

3780/S1

3780/CU14

3780/SA

3780/VSS

3780/DEVSTRA

3780/CU21

3780/CO15

**From:**

Local Plan Review

**Subject:**

FW: Local Plan With Modifications Representations on behalf of Mr Force and Mr Christian

**Attachments:**

App 3.pdf; App 4.pdf; App 1.pdf; App 2.pdf; modssubmissionfinal17.pdf

**From:** Paul White

**Sent:** 10 February 2017 15:50

**To:** Local Plan Review

**Subject:** Local Plan With Modifications Representations on behalf of Mr Force and Mr Christian

Dear sirs,

On behalf of our clients we attach representations and relevant attachments in respect of your Local Plan Review. We look forward to receiving an acknowledgement of receipt in due course.

Regards

Paul White BA (Hons) DipTP MRTPI  
Director of Planning

26 Chapel Street  
Chichester  
West Sussex  
PO19 1DL

Web: [www.genesistp.co.uk](http://www.genesistp.co.uk)

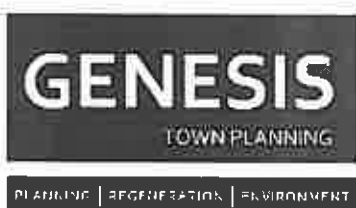
3780/CU1-CU6/mod

3780/CU7-CU12/mod.

3780/S2

3780/S4

3780/S11



Mid Devon District Council

## LOCAL PLAN SUBMISSION WITH PROPOSED MODIFICATIONS

Representations submitted on behalf of:

Peter Force and David Christian

February 2017



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### 1.0 INTRODUCTION AND SCOPE OF REPRESENTATIONS

- 1.1 These representations on the Mid Devon Submission Local Plan (with modifications) are submitted by Genesis Town Planning on behalf of Mr Peter Force and Mr David Christian. They deal with policies S1, S2, S4, S11 and CU21.
- 1.2 Representations were submitted to the earlier Proposed Submission Plan dated February 2015. At this time we objected to the overall amount and distribution of housing development which was set at 7,200 dwellings in the period 2013-2033 (equivalent to 360dpa) because the identified need in the SHMA was higher at 359-381dpa. We are therefore pleased that the proposed modifications have increased the overall level of housing by 660 dwellings to 7,860 dwellings or 393dpa as this will allow the Plan to meet housing need. We are not therefore pursuing objections to the overall level of housing provided for in policies S2 or S3 in connection with the 'positively prepared' test of soundness.
- 1.3 We objected to proposed baseline allocations at Ware Park (38 dwellings) and Exeter Road (45 dwellings) as these scored less than the contingency policy 21 4.8ha site at Colebrook in the Sustainability Appraisal (SA). In our view the higher scoring Colebrook site should have been a baseline allocation for 100 dwellings and the lower scoring sites allocated as contingencies.
- 1.4 We objected to the failure of the Council to include 16.8ha of land at Colebrook adjacent to the contingency policy CU21 site. We showed that part of this land had previously been included as a potential site for 300 dwellings in Policy CU9 of the Local Plan Options document and said the 2 sites should have been combined in a single baseline allocation for 400 dwellings.
- 1.5 We pointed out that both Colebrook sites were justified as a combined baseline allocation in terms of the findings of the Council's Sustainability Appraisal and the conclusions of its Strategic Housing Land Availability Assessment (SHLAA) which assessed the land positively in Sept 2013 and again in June 2014. We also said there were no highways, flood or landscape reasons for rejecting the sites and consultant reports were provided to confirm this.
- 1.6 Now there are an additional 660 dwellings included in the Plan, and yet the Colebrook CU21 site continues to be overlooked as a baseline allocation. We therefore maintain our objections to 1) the distribution of housing to Cullompton, 2) the failure to make the policy CU21 contingency site a baseline allocation for 100 dwellings and 3) the failure of the Plan to allocate a further 16.8ha of land at Colebrook as a new baseline or contingency housing site.
- 1.7 **We therefore propose that both sites at Colebrook are made baseline allocations in a reworded Policy CU21. The new Policy CU21 should specify a minimum of 400 dwellings and a new combined site area of 21.6ha (16.8ha plus 4.8ha).**



- 1.8 **Alternatively, the CU21 site comprising 4.8ha could be made a baseline allocation for 100 dwellings as a first phase and the 300 units on adjoining land to come forward after either as a baseline or contingency allocation.**
- 1.9 The baseline allocation of 100 dwellings could come forward immediately with no adverse impacts in terms of landscape, flood or impact on the capacity of the M5 junction 28. The M5 junction and Flood Assessment findings are set out in the accompanying Preliminary Highways Impact Study and FRA prepared by Jubbs Consulting Engineers at Annex 1 and 2 and the landscape impact findings by Bradley Murphy Design at Annex 3.
- 1.10 The smaller urban extensions at Colebrook would not have the same long lead in times for housing delivery as the larger extensions proposed for the north-west and east of the town. Unlike the larger sites the smaller extensions would both contribute to housing need in the early part of the plan period, an important point especially as completions are already running some 255 dwellings behind the housing requirement target in the Plan. This would help the Plan meet the 'justified' and 'effective' tests of soundness.

### 2.0 PLANNING HISTORY

#### The Previous Submission Local Plan

- 2.1 As explained in section 1 above, representations were submitted to the February 2015 Submission Plan to object to 1) the proposed annual housing target; 2) the allocation of 4.8ha of land at Colebrook as a contingency residential allocation for 100 dwellings in policy CU21 and 3) the failure of the Council to allocate a further 16.8ha of land at Cullompton as a baseline allocation. The Council's response to the objections is attached to these representations at Annex 4 and it states:

**'The Council has proposed to amend the annual housing target in the plan to reflect the final SHMA report. The scoring of the site is not dissimilar to that for CU14 and CU15 however those sites are almost exclusively flood zone 1 so are sequentially preferable. Furthermore transport modelling undertaken by the highways authority indicates that significant mitigation to the M5 junction would need to be undertaken before any further development takes place. The site is of a scale that is significant enough to affect the cumulative impact on infrastructure and require additional works to the M5 junction which this site alone cannot mitigate. An amendment is proposed to the text to clarify that the site can only come forward if it can be demonstrated that it does not result in a significant adverse impact on the capacity of junction 28 and also to clarify that it is the completion of the NW Cullompton through route, rather than the town centre relief road which sets a limitation on the earliest point that the site could come forward. It is not agreed that CU14 and CU15 are preferable contingency options as they do not have the quantum of development to be effective as a contingency'.**

#### Response

- 2.2 As noted in paragraph 1.2 of these comments above, we welcome the Council's decision to increase housing provision to meet housing need in accordance with the Strategic Housing Market Assessment (SHMA). In meeting need, we accept the Plan now meets the 'positively prepared' test of soundness and we are not therefore pursuing this objection further.
- 2.3 However we still believe the contingency site at Colebrook in CU21 should be baseline allocation and the adjacent land a baseline or contingency site. They would help deliver some of the extra 660 dwellings proposed in the Plan and provide a complimentary mid-sized urban extension to the very large sites NW and E of Cullompton which have long lead in times for housing completions.
- 2.4 In our view the Council's concerns about the potential impact of the CU21 site on the M5 junction 28 are overplayed and we refer the Inspector to the Jubbs report at Annex 1 as evidence of this. We accept that the CU21 site is partly within flood zone 3 (that part

immediately adjacent the watercourse) but this is outside the developable area and the accompanying Flood Risk Assessment at Annex 2 confirms the remainder of the site has the capacity to deliver the proposed residential development.

- 2.5 Overall therefore the site is capable of immediate development and its inclusion as a baseline allocation in the Plan would ensure it meets the remaining tests of soundness for Plan preparation. We deal with these tests later in section 3.

### The Sustainability Appraisal (Feb 2015)

- 2.6 The Sustainability Appraisal (SA) has assessed the extent to which the emerging plan, when judged against reasonable alternatives, will help deliver sustainable development. Properly carried out therefore, it will ensure the Local Plan meets the 'justified' and 'consistent with national policy' tests of soundness'.
- 2.7 However in our view the Sustainability Appraisal is flawed and should not be relied on in the evidence base for the Local Plan because it has not properly considered all the site alternatives at Cullompton.
- 2.8 For instance, Appendix 2 of the SA sets out all the preferred site allocations and compares these with other alternative site options. The sites at Cullompton feature on pages 258-324. The only reference to the Colebrook site is on page 298 in connection with its allocation as a contingency with a site area of 4.8ha and a capacity of 100 dwellings. However there is no mention of the larger option for 300 dwellings on 16.8ha at Colebrook in the alternative site options section, even though this was previously an option in Policy CU9 of the Local Plan Review Options Consultation Local Plan. Our representations to the Options consultation explained in detail with a full highways and flood risk assessment why this larger 16.8ha site was suitable and able to deliver 300 dwellings. We assume therefore that no assessment has been carried out of this land in the SA.
- 2.9 We also note there is no correlation between the allocated sites at Cullompton and the scores they achieved in the scoring matrix of the SA. A summary table of scores for the Cullompton sites are set out on page 48 of the SA and we have counted all the positive and negative scores for the Colebrook CU21 site and compared these with the scores for the CU14 and CU15 sites. Based on the scoring matrix, the CU21 site scores a total of +4 overall. Site CU14 only scores +1 and CU15 +2. However despite the lower scores, both the CU14 and CU15 sites have both been allocated as baseline sites ahead of the CU21 site which is still only a contingency reserve site.
- 2.10 The third point we would make against the SA is that the scores in terms of the 9 Sustainability Objectives appear to be very subjective in any event, and are set out after applying mitigation measures as 'post mitigation' figures. The scores also ignore the absolute size of the site alternatives which must distort their impact. For example, with regards to Objective A – Protection of the Natural Environment, the landscape impact of

the NW Cullompton option on 94ha (Policy CU1-6) comprising 1,150 dwellings initially scored -3 but after mitigation, scored 0; and the score for the 2,100 eastern extension on 190ha in policy CU7-12 initially scored -2 but after mitigation scored -1. These scores compare with 100 dwellings on just 4.8ha at Colebrook in Policy CU21 which also scored -1 and after mitigation scored 0, the same as the NW option.

- 2.11 In our view, it cannot be right that the very large sites score the same as smaller sites in landscape impact terms, and to demonstrate the point we enclose our own Landscape and Visual Impact Summary carried out by Bradley Murphy Design at Annex 3. This has taken account of site area and landform and overall, it has scored the additional 16.8ha of land at Colebrook both in isolation and in combination with the CU21 site in similar terms to the site options in policies CU1 and CU7.
- 2.12 Lastly, the SA does not comment on site deliverability in terms of phasing and meeting housing need. In our view the very large sites included at CU1 (NW Cullompton) and CU7 (east Cullompton) will have long lead in times before any housing completions can be expected and might not be able to deliver sufficient housing in the early part of the plan period to meet need. To rely on sites like this exclusively in the Local Plan might well therefore run the risk of it failing the 'effectiveness' test.
- 2.13 In our view, the SA is an unreliable part of the evidence base for the Local Plan and in ignoring the 16.8ha of land at Colebrook as a site option, is incomplete. This land could be combined with the existing 4.8ha contingency site and the total site of 21.6ha made a baseline allocation for a minimum of 400 dwellings. This would provide an opportunity for immediate delivery of the needed additional housing with no lengthy delays in phasing. If selected, this mid-sized site would complement the larger sites and provide more flexibility to the Plan and increase its 'effectiveness'.

### 3.0 ASSESSMENT OF SOUNDNESS

3.1 The 'tests of soundness' for Local Plans are set out in paragraph 182 of the NPPF. They require the Submission Local Plan to have been:

- Positively prepared – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- Justified – the plan should be the most appropriate strategy when considered against the reasonable alternatives based on proportionate evidence;
- Effective – the plan should be deliverable over its period and based on effective joint working on cross boundary strategic priorities and
- Consistent with national policy – the plan should enable the delivery of sustainable development in accordance with policies of the framework.

3.2 With the increased 660 dwellings to meet need, we accept the plan now meets the first test so the remainder of these comments assess the soundness of the Plan in terms of the following:

1. Would the plan be better 'justified' if the proposed site at Colebrook was included as a baseline allocation for 400 dwellings?
2. Would the plan be more 'effective' with a mix of site sizes?
3. Would the Colebrook site be capable of delivering sustainable development in accordance with national policy?

#### Would the Plan be better justified if the Colebrook site was included as a baseline allocation for 400 dwellings?

3.3 The vision and strategy of the Local Plan as set out on page 11 is that Cullompton is intended to become '...In the medium to long term.... the strategic focus of new development, reflecting its accessibility, economic potential and environmental capacity' with targeted provision of urban extensions. Tiverton and Crediton will be the secondary focusses for development.

3.4 As an expression of this vision and strategy, table 4 and table 5 on page 23 of the Submission Plan confirms that out of the total 7860 dwellings, Cullompton will provide 50%, Tiverton 30%, Crediton 10% and the rural area 10%. In our view we are not convinced that this distribution will necessarily enable Cullompton to become the main strategic focus for development in the District and we suggest that a figure above 50% could be justified. In this regard a greater proportion of the additional 660 dwellings could

be directed to Cullompton in accordance with the Vision and Strategy of the Plan. Both sites at Colebrook are well qualified to accommodate any such additional housing.

- 3.5 Another reason for considering housing at Colebrook is that the contingency site in CU21 has scored better than the baseline sites at Ware Park and Exeter Road in the SA. Whilst only small sites we still believe they should be relegated to contingency status and the Colebrook site made a baseline.

### Would the Plan be more 'effective with a mix of site sizes?

- 3.6 However, of greater concern is the Submission Plan strategy to focus most housing on just 2 very large urban extensions at Cullompton in policy CU1 and CU7. Table 5 on page 23 shows a residual requirement at Cullompton of 3234 dwellings. The NW site in CU1 is now proposed for 1350 dwellings, an increase of 150 from the last Submission Plan. The CU7 East Cullompton site now proposes 1750 dwellings and a further 850 dwellings post 2033.
- 3.7 Therefore up until 2033, the 2 sites will deliver a total of 3,100 dwellings out of total of 3234 dwellings. This is equivalent to 96% of the total. In our view, to focus 96% of all housing in just 2 very large urban extensions is not necessarily the most effective strategy as they will both have long lead in times before any housing completions can be expected.
- 3.8 This is a real concern to us because paragraph 2.2 and table 4 of the Plan shows that in March 2016, completions from 2013 amounted to 924 dwellings and yet the cumulative target for completions by 2016 is higher at 1179 dwellings (see table on page 38). So even before the large new sites have been confirmed, the completions in the Plan are not delivering at the rate they should be and are already showing a shortfall of 255 dwellings.
- 3.9 In our view, if the CU21 site was made a baseline allocation for 100 dwellings it would assist housing delivery early on in the plan period. It would complement the very large sites which will drive housing completions later on in the plan period. It would also complement the very small sites which don't have the capacity to meet housing need.
- 3.10 In short, in helping the Plan deliver housing over its entire period including the early years will ensure it better meets the 'effectiveness' and 'justified' tests of soundness.

### Would the Colebrook site achieve sustainable development?

- 3.11 The Colebrook CU21 contingency for 100 dwellings immediately adjoins the existing south west settlement boundary of Cullompton. It would not have been allocated as a contingency residential site if it could not deliver sustainable development in principle. The adjacent land is equally sustainable in locational terms. The larger site causes no harmful landscape, flood or highways impact that cannot be satisfactorily mitigated. In

our view if both sites were allocated they would comply with national policy and deliver sustainable development.

### 4.0 LOCAL PLAN POLICY CHANGES

- 4.1 To ensure the Plan as drafted better meets the tests of soundness, we propose the following policy amendments.

#### Policy S1

- 4.2 Policy S1(a) states that the market towns of Tiverton, Cullompton and Crediton will be the main focus for development, with long-term growth to the east of Cullompton and a limited level of development in identified villages.

#### Comment

- 4.3 The Vision and Strategy of the Plan (page 11) states that the market town of Cullompton will become the strategic focus of new development and the market towns of Tiverton and Crediton will be the secondary focuses of new development. We request that the wording of policy S1 is amended to reflect this.
- 4.4 In addition policy S1 must make clear that housing at Cullompton should not be wholly dependent on large urban extensions North West and East of the town for its growth as they will not provide housing in the short term. In our view, a balanced mix of sites including larger extensions with medium sized opportunities would be best. The sites at Colebrook either separate or combined would provide a medium sized opportunity of between 100-400 dwellings. They would complement the larger sites in bringing forward housing in the short term and improve the flexibility and effectiveness of the Plan overall.
- 4.5 We therefore suggest new wording to Policy S1 a) to refer to the site allocations at Cullompton comprising a range of mid-sized and larger urban extensions sites with the former able to deliver needed housing earlier in the Plan period.

#### Policy S2

- 4.6 Policy S2 sets a development target for Tiverton, Cullompton, Crediton and the rural area.

#### Comment

- 4.7 If the Inspector agrees that Cullompton can accommodate additional housing in accordance with its status as the strategic focus for new development, the development targets in policy S2 will need to be revised.



### Policy S4

- 4.8 Policy S4 is a monitoring policy requiring the release of contingency sites, if required, to boost housing supply.

### Comment

- 4.9 In our view, existing contingency sites should become baseline allocations in the new Local Plan as this will help the Plan meet housing need in the early part of the plan period. Unless the additional 16.8ha of land at Colebrook is made a new contingency site this policy should be deleted.

### Policy S11

- 4.10 Policy S11 summarises the development strategy for Cullompton.

### Comment

- 4.11 If the inspector agrees that the development target needs to be adjusted, the policy wording in S11 will need to be revised. If the Colebrook contingency site for 100 dwellings is made a baseline and/or extended to include adjacent land as a baseline or contingency, this could be referred to as well.

### Colebrook Contingency Site Policy CU21

- 4.12 Policy CU21 refers to 4.8ha of land at Colebrook as a contingency site for 100 dwellings.

### Comment

- 4.13 We request the contingency site is made a baseline allocation for 100 dwellings. The 16.8ha of adjoining land could also be made a baseline site providing 400 units on 21.6ha or made a separate contingency. Both sites would contribute towards the higher housing target and provide a medium sized urban extension to meet housing need in the early part of the plan period before the very large sites NW and E of the town start to deliver housing completions. It would improve the completion rate for housing which is already running behind target. The 100 dwellings would have no adverse impacts in terms of landscape, flood or impact on the capacity of the M5 junction 28.

**PRELIMINARY IMPACT ANALYSIS**

**FOR**

**RESIDENTIAL DEVELOPMENT**

**AT**

**COLEBROOKE LANE, CULLOMPTON**

**Jubb Consulting Engineers Limited**  
Alexander House  
Excelsior Road  
Western Avenue  
Cardiff  
CF14 3AT

  
WWW: [www.jubb.uk.com](http://www.jubb.uk.com)



**REPORT CONTROL SHEET**

**Project:** Colebrooke Lane, Cullompton  
**Job No:** C9841  
**Client/Applicant:** David Christian C/o Genesis Town Planning  
**Title:** Access Appraisal and Strategy  
**Report Ref:** Rep02  
**Prepared by:** S. Radford, BE (Hons), MSc  
**Reviewed by:** M. Hadley, BSc (Hons), DipTP, MBA, MRTPI  
**Authorised by:** M. Grist, BSc(Hons), DipUD, MCIT, MIHT

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A	Draft	SR Feb '16	MH Feb '16	MG Feb '16

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- 5.0 Conclusion

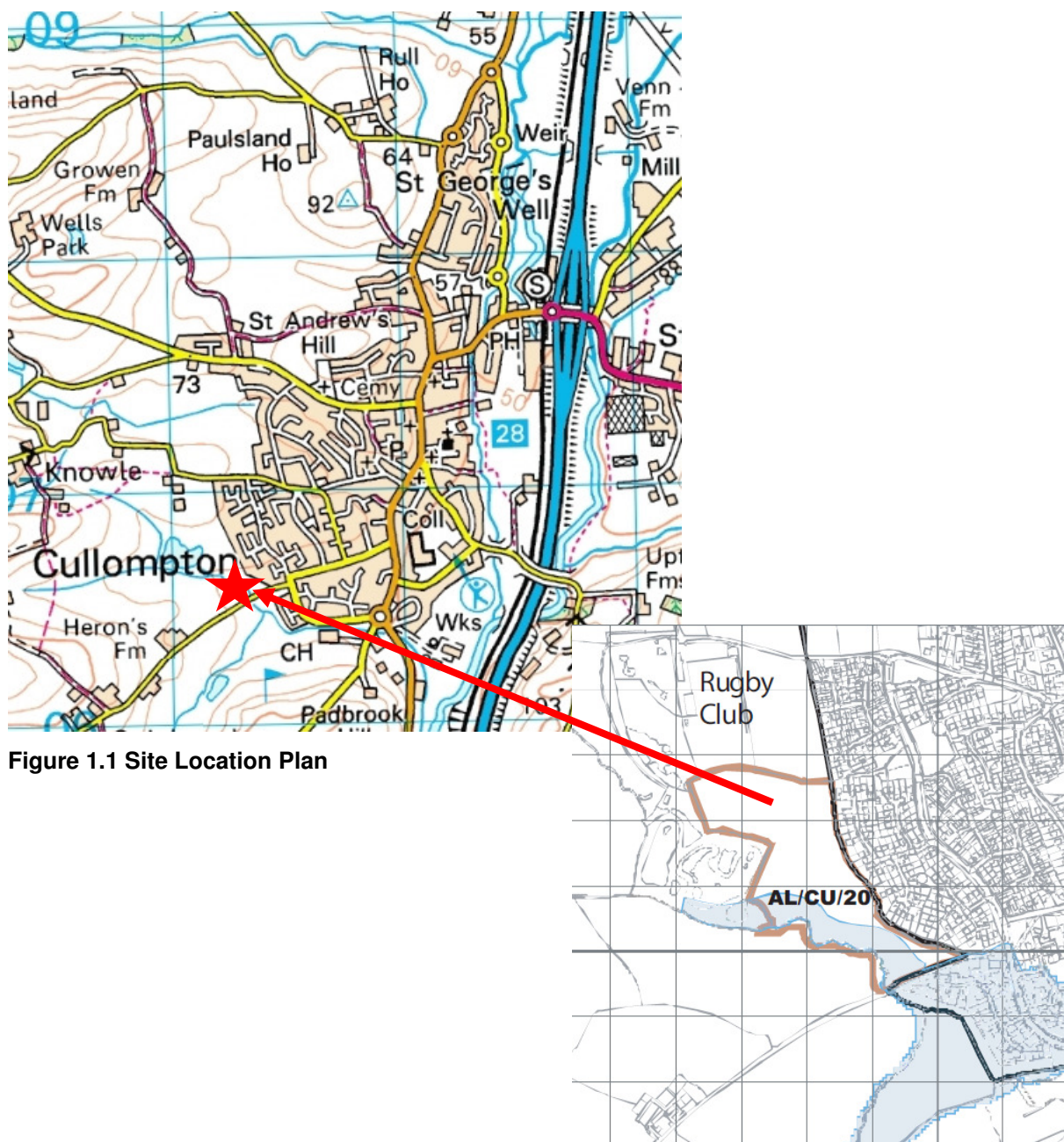
**FIGURES**

- Figure 1.1 Site Location
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## 1.0 INTRODUCTION

- 1.1 Jubb have been commissioned as Transport Consultant to advise on capacity implications on the M5 Junction 28 associated with a potential residential development located to the north of Colebrooke Lane on the southwest periphery of Cullompton.
- 1.2 The application site, known as Colebrooke Lane, occupies a Greenfield site located in a semi suburban setting bounded by low intensity farmland to the southeast and existing residential properties to the north and east. A Site Location Plan is shown in

**Figure 1.1.**



**Figure 1.1 Site Location Plan**

**Development Proposal**

- 1.3 The Masterplan for the site in respect to the form, mix, and quantum is yet to be fixed in order to respond to market forces and other outside constraints but is envisaged as providing approximately 100 dwellings.
- 1.4 The primary vehicular access to the site will be via an extension of the existing estate accessed through Nightingale Lawns onto Swallow Way. The design of the internal road network will be engineered to accomplish the standards specified in the MfS Guidance and Devon County Council's Highways in Residential and Commercial Estates Design Guide, with particular emphasis on the creation of safe routes around the site facilitating easy access by foot and cycle. Parking provision would be in accordance with the relevant adopted standards. In addition suitable cycle parking storage will be provided onsite in the form of secured and sheltered cycle stands, internal storage with residential properties, and public spaces as appropriate to the development form.
- 1.5 The scheme would cater for identified housing demand to meet the longer term needs in a sustainable manner with the site being promoted through the Local Plan process. The site was previously allocated as a contingency site (RefAL/CU/20) in the previous Local Plan, and was therefore considered in principle appropriate for residential development. The site is noted to benefit from:
- In close proximity to local education, employment, shopping and social facilities.
  - It is accessible by a number of cycleways and footpaths to existing facilities within the surrounding area and well served by a number of public transport services commuting between Exeter and nearby regional centres.
  - A location that provides an opportunity for people to travel to and from the site by a variety of means of travel other than solo car use.
- 1.6 Despite new allocations coming forward, and whilst it would be logical that as a reserve site this would be an appropriate location to promote for residential uses, highway capacity issues have been raised by the Highway Authority as a reason for objection.
- 1.7 The purpose of this report is to assess the development impact on the M5 Junction 28 in response to Local Highway Authority's comments on this reserved site in support of the Mid Devon Local Plan Review Process. The methodology and approach adopted in establishing the development traffic impact have subsequently been agreed with DCC in developing the assessment methodology.

