
From: Horn, Darren A (NE)
Sent: 14/12/2017 14:46:11
To: Higgins, Michael
Subject: Exeter Royal Academy For Deaf Education, 50 Topsham Road, Exeter. Reference Number 17/1640/FUL (Our ref: 231814)
Attachments: Exeter City Council - 17 1640 FUL - Redevelopment of Exeter Royal Academy for Deaf Education site to provide 147 new homes - Care home and assisted living units - Pre-school etc - 231814.pdf; 231814 - 17 1640 FUL - Annex A.pdf

Dear Mr Higgins,

Please find our response attached.

Kind regards,

Darren Horn

Planning Adviser (Part-time: Monday, Thursday and Friday)

Devon, Cornwall and Isles of Scilly Team

Sterling House, Dix's Field, Exeter, EX1 1QA

Tel: 0208 026 7400 (Monday and Thursday)

Mob: 07826 891 828 (Friday)

For new consultations or to provide further information on existing consultations please send all correspondence to consultations@naturalengland.org.uk

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

From: Llewellyn, John [<mailto:john.llewellyn@exeter.gov.uk>]
Sent: 15 November 2017 13:58
To: 'Lloyd Orriel' <Lloyd.Orriel@devon.gov.uk>; 'floodrisk@devon.gov.uk' <floodrisk@devon.gov.uk>; 'paul.taylor@devonandcornwall.pnn.police.uk' <paul.taylor@devonandcornwall.pnn.police.uk>; 'SPDC@environment-agency.gov.uk' <SPDC@environment-agency.gov.uk>; Bulleid, Alex <alex.bulleid@exeter.gov.uk>; Consultations (NE) <consultations@naturalengland.org.uk>; 'Helene Jessop' <helene.jessop@rspb.org.uk>; Macdonald, Vanessa <vanessa.macdonald@exeter.gov.uk>
Cc: Higgins, Michael <michael.higgins@exeter.gov.uk>
Subject: Exeter Royal Academy For Deaf Education, 50 Topsham Road, Exeter. Reference Number 17/1640/FUL

Dear Sirs

Please find below details of an application recently received by Exeter City Council. The Council is required to consult you on this proposal. If you have any comments, please send them to the Case Officer by the deadline date below.

Deadline for Response: 14 December 2017

Application Details

-

Site Address: Exeter Royal Academy For Deaf Education, 50 Topsham Road, Exeter, Devon

EX2 4NF

Proposal: Redevelopment of the Exeter Royal Academy for Deaf Education (eRADE) site to provide 147 new homes (C3), a care home and assisted living units (both C2), accommodation for a pre-school, access related works, provision of landscaping and open space and other associated works.

Application Reference: 17/1640/FUL

APPLICATION DOCUMENTS CAN BE FOUND AT:

<http://publicaccess.exeter.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=OY23F1HBIJR00>

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Contact Details

-

Planning Officer: Michael Higgins

Tel: 01392 265616

Email: michael.higgins@exeter.gov.uk

Postal Address:

City Development

Civic Centre

Paris Street

Exeter

Devon

EX1 1NN

Disclaimer: <http://www.exeter.gov.uk/disclaimer>

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Date: 14 December 2017
Our ref: 231814
Your ref: 17/1640/FUL



Michael Higgins
City Development
Civic Centre
Paris Street
Exeter
EX1 1NN
michael.higgins@exeter.gov.uk

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Higgins,

Planning consultation: Redevelopment of the Exeter Royal Academy for Deaf Education (eRADE) site to provide 147 new homes (C3), a care home and assisted living units (both C2), accommodation for a pre-school, access related works, provision of landscaping and open space and other associated works.

Location: Exeter Royal Academy For Deaf Education, 50 Topsham Road, Exeter, Devon EX2 4NF.

Thank you for your consultation on the above, which was received by Natural England on 15 November 2017

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

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

Natural England's advice on other natural environment issues is set out below.

European sites

Natural England considers that the proposed development will not have likely significant effects on the Exe Estuary Special Protection Area (SPA) and Ramsar Site and has no objection to the proposed development, subject to the following:

To meet the requirements of the Habitats Regulations, we advise you to record your decision that a likely significant effect can be ruled out. The following may provide a suitable justification for that decision:

The application site is within 3km of the Exe Estuary Special Protection Area (SPA) and Ramsar Site. This is within the 10km zone within which impacts of residential development on the aforementioned site could reasonably be expected to arise in the absence of appropriate mitigation.

We understand that provision of mitigation for the European Sites in the form of Suitable Alternative Natural Greenspace (SANGS)¹ will be covered by the Community Infrastructure Levy (CIL). We recommend that you secure confirmation of the following to assist you in reaching a positive conclusion to your Habitats Regulations Assessment:

1. For any SANGS which is to be delivered as part of the mitigation package, whether by the applicant or your Authority, a site must be identified and confirmed as suitable and deliverable prior to granting of permission.
2. A condition must be included on the permission preventing occupancy of any dwellings until an appropriate quantum of SANGS has been provided (i.e. a Grampian Condition).

Sites of Special Scientific Interest (SSSIs)

Providing appropriate mitigation is secured to avoid impacts upon the European sites occurring there should be no additional impacts upon the SSSI interest features of the Exe Estuary.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on 0208 026 7400.

Yours sincerely

Darren Horn
Planning Adviser – Devon, Cornwall and Isles of Scilly Team
darren.horn@naturalengland.org.uk

¹ In line with the South East Devon European Sites Mitigation Strategy (SEDEMS) and the Joint Approach of your Authority, Teignbridge and East Devon.

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 109 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute](#) Guidelines for Landscape and Visual Impact Assessment for further guidance.

Soils

Guidance on soil protection is available in the Defra *Construction Code of Practice for the Sustainable Use of Soils on Construction Sites*, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraph 113 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species

are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland and veteran trees

You should consider any impacts on ancient woodland and veteran trees in line with paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forest Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland/veteran trees where they form part of a SSSI or in exceptional circumstances.

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

² <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Annex A – Additional advice

Environmental enhancement

Development provides opportunities to secure a net gain for nature and local communities, as outlined in paragraphs 9, 109 and 152 of the NPPF. We advise you to follow the mitigation hierarchy as set out in paragraph 118 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you may wish to consider off site measures, including sites for biodiversity offsetting. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Rights of Way, Access land, Coastal access and National Trails

Paragraph 75 of the NPPF highlights the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development. Consideration should also be given to the potential impacts on the any nearby National Trails. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer. Appropriate mitigation measures should be incorporated for any adverse impacts.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).