bird nesting period. The success of wildflower planting on a modified grassland field managed for silage is a little questionable without appropriate long-term management.

Should the proposal be minded for approval I would recommend the following conditions:

1. Under no circumstances should any external lighting be installed without prior consent from the local planning authority. Any lighting design should be fully in accordance with BCT/ILP Guidance Note 08/2023.
2. A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the first use of the development based on the submitted ecology report (Acorn, November 2023). It should include details of planting and landscaping specifications, management, work schedule, adaptive management measures, and measures to ensure compliance of works being undertaken.

Reason

To ensure that the development has no adverse effect on protected and notable species and provides ecological mitigation and enhancement measures in accordance with Strategy 47 (Nature Conservation and Geology) and Policy EN5 (Wildlife Habitats and Features) and EN14 (Control of Pollution) of the Adopted East Devon Local Plan 2013-2031.