## 2.0 SITE ACCESSIBILITY

### Site Location

- 2.1 The proposed development is situated within a comfortable walking distance of the employment, education, shopping and recreational facilities in Cullompton Town Centre and within close proximity to a wide range of compatible and supportive 'day to day' services which would support sustainable travel habits.
- 2.2 The proximity of the site to local facilities is summarised in Table 2.1 as depicted in Figure 2.1. The estimated journey time by different means of travel have been gauged as based on the distances being approximately measured from the centre of the development site along a suitable walking route to the nearby facilities. The estimated walking and cycling times are approximated using a walking speed of 80m/min (abstracted from IHT Guidelines for: Providing for Journeys of Foot) and a cycle speed of 240m/min.

Facilities	Location	Approx. Distance	Journey Time
Nursery/Crèche	Young Ones Day Nursery, 28 Tiverton Road, Cullompton, EX15 1HT	1.5 km	18 min 🚶
Primary School	Willowbank Primary School, Manitoba Gardens, Cullompton EX15 1EZ	930m	11.6 min 🚶
Secondary School	Cullompton Community College, Exeter Rd, Cullompton, Devon EX15 1DX	700m	10.8 min 🚶 / 3.6 min 🚲
Doctors	Bramblehaies Surgery, College Road, Cullompton, EX15 1TZ	1.7 km	21.3 min 🚶 / 7.1 min 🚲
	College Surgery, Culm Valley Integrated Centre for Health Willand Road, Cullompton, EX15 1FE	2.2 km	26.8 min 🚶 / 8.9 min 🚲
Dentist	Golds Place Dental Practice Ltd, 26 High Street, Cullompton, EX15 1AA	1.5 km	18.8 min 🚶 / 6.3 min 🚲
	Cullompton Dental Care 2 Higher Street, Cullompton, EX15 1AJ	1.65 km	20.7 min 🚶 / 6.9 min 🚲
Pharmacy	Moss Pharmacy, 14 Fore Street, Cullompton EX15 1JL	1.3 km	16.3 min 🚶 / 5.4 min 🚲
Post Office	61A Fore Street, Town Centre, Cullompton EX15 1JY	1.2 km	15min 🚶
Supermarket	Aldi, 1 Brook Rd, Cullompton EX15 1FU	850m	10.6 min 🚶 / 3.5 min 🚲
	Tesco, Station Rd, Cullompton, EX15 1FT	2.0 km	25 min 🚶 / 8.3 min 🚲
Bus Stop	Swallow Lane	240m	3 min 🚶 / 1 min 🚲
Cullompton Town Centre	Fore Street/High Street	1.4km	17.5 min 🚶

**Table 2.1 Local Facilities and Services**



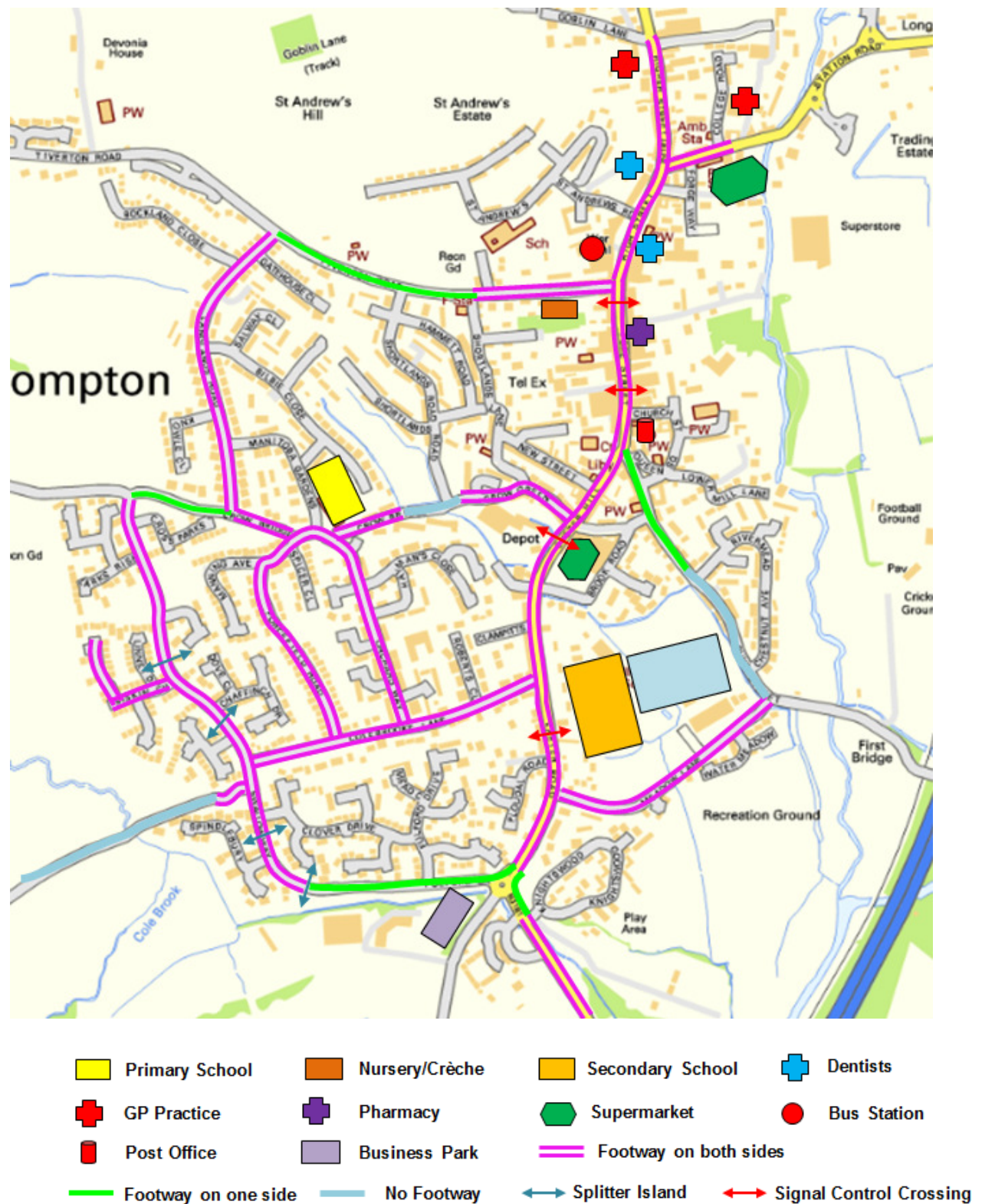


Figure 2.1 Local Movement Plan

**Walking and Cycling**

- 2.3 The roads within the vicinity of the site are generally a mixture of residential and local distributors with reasonable quality footways, street lighting and dropped kerbs at crossing points near to junctions.
- 2.4 With a well-maintained and kerbed footpath continually running along either side of Swallow Way, the local access road forms a pedestrian link between the development site and the wider strategic pedestrian network and facilitates an extended pedestrian route throughout the local settlement that lies to the west of Cullompton.
- 2.5 Attributably to its organic growth and historical nature, the town's road network has grown from a series of lanes leading to confined highway geometry. This has led to a lack of formal cycle paths along the local highway with a majority of the cycle route network either shared with pedestrians or in the form of a bridleway.
- 2.6 The market town has been identified as being in urgent need of future cycling enhancement through the LDF process with a potential cycle link through the Town Centre envisaged for consideration.

**Public Transport**

- 2.7 The nearest bus stops are located some 300m north of the proposed allocation site along Swallow Way facilitating regular bus services No 1/1A running between Exeter, Tiverton and Cullompton with an average frequency of 2 services per hour in each direction. The northbound bus stop is a simple flag whereas sheltered waiting facility and a timetable display are provided at the southbound stop. In addition, the Town Circular (service 350) runs 4 services on a Wednesday.
- 2.8 For rail connections Tiverton Parkway train station lies approximately 7.6 kilometres to the north east of the site and can be reached via a 30 minute bus journey on Bus No. 1. The station is situated on the London to Penzance and Exeter to Bristol Line. The station provides access to frequent railway services that serve several major conurbations with onwards connection to the rest of UK. Alternatively services can be accessed in Exeter from a number of stations including Exeter St David's and Exeter Central. Longer term aspirations for a new station within the town are included within the Local Transport Plan.





### Figure 2.2. Local Bus Routes

**Travel by Car**

- 2.9 Vehicular access to the development site located north of the Kia-Ora Farm will be through the adjoining housing estate off Swallow Way. Swallow Way operates as a local access road of 7.0 metres wide with predominantly a residential frontage along its length. The single carriageway runs parallel to the B3181 and bisects the western residential area of Cullompton in a north-south direction providing the primary vehicular route between the site and the strategic highway.
- 2.10 Some 200 metres north of access junctions to the site, Swallow Way meets the eastern stretch of Colebrooke Lane at a priority T-junction as a major arm. Continuing northwards, the single carriageway extends onto a new link road that runs through the consented Kingfisher Reach with onwards connection onto Tiverton Road. A future new link will also be created through the north west Cullompton urban extension and onto Willand Road.
- 2.11 Travelling southwards, Swallow Way proceeds into the B3181 Exeter Road at a 4-arm roundabout with the latter one continuing southwards and onto the centre of Exeter. The B3181 operates as a local distributor road and forms the primary route through Cullompton with onwards connections to the A373 and M5 junction 28, A38 and Willand in the north and Exeter to the south. To the north of Cullompton Town Centre, the B3181 proceeds as High Street and meets Station Road and Higher Street at a signalised junction.
- 2.12 Continuing northwards, the B Road travels through the northern residential area of Cullompton and proceeds into the village of Willand with onward connection to the A38. Whereas at the signalised junction eastwards, the B3181 continues as Station Road providing access to Millennium Way, M5 Junction 28 and the A373 Honiton Road.
- 2.13 Millennium Way forms part of the Cullompton Eastern Relief Road offering an alternative route between the M5 junction 28 and the northern settlement area of Cullompton..

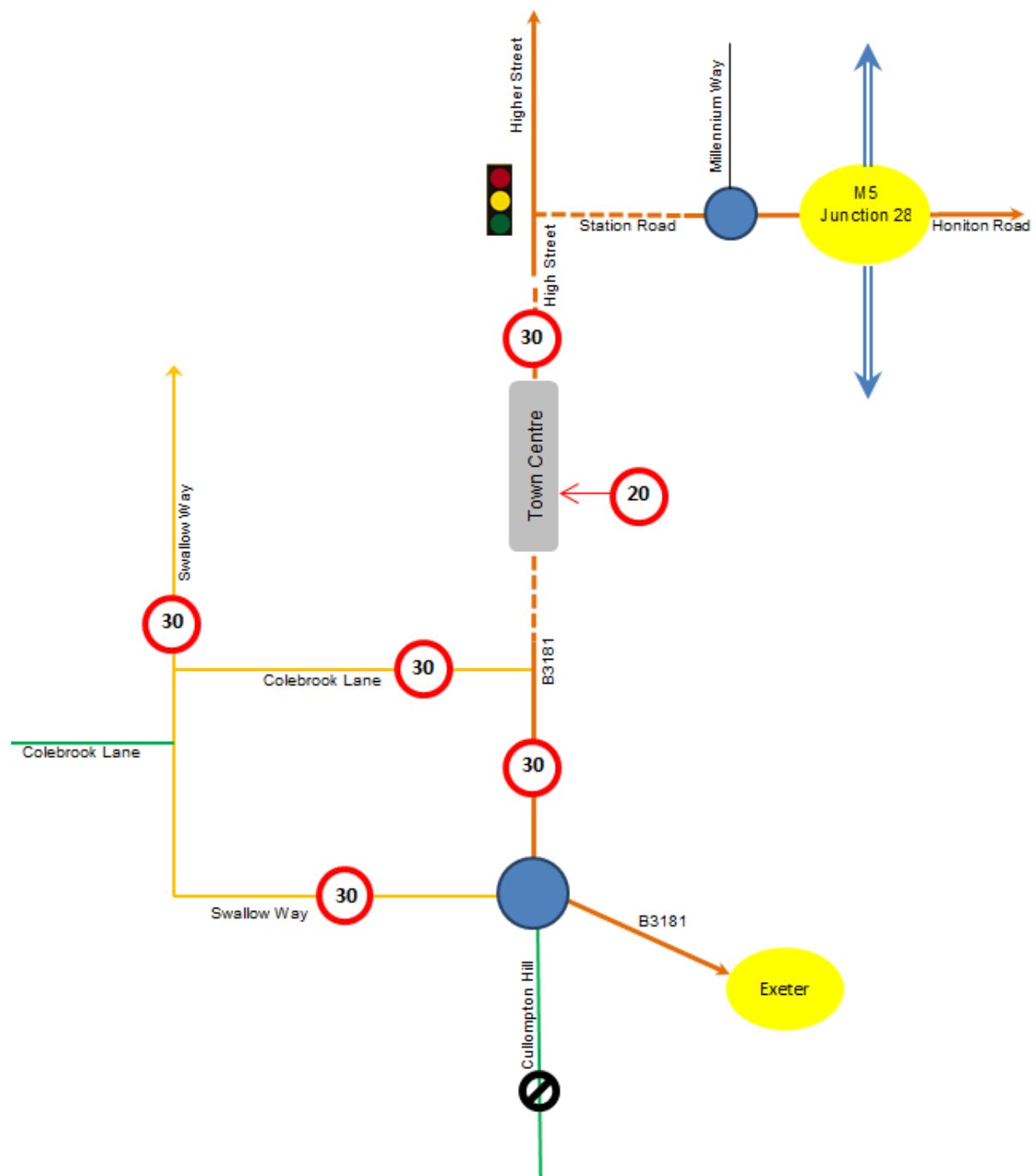


Figure 2.3 Local and Strategic Highway Network in Cullompton

### 3.0 ESTABLISHMENT OF DEVELOPMENT IMPACT on M5 Junction 28

#### Vehicle Traffic Generation

- 3.1 In assessing trip generation the approved vehicle trip rates that were originally developed for the consented Knowle Lane (Phase 2) development have been adopted with the associated development traffic generation as follows:

Period	IN	Out	Total	IN	Out	Total
	Vehicle Trip Rates			Development Traffic		
<b>AM Peak</b>	0.14	0.41	0.55	14	41	55
<b>PM Peak</b>	0.29	0.23	0.52	29	23	52
<b>Daily</b>	3.5	3.5	7.0	350	350	700

**Table 3.1 Development Traffic**

#### Travel Patterns

- 3.2 In order to predict a baseline modal split for the proposed residential development, 2011 Census Data - Travel to Work (UV39) for the administrative ward of Cullompton South was consulted to reveal the prevailing travel patterns in the neighbouring communities.

Method of Travel	Cullompton South
Car Driver	72%
Car Passenger	7%
Public Transport	6%
Walking	12%
Cycling	2%
Total	100%

**Table 3.2 Modal Split**

- 3.3 Applying the above modal split, the anticipated trip generation by various means of transport is tabulated below:

Method of Travel	AM Peak	PM Peak
Car Driver	55	52
Car Passenger	5	5
Public Transport	5	4
Walking	9	9
Cycling	2	1
Total	76	72

**Table 3.3 Trip Generation by All Modes of Transport**

**Trip Distribution**

- 3.4 The O/D distribution model adopted in the wider strategic model for developments in Cullompton Area were provided by Devon County Council as follows:

Destination	Share	AM		PM	
		In	Out	In	Out
Exeter	31%	4	13	9	7
Cullompton	17%	2	7	5	4
E Devon	14%	2	6	4	3
Tiverton	11%	2	5	3	3
Willand	10%	1	4	3	2
M5N	8%	1	3	2	2
Bickleigh	4%	1	2	1	1
Teignbridge	2%	0	1	1	0
North Devon	1%	0	0	0	0
Crediton	1%	0	0	0	0
Total	100%	14	41	29	23

**Table 3.4 Traffic Distribution**

- 3.5 To assign the development traffic onto local highway network the following routing strategy has been applied. This is accordance with the neighbouring consented scheme at Knowle Lane with local trips dispersed to four key employment area in Cullompton.

Destination	Routing	%
Exeter	M5S	30%
	B3181	70%
Cullompton	E of M5	5%
	Willand Rd	4%
	Town Centre	5%
	Station Rd	3%
E Devon	M5N	50%
	A373	50%
Tiverton	M5N	30%
	Tiverton Road West	70%
Willand	Higher St	100%
M5N	M5N	100%
Bickleigh	Tiverton Road West	100%
Teignbridge	M5S	100%
North Devon	Tiverton Road West	100%
Crediton	Cullompton Hill	100%

**Table 3.5 Routing Choice**

3.6 The resultant traffic generation along the identified study network is summarised below.

Direction	%	AM		PM	
		In	Out	In	Out
M5N	18%	3	8	5	4
M5S	11%	2	5	3	3
B3181 North	10%	1	4	3	2
Tiverton Rd	13%	2	5	4	3
B3181 South	22%	3	9	6	5
A373	7%	1	3	2	2
Cull Hill	1%	0	0	0	0
Town Centre - High St	5%	1	2	1	1
Station Road	3%	0	1	1	1
E of M5 - Kings Mill Road	5%	1	2	1	1
Willand Road	4%	1	2	1	1
Total	100.0%	14	41	29	23

**Table 3.6 Traffic Distribution**

3.7 Therefore the anticipated development traffic that will disperse via M5 Junction 28 is as per **Figure 3.1**. Overall this shows the proposed development will result in a minimal impact on the SRN with an increase of less than 10 pcu in 2-way movements experienced at the M5 junction 28. This level of additional traffic will not be discernible within the peak hour traffic flow variation at this junction and will not lead to any noticeable changes in junction performance.

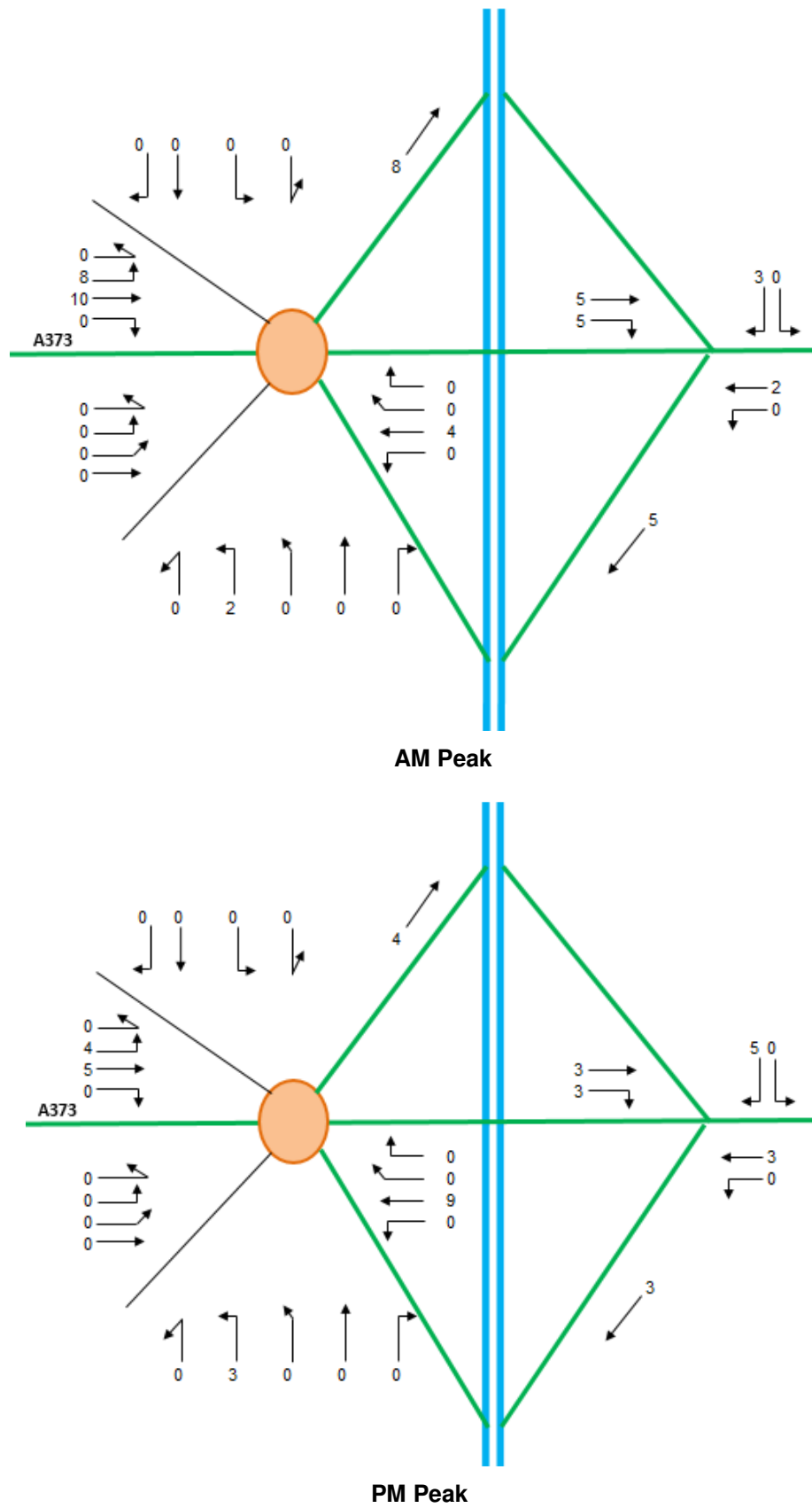


Figure 3.1 Development Traffic

**Potential Development Traffic Impact**

- 3.8 It is understood that a comprehensive modelling exercise was carried out in support of the proposed junction enhancements at the M5 Junction 28. To deliver a long term highway solution and cater for the future growth, development aspirations that are designated as part of the Mid Devon Local Plan has been considered as part of the model. These include:
- North West Cullompton AL/CU/1 - 1100 dwellings and 40,000sq.m employment
  - Court Farm AL/CU/9– 150 dwellings
  - Padbrook Park AL/CU/10 – 30 dwellings
  - Knowle Lane AL/CU/8 – 340 dwellings
  - Exeter Road AL/CU/11 – 45 dwellings
- 3.9 Both Local Highway Authority and Highway England are satisfied that the approved M5 Junction 28 improvements will provide sufficient capacity to accommodate the traffic arising from the above identified allocations without negating the benefits of the improvements, but provide a notional ceiling and capacity threshold. Any other developments outside those identified have to be considered on their own merits.
- 3.10 It is understood that a further residential developments of 120 dwellings at Cummings Nursery was also accepted by DCC and HE based on the ground that the impact of this scheme will be compensated by a smaller scale of Knowle Lane development.
- 3.11 A revised masterplan for the North West Cullompton Urban Extension scheme has been produced for approval by the relevant Local Authorities and this will see a reduction in the total commercial allocation of 30,000sq.m attributable to site constraints and refinement of the actual quantum of land that can be developed. The loss in employment use will inevitably led to a decrease in development traffic passing through the J.28 and thus release capacity for other developments.
- 3.12 To establish the associated employment traffic impact, vehicle trip rates and the associated distribution model were abstracted from the “Assessment of Highway Options to Accommodate Potential Developments” published in August 2014 as part of the Mid Devon Local Plan Review. Based on the assessment the removal of 30,000sq.m employment space would see a reduction in development traffic as follows:

Employment	AM Peak		PM Peak	
	IN	OUT	IN	OUT
Trip Rates	1.399	0.28	0.194	1.147
Vehicle Trips	420	84	58	344

**Table 3.5 Employment Traffic Generation**



Commercial – From Work	%	AM Peak		PM Peak	
		IN	OUT	IN	OUT
B3440	2%	8	2	1	7
East Devon	6%	25	5	3	21
M5 North	9%	38	8	5	31
M5 South	13%	55	11	8	45
Halberton/ Willand	10%	42	8	6	34
B3181 South	1%	4	1	1	3
Bradninch	3%	13	3	2	10
Bickleigh	1%	4	1	1	3
Tiverton	9%	38	8	5	31
Cullompton	46%	193	39	27	158

**Table 3.6 Employment Traffic Distribution**

- 3.13 In light of this, the associated employment traffic that will pass through the M5 J.28 is tabulated below in comparison with the anticipated residential development traffic.

		2-Way Traffic	
		Commercial	
		AM Peak	PM Peak
M5 Junction 28	M5 North	45	13
	M5 South	65	52
	A373 - East Devon	30	24
	Total Junction	141	89
Colebrooke			
M5 Junction 28	M5 North	10	10
	M5 South	6	6
	A373 - East Devon	7	6
	Total Junction	23	22
Residual Capacity			
M5 Junction 28	M5 North	35	3
	M5 South	59	46
	A373 - East Devon	23	18
	Total Junction	117	67

**Table 3.7 Residual Capacity**

- 3.14 As can be seen above, the anticipated development traffic arising from the proposed development site can be comfortably accommodated within the released capacity at Junction 28 as allowed for in the NW Cullompton commercial allocation. Therefore it is felt there is no justifiable highway objection to the proposed allocation of the Colebrooke site based on the operational performance of the junction consistent with the approach DCC and HE adopted to determine the residential development at Cummings Nursery.

## 4.0 TRAVEL PLAN FRAMEWORK

4.1 Travel Plans are seen by the Government as a strategic management tool in achieving traffic reduction and accelerating the development of more sustainable travel trends on both strategic and local highway networks. They have the potential to bring significant benefits to the organisations, businesses and the community alike.

4.2 It is therefore proposed that the site would provide a Travel Plan focusing on:

- reducing car dependency and usage;
- travel demand, sustainability and reduced travel need;
- promoting and facilitating walking and cycling;
- promoting and facilitating an increased use of public transport;
- information, awareness raising and marketing; and
- partnership working.

4.3 The Travel Plan which will be submitted in support of any TA:

- establish the policy framework under which the plan will operate;
- summarise the existing transport situation on the local highway network and accessibility of the site by all transport modes;
- provide baseline data on existing local travel behaviour together with an estimation of new demand;
- establish the key objectives for the Plan;
- summarise the on-site and off-site highway and other transport infrastructure measures / improvements being introduced to support sustainability;
- include details of demand restraint and other positive incentive measures that will be introduced to encourage increased use of more sustainable modes.

These will include:

- numbers, management and allocation of the car parking spaces
- measures to encourage car sharing
- measures to encourage an increase in walking and cycling e.g. cycle purchase scheme, secure cycle parking and changing facilities
- measures to encourage increase use of public transport
- use of IT to reduce travel needs
- travel information boards, trip planning services
- visitor/customer travel management site servicing and deliveries management measures (e.g. home delivery service).
- appropriate indicators and targets;
- details of the necessary monitoring and review mechanisms proposed.

## 5.0 CONCLUSION

- 5.1 This document has assessed the accessibility of this site and carried out a detailed study to establish the likely impact on the M5 J.28 which has been identified as a barrier to the site's allocation.
- 5.2 Prior to any planning submission a full assessment at key junctions within the town will be required to identify and propose any appropriate mitigation measures should these be required.
- 5.3 This review concludes that:
- The site is strategically positioned within the vicinity of the existing shopping, education, healthcare and employment destinations;
  - Its connectivity to the walking/cycling routes and proximity to the public transport network, offers realistic alternative travel mode choices to the private car for day to day destinations; and
  - The site has no perceptible detrimental impact on the M5 Junction 28 as the anticipated development traffic can be accommodated within the envisaged enhancement scheme and released capacity from a reduction in the quantum of commercial development in the NW Cullompton masterplan.
  - Consistent with other approved applications in the town, there are no justifiable grounds for a highway objection to this proposal based on its impact on Junction 28.
  - The Design of the site will facilitate:
    - an adequate and safe parking environment;
    - access junctions suitable for all road users; and
    - a highly permeable and appealing walking and cycling environment.
  - The introduction of the Development Travel Plan will assist in:
    - mitigating the site impact;
    - strengthening the coherence of the whole community; and
    - delivering a sustainable site in the neighbourhood area.
- 5.4 It is therefore considered that in transportation terms the site is suitable for promotion within the Local Plan as a residential development.

# **GENESIS TOWN PLANNING**

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## **FLOOD RISK APPRAISAL**

**AT**

**COLEBROOK LANE, CULLOMPTON**

**O.S. GRID REFERENCE: ST 01180 06473**

**REPORT NO P9841/G201/A**

**JUNE 2013**

**Jubb Consulting Engineers Ltd**  
Plymouth City Airport  
Crownhill  
Plymouth  
PL6 8BW

Tel:

Fax:

Email:

## **REPORT CONTROL SHEET**

**Client:** Genesis Town Planning

**Project:** Colebrook Lane, Cullompton

**Job No:** P9841

**Title:** Flood Risk Appraisal

**Report No:** P9841/G201/A

**Prepared by:** S D Hurdwell  
B.Sc. (Hons), I.Eng., MICE.

**Reviewed by:** P Webber  
B.Sc. (Hons).

**To be Approved by:** M Hadley

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## **1.0 INTRODUCTION**

### **1.1 Commission**

This report has been commissioned by Genesis Town Planning to support a feasibility review for the potential redevelopment of land at Colebrook Lane, Cullompton

This report has been prepared exclusively for Genesis Town Planning and their professional consultees in relation to the current proposed redevelopment of the site; it may not be relied upon or reproduced by any third-party without the written agreement of Jubb Consulting Engineers Ltd.

### **1.2 Objective**

The objective of this Flood Risk Appraisal is to review the flood risk to the site and identify the possibilities for the site's development.

The information provided uses currently available information provided by mapping and data provided by the Environment Agency (EA) and national hydrological research bodies.

The advice in this report regarding flood risk at the subject site does not constitute a full flood risk assessment in accordance with current planning guidance.

## 2.0 THE SITE & DEVELOPMENT PROPOSALS

### 2.1 Site Location

The site is located on “greenfield” land to the west of Cullompton both north and south of Colebrook Lane.

The Ordnance Survey National Grid reference for the site centre is ST 01180 06473. A location plan and aerial photograph is reproduced for reference in **Appendix A**.

### 2.2 Site Description

The site is an irregularly shaped parcel of land which extends west from the outskirts of Cullompton. Colebrook Lane runs through the southern section of the site. The site is currently occupied by open farm land used for the grazing of animals. The site is divided into 4 separate fields with Herons farm located in the western end of the site.

A Site Walkover inspection of the site was carried out on the 25<sup>th</sup> June 2013 by Sam Hurdwell of Jubb Consulting Engineers. A visual inspection of the site including a general review of the sites’ condition and its setting was undertaken. A photographic record was taken and reproduced for reference in **Appendix D**.

The site is shown as lying partly within the Environment Agency’s indicative flood plain (see **Appendix B**).

#### Topography

The site slopes generally down to the east. Shallow gradients are noted across the site. Along the valley bottom of the two watercourses a flatter ‘flood plain’ area is noted. The site is divided into 4 large fields by banks with hedging on top. Land drainage is noted along the low lying edge of the fields which route water to the Cole Brook.

#### Hydrology

The Cole Brook (a designated as a main river) is noted as flowing along the southern boundary of the site from west to east.

A small un-named tributary to the Cole Brook is noted flowing through the northern parts of the site. This tributary flows either side of a dividing hedge before passing beneath a Colebrook Lane. An ‘Irish bridge’ is noted where a gated entrance onto the north eastern field is accessed internally. This is noted to be ‘outflanked’ during high fluvial flows.

The culvert beneath Colebrook Lane is a known flood risk problem which will require further detailed assessment.

The site is within a largely rural catchment upstream of the subject site.

Downstream of the site the watercourse is identified as being ‘perched’ and does not follow the valley bottom. The means there is a known problem with erosion where the watercourse is trying to find the lower areas of the flood plain.



Downstream of the site the watercourse has had extensive area of residential land identified as within the flood plain and subject to possible flooding during extreme events.

### Geology

The British Geological Survey Map for Exeter (sheet No. 325, 1:50,000 scale, Solid & Drift Edition) indicates a complex geological succession in the area beneath the site.

Along the watercourse corridor and to the south east of the site alluvial deposits are noted which in turn overlie head deposits/river terrace deposits and Alphington Breccia of the Exeter Group of Sherwood Sandstone.

The solid geology of the site which is defined as Permo-Triassic Sandstones and Mudstones principally comprises the Lower Sandstone in this area. These deposits will commonly weather to sands, or clays if mudstone is locally present.

### Soils

Soil Survey of England and Wales, 1984 (1:250,000 Scale) – Map Sheet No.5 identifies two soil types beneath the site –

- 541e – Crediton – *'Permian and Carboniferous reddish breccia - Well drained gritty reddish loamy soils over breccia, locally less stoney. Steep Slopes in places.'*
- 712e - Hallsworth 2 – *'Drift from Paleozoic shale - Slowly permeable seasonally waterlogged clayey, fine loamy and fine silty soils.'*
- 811c Hollington – *'Reddish River Alluvium - Deep stoneless reddish fine silty and clayey soils variably affected by groundwater. Flat Land, Risk of flooding.'*

According to the *Wallingford Procedure* Winter Rainfall Acceptance Potential (WRAP) map, the site has a low acceptance potential (WRAP Class 1), with an associated 'SOIL' classification of 0.1. This SOIL parameter indicates that, on an annual basis, approximately 10% of rainfall does not infiltrate into the underlying ground but is shed as surface water runoff.

The standard percentage runoff derived using the hydrology of soils types (SPRHOST) provides a measure of the volumetric characteristic of the runoff response to rainfall. SPRHOST has been obtained for the site from the *Flood Estimation Handbook* (FEH) CD-ROM for the catchment of the Colebrook (of which the subject site is part). The Colebrook catchment covers a small area of approximately 5.99km<sup>2</sup>. An SPR Host value of 0.38 has been obtained, indicating that approximately 38% of rainfall is shed as rapid response surface water runoff in this catchment. An SPRHOST value of 38% corresponds to a SOIL value of 0.38. This is the value for the whole catchment.

As discussed above, the soil survey identifies the site to be underlain by Crediton (541e), Hallsworth 2 (712e) and Hollington (811c). Using the FEH volume 4, a specific assessment of the SPR for the site can be calculated from its 29 index soil classes using the percentages which make up the soil type. The SPR is estimated from HOST soil class fractions, the table below showing how the soil beneath the site is divided up and pro-rata'd to give a site specific SPR.

Soil Type	HOST Classes	HOST Class Percentage	SPR value for HOST Class	Totals
541e - Crediton	Class 2	22.22%	2 %	0.444 %
	Class 3	77.78 %	14.5 %	11.278 %
			<b>Total</b>	<b>11.72 %</b>
712e - Hallsworth2	Class 24	100 %	39.70 %	39.70 %
			<b>Total</b>	<b>39.70 %</b>
811c - Hollington	Class 8	11.11 %	44.30 %	4.922 %
	Class 9	88.89 %	25.30 %	22.489 %
			<b>Total</b>	<b>27.41%</b>

		SPR Total	Proportion of site	Totals
The ratios to which these soil types occur across the site are estimated to be —	541e - Crediton	11.72%	@80%	9.38%
	712e - Hallsworth 2	39.70%	@10%	3.97%
	811c – Hollington	27.41%	@10%	2.74%
			<b>Total</b>	<b>16.01%</b>

An SPR value of 16% corresponds to a SOIL value of 0.16. This is the specific value for the application site only.

From our experience on the sites to the north of the site we have identified a significant difference between the WRAP soil parameter, the SPRHOST and the SPR for the site. The SPRHOST and SPR values are derived using 29 soil classes as opposed to the five defined on the WRAP map; accordingly it is generally considered that SPR values provide a more accurate representation of soil characteristics and variation in run-off between soil types. Soils encountered on the land immediately adjacent site to the north are shallow reddish, frequently waterlogged soils, possibly due to slowly permeable subsoils. Soakaway test undertaken across that site by T&P Regeneration in 2011 indicate best subsoil permeability of between  $10^{-5}$  &  $10^{-6}$  m/s (average 0.48m/day) despite high sand and silt contents (WRAP Class between 2 and 4; cf WRAP map indicates WRAP class 1 or 4). For SuDS design the most conservative value of SPR has been recommended in the estimation of greenfield runoff rates from the proposed site. Further work will be required to determine further the specific soil runoff parameters to confirm the actual runoff from the site and catchment.

### Hydrogeology

The Environment Agency online indicative aquifer mapping identifies that both the solid geology and the superficial deposits beneath the site are identified as a Secondary A aquifer.

Secondary A aquifers are classified as permeable layers capable of supporting water supplies at a local rather than strategic scale, and in some cases forming an important

source of base flow to rivers. These are generally aquifers formerly classified as minor aquifers.

The subject site is not located within an Environment Agency (EA) Source Protection Zone.

### 3.0 FLOOD RISK & PLANNING POLICY

#### 3.1 National Planning Policy

The National Planning Policy Framework and associated Technical Guidance were published on the 27<sup>th</sup> March 2012 and supersede a number of previous planning policy documents.

Section 10 of the NPPF deals with Climate Change, Flooding and Coastal Change. The role of this chapter is to provide a framework to which local councils can provide policy to their own local plans. The NPPF also has a technical guidance document which includes advice on assessment of flood risk, descriptive targets for climate change and includes land use vulnerability classifications.

##### 3.1.3 Building Regulations

The principal purpose of Building Regulations is to protect the health and safety of building occupants, with secondary considerations for sustainability and comfort). Nevertheless the Building Regulations and Approved Documents do not currently advise on flood protection measures for buildings.

#### 3.2 Local Planning Policy

The Mid Devon District council Core Strategy includes the following policy in relation to Flooding.

*"COR 11 - Flooding*

*The impact of flooding, taking account of the likely impact of climate change, will be managed in order to:*

- a) reduce the risk of flooding to life and property where possible;*
- b) guide development to sustainable locations with the lowest flood risk by applying a sequential test, and locate appropriate development in areas of higher flood risk only where the benefits outweigh the risk of flooding;*
- c) ensure that development does not increase the risk of flooding of properties elsewhere."*

In addition to the above Cullompton is included in the following policy:-

*"COR14 - Cullompton*

*Cullompton will continue to develop as a small, growing market town with an expanding rural hinterland in the Culm Valley and adjacent areas. The strategy will aim to increase the self-sufficiency of the town and its area by improving access to housing, employment and services for its population and nearby rural areas. Proposals will provide for the following average annual development rates:*

- a.) 67 market dwellings*
- b.) 28 affordable dwellings*
- c.) 4000 square metres employment gross floorspace.*

*The Council will guide high quality development and other investment to:*

- d.) *Promote the removal of through traffic from the town centre and improve local air quality by enhancing walking and cycling opportunities around the town, completing a relief road system and implementing air quality action plan initiatives.*
- e.) *Ensure developments within, adjoining or affecting the Air Quality Management Area provide measures to meet air quality objectives, taking full account of cumulative development impacts and based on air quality assessments giving realistic "baseline" and "with development" scenarios.*
- f.) *Make any necessary improvements to the motorway junction.*
- g.) *Promote further public transport improvements within Cullompton and to other urban centres (particularly Tiverton and Exeter) and improve access to the rail network.*
- h.) *Manage the town centre so that economic regeneration and heritage reinforce each other by promoting new homes, shops, leisure, offices and other key town centre uses which are well designed and contribute to vitality and viability, including an additional 1,950 square metres of convenience and 700 square metres of comparison net retail floorspace by 2016 in accordance with the sequential and other PPS6 retail policy considerations.*
- i.) *Reduce the risk of flooding.*
- j.) *Enhance the tourism and visitor role of the town and area."*

As well as the above specific policy for Cullompton above part of the subject site is allocated as a Contingency Housing Site.

*"AL/CU/20 - Colebrook*

*A site of 4.8 hectares at Colebrook is identified as a contingency site for residential development, to be released in accordance with policy AL/DE/1 subject to the following:*

- a.) *100 dwellings with 35% affordable housing;*
- b.) *Provision of two points of access from Siskin Chase;*
- c.) *Provision of 2.7 hectares of Green Infrastructure, to include the retention of land in the floodplain as informal amenity open space;*
- d.) *Measures to protect and strengthen trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;*
- e.) *Provision of a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;*
- f.) *Detailed archaeological investigation and measures to record, and where necessary, protect the archaeological interest of the site through appropriate design, layout and mitigation."*

For reference a plan showing the Local Plan allocations is reproduced in **Appendix G**.

### **3.3 Strategic Flood Risk Assessment (SFRA)**

Mid Devon District Council has produced a Level 1 Coarse Assessment SFRA (July 2006) to cover their area, updated in June 2009 to include a Level 2 Assessment.

This document has been produced to inform the Local Development Framework (LDF) and the spatial planning process at a local scale.

The Level 1 SFRA does not contain any prescriptive details on defending sites at risk of flooding.

The Level 2 SFRA includes specific recommendations for development/redevelopment in Flood Zones 3 generally, the key action being the application of an appropriate Sequential Test. The SFRA recommendations distinguish between defended and undefended sites (with more onerous restrictions on the latter) but do not address the case where no physical development or change of use is proposed.

This SFRA is a generic document providing a framework of principles; it does not include any site specific guidance or recommendations.

It identifies the application site as lying within Flood Zones 1, 2 and 3 as discussed earlier in this FRA report.

For more details refer to the SFRA flood mapping reproduced for reference in **Appendix G**.

### 3.4 Other Policy

#### Access to the Watercourse

The Environment Agency have powers which allow them access to any land for the purpose of any functions/obligations required by them to the adjacent river (i.e. maintenance of the river bank etc.). This access is granted under the Land Drainage Act 1991 Chapter 59, Part V, Section 64. New development is usually required, therefore, to maintain or provide an access strip alongside watercourses.

In order for the site to be developed adjacent to a river, access has to be taken into account when developing the development proposals. The Environment Agency's standard requirement for access is an 8 metre "no build zone" from the top of the river bank.

Also any construction within 8 metres of the top (brink) of the river bank requires land drainage consent from the Environment Agency.

This may provide a constraint on the proposals for the site, but due to the size and shape of the site it is not considered a significant issue.

#### Insurance

The Insurance Industry is typically concerned with the 0.5% annual probability flood for both fluvial and tidal flooding. The proposed development site is outside the 1% flood line. This, for buildings within the Flood Zone 2 areas (1.0% > annual probability of flooding > 0.1%), there may be increase insurance premiums with regards to fluvial flood risk.

## **4.0 FLOOD RISK SOURCES, POTENTIAL EXTENT AND IMPACTS OF FLOODING**

### **4.1 Flood Extent and Consequence of Flooding**

The Environment Agency's indicative flood plain maps (one of which is reproduced in **Appendix C**) indicate that the land bordering the watercourses is in Flood Zone 3. The extents of this flood zone are based on raw data from the EA's flood model. Further assessment, modelling and delineation will be required to confirm the exact extent of the high risk flood zone.

### **4.2 Flooding History**

The site has not been identified as flooded in the past. It is conceivable that the site has flooded previously. However, due to it being open farm fields the flooding has not been reported specifically. There have been a number of significant flooding events in the recent past which has affected the downstream areas within Cullompton. The most recent flooding was in the winter of 2012 where wide spread flooding across the region was found.

### **4.3 Sources of Flooding**

There are two significant sources of flood risk to any proposed development: from extreme fluvial flows from the Cole Brook and its northern tributary and from surface water run-off disposal.

There are, therefore, four matters to address –

- extent, depth, speed and volume of possible extreme fluvial flooding (as a residual risk);
- collection and disposal of surface water due to the rainfall runoff, so as to avoid flooding on site;
- control of surface water discharges from the site ensuring that there is no increased risk of flooding downstream; and,
- control /routing of offsite and onsite excess surface water run-off or overflow discharges from drainage systems in residual risk conditions so as to ensure that existing flood escape routes are maintained or improved with regard to offsite flood risk impacts and consequences.

Whilst not a significant flood risk; in addition to these two main sources there is noted shallow groundwater which will have to be carefully managed when assessing the options for surface water disposal and SuDS.

### **4.4 Environment Agency Flood Model Data**

The Environment Agency does not have any hydraulic modelling information for this area of the catchment. The EA's flood zone mapping is based on raw data and it is possible that when modelled the extents of flooding identified will be different to that shown on the indicative mapping.

### **4.5 Future Flood Risks**

The site will remain at high risk of flooding in the low lying areas of the site. The extent and depth of flooding will increase with the adverse impacts of climate change.

## **5.0 PROPOSALS FOR FLOOD DEFENCE**

### **5.1 Existing Land Use**

The majority of the site is currently “greenfield” land used for the grazing of animals. The site is divided up to form four large fields. Colebrook Lane divides the site in two.

### **5.2 Possible Proposed Uses and Constraints**

Provided that the Sequential Test issues can be dealt with, development should be viable, with habitable buildings sited in the lowest flood risk areas. Current guidelines seek development away from the high risk Flood Zone (Flood Zone 3).

The extent of any possible development at this site will need to provide dwellings outside the extreme flood extent and at a level where flooding will not occur during a 1-in-100 year event (plus due allowance for climate change during the design lifetime of the development). This means currently that housing development are generally required to be protected from flood events having an annual probability of occurrence of 1% or more for at least 100 years from construction.

### **5.3 Development Proposals**

The site is capable of a residential development providing the flood risk constraints can be met.

Hydraulic modelling will be required to be undertaken to confirm the exact extent of possible flood plain. This will supersede the indicative flood mapping which the EA currently has. It's possible that the extents of flooding noted are less than those shown indicatively on their mapping.

The modelling will be required to assess the issues around the culvert beneath Colebrook Lane. Works to reduce the flood risk from this structure should be assessed also.

Surface water drainage will also require to be considered. The proposals will seek to mimic the existing, largely greenfield, regime. The provision of a SuDS scheme to accommodate the runoff from proposed roofs and impermeable surfacing will meet the requirements for sustainable development as well and improving the risk of flooding from this source. The EA are likely to require betterment to the existing greenfield regime. This is to try and reduce the current flood risks downstream of the site.



## **6.0 FLOOD RISK SUMMARY**

### **6.1 Further work**

Once the outline development proposals have been drawn up a full flood risk assessment should be undertaken to establish the extents of potential flooding and the impacts to the site and surrounding areas from development on the subject site.

- Flood modelling  
Modelling will need to -
  - o Confirm the extent of flood plain
  - o Model a blockage scenario for the Colebrook Lane culvert
  - o Establish an appropriate level of FFL's to proposed buildings
  - o Establish appropriate management of the watercourse and floodplain to ensure adequate maintenance is provided and continued as part of the proposals
- Outline surface water drainage design to ensure the proposals do not increase surface water flooding downstream of the subject site.
- Soakaway testing across the site to assess the soil properties for establishment of greenfield runoff rates.
- Flood Management and Evacuation plan to confirm the proposed measures for flood warning and evacuation.

### **6.2 Hydraulic Modelling**

The Environment Agency have identified that they do not hold any hydraulic modelling for the site or up-stream catchment. Therefore hydraulic modelling will be required to delineate the extent of high risk flood zone.

The EA have raised concern over the Colebrook Lane culvert also and this will require assessment to determine if a replacement structure should be installed.

A full topographic survey of the site and culvert and downstream channel would be required for any such assessment.

### **6.3 Surface Water Drainage**

A comprehensive surface water drainage solution incorporating SUDS techniques will be required to service the proposals at the site. The use of soakaways should be considered as a priority over other less sustainable measure. The primary objectives of the surface water drainage system are to capture and control water within the site, whilst reducing runoff rates and volumes and provide water quality protection to offsite discharges.

The Environment Agency has identified that the Cole Brook catchment as one where it is likely to be made a critical drainage catchment under the terms of the NPPF. This will require more onerous surface water drainage criteria to be adhered to. Betterment on the existing greenfield regime is likely to be implemented as a result of this allocation to the catchment.

Further work will be required to assess the soils within the catchment for the run off characteristics. This will confirm the baseline runoff rates to which the surface water drainage will seek to mimic / improve on. The site is located on the border of a WRAP Class 1 and a WRAP Class 4. The difference between the two is significant and from our experience on the land to the north we'd expect to be able to improve on the WRAP Class 1 to say a Class 2-3.

#### **6.4 Flood Warning / Evacuation**

A flood management plan will be required to be produced to ensure the safety of the occupiers of the site. Management of overland flow routes and surface water drainage implications will need to be confirmed as part of the flood management plan.

#### **6.5 Conclusions**

The site is capable for economic development. Further works are required to delineate the fluvial flood risks to the site.

Discussions have been held with the EA regarding the proposals at this site and their main concern was regarding surface water disposal and the fluvial flood risks associated with the two watercourses. They were able to make us aware of their concerns regarding the Colebrook Lane culvert also. Further discussion and dialog is recommended prior to further works being progressed.

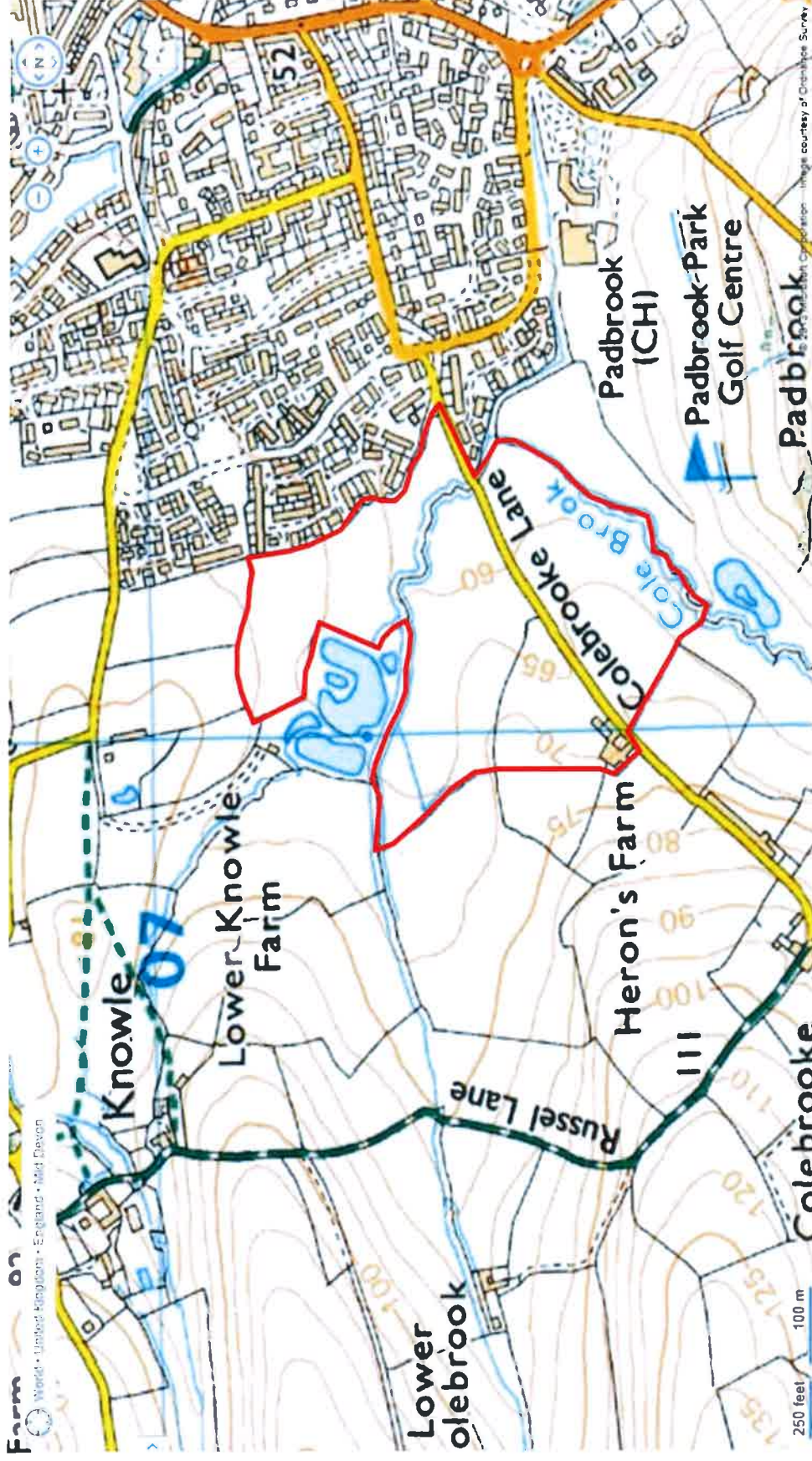
There is potential for shallow ground water to be present in the lower lying area of the site. Whilst this should not pose a significant flood risk issue it will have a bearing on the requirements for surface water disposal.

Hydraulic flood modelling will be required to confirm the extent of the flood plain which is to remain undeveloped. It should be noted that EA's own mapping the extents of the flood zones on these plans are indicative and will be refined by hydraulic modelling.

No development will be permitted within the high risk flood zone. In addition to this the watercourses will require an 8m easement along both sides for access and maintenance.

## **Appendix A**

### **Site Location Plan & Aerial Photograph**



Project:		SDH	
Colebrook Lane, Cullompton		26/06/2013	
Title:		Figure	
Site Location Plan		Appendix A	
By		SDH	
Date		26/06/2013	
Job Number		P9841	



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Project:

Colebrook Lane, Cullompton

Title:

Aerial Photograph (2002)

By	SDH	Checked	SDH
Date	26/06/2013	Date	26/06/2013
Job Number	Figure		
P9841	Appendix A		



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Project:

**Colebrook Lane, Cullompton**

Title:

**Aerial Photograph (2007)**

By  
Date  
Job Number

SDH  
26/06/2013  
P9841

Checked  
Date  
Figure

SDH  
26/06/2013  
Appendix A



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Project:

**Colebrook Lane, Cullompton**

Title:

**Aerial Photograph (2010)**

By  
Date  
Job Number

SDH  
26/06/2013  
Date

SDH  
26/06/2013  
Figure

SDH  
26/06/2013  
Figure

SDH  
26/06/2013  
Figure

**P9841**

**Appendix A**



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Project:

**Colebrook Lane, Cullompton**

Title:

**Aerial Photograph (Facing North)**

By

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26/06/2013

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26/06/2013

Date

Appendix A



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Project:

**Colebrook Lane, Cullompton**

Title:

**Aerial Photograph (Facing East)**

By

SDH

Date

26/06/2013

Job Number

**P9841**

Checked

Date

26/06/2013

Figure

**Appendix A**

SDH

26/06/2013

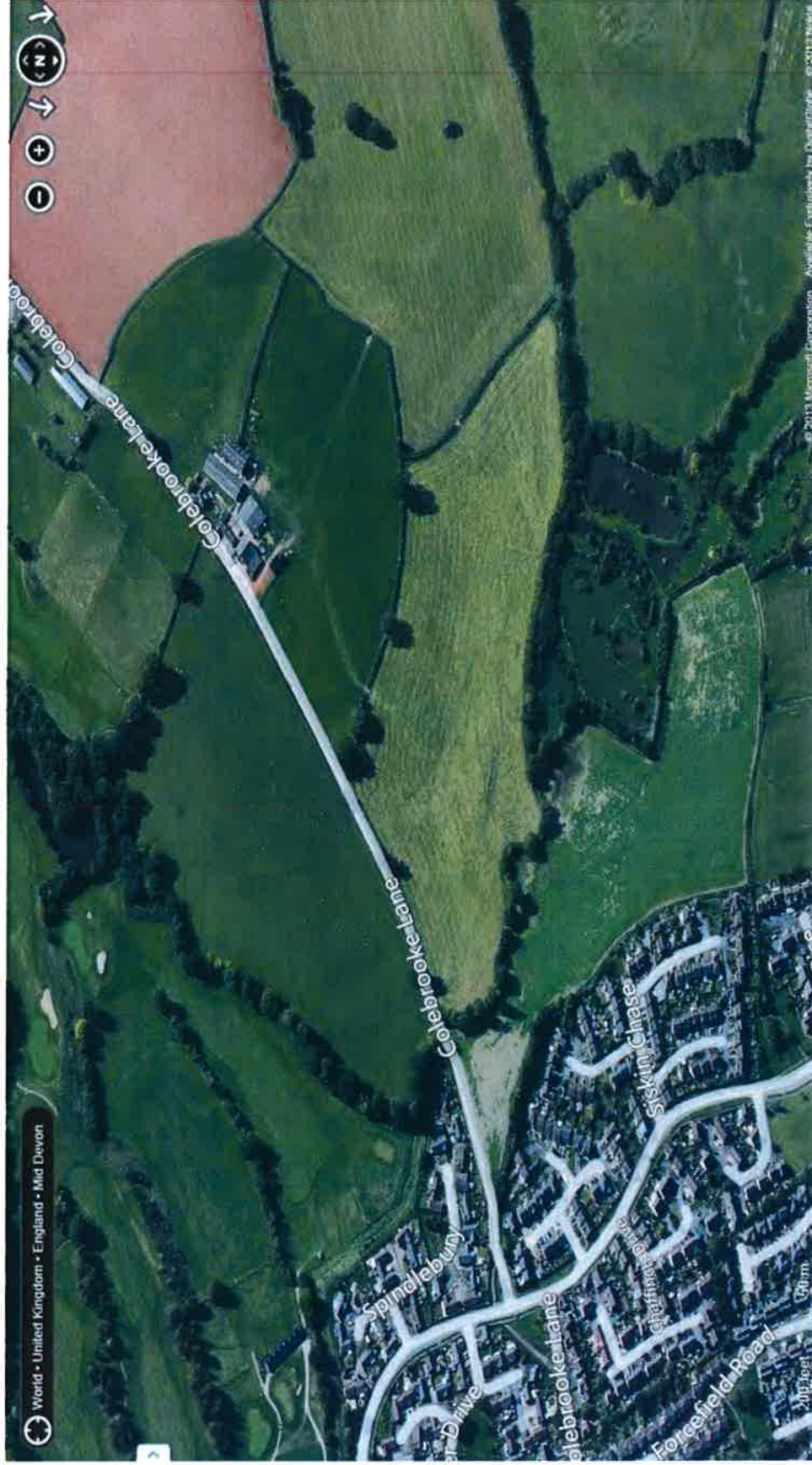
Figure

**Appendix A**



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Project:

**Colebrook Lane, Cullompton**

Title:

**Aerial Photograph (Facing South)**

By

Date

Job Number

SDH

26/06/2013

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Date

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26/06/2013

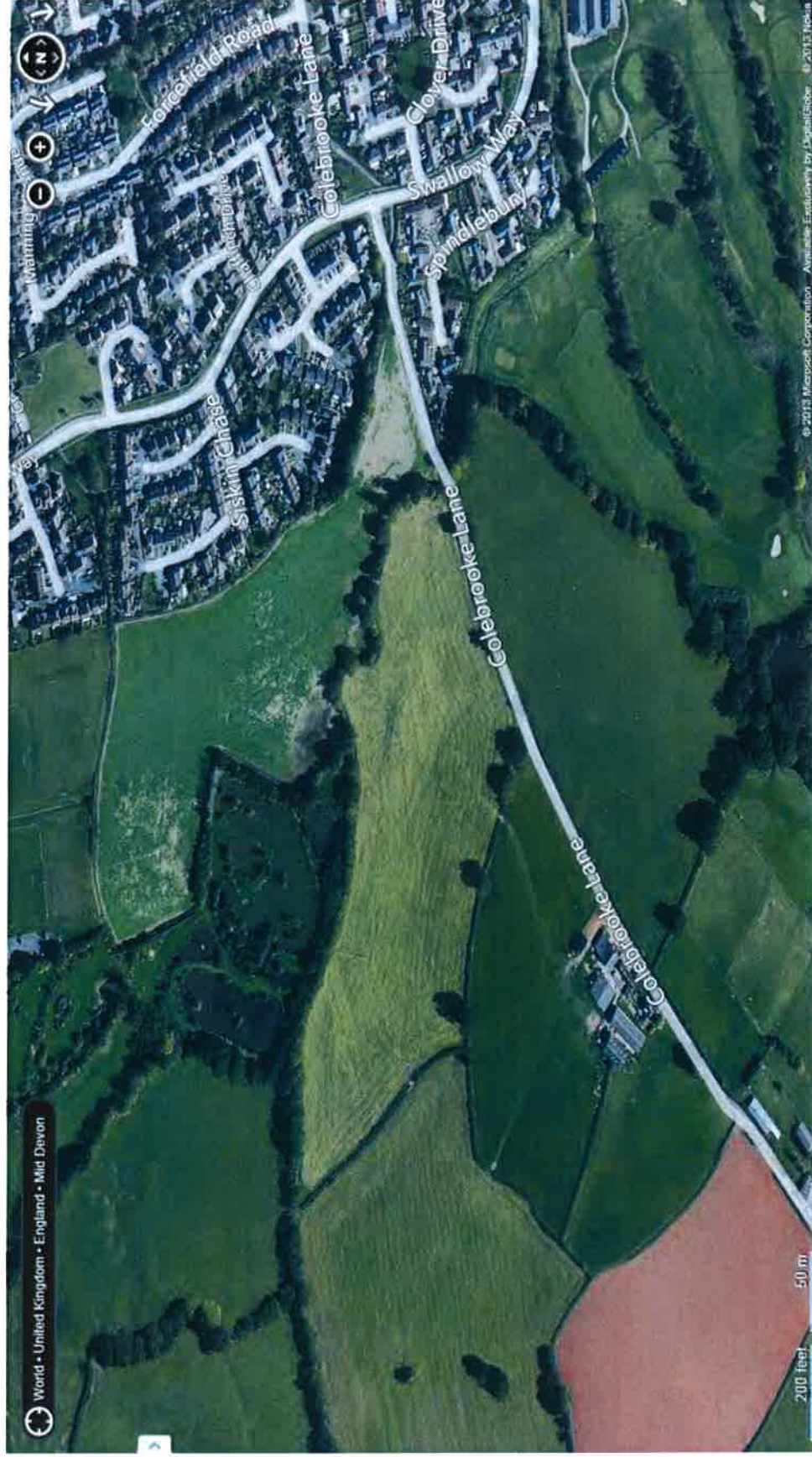
Figure

**Appendix A**

**كوكب**

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Project:

**Colebrook Lane, Cullompton**

Title:

**Aerial Photograph (Facing West)**

By  
Date  
Job Number

SDH  
26/06/2013  
Date

SDH  
26/06/2013  
Figure

**P9841**

**Appendix A**



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## **Appendix B**

### **Environment Agency Indicative Mapping**


X: 301,065;Y: 106,447 at scale 1:10,000


**Map legend**


Click on the map to see what is the Risk of Flooding at a particular location.


☐ Flood Maps


☒ Flood Maps

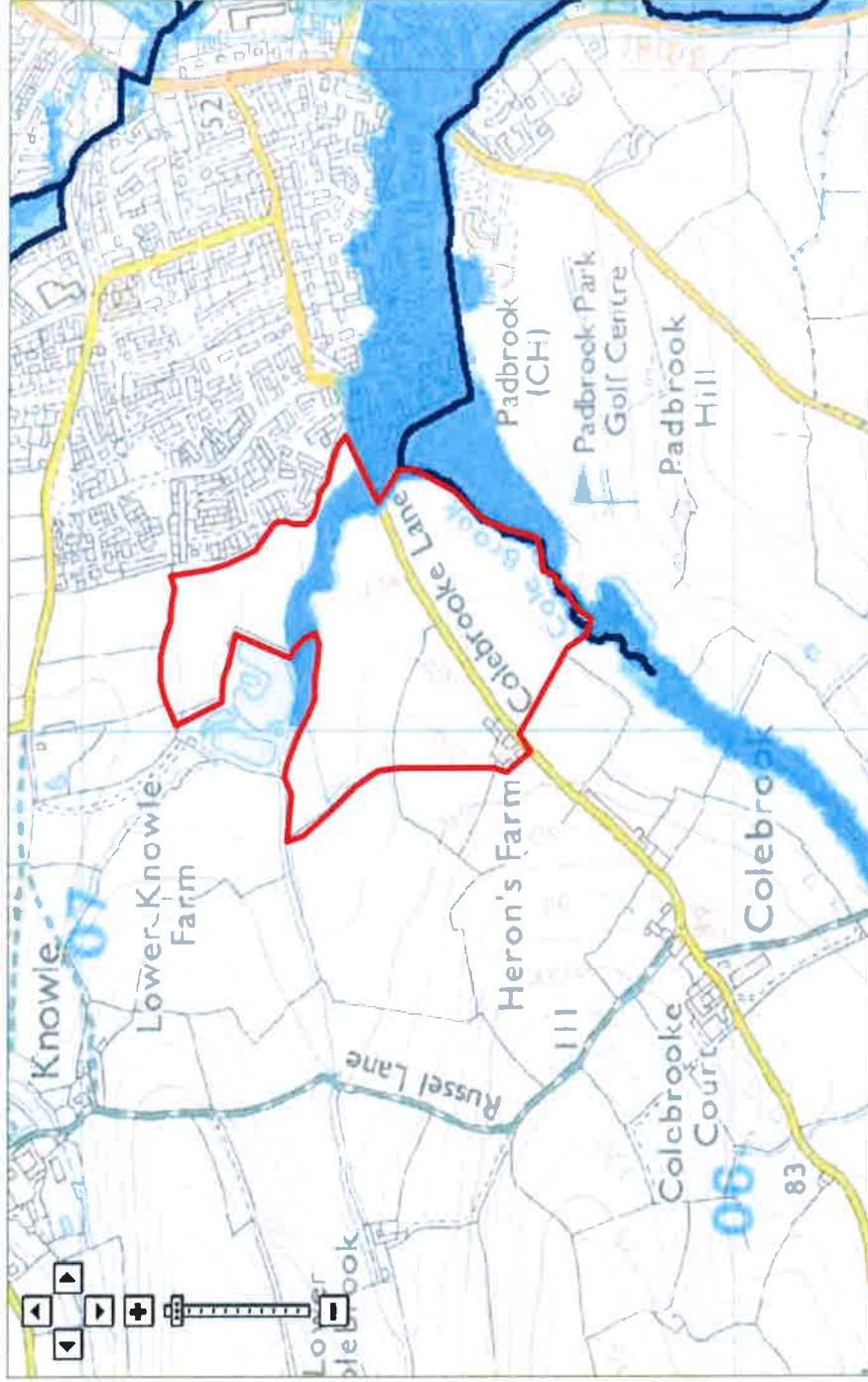
 Flooding from rivers or sea without defences

 Extent of extreme flood

 Flood defences (Not all may be shown\*)

 Areas benefiting from flood defences (Not all may be shown\*)

 Main rivers



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Project:

Colebrook Lane, Cullompton

Title:

Environment Agency Flood Map

By  
Date  
Job Number

SDH  
26/06/2013  
Date

SDH  
26/06/2013  
Figure

P9841

Appendix B



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X: 301,460; Y: 106,225 at scale 1:75,000

Map legend

☒ Groundwater source protection zones

☒ Aquifer Maps - Superficial Deposits Designation

☒ Aquifer Maps - Bedrock Designation

Principal

Secondary A

Secondary B

Secondary (undifferentiated)

☒ Groundwater Vulnerability Zones

A map of the Cullompton area in Devon, UK, showing groundwater vulnerability zones. The map is color-coded: purple for Principal zones, orange for Secondary A, dark orange for Secondary B, and yellow for Secondary (undifferentiated) zones. A red arrow points to a specific location labeled 'SITE' in the center of the map. The map includes a scale bar and a north arrow. Various place names are visible, including Willand, Cullompton, Colebrook, and Silverton.

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Project:

**Colebrook Lane, Cullompton**  
Environment Agency Groundwater Mapping  
(Bedrock)

By  
Date  
Job Number

SDH  
26/06/2013  
P9841


















Checked  
Date

SDH  
26/06/2013  
Figure

Appendix B

The logo for JCB Consulting Engineers Limited, featuring the letters 'JCB' in a stylized, bold, red font.

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Map legend	
	 Groundwater source protection zones 
	 Aquifer Maps - Superficial Deposits Designation 
	Principal
	Secondary A
	Secondary B
	Secondary (undifferentiated)
	Unknown (lakes and landslip)
	 Aquifer Maps - Bedrock Designation 
	 Groundwater Vulnerability Zones 



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Project:

**Colebrook Lane, Cullompton**

**Title:** Environment Agency Groundwater Mapping (Superficial Deposits)

By	
Date	
Job Number	

**P9841**

By	SDH	Checked
Date	26/06/2013	Date
Job Number		

SDH
26/06/2013
Figure

## Appendix B





X: 301,460;Y: 106,225 at scale 1:75,000

Map legend

☐ Groundwater source protection zones

☐ Aquifer Maps - Superficial Deposits Designation

☐ Aquifer Maps - Bedrock Designation

☒ Groundwater Vulnerability Zones

Major Aquifer High

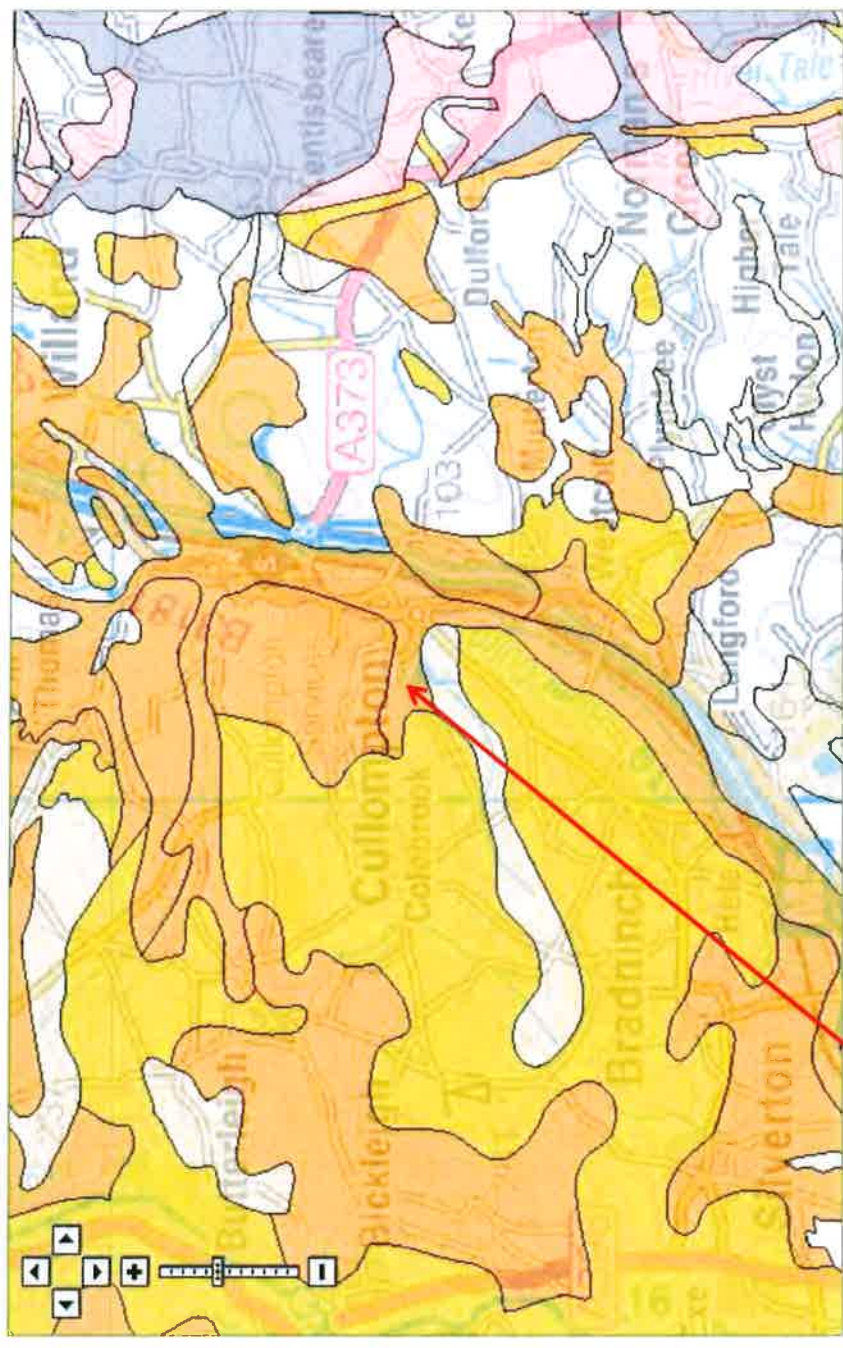
Major Aquifer Intermediate

Major Aquifer Low

Minor Aquifer High

Minor Aquifer Intermediate

Minor Aquifer Low



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SITE

Project:

Colebrook Lane, Culmpton

Title:

Environment Agency Groundwater Mapping  
(Vulnerability Zones)

By

Date

Job Number

SDH

Checked

Date

SDH

Figure

P9841

Appendix B

## **Appendix C**

### **NPPF Technical Guidance Tables 1, 2 and 3**

indicates the need to apply the Exception Test (as set out in the National Planning Policy Framework), the scope of a Strategic Flood Risk Assessment will be widened to consider the impact of the flood risk management infrastructure on the frequency, impact, speed of onset, depth and velocity of flooding within the flood zones considering a range of flood risk management maintenance scenarios. Where a Strategic Flood Risk Assessment is not available, the Sequential Test will be based on the Environment Agency flood zones.

5. The overall aim should be to steer new development to Flood Zone 1. Where there are no reasonably available sites in Flood Zone 1, local planning authorities allocating land in local plans or determining planning applications for development at any particular location should take into account the flood risk vulnerability of land uses (see table 2) and consider reasonably available sites in Flood Zone 2, applying the Exception Test if required (see table 3). Only where there are no reasonably available sites in Flood Zones 1 or 2 should the suitability of sites in Flood Zone 3 be considered, taking into account the flood risk vulnerability of land uses and applying the Exception Test if required.

### **Table 1: Flood zones**

*(Note: These flood zones refer to the probability of river and sea flooding, ignoring the presence of defences)*

#### **Zone 1 - low probability**

##### **Definition**

This zone comprises land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).

##### **Appropriate uses**

All uses of land are appropriate in this zone.

##### **Flood risk assessment requirements**

For development proposals on sites comprising one hectare or above the vulnerability to flooding from other sources as well as from river and sea flooding, and the potential to increase flood risk elsewhere through the addition of hard surfaces and the effect of the new development on surface water run-off, should be incorporated in a flood risk assessment. This need only be brief unless the factors above or other local considerations require particular attention.

##### **Policy aims**

In this zone, developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area and beyond through the layout and form of the development, and the appropriate application of sustainable drainage systems<sup>2</sup>.

<sup>2</sup> Sustainable drainage systems cover the whole range of sustainable approaches to surface drainage management. They are designed to control surface water run off close to where it falls and mimic natural drainage as closely as possible.

## **Zone 2 - medium probability**

### **Definition**

This zone comprises land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.

### **Appropriate uses**

Essential infrastructure and the water-compatible, less vulnerable and more vulnerable uses, as set out in table 2, are appropriate in this zone. The highly vulnerable uses are *only* appropriate in this zone if the Exception Test is passed.

### **Flood risk assessment requirements**

All development proposals in this zone should be accompanied by a flood risk assessment.

### **Policy aims**

In this zone, developers and local authorities should seek opportunities to reduce the overall level of flood risk in the area through the layout and form of the development, and the appropriate application of sustainable drainage systems.

## **Zone 3a - high probability**

### **Definition**

This zone comprises land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

### **Appropriate uses**

The water-compatible and less vulnerable uses of land (table 2) are appropriate in this zone. The highly vulnerable uses should not be permitted in this zone.

The more vulnerable uses and essential infrastructure should only be permitted in this zone if the Exception Test is passed. Essential infrastructure permitted in this zone should be designed and constructed to remain operational and safe for users in times of flood.

### **Flood risk assessment requirements**

All development proposals in this zone should be accompanied by a flood risk assessment.

### **Policy aims**

In this zone, developers and local authorities should seek opportunities to:

- reduce the overall level of flood risk in the area through the layout and form of the development and the appropriate application of sustainable drainage systems;

- relocate existing development to land in zones with a lower probability of flooding; and
- create space for flooding to occur by restoring functional floodplain and flood flow pathways and by identifying, allocating and safeguarding open space for flood storage.

### **Zone 3b - the functional floodplain**

#### **Definition**

This zone comprises land where water *has* to flow or be stored in times of flood.

Local planning authorities should identify in their Strategic Flood Risk Assessments areas of functional floodplain and its boundaries accordingly, in agreement with the Environment Agency. The identification of functional floodplain should take account of local circumstances and not be defined solely on rigid probability parameters. But land which would flood with an annual probability of 1 in 20 (5%) or greater in any year, or is designed to flood in an extreme (0.1%) flood, should provide a starting point for consideration and discussions to identify the functional floodplain.

#### **Appropriate uses**

Only the water-compatible uses and the essential infrastructure listed in table 2 that has to be there should be permitted in this zone. It should be designed and constructed to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;
- not impede water flows; and
- not increase flood risk elsewhere.

Essential infrastructure in this zone should pass the Exception Test.

#### **Flood risk assessment requirements**

All development proposals in this zone should be accompanied by a flood risk assessment.

#### **Policy aims**

In this zone, developers and local authorities should seek opportunities to:

- reduce the overall level of flood risk in the area through the layout and form of the development and the appropriate application of sustainable drainage systems;
- relocate existing development to land with a lower probability of flooding.

**Table 2: Flood risk vulnerability classification**

<p><b>Essential infrastructure</b></p> <ul style="list-style-type: none"> <li>• Essential transport infrastructure (including mass evacuation routes) which has to cross the area at risk.</li> <li>• Essential utility infrastructure which has to be located in a flood risk area for operational reasons, including electricity generating power stations and grid and primary substations; and water treatment works that need to remain operational in times of flood.</li> <li>• Wind turbines.</li> </ul>
<p><b>Highly vulnerable</b></p> <ul style="list-style-type: none"> <li>• Police stations, ambulance stations and fire stations and command centres and telecommunications installations required to be operational during flooding.</li> <li>• Emergency dispersal points.</li> <li>• Basement dwellings.</li> <li>• Caravans, mobile homes and park homes intended for permanent residential use<sup>3</sup>.</li> <li>• Installations requiring hazardous substances consent<sup>4</sup>. (Where there is a demonstrable need to locate such installations for bulk storage of materials with port or other similar facilities, or such installations with energy infrastructure or carbon capture and storage installations, that require coastal or water-side locations, or need to be located in other high flood risk areas, in these instances the facilities should be classified as “essential infrastructure”)<sup>5</sup>.</li> </ul>
<p><b>More vulnerable</b></p> <ul style="list-style-type: none"> <li>• Hospitals.</li> <li>• Residential institutions such as residential care homes, children’s homes, social services homes, prisons and hostels.</li> <li>• Buildings used for dwelling houses, student halls of residence, drinking establishments, nightclubs and hotels.</li> <li>• Non-residential uses for health services, nurseries and educational establishments.</li> <li>• Landfill and sites used for waste management facilities for hazardous waste<sup>6</sup>.</li> <li>• Sites used for holiday or short-let caravans and camping, <i>subject to a specific warning and evacuation plan</i>.<sup>7</sup></li> </ul>
<p><b>Less vulnerable</b></p> <ul style="list-style-type: none"> <li>• Police, ambulance and fire stations which are <i>not</i> required to be operational during flooding.</li> <li>• Buildings used for shops, financial, professional and other services,</li> </ul>

<sup>3</sup> For any proposal involving a change of use of land to a caravan, camping or chalet site, or to a mobile home site or park home site, the Sequential and Exception Tests should be applied.

<sup>4</sup> See Circular 04/00: *Planning controls for hazardous substances* (paragraph 18) at: [www.communities.gov.uk/publications/planningandbuilding/circularplanningcontrols](http://www.communities.gov.uk/publications/planningandbuilding/circularplanningcontrols)

<sup>5</sup> In considering any development proposal for such an installation, local planning authorities should have regard to planning policy on pollution in the National Planning Policy Framework.

<sup>6</sup> For definition, see *Planning for Sustainable Waste Management: Companion Guide to Planning Policy Statement 10* at

[www.communities.gov.uk/publications/planningandbuilding/planningsustainable](http://www.communities.gov.uk/publications/planningandbuilding/planningsustainable)

<sup>7</sup> See footnote 3.



restaurants and cafes, hot food takeaways, offices, general industry, storage and distribution, non-residential institutions not included in "more vulnerable", and assembly and leisure.

- Land and buildings used for agriculture and forestry.
- Waste treatment (except landfill and hazardous waste facilities).
- Minerals working and processing (except for sand and gravel working).
- Water treatment works which do *not* need to remain operational during times of flood.
- Sewage treatment works (if adequate measures to control pollution and manage sewage during flooding events are in place).

#### **Water-compatible development**

- Flood control infrastructure.
- Water transmission infrastructure and pumping stations.
- Sewage transmission infrastructure and pumping stations.
- Sand and gravel working.
- Docks, marinas and wharves.
- Navigation facilities.
- Ministry of Defence defence installations.
- Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location.
- Water-based recreation (excluding sleeping accommodation).
- Lifeguard and coastguard stations.
- Amenity open space, nature conservation and biodiversity, outdoor sports and recreation and essential facilities such as changing rooms.
- Essential ancillary sleeping or residential accommodation for staff required by uses in this category, *subject to a specific warning and evacuation plan*.

#### **Notes to table 2:**

a. This classification is based partly on Department for Environment, Food and Rural Affairs and Environment Agency research on *Flood Risks to People (FD2321/TR2)*<sup>8</sup> and also on the need of some uses to keep functioning during flooding.

b. Buildings that combine a mixture of uses should be placed into the higher of the relevant classes of flood risk sensitivity. Developments that allow uses to be distributed over the site may fall within several classes of flood risk sensitivity.

c. The impact of a flood on the particular uses identified within this flood risk vulnerability classification will vary within each vulnerability class. Therefore, the flood risk management infrastructure and other risk mitigation measures needed to ensure the development is safe may differ between uses within a particular vulnerability classification.

<sup>8</sup> See website for further details.

[www.defra.gov.uk/science/Project\\_Data/DocumentLibrary/FD2320\\_3364\\_TRP.pdf](http://www.defra.gov.uk/science/Project_Data/DocumentLibrary/FD2320_3364_TRP.pdf)

**Table 3: Flood risk vulnerability and flood zone ‘compatibility’**

Flood risk vulnerability classification (see table 2)		Essential infrastructure	Water compatible	Highly vulnerable	More vulnerable	Less vulnerable
Flood zone (see table 1)	Zone 1	✓	✓	✓	✓	✓
	Zone 2	✓	✓	Exception Test required	✓	✓
	Zone 3a	Exception Test required	✓	x	Exception Test required	✓
	Zone 3b functional floodplain	Exception Test required	✓	x	x	x

**Key:**      ✓ Development is appropriate.  
                  x Development should not be permitted.

**Notes to table 3:**

This table does not show:

- the application of the Sequential Test which guides development to Flood Zone 1 first, then Zone 2, and then Zone 3;
- flood risk assessment requirements; or
- the policy aims for each flood zone.

## Flood risk assessment

- Properly prepared assessments of flood risk will inform the decision-making process at all stages of development planning. A Strategic Flood Risk Assessment is a study carried out by one or more local planning authorities to assess the risk to an area from flooding from all sources, now and in the future, taking account of the impacts of climate change, and to assess the impact that changes or development in the area will have on flood risk. It may also identify, particularly at more local levels, how to manage those changes to ensure that flood risk is not increased. A site-specific flood risk assessment is carried out by, or on behalf of, a developer to assess the risk to a development site and demonstrate how flood risk from all sources of flooding to the development itself and flood risk to others will be managed now, and taking climate change into account. There should be iteration between the different levels of flood risk assessment.

### Strategic Flood Risk Assessment

- As set out in the National Planning Policy Framework, Local Plans should be supported by Strategic Flood Risk Assessment. The Strategic Flood Risk Assessment should be prepared in consultation with the Environment Agency,



## **Appendix D**

### **Site Photographs**































## Appendix E

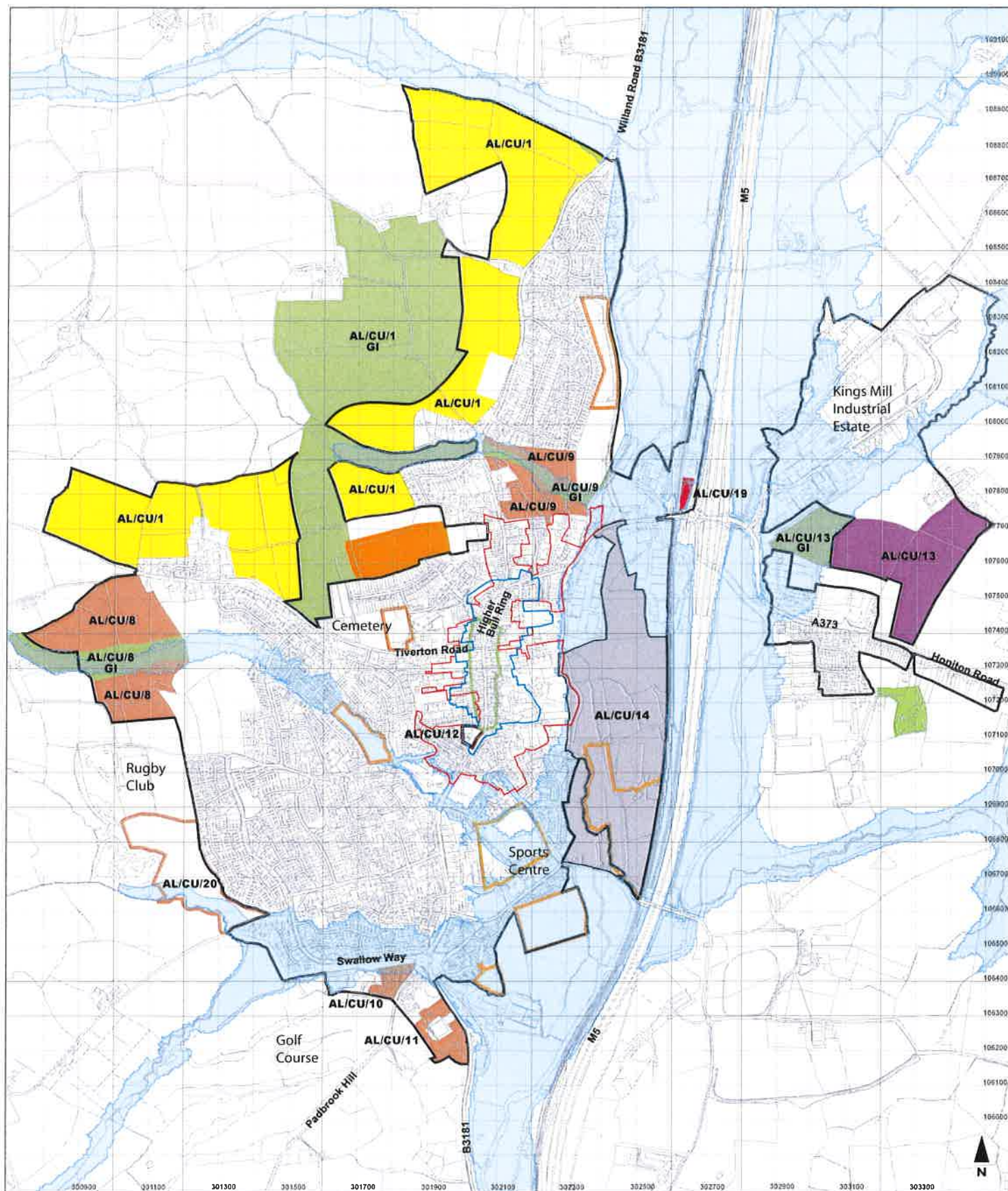
### Environment Agency Information Ref:

## **Appendix F**

### **Outline Development Plan Ref: 13035/SK/03**

## **Appendix G**

### **Local Plan and SFRA Mapping Extracts**



- Settlement Limit
- Residential
- Contingency Housing Site
- Mixed Use
- Green Infrastructure
- Employment
- Town Centre Boundary
- Proposed Primary Shopping Area



- Community Use
- Railway Station Car Park
- Area for Eastern Relief Road
- Conservation Area
- Important Land for Sport and Recreation
- Ancient Monument
- County Wildlife Site
- Floodplain



Deleted Important Land for Sport and Recreation

Mid Devon Local Plan Part III

## Proposed Policies Map Cullompton

Notes: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.  
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Scale  
1:10,000

July  
2012



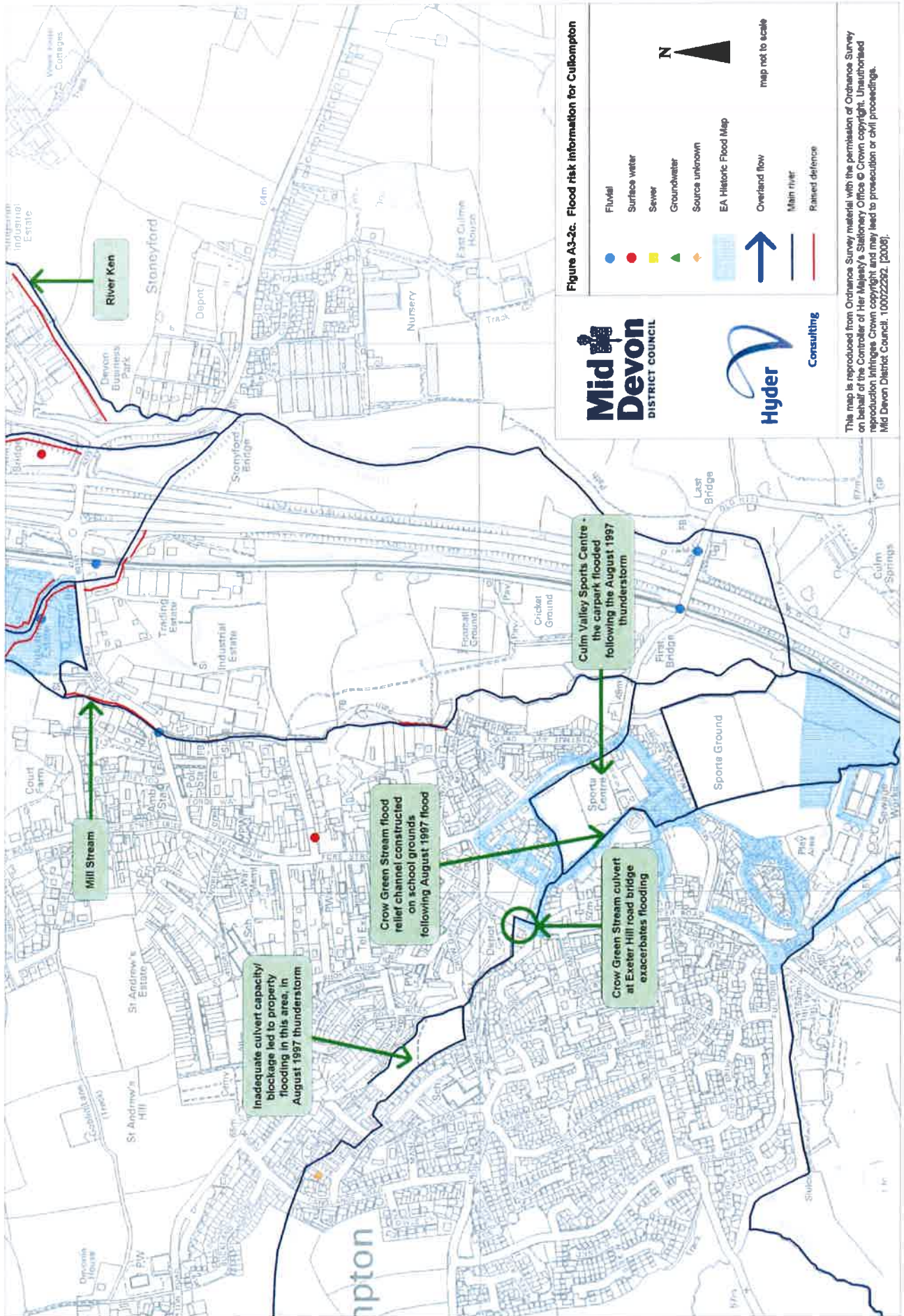
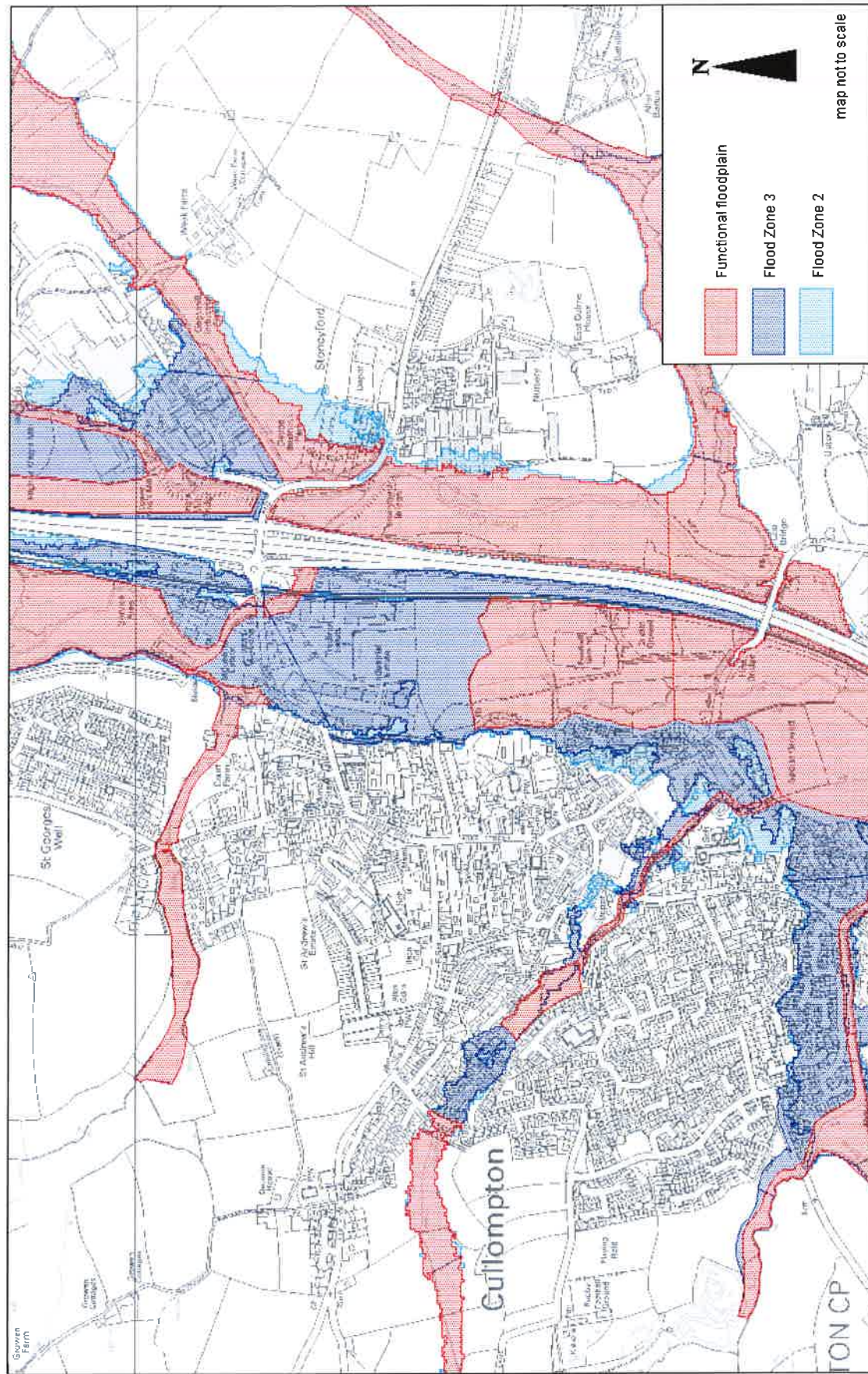








Figure A4-1c. Flood Zones 2 and 3  
Cullompton



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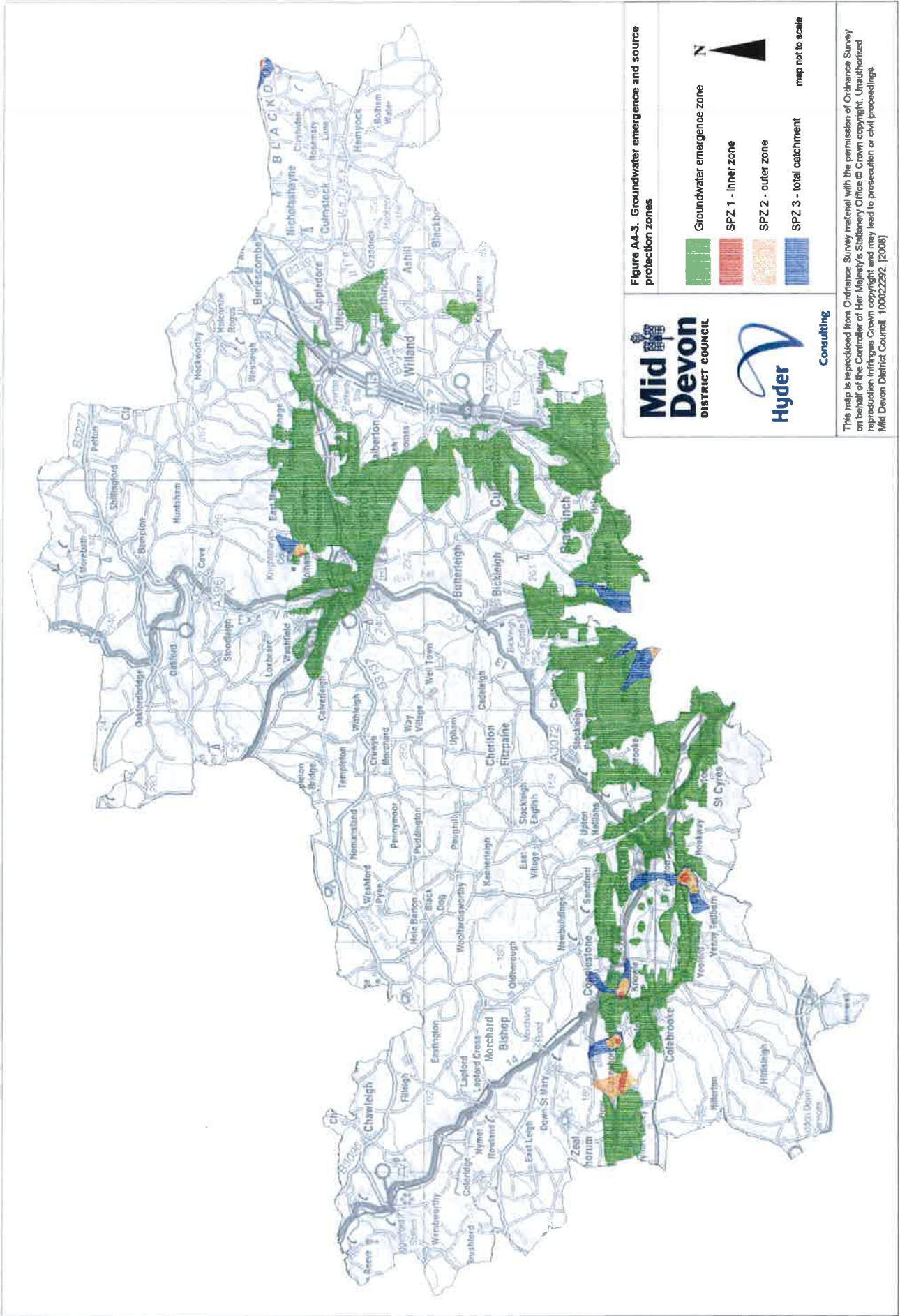
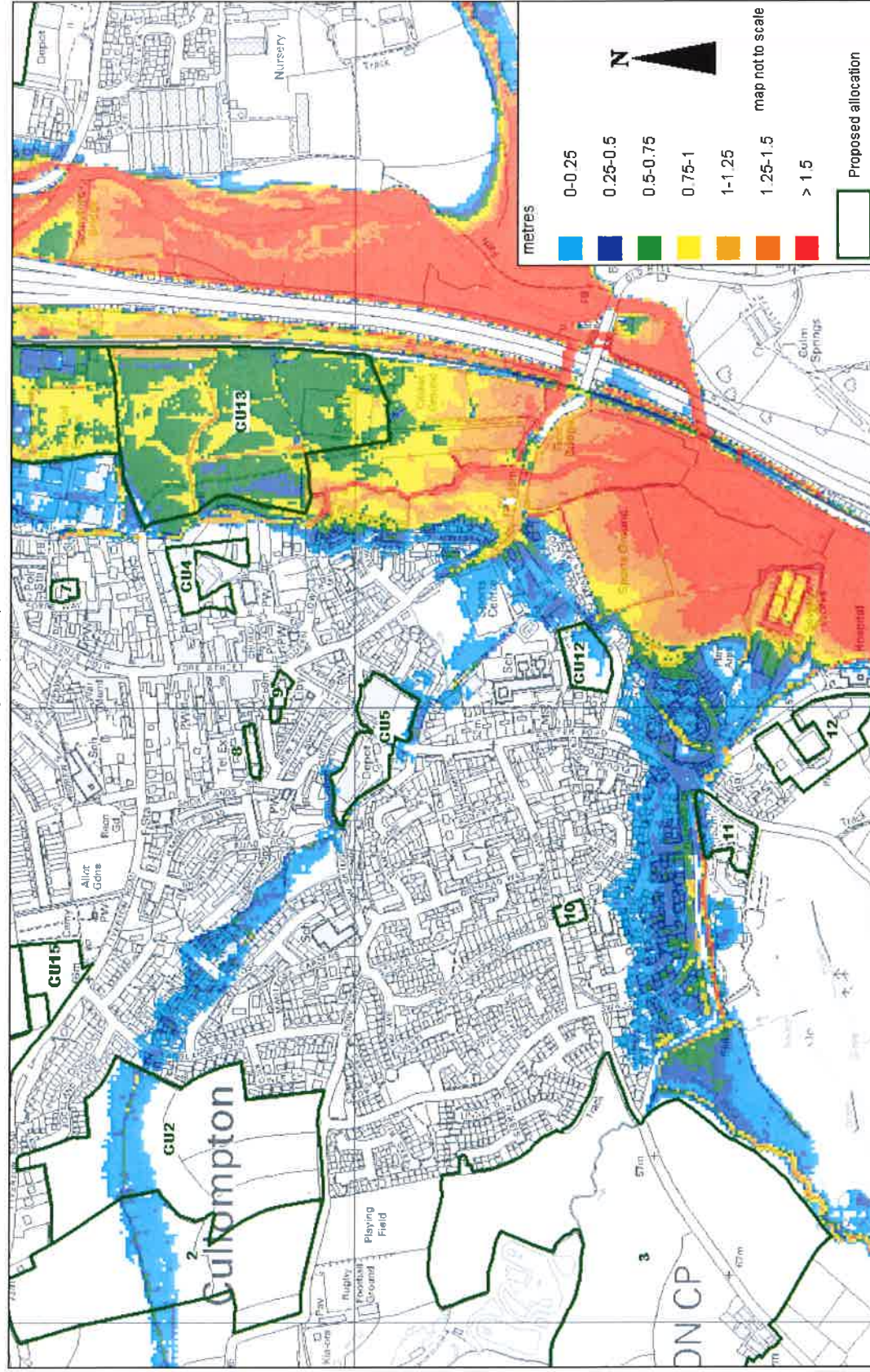


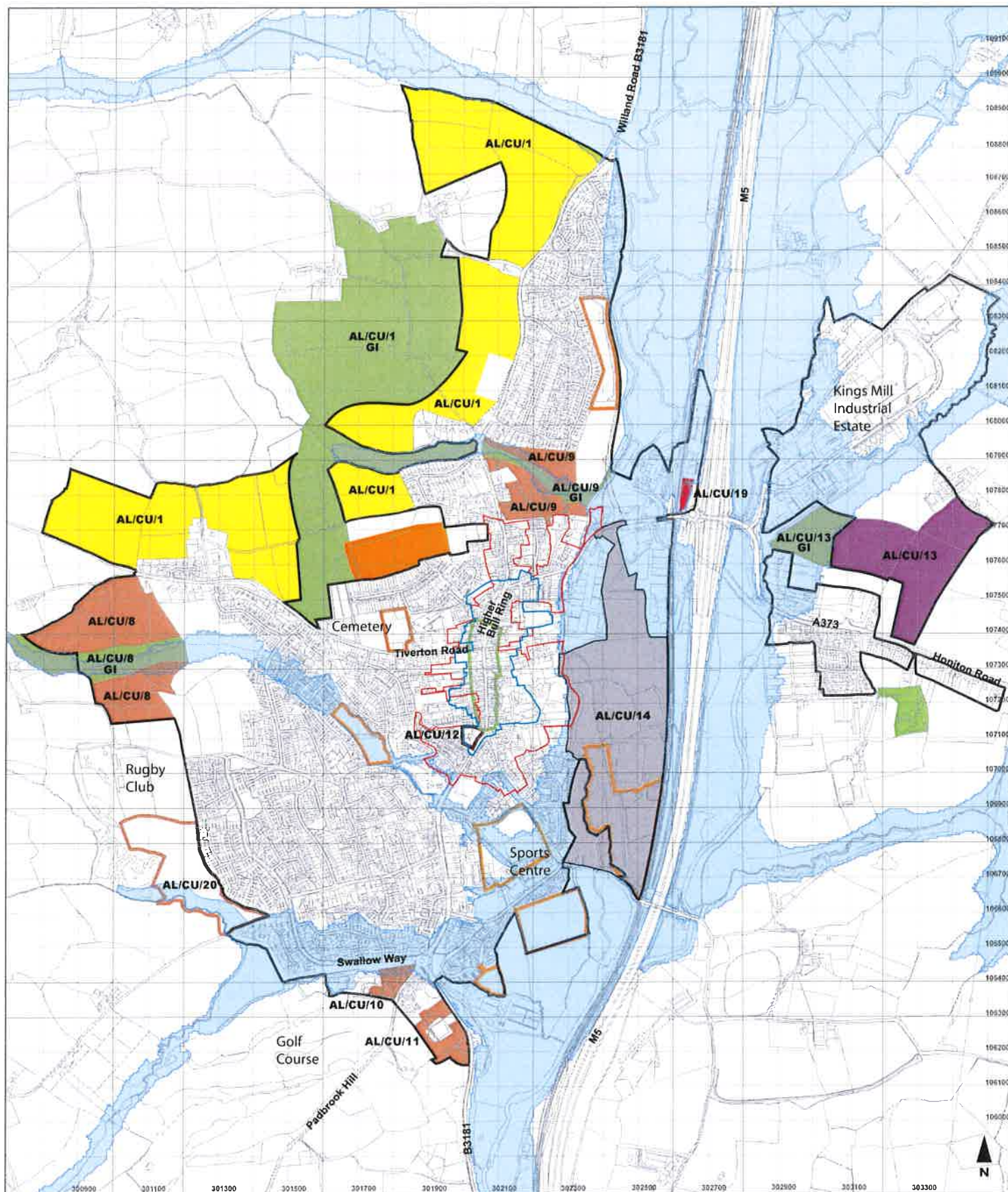


Figure A6-1b-part ii. Flood depths during a 1 in 100 year event  
Culmpton (South)



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Settlement Limit  
Residential  
Contingency Housing Site  
Mixed Use  
Green Infrastructure  
Employment  
Town Centre Boundary  
Proposed Primary Shopping Area



Community Use  
Railway Station Car Park  
Area for Eastern Relief Road  
Conservation Area  
Important Land for Sport and Recreation  
Ancient Monument  
County Wildlife Site  
Floodplain



Deleted Important Land for Sport and Recreation



Mid Devon Local Plan Part III

## Proposed Policies Map Cullompton

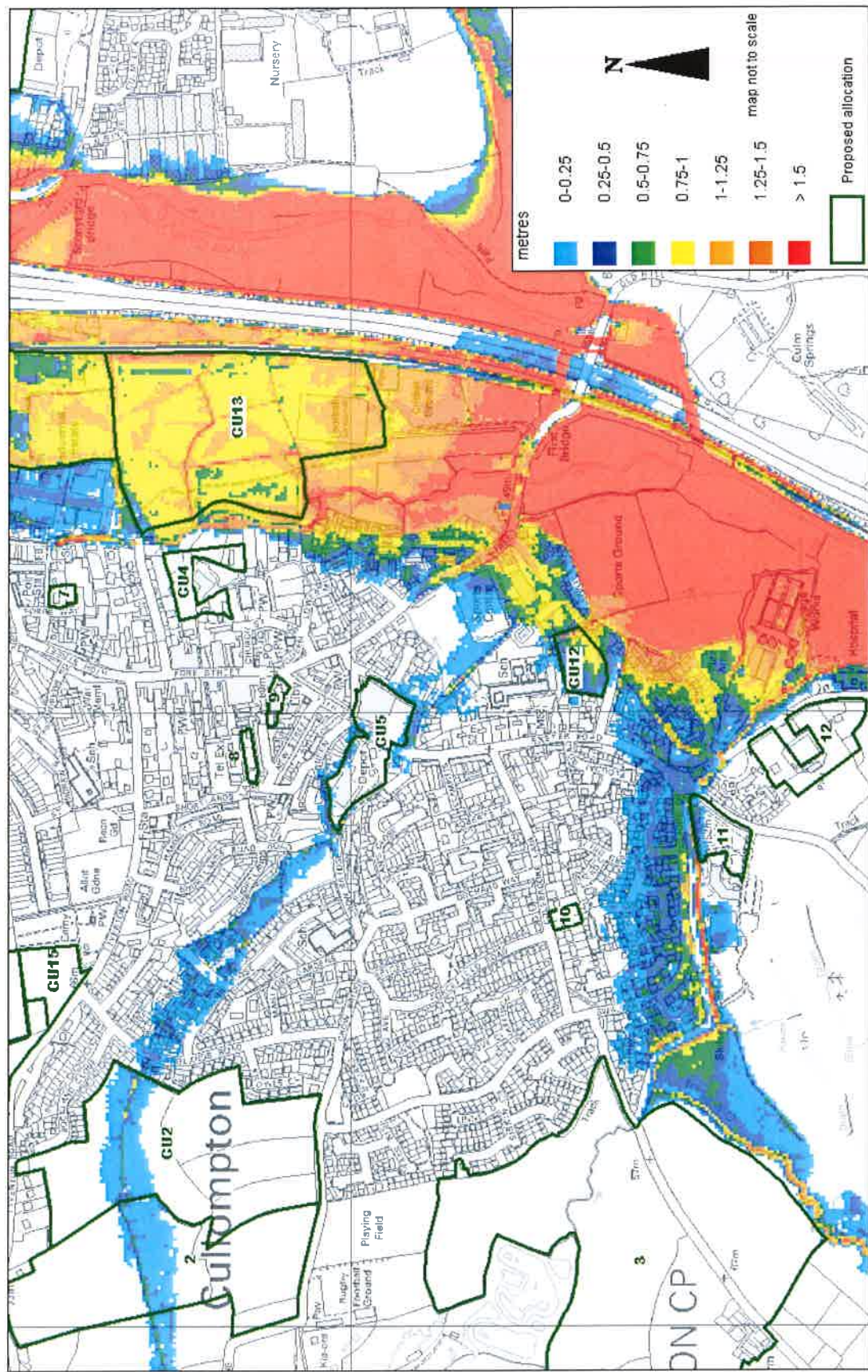
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently not all development may be shown.  
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Scale  
1:10,000

July  
2012



**Figure A6-2b-part ii. Flood depths during a 1 in 1000 year event  
Cullompton (South)**



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## **Appendix H**

### **Outline Surface Water Drainage Information**

# CALCULATION SHEET

**Details:** Preliminary Surface Water Drainage Calculations

**Project:** Colebrook Lane, Cullompton

**Project No:** P9841



CONSULTING ENGINEERS LIMITED

**Date:** 20/06/2013

**Prepared By:** S.Hurdwell

**Checked By:** T.Shipp

## Downstream Flood Risk and Surface Water Discharge Rates Assessment

### Institution of Hydrology Report 124 method - Calculating greenfield discharge rates (original unmodified version)

Total Development Area (ha): **19.80**      loH 124 Equation:  $Q_{BAR} = 0.00108 A^{0.89} SAAR^{1.17} SOIL^{2.17} + cc$

SAAR (mm): **980**

WRAP Class: **1**

SOIL: **0.15**

A = Area (km<sup>2</sup>)

Hydrological Region: **8**

SAAR = Average Annual Rainfall (mm) - (From FEH CD-ROM catchment descriptors)

Climate Change since 1990 (cc): **5.0%**

SOIL = SOIL Index Derived from WRAP map

$Q_{BAR}$  (l/s): **13.8**

$Q_{BAR}$  (l/s/ha): **0.7**

Return Period (Years)	Growth Factors (from loH124 and based on corresponding Hydro Region)	Unit Area Run-off Rate (l/s/ha)	Site Specific Run-off Rate (l/s)
<b>1</b>	<b>0.88</b>	<b>0.6</b>	<b>12.2</b>
<b>2.33</b>	<b>1.00</b>	<b>0.7</b>	<b>13.8</b>
<b>5</b>	<b>1.23</b>	<b>0.9</b>	<b>17.0</b>
<b>10</b>	<b>1.49</b>	<b>1.0</b>	<b>20.6</b>
<b>25</b>	<b>1.84</b>	<b>1.3</b>	<b>25.4</b>
<b>30</b>	<b>1.89</b>	<b>1.3</b>	<b>26.1</b>
<b>50</b>	<b>2.12</b>	<b>1.5</b>	<b>29.3</b>
<b>100</b>	<b>2.42</b>	<b>1.7</b>	<b>33.4</b>
<b>200</b>	<b>2.92</b>	<b>2.0</b>	<b>40.4</b>
<b>500</b>	<b>3.41</b>	<b>2.4</b>	<b>47.1</b>

CALCULATION SHEET

Details: Preliminary Surface Water Drainage Calculations

Project: Colebrook Lane, Cullompton

Project No: P9841



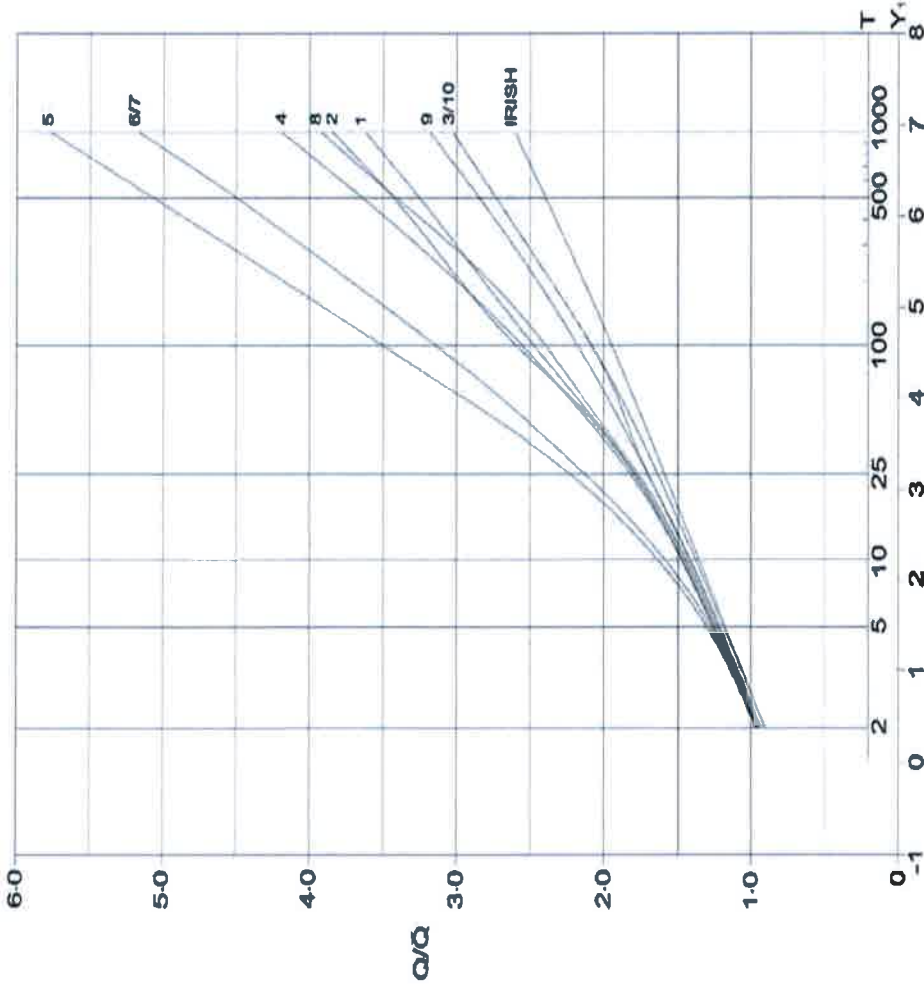
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Date: 20/06/2013

Prepared By: S.Hurdwell

Checked By: T.Shipp

UK Growth Curves



Uk Growth Curve Factors

Hydrometric Area	Return Period									
	1	2.33	5	10	25	30	50	100	200	500
1	0.90	1.00	1.20	1.45	1.81		2.12	2.48		3.25
2	0.91	1.00	1.11	1.42	1.81		2.17	2.63		3.45
3	0.94	1.00	1.25	1.45	1.70		1.90	2.08		2.73
4	0.89	1.00	1.23	0.49	1.87		2.20	2.57		3.62
5	0.89	1.00	1.29	1.65	2.25		2.83	3.56		5.02
6/7	0.88	1.00	1.28	1.62	2.14		2.62	3.19		4.49
8	0.88	1.00	1.23	1.49	1.84	1.89	2.12	2.42		3.41
9	0.93	1.00	1.21	1.42	1.71		1.94	2.18		2.86
10	0.93	1.00	1.19	1.38	1.64		1.85	2.08		2.73
Ireland	0.95	1.00	1.20	1.37	1.60		1.77	1.96		2.40

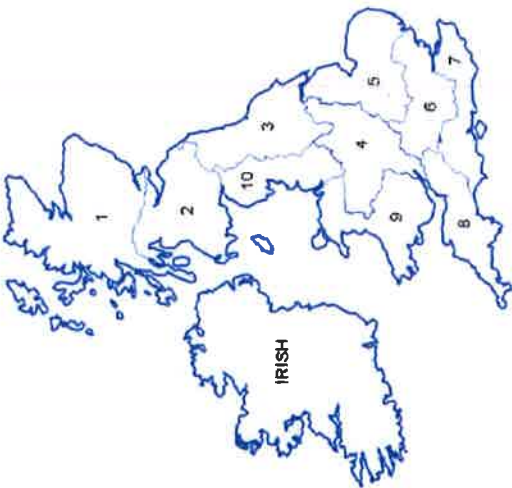


Figure 1: Hydrological Areas Map



# CALCULATION SHEET

**Details:** Preliminary Surface Water Drainage Calculations

**Project:** Colebrook Lane, Cullompton

**Project No:** P9841

**Date:** 20/06/2013

**Prepared By:** S.Hurdwell

**Checked By:** T.Shipp

## Institution of Hydrology Report 124 method - Calculating greenfield discharge rates (as modified by EA Technical Report W5-074/A/TR/1 Rev.D)

Total Development Area (ha): **19.80**  
 SAAR (mm): **980**  
 WRAP Class: **1**  
 SPR (Site - from WRAP-SPR table): **0.15**  
 SPRHOST (Catchment): **38.00%**  
 SPR (Site - from SOIL HOST classes): **0.16**  
 Hydrological Region: **9**  
 Climate Change since 1990 (cc): **5.0%**

IoH 124 Equation (modified):  $Q_{BAR} = 0.00108 A^{0.89} SAAR^{1.17} SPR^{2.17} + CC$

A = A notional area of 0.5 km<sup>2</sup>; the site discharge is then calculated from the pro-rata'd site area.  
 SAAR = Average Annual Rainfall (mm) - (From FEH CD-ROM catchment descriptors)  
 SPR = site specific Standard Percentage Run-off (derived from SOIL [=WRAP] class to SPR correlation as tabulated in W5-074/A/TR/1 Rev.D ) or from proportioned HOST SOIL classes given in FEH Volume 4.

$Q_{BAR}$  (50ha area) (l/s): **36.3**  
 $Q_{BAR}$  (site) (l/s): **14.4**  
 $Q_{BAR}$  (l/s/ha): **0.7**

SPRHOST = catchment Standard Percentage Run-off (from FEH catchment descriptors)

Return Period (Years)	Growth Factors (from IoH124 and based on corresponding Hydro Region)	Unit Area Run-off Rate (l/s/ha)	Site Specific Run-off Rate (l/s)
1	<b>0.88</b>	<b>0.6</b>	<b>12.6</b>
<b>2.33</b>	<b>1.00</b>	<b>0.7</b>	<b>14.4</b>
<b>5</b>	<b>1.23</b>	<b>0.9</b>	<b>17.7</b>
<b>10</b>	<b>1.49</b>	<b>1.1</b>	<b>21.4</b>
<b>25</b>	<b>1.84</b>	<b>1.3</b>	<b>26.4</b>
<b>30</b>	<b>1.89</b>	<b>1.4</b>	<b>27.1</b>
<b>50</b>	<b>2.12</b>	<b>1.5</b>	<b>30.4</b>
<b>100</b>	<b>2.42</b>	<b>1.8</b>	<b>34.7</b>
<b>200</b>	<b>2.92</b>	<b>2.1</b>	<b>41.9</b>
<b>500</b>	<b>3.41</b>	<b>2.5</b>	<b>49.0</b>



## CALCULATION SHEET

**Details:** Preliminary Surface Water Drainage Calculations

**Project:** Colebrook Lane, Cullompton

**Project No:** P9841



CONSULTING ENGINEERS LIMITED

**Date:** 20/06/2013

**Prepared By:** S.Hurdwell

**Checked By:** T.Shipp

### ADAS Reference Book 345 "Design of Field Drainage systems" - Calculating greenfield discharge rates

#### Introduction

This guidance indicates an acceptable method for the assessment of greenfield run-off rates from small sites in the South Western Region of the Environment Agency. The method is based on the ADAS reference book 345 'The design of field drainage systems' combined with the regional growth curves developed by South West Water Authority as well as area data on soil and rainfall statistics. Reviews of small catchments in the region have been carried out that demonstrate that this method produces results that, when extrapolated to a larger area, give a reasonable degree of agreement with the *Flood Estimation Handbook (FEH)* estimates.

The method for assessing run-off rates in this region has been adapted to cover sites outside this region.

#### Methodology

The ADAS 345 method first assess the Mean Annual Flood which is used as an index run-off rate. The index run-off rate is then multiplied by a range of multipliers, which indicate increasing run-off rates with increasing return period/severity of storm event.

The steps involved in this process are given below.

#### Site area and slope

The ADAS 345 method was designed for calculating allowable discharges from field systems. As such, where the proposed development site is of a large size, of a complicated shape, has complicated topography or even a watercourse running through it, it may be necessary to break down the area into smaller more uniform areas and derive index run-off rates from each of these individually.

The site area is input in hectares; the maximum length of the site area, or the length across the typical slope of the area is input in metres; the maximum height difference across the site area is also input in metres, and typical slope gradients (derived therefrom) are input as decimal fractions.

#### Site/Catchment characteristic flood flow intensity relationship

Figure 1 below relates the site topography via the Average Annual Rainfall (**AAR**) rate to a Flood Flow Factor **F**.

The slope and length of the site are used to determine a site/catchment characteristic **C**. The **AAR** can either be taken the *Wallingford Procedure* maps, which gives a broad region-wide indication of this value, or, more accurately, local values can be obtained from the Agency, the Met Office or the *FEH* CD-ROM or the *FEH* printed lists of soil characteristics and HOST classes.

In the case of the application site in, the **AAR** has been taken from the *Wallingford Procedure* mapping.  
The soil *Winter Rainfall Acceptance Potential (WRAP)* class has also been read from the *Wallingford Procedure* maps.

# CALCULATION SHEET

Details: Preliminary Surface Water Drainage Calculations

Project: Colebrook Lane, Cullompton

Project No: P9841



CONSULTING ENGINEERS LIMITED

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Checked By: T.Shipp

## Assessment of Standard Percentage Run-off (SPR) from soil type and HOST classes

Soil Type	HOST Classes	HOST Class Percentage	SPR value for HOST Class	Totals	Soil Description	Comment
541e - Crediton	Class 2	22.22%	2.00%	0.444%	Permian and Carboniferous reddish breccia - Well drained gritty reddish loamy soils over breccia, locally less stoney. Steep Slopes in places.	
	Class 3	77.78%	14.50%	11.278%		
			Site SPR = TOTAL	11.72%		

Soil Type	HOST Classes	HOST Class Percentage	SPR value for HOST Class	Totals	Soil Description	Comment
712e - Hallsworth 2	Class 24	100.00%	39.70%	39.700%	Drift from Paleozoic shale - Slowly permeable seasonally waterlogged clayey, fine loamy and fine silty soils.	
			Site SPR = TOTAL	39.70%		

Soil Type	HOST Classes	HOST Class Percentage	SPR value for HOST Class	Totals	Soil Description	Comment
811c Hollington	Class 8	11.11%	44.30%	4.922%	Reddish River Alluvium - Deep stoneless reddish fine silty and clayey soils variably affected by groundwater. Flat Land. Risk of flooding.	
	Class 9	88.89%	25.30%	22.489%		
			Site SPR = TOTAL	27.41%		

The ratios to which these soil types occur across the site are estimated to be :-

541e - Crediton	11.72%	@ 80%	9.38%
712e - Hallsworth 2	39.70%	@ 10%	3.97%
811c Hollington	27.41%	@ 10%	2.74%
Total			16.09%

## CALCULATION SHEET

**Details:** Preliminary Surface Water Drainage Calculations

**Project:** Colebrook Lane, Cullompton

**Project No:** P9841



CONSULTING ENGINEERS LIMITED

**Date:** 20/06/2013

**Prepared By:** S.Hurdwell

**Checked By:** T.Shipp

### **Assessment of Standard Percentage Run-off (SPR) from soil type and HOST classes (cont....)**

There is a significant difference in the WRAP soil parameter, the SPRHOST and the SPR for the site. The SPRHOST and SPR values are derived using 29 soil classes as opposed to the five defined on the WRAP map; it is generally considered that SPR values provide a more accurate representation of soil characteristics and variation in run-off between soil types. The most realistic value, SPR, has therefore been adopted in the estimation of greenfield run-off rates from the proposed site.

#### **Greenfield run-off rates**

The Mean Annual Flood (MAF) is estimated at step 9 below. For this the Soil Type factor  $S_T$  is multiplied by the Flood Flow Factor  $F$  and the site area to give the MAF  $Q_o$ .

Based upon the MAF  $Q_o$  figure calculated, an adjustment is made for increases in peak rainfall due to climate change since AD1990 ( $= \text{MAF } Q_o + \text{cc}$ ); then an appropriate "growth factor" is applied to the adjusted MAF  $Q_o + \text{cc}$  to determine the peak run-off rates that would occur from the site during more intense storms. To estimate these more extreme conditions the UK Growth Curve multipliers are taken from the Neil Whittier figures published by the Environment Agency for the South West Region or those from W5-074/ATR/1 Rev.D, as considered most appropriate.



## CALCULATION SHEET

Details: Preliminary Surface Water Drainage Calculations

Project: Colebrook Lane, Cullompton

Project No: P9841



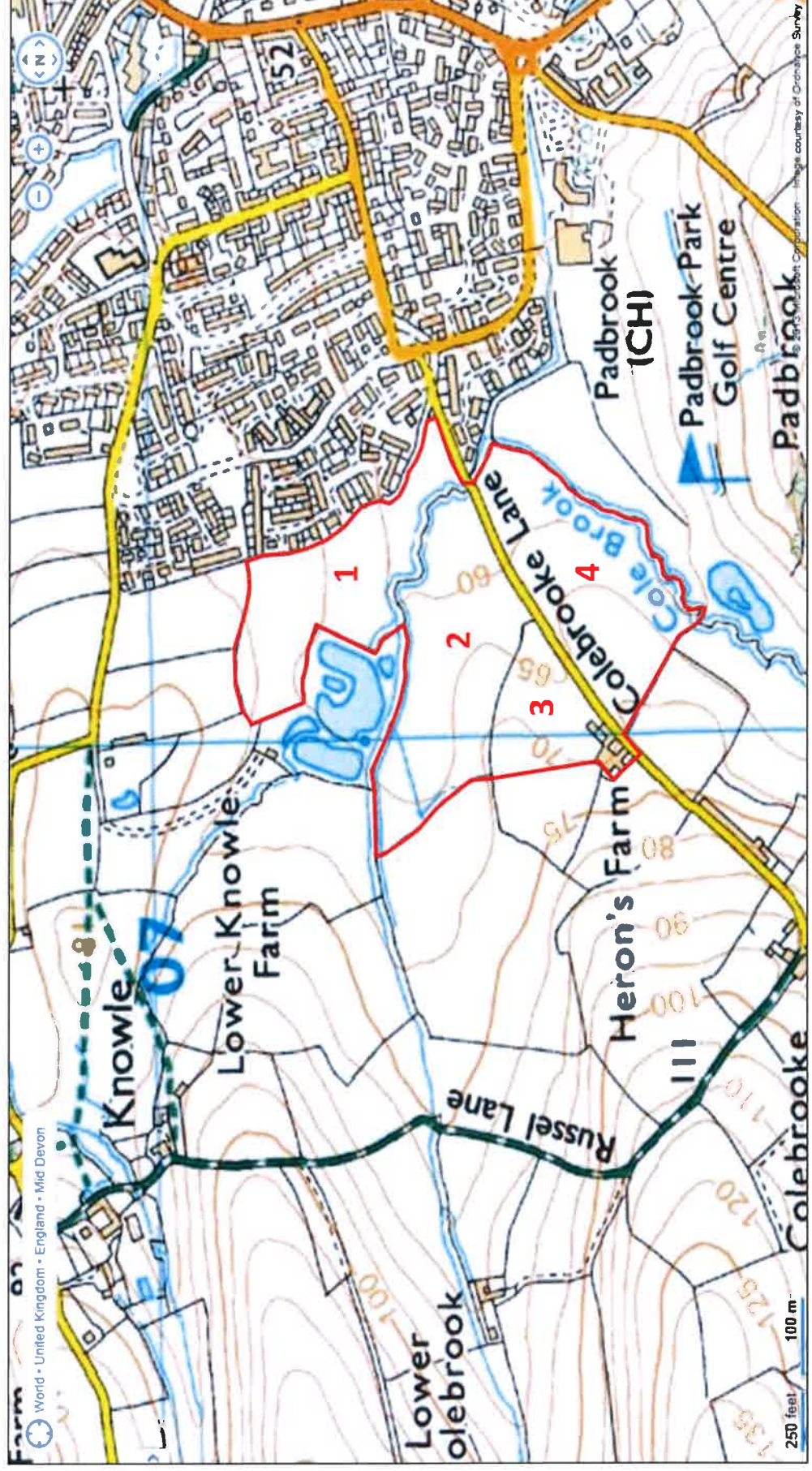
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Site Areas--



# CALCULATION SHEET

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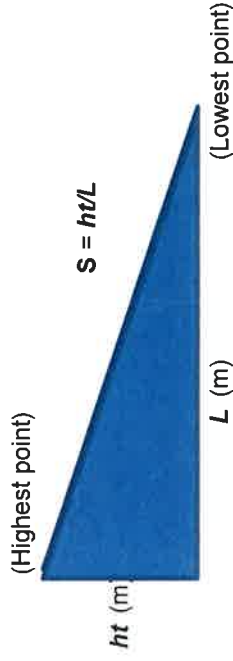
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## Determination of mean Annual Flood $Q_0$

1. Locate a suitable map of the area and determine the catchment area **A** in hectares.

2. Determine the maximum length of catchment **L** in metres

3. Determine the average slope of the catchment **S**



4. Determine the catchment characteristic **C**  $C = 0.0001 \times L/S$

5. Determine the dominant crop type Grass / Arable / Horticultural

6. Determine the average annual rainfall **AAR** in mm

7. Determine the soil type factor **S<sub>T</sub>**

Permeability Class	Range (m/day)	WRAP Class	Soil Index	S <sub>T</sub>
----	----	5	0.50	1.3
Very Slow	< 0.01 - 0.1	4	0.45	1.0
Slow - Mod	0.1 - 0.3	3	0.40	0.8
Moderate	0.3 - 1.0	2	0.30	0.5
Mod - Rapid	1.0 - 10.0	1	0.15	0.1
Rapid	>10	1		0.1

AREA 1	AREA 2	AREA 3	AREA 4	Total Area
5.10 ha	6.10 ha	2.73 ha	5.9 ha	19.83 ha
L = 220 m	180 m	190 m	270 m	
= $\frac{68 - 60}{220}$	= $\frac{70 - 60}{180}$	= $\frac{72 - 62}{190}$	= $\frac{71 - 60}{270}$	
S = 0.036	0.056	0.053	0.041	

C = 0.61	0.32	0.36	0.66	
= G	G	G	G	
AAR = 980 mm	980 mm	980 mm	980 mm	
S <sub>T</sub> = 0.1	0.1	0.1	0.1	



CALCULATION SHEET

Details: Preliminary Surface Water Drainage Calculations

Project: Colebrook Lane, Cullompton

Project No: P9841



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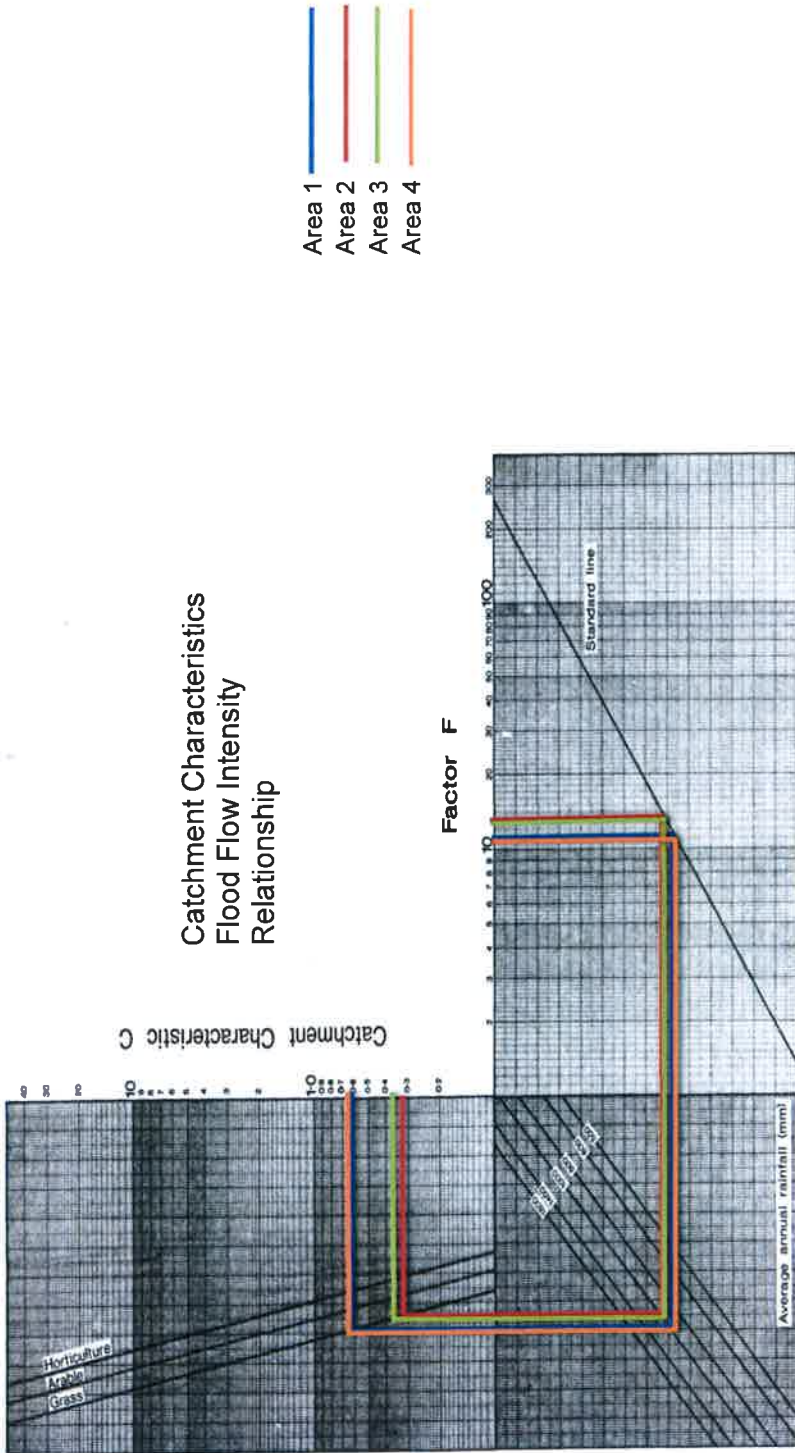
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Determination of mean Annual Flood  $Q_0$  Cont....

8. At figure 4 below, enter the graph at C. Move across (left) to crop type, down to average annual rainfall (AAR), across (right) to the standard line and up to F number.

$F = 11 \quad 13 \quad 12.5 \quad 10.5$

Figure 1. Flood Flow Intensity Relationship





# CALCULATION SHEET

**Details:** Preliminary Surface Water Drainage Calculations

**Project:** Colebrook Lane, Cullompton

**Project No:** P9841



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**Date:** 20/06/2013

**Prepared By:** S.Hurdwell

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## Determination of mean Annual Flood $Q_0$ Cont....

9. Peak flood Flow  $Q_0 = S_T \times F \times A$

$$Q_0 = \begin{matrix} 5.6 & 7.9 & 3.4 & 6.2 \end{matrix}$$

10. Mean Annual Estimated peak flow (+5% for climate change from 1990 figures)

$$Q_0 + cc = \begin{matrix} 5.9 & 8.3 & 3.6 & 6.5 \end{matrix}$$

11. Greenfield run-off Rates -

Return Period (Years)	$Q_2$	MAF (2013) $Q_0 + cc$	$Q_5$	$Q_{10}$	$Q_{30}$	$Q_{50}$	$Q_{100}$
South West Region Multiplier	0.88	1	1.23	1.49	1.89	2.12	2.42
Mean Annual Probability	63%	MAF (2011)	18%	10%	3.30%	2%	1%
Greenfield Discharge Rates (l/s)	5.18	5.89	7.25	8.78	11.13	12.49	14.26
Greenfield Discharge Rates (l/s)	7.33	8.33	10.24	12.41	15.74	17.65	20.15
Greenfield Discharge Rates (l/s)	3.15	3.58	4.41	5.34	6.77	7.60	8.67
Greenfield Discharge Rates (l/s)	5.72	6.50	8.00	9.69	12.29	13.79	15.74
Totals (l/s)	21.39	24.30	29.89	36.21	45.94	51.53	58.82
Totals (l/s/ha)	1.08	1.23	1.51	1.83	2.32	2.60	2.97



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CALCULATION SHEET

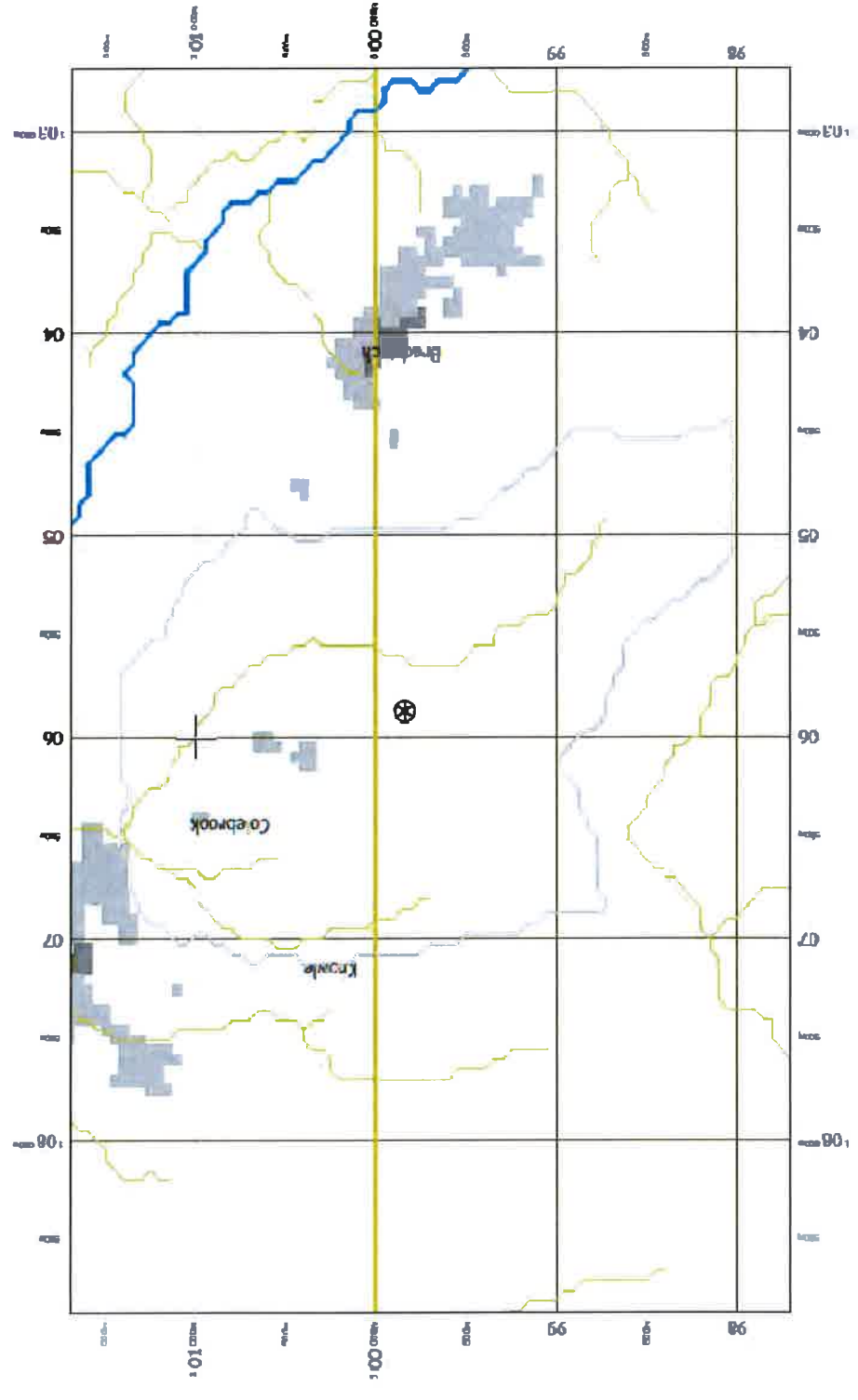
Details: Preliminary Surface Water Drainage Calculations

Project: Colebrook Lane, Cullompton

Project No: P9841

Flood Estimation Handbook Catchment Characteristics

Catchment Plan



Date: 20/06/2013

Prepared By: S.Hurdwell

Checked By: T.Shipp

## CALCULATION SHEET

Details: Preliminary Surface Water Drainage Calculations

Project: Colebrook Lane, Cullompton

Project No: P9841

### Flood Estimation Handbook Catchment Characteristics

#### Catchment Parametres

AREA	= 5.99	C	= -0.02417
ALTBAR	= 120	D1	= 0.37397
ASPBAR	= 69	D2	= 0.2838
ASPVAR	= 0.34	D3	= 0.33345
BFIHOST	= 0.795	E	= 0.281
DPLBAR	= 2.26	F	= 2.49692
DPSBAR	= 113.4	C(1 km)	= -0.026
FARL	= 0.993	D1(1 km)	= 0.378
LDP	= 4.8	D2(1 km)	= 0.293
PROPWET	= 0.42	D3(1 km)	= 0.34
RMED-1H	= 11	E(1 km)	= 0.288
RMED-1D	= 33.4	F(1 km)	= 2.488
RMED-2D	= 42.1		
SAAR	= 928		
SAAR4170	= 981		
SPRHOST	= 18.05		
URBCONC1990	= -999999		
URBEXT1990	= 0		
URBLOC1990	= -999999		

# CALCULATION SHEET

Details: Preliminary Surface Water Drainage Calculations

Project: Colebrook Lane, Cullompton

Project No: P9841



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Date: 20/06/2013

Prepared By: S.Hurdwell

Checked By: T.Shipp

**Summary table of Surface Water Runoff Rates for Comparison**

Method of Calculation	$Q_2$	MAF (2013) $Q_0 + cc$	$Q_5$	$Q_{10}$	$Q_{30}$	$Q_{50}$	$Q_{100}$
Institution of Hydrology Report 124 method (original unmodified version)	0.6 l/s/ha	0.7 l/s/ha	0.9 l/s/ha	1.0 l/s/ha	1.3 l/s/ha	1.5 l/s/ha	1.7 l/s/ha
Institution of Hydrology Report 124 method (as modified by EA Technical Report W5- 074/A/TR/1 Rev.D)	0.6 l/s/ha	0.7 l/s/ha	0.9 l/s/ha	1.1 l/s/ha	1.4 l/s/ha	1.5 l/s/ha	1.8 l/s/ha
ADAS Reference Book 345 "Design of Field Drainage systems"	1.1 l/s/ha	1.2 l/s/ha	1.5 l/s/ha	1.8 l/s/ha	2.3 l/s/ha	2.6 l/s/ha	3.0 l/s/ha

Discussion:

Whilst we understand the ADAS 345 method to be the most realistic we would using the lowest result to give the most conservative baseline rates from the site.



## **Local Plan Review Options: Public Consultation Cullompton**

Representations submitted on behalf of Mr Force and Mr Christian

BMD.15.013.RP.001  
April 2015

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## DOCUMENT HISTORY

Project Number: 15.013		Document Reference: BMD.15.013.RP.001			
Revision	Purpose of Issue	Originated	Reviewed	Approved	Date
-	DRAFT	LB	LB	LB	27.04.2015

**Bradley Murphy Design Ltd**  
1 The Courtyard  
Hatton Technology Park  
Dark Lane  
Hatton  
Warwickshire  
CV35 8XB

Company No. 7788475

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## INTRODUCTION

### PURPOSE OF THE STUDY

Bradley Murphy Design was commissioned by Mr Force and Mr Christian to review and comment on the conclusions set out within the Mid Devon District Council Local Plan Review: Proposed Submission Consultation Sustainability Appraisal February 2015.

The Sustainability Appraisal (SA) has been prepared as part of a wider evidence base to inform the Local Plan making process; the February 2015 Sustainability Appraisal is the result of an iterative appraisal process undertaken by Mid Devon District Council.

Specifically BMD was asked to comment on the findings of sustainability objective A) Protection of the Natural Environment for a number of sites identified for residential development. BMD was also asked to provide a commentary on the likely impact of development on a site of an additional 16.8ha and the combined impact of the 16.8ha site combined with land allocated under Policy CU21. The sites are shown in *Figure 1: Site and Study Area*.

The purpose of the commission was to review: the commentary relating to landscape and visual sensitivity; and the associated scoring within the SA, which reflects the considered likely impact of development on the landscape character and visual context, with and without mitigation.

To enable a view to be reached on the appropriateness or otherwise of the findings, a desktop study for each of the sites was conducted in April 2015. The desktop study included a review of background information about the sites and surrounding landscape context including the existing evidence base relating to landscape character assessment and visual sensitivity. This included:

- Published landscape character assessment;
- Landscape and Visual Appraisal, Strategic Site Options, Mid Devon, September 2014;
- Local Plan Review: Proposed Submission Consultation: Sustainability Appraisal, February 2015;
- Mid Devon Green Infrastructure Assessment 2013.

Further to the desk top study, a site visit to Cullompton was carried out in April 2015. The site visit enabled an understanding of each of the sites' landscape character and their existing visual context, alongside the likely visibility and landscape impact of any development on site. To inform the visual appraisal, a review of viewpoints identified as part of the Peter Brett Associates Landscape and Visual Appraisal, Strategic Site Options, Mid Devon, September 2014 was undertaken, alongside the testing of potential viewpoints identified as part of the desk top study.

A commentary for each site has been compiled which identifies key landscape features, an overview of landscape character and visual context and the likely impacts of development on each site. In commenting on the appropriateness or otherwise of the scoring relating to impact on the Natural Environment, the methodology as set out within the Local Plan Review: Proposed Submission Consultation: Sustainability Appraisal, February 2015 was followed. A summary of the commentary and scoring for each site is collated on Table 1.0 in Appendix 1.

The desktop study, site visit and subsequent written commentary were undertaken at a strategic level to enable a review of an existing appraisal and do not purport to form a separate Landscape and Visual Appraisal. All findings are subject to further site visits to verify the initial appraisals made relating to intervisibility and landscape character.

## **NORTH WEST CULLOMPTON: POLICY CU1-6**

North West Cullompton is a site of 94 ha and is allocated for mixed use development with up to 1150 new dwellings.

The site falls within the Devon Landscape Character Type LCT 3B: Lower Rolling Farmland and Settled Valley Slopes'.

The site lies within a gently rolling landscape with strong undulations, Rull Hill forms a visible high point within the landscape.

The site falls in to two parts, with a northern parcel wrapping around the lower slopes of Rull Hill and the southern parcel straddling Goblin Lane, the sites are separated by areas of proposed Green Infrastructure, which is to include strategic scale GI as well as areas of public open space.

The boundary of the site to the north is formed from field hedgerows, separating the site from open countryside, the eastern boundary lies along the B318 and the western edge of Cullompton. The southern boundary meets the western edge of Cullompton as it extends along Little Toms, and the western boundary is again separated from open countryside by hedgerow and intermittent hedgerow trees forming vertical features within the landscape.

The site comprises pasture and arable farmland and combines an irregular shaped small to medium scale field structure bounded by mature hedgerows and hedgerow trees, some of which are covered by TPO's.

The site is most visible from a variety of points along Goblin Lane PROW running north south through Growen Farm, points along the PROW crossing Rull Hill, and the stretch of the B3181 travelling south where the allocated land borders the road. In addition there are a small number of residential receptors with direct views on to the land. The allocated land is also visible from field gateways along Beacon Lane to the northwest, and from points along Rull Lane travelling from Sutton Barton.

The majority of the site is currently separated from the developed edge of Cullompton through a combination of landform and vegetation. Within views of the site, particularly from the north and west, the developed edge of Cullompton is not a predominant feature. Where development is visible, it appears small scale and nestled amongst the gently rolling landscape. The landscape character is rural, tranquil and settled.

Development would extend the western edge of Cullompton in to open countryside and would change irrevocably the current landscape character. The policy requires 'environmental protection and enhancement' alongside development and a significant proportion of green infrastructure is proposed as part of the allocation. Whilst it is considered that green infrastructure could contribute in part to the integration of the proposed southern parcel of development at Growen Farm with the rural landscape to the west and north, the development of the lower parts of Rull Hill and Rull Lane will contribute to the visible extension of Cullompton in to the rural landscape, reducing the distance between Cullompton and Sutton Barton, and will change the immediate character of the view and landscape context permanently. Even with mitigation it is considered that the overall impact of development will remain negative.

## **EAST CULLUMPTON: POLICY CU7-12**

A site of 160ha to the east of Cullompton is allocated for mixed use development with up to 2100 dwellings.

The site falls within the Devon Landscape Character Type LCT3E: 'Lowland Plains'.

The site is predominantly flat and relatively open, as is the surrounding landscape although the land does gradually rise up to the east with localised high points and variations in topography.

The north, east, and southern boundaries coincide with hedged field boundaries. To the west, a hedged boundary separates the site from a small area of Public Open Space in flood plain next to the River Culm. Where the site is bisected by the Honiton road, lower level hedgerow and fenced boundaries afford wider views across the site.

The site consists of predominantly agricultural farmland, with a medium to large scale field structure. Whilst not all fields are bounded by hedgerows, where these exist they tend to be mature and species rich. Most of the hedgerows are likely to be considered as 'important' under the Hedgerow Regulation Act 1997. Small stands of mature trees also form vertical features within the landscape.

The low lying site, within a wider flatter area of landscape, means that short distance views from the surrounding network of lanes are restricted. Some longer distance, glimpsed views of the site from higher ground to the south west and north west of Cullompton and the Blackdown AONB are available. An absence of PROW across the land results in a high level of visual containment, despite the size of the site. Most sensitive views are from existing dwellings on

the Honiton Road and from a PROW next to the Culm watercourse on the western edge of the site.

The site is currently entirely separate from the urban development of Cullompton, separated by the M5 corridor and the River Culm. The industrial estate to the north west of the land allocation has physically extended the urban fringe across the motorway, but the developed edge of Cullompton is not perceived as crossing the motorway and river corridor. The linear development of Stonyford to the east of the motorway and the flatter more agricultural use of the site result in a more urbanised character to the west of the site, closer to the motorway. Once the vegetated valley is crossed on the Honiton road approximately half way across the land, the landscape character becomes more rural.

Development of this area would create a new urban development, effectively doubling the size of Cullompton. Fields to the west of the site are more readily able to be developed than those to the east beyond the vegetated valley bisecting the site due to the more urbanising elements already present. The land use would change irreversibly, and the more rural landscape character of the site in the east would be impacted upon. The visual perception of the location of Cullompton will change. The policy requires 'environmental protection and enhancement' which will help mitigate the impact, but the SA acknowledges that there will still be an impact on the character of this area. Given the scale of the development and the current open landscape character it is considered that post mitigation the impact of development will remain negative.

## **KNOWLE LANE: POLICY CU13**

A site of 9.8ha of land is allocated for residential development of up to 315 dwellings.

The site is located within the Devon Landscape Character Type LCT 3B: 'Lower Rolling Farmland and Settled Valley Slopes'

The site is bordered by Ponsford Lane to the north and extends across a localised watercourse which will become an integral part of any development. The eastern boundary of the site links with the existing urban edge of Cullompton, the western boundary tapers with the localised watercourse.

The site is currently used as pasture and is part of a localised low lying valley landscape, the site is in close proximity to a number of TPO'd trees close to the north eastern corner of the site, small scale field boundaries are defined by hedgerows and lines of maturing hedgerow trees.

The site is visually well contained, with the most sensitive viewpoints restricted to views across to the site beyond hedgerows from Knowle Lane and a short stretch of PROW crossing from Ponsford Lane. Glimpsed views across the site are also available from gateways on Ponsford Lane. The existing edge of Cullompton is a visible feature of views towards the site.



The site has a strong degree of intervisibility with the urban edge of Cullompton lying to the east, new development within the town is visible extending along the watercourse towards the site. The existing landscape of the site is pastoral and settled with prominent built form and infrastructure associated with the town giving the site more of an urban edge character.

Development within the site represents a continuation of the existing western edge of Cullompton. Development will extend in to open countryside, and land use will be altered permanently, but the backdrop of the existing townscape will remain an influencing characteristic within localised views. Mitigation is likely to include green infrastructure along the watercourse. It is considered that the impact of development will be mitigated for through the introduction of new SuDS and native planting resulting in a neutral effect post mitigation.

## **WARE PARK AND FOOTLANDS: POLICY CU14**

A site of 2.1ha is allocated for residential development of up to 38 dwellings.

The site is located within the Devon Landscape Character Type LCT 3B: 'Lower Rolling Farmland and Settled Valley Slopes'

The site lies to the west of the Knowle Lane site CU13. The site extends to the western end of Knowle Lane and meets the watercourse at its northern boundary.

Development within the site will represent a continuation of any development at the Knowle Lane site. Given the visual containment of the site in conjunction with development to the north and east, landscape and visual impact is likely to be minimal. Taking in to account mitigation that would include green infrastructure along the watercourse. It is considered that the impact of development would result in a neutral effect post mitigation.

## **LAND AT EXETER ROAD, CULLOMPTON: POLICY CU15**

A site of 1.4ha is allocated for residential development of up to 38 dwellings.

The site falls within Devon Landscape Character Type LCT 3A: 'Upper Farmed and Wooded Valley Slopes'

The site is bordered to the north by the existing development of Heyridge Meadow. The B3183 lies to the eastern boundary, the Culm Vale Bowls Club, accessed from the B3183 will remain at the centre of the development. The southern boundary incorporates a stand of maturing trees which screen wider views from the south. To the west of the site, landform rises sharply towards Padbrook Hill.

The site has small number of dwellings on it currently, the Culm Valley bowls club lies at the centre of the site, but does not form part of the allocation. The existing built form and

relationship to the urban edge of Cullompton results in an estate character across the site, with maturing trees within maintained grounds a feature of the landscape. An Oak tree borders the roadside covered by a temporary TPO.

The site is visible from the B3183 as you enter the outer limits of Cullompton, but remains relatively well contained from wider views as a result of rising landform and intervening vegetation which form an effective screen from the south and west.

The site's uses and relationship with adjacent development to the northwest give the site a more urban character, although maturing vegetation bordering the roadside to the east and west, and pasture rising sharply to the west, offset this to a degree.

Development on this site will extend the urban edge of Cullompton. The more wholesale development of this site will be in contrast to the more open nature of the site at present and will remain visible from the B3183. Mitigation will be provided through policies S9 'Environment' and DM1 'High Quality Design'. Overall the impact of development on the site is considered to be neutral post mitigation.

## **CUMMINGS NURSERY: POLICY CU16**

A site of 2.78ha at Cummings Nursery is allocated for residential development of up to 120 dwellings.

The site falls within the Devon Landscape Character Type LCT 3E: 'Lowland Plains'

The site is a former plant growing nursery, the footprint of the land consists of a number of derelict greenhouses. The site is bordered to the east by the residential development of Culm Lea and to the north by River Drive, both accessed from Honiton Road. To the south, lie arable fields associated with the nursery site. These currently lie within a separate allocation (CU7-12). To the west, lies the flood plain of the River Culm and a PROW bordering the site.

The site is visually well contained within wider views from the north, east and west, although the greenhouses are a visible feature of the footpath walking north next to the river and from within longer distance views from higher ground from parts of south east Cullompton. Here the greenhouses are seen against the backdrop of the existing industrial estate.

The site's location adjacent to residential development to the east and north, coupled with the visual relationship of the site with the industrial estate to the north gives the site an urban edge quality. The use of coniferous trees as a boundary with the flood plain to the west exacerbate this.

Development of the site would change the land use, replacing the existing derelict greenhouses with residential development. The development of this site, taken in isolation, is unlikely to affect the wider landscape character or visual amenity to a large degree. The inclusion of GI to

replace existing coniferous hedgerows with more native boundaries would offset any negative impacts resulting in a neutral effect post mitigation.

## **LAND AT COLEBROOK: POLICY CU21**

A site of 4.8 ha is allocated for residential development of up to 100 dwellings.

The south of the site is located within the Devon Landscape Character Type LCT 3C: 'Sparsely Settled Farmed Valley Floors' the northern portion of the site lies within the LCT 3B: 'Lower Rolling Farmland and Settled Valley Slopes'.

The site forms part of a gently rolling landscape meeting the urban edge of Cullompton to the east and fishing lakes associated with Kia Ora farm in the northwest corner. The land rises up to border the rugby club in the north.

The site is bounded by Cole Brook to the west, and the urban edge of Cullompton to the east and south beyond Colebrook Lane, elsewhere hedgerows separate the site from adjacent land.

The site is currently used for pasture and is part of a small scale field structure that extends west up through a localised valley. Hedgerow boundaries and intermittent hedgerow trees are a feature of the site as is mature vegetation associated with the watercourse on the western boundary.

The site is visually well contained; it is visible within localised views at the bottom of the valley leaving Cullompton, but screened beyond vegetation and intervening landform from longer distance viewpoints. The most sensitive receptors will include pedestrians on the PROW on Russel Lane, from which glimpsed views are available of the site from localised high points. The townscape of Cullompton forms a predominant feature of longer distance views from the PROW creating an urban backdrop to a rural foreground.

The site has a strong association with the western and southern edge of Cullompton, separated from it by a vegetated boundary. The bridge crossing Cole Brook at the western edge of the site effectively forms the edge of urban development, and gives the site more of an urban fringe character; beyond the bridge Colebrook Lane winds up through a pastoral and tranquil landscape.

Development of the site would extend the urban edge marginally to the west. Whilst land use and immediate landscape character would change, the wider landscape and visual amenity would be less affected. The site is relatively small in scale and is locally visually contained, where the site is visible within longer distance views the site will be seen against the backdrop of the existing development of Cullompton. A proportion of Green Infrastructure is proposed as part of the allocation within an area of flood plain within the site. Given the relationship of the site to the existing urban edge and the screening of the site offered by the existing vegetated

boundaries, it is considered that post mitigation the impact of development on the site would be neutral.

## **LAND AT COLEBROOK 16.8HA**

The site has not been allocated within the Local Plan Review February 2015, but has been previously considered and is partially discussed within the SA in relation to Policy CU21.

The site lies within the Devon Landscape Character Type LCT3C 'Sparsely Settled Farmed Valley Floors' the western half of the site lie within the LCT 3B: Lower Rolling Farmland and Settled Valley Slopes'.

The site forms part of a gently rolling landscape at the floor of a localised valley. The site extends from the southern urban edge of Cullompton up towards Colebrook and north to meet the Kia Ora fishing lakes.

The northern boundary of the site is formed with the fishing lakes at Kia Ora farm. The eastern and southern boundaries follow the vegetated watercourse of Cole Brook. The western boundary is hedged in the south at the point up to the point at which Colebrook Lane bisects the site, to the north of Colebrook Lane it cuts across two fields to reach the watercourse, with no apparent boundary edge.

The site is currently used for pasture and features hedgerow field boundaries with mature hedgerow trees at intervals which give a degree of compartmentalisation. The watercourse and fishing lakes are more strongly vegetated and visually define the watercourse from longer distances.

The rising landscape to the west and north result in relatively locally contained views. The most sensitive receptors will include pedestrians on the PROW on Russel Lane, from which more open views are available of the site from localised high points. The urban development of Cullompton forms a predominant feature of longer distance views from the PROW.

The site is currently physically separated from the urban edge of Cullompton by Cole Brook and the current pasture land associated with Policy CU21. The landscape character of the site is pastoral and tranquil; there is a visual perception of Cullompton when travelling east towards the town and from PROW on Russel Lane as it features within views.

Development would extend the urban edge of Cullompton in to the rural open countryside and would reduce the gap between Colebrook and Cullompton. The current land use and landscape character would alter irreversibly beyond Cole Brook. Within longer distance views from PROW along Russel Lane, whilst the urban edge of the town would appear closer, the backdrop of Cullompton would remain in view; new development would be seen against the backdrop of the existing townscape. As elsewhere, new GI would be incorporated as part of the proposals to integrate development with the wider landscape, including the retention of



existing hedgerows and trees where possible. Post mitigation it is considered that the impact of development will still result in a negative impact.

## **COMBINED SITE OF LAND AT COLEBROOK AND ADDITIONAL 16.8HA**

BMD was asked to consider the impacts of development on a combined site comprising Land at Colebrook and the additional 16.8ha adjacent to it.

The rising landscape to the west and north result in relatively locally contained views. The most sensitive receptors will include pedestrians on the PROW on Russel Lane, from which more open views are available of the site from localised high points. The urban development of Cullompton forms a predominant feature of longer distance views from the PROW.

The combined site is currently separated from the western and southern edge of Cullompton by a vegetated boundary. The bridge crossing Cole Brook at the western edge of the site effectively forms the edge of urban development, and gives the eastern portion of the site more of an urban fringe character. Beyond the bridge, Colebrook Lane runs through the western portion of the site which has a more pastoral and tranquil landscape character.

Development would extend the urban edge of Cullompton in to the rural open countryside and would reduce the gap between Colebrook and Cullompton. The current land use and landscape character would alter irreversibly beyond Cole Brook. Within longer distance views from PROW along Russel Lane, whilst the urban edge of the town would appear closer, the backdrop of Cullompton would remain in view; new development would be seen against the backdrop of the existing townscape. As elsewhere, new GI would be incorporated as part of the proposals to integrate development with the wider landscape, including the retention of existing hedgerows and trees where possible. Post mitigation it is considered that the impact of development will still result in a negative impact.

## **SUMMARY**

Whilst for the most part the BMD scoring is consistent with the scoring recorded in the SA there are two inconsistencies:

- **Northwest Cullompton CU1-6:** BMD record a post mitigation score of -2 to the SA's score of 0. Whilst it is considered that green infrastructure could contribute in part to the integration of the proposed southern parcel of development at Growen Farm with the rural landscape to the west and north, the development of the lower parts of Rull Hill and Rull Lane will contribute to the visible extension of Cullompton in to the rural landscape, reducing the distance between Cullompton and Sutton Barton, and will change the immediate character of the view and landscape context permanently. Even with mitigation it is considered that the overall impact of development will remain negative.

- **Land at Exeter Road CU15:** BMD record an impact score of -1 to the SA's score of -2. The site's uses and relationship with adjacent development to the northwest give the site a more urban character, although maturing vegetation bordering the roadside to the east and west, and pasture rising sharply to the west, offset this to a degree. Overall the impact of development on the site is considered to be neutral post mitigation.

In assessing the additional land of 16.8ha both in isolation and in combination with CU21 the following scores were recorded.

- **Additional Land 16.8ha:** BMD record an impact score of -2, with a post mitigation score of -1
- **Combined site:** BMD record an impact score of -2, with a post mitigation score of -1

## APPENDICES

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## **A. BASELINE FIGURES**

- Figure 01: Site and Study Area
- Figure 02: Landscape Summary Table

Figure 2.0 Landscape and Visual Impact Summary Table

Policy Allocation	Sustainability Objective A) Protection of the Natural Environment: Commentary	Impact		Mitigation	Post Mitigation	
		SA	BMD		SA	BMD
North West Cullompton CU1-CU6	The majority of the site is currently separated from the developed edge of Cullompton through a combination of landform and vegetation. Within views of the site, particularly from the north and west, the developed edge of Cullompton is not a predominant feature. Where development is visible, it appears small scale and nestled amongst the gently rolling landscape. The landscape character is rural, tranquil and settled.	-3	-3	Development would extend the western edge of Cullompton in to open countryside and would change irrevocably the current landscape character. The policy requires 'environmental protection and enhancement' alongside development and a significant proportion of green infrastructure is proposed as part of the allocation. Whilst it is considered that green infrastructure could contribute in part to the integration of the proposed southern parcel of development at Growen Farm with the rural landscape to the west and north, the development of the lower parts of Rull Hill and Rull Lane will contribute to the visible extension of Cullompton in to the rural landscape, reducing the distance between Cullompton and Sutton Barton, and will change the immediate character of the view and landscape context permanently. Even with mitigation it is considered that the overall impact of development will remain negative.	0	-2
East Cullompton CU7-CU12	The site is currently entirely separate from the urban development of Cullompton, separated by the M5 corridor and the River Culm. The industrial estate to the north west of the land allocation has physically extended the urban fringe across the motorway, but the developed edge of Cullompton is not perceived as crossing the motorway and river corridor. The linear development of Stonyford to the east of the motorway and the flatter more agricultural use of the site result in a more urbanised character to the west of the site, closer to the motorway. Once the vegetated valley is crossed on the Honiton road approximately half way across the land, the landscape character becomes more rural.	-2	-2	Development of this area would create a new urban development, effectively doubling the size of Cullompton. Fields to the west of the site are more readily able to be developed than those to the east beyond the vegetated valley bisecting the site due to the more urbanising elements already present. The land use would change irreversibly, and the more rural landscape character of the site in the east would be impacted upon. The visual perception of the location of Cullompton will change. The policy requires 'environmental protection and enhancement' which will help mitigate the impact, but the SA acknowledges that there will still be an impact on the character of this area. Given the scale of the development and the current open	-1	-1



Figure 2.0 Landscape and Visual Impact Summary Table

				landscape character it is considered that post mitigation the impact of development will remain negative.		
Knowle Lane CU13	The site has a strong degree of intervisibility with the urban edge of Cullompton lying to the east, new development within the town is visible extending along the watercourse towards the site. The existing landscape of the site is pastoral and settled with prominent built form and infrastructure associated with the town giving the site more of an urban edge character.	-1	-1	Development within the site represents a continuation of the existing western edge of Cullompton. Development will extend in to open countryside, and land use will be altered permanently, but the backdrop of the existing townscape will remain an influencing characteristic within localised views. Mitigation is likely to include green infrastructure along the watercourse. It is considered that the impact of development will be mitigated for through the introduction of new SuDS and native planting resulting in a neutral effect post mitigation.	0	0
Ware Park and Footlands CU14	The site lies to the west of the Knowle Lane site CU13. The site extends to the western end of Knowle Lane and meets the watercourse at its northern boundary.	0	0	Development within the site will represent a continuation of any development at the Knowle Lane site. Given the visual containment of the site in conjunction with development to the north and east, landscape and visual impact is likely to be minimal. Taking in to account mitigation that would include green infrastructure along the watercourse. It is considered that the impact of development would result in a neutral effect post mitigation.	0	0
Land at Exeter Road, Cullompton CU15	The site's uses and relationship with adjacent development to the northwest give the site a more urban character, although maturing vegetation bordering the roadside to the east and west, and pasture rising sharply to the west, offset this to a degree.	-2	-1	Development on this site will extend the urban edge of Cullompton. The more wholesale development of this site will be in contrast to the more open nature of the site at present and will remain visible from the B3183. Mitigation will be provided through policies S9 'Environment' and DM1 'High Quality Design'. Overall the impact of development on the site is considered to be neutral post mitigation.	0	0

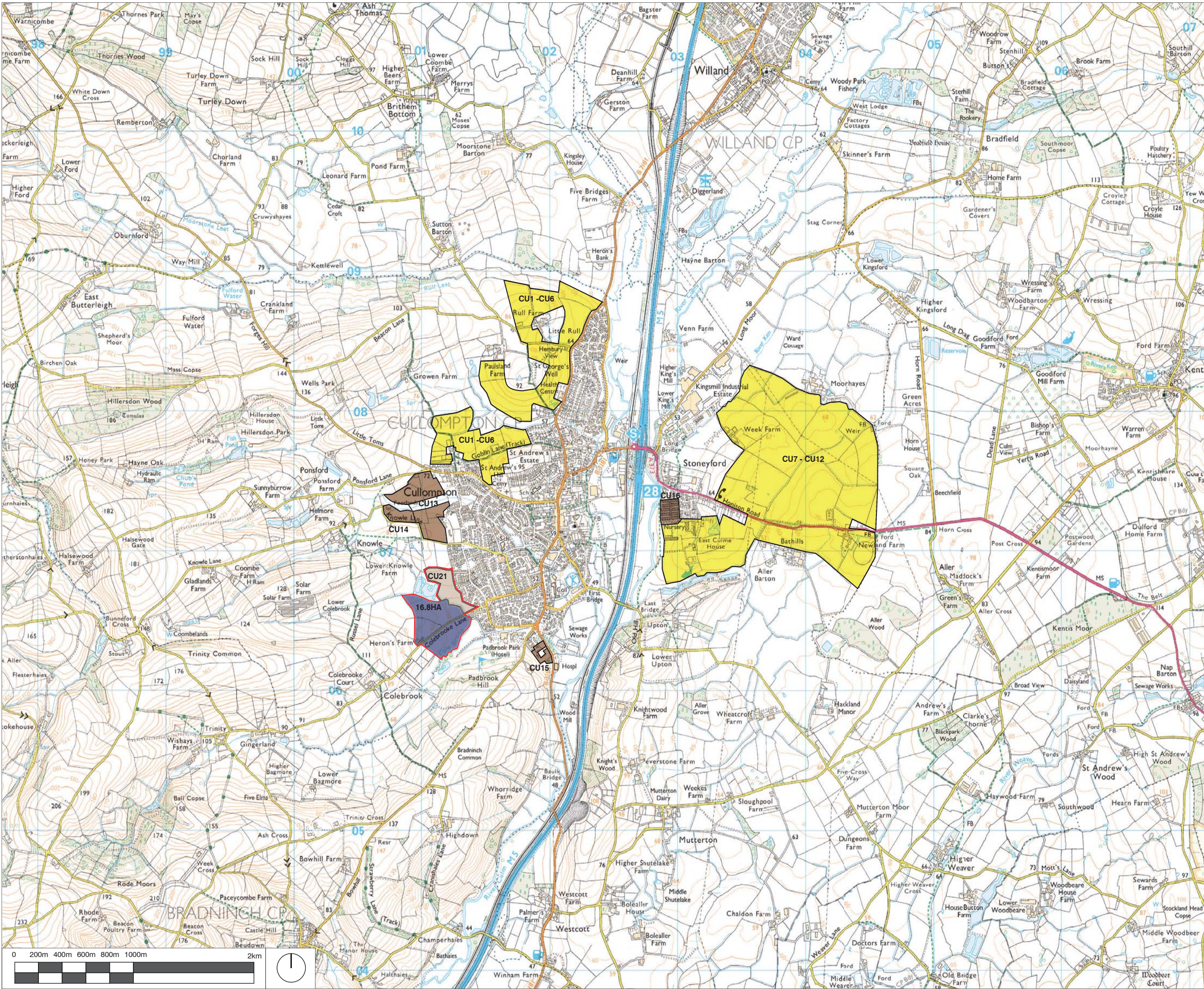
Figure 2.0 Landscape and Visual Impact Summary Table

Cummings Nursery CU16	The site's location adjacent to residential development to the east and north, coupled with the visual relationship of the site with the industrial estate to the north gives the site an urban edge quality. The use of coniferous trees as a boundary with the flood plain to the west exacerbate this.	0	0	Development of the site would change the land use, replacing the existing derelict greenhouses with residential development. The development of this site, taken in isolation, is unlikely to affect the wider landscape character or visual amenity to a large degree. The inclusion of GI to replace existing coniferous hedgerows with more native boundaries would offset any negative impacts resulting in a neutral effect post mitigation.	0	0
Land at Colebrook CU21	The site has a strong association with the western and southern edge of Cullompton, separated from it by a vegetated boundary. The bridge crossing Cole Brook at the western edge of the site effectively forms the edge of urban development, and gives the site more of an urban fringe character; beyond the bridge Colebrook Lane winds up through a pastoral and tranquil landscape.	-1	-1	Development of the site would extend the urban edge marginally to the west. Whilst land use and immediate landscape character would change, the wider landscape and visual amenity would be less affected. The site is relatively small in scale and is locally visually contained, where the site is visible within longer distance views the site will be seen against the backdrop of the existing development of Cullompton. A proportion of Green Infrastructure is proposed as part of the allocation within an area of flood plain within the site. Given the relationship of the site to the existing urban edge and the screening of the site offered by the existing vegetated boundaries, it is considered that post mitigation the impact of development on the site would be neutral.	0	0
Additional 16.8ha	The site is currently physically separated from the urban edge of Cullompton by Cole Brook and the current pasture land associated with Policy CU21. The landscape character of the site is pastoral and tranquil; there is a visual perception of Cullompton when travelling east towards the town and from PROW on Russel Lane as it features within views.	NA	-2	Development would extend the urban edge of Cullompton in to the rural open countryside and would reduce the gap between Colebrook and Cullompton. The current land use and landscape character would alter irreversibly beyond Cole Brook. Within longer distance views from PROW along Russel Lane, whilst the urban edge of the town would appear closer, the backdrop of Cullompton would remain in view; new development would be seen against the backdrop of the existing townscape. As elsewhere, new GI would be incorporated as part of the proposals to integrate development with the wider landscape, including the retention of existing hedgerows and trees where possible.	NA	-1

Figure 2.0 Landscape and Visual Impact Summary Table

				Post mitigation it is considered that the impact of development will still result in a negative impact.		
Combined Site CU21 +Additional 16.8ha	The combined site is currently separated from the western and southern edge of Cullompton by a vegetated boundary. The bridge crossing Cole Brook at the western edge of the site effectively forms the edge of urban development, and gives the eastern portion of the site more of an urban fringe character. Beyond the bridge, Colebrook Lane runs through the western portion of the site which has a more pastoral and tranquil landscape character.	NA	-2	Development would extend the urban edge of Cullompton in to the rural open countryside and would reduce the gap between Colebrook and Cullompton. The current land use and landscape character would alter irreversibly beyond Cole Brook. Within longer distance views from PROW along Russel Lane, whilst the urban edge of the town would appear closer, the backdrop of Cullompton would remain in view; new development would be seen against the backdrop of the existing townscape. As elsewhere, new GI would be incorporated as part of the proposals to integrate development with the wider landscape, including the retention of existing hedgerows and trees where possible. Post mitigation it is considered that the impact of development will still result in a negative impact.	NA	-1





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KEY

RESIDENTIAL ALLOCATIONS IN CULLOMPTON (2013 - 2033)

- PROPOSED MIXED USE ALLOCATION
  - CU1 - 6 - NORTH WEST CULLOMPTON
  - CU7 - 12 - EAST CULLOMPTON
- PROPOSED RESIDENTIAL ALLOCATION
  - CU13 - KNOWLE LANE
  - CU14 - WARE PARK & FOOTLANDS
  - CU15 - LAND AT EXETER ROAD
  - CU16 CUMMINGS NURSERY
- PROPOSED CONTINGENCY HOUSING SITE ALLOCATION
  - CU21 - COLEBROOKE
- ADDITIONAL LAND 16.8HA
- COMBINED SITE BOUNDARY

SOURCE:  
MID DEVON LOCAL PLAN 2013 - 2033  
PUBLICATION STAGE POLICIES MAP - CULLOMPTON

Rev	Description	Date
	Purpose of Issue	

Information

Bradley Murphy Design Ltd  
1 The Courtyard  
Hatton Technology Park  
Dark Lane  
Hatton  
Warwickshire  
CV35 8XB  
  
t: 01926 676496  
e: info@bradleymurphydesign.co.uk  
www.bradleymurphydesign.co.uk  
Client

BMD

LANDSCAPE  
DESIGN  
PLANNING

GENESIS TOWN PLANNING


Project  
COLEBROOKE, CULLOMPTON

Drawing Title  
FIGURE 01: SITE AND STUDY AREA

Drawn	Checked	Approved	Date
JP	JP	LB	27/04/2015
Job No. 15.013	Scale As Shown	Sheet Size A3	Revision

Drawing Number  
BMD.15.013.RP01.FIGURE 1



	<p>Objects to exclusion of 16.8ha site as a full allocation within the plan / objects to inclusion of 4.8 ha as contingency site only. Minimum of 400 dwellings should be allocated with site area of 21.6ha – new allocation required as contribution to additional housing requirement (criticises annual target). Failure to allocate site ignores findings of Council's Sustainability Appraisal and SHLAA assessment and the promoter's highways and flood reports (provided with representation). Sites CU14 and CU15 should be made contingency sites instead (as both score less). Without making requested changes considers plan to run risk of being found unsound.</p>	<p>Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p> 	<p>The Council has proposed to amend the annual housing target in the plan to reflect the final SHMA report. The scoring of the site is not dissimilar to that for CU14 and CU15, however those sites are almost exclusively flood zone 1 so are sequentially preferable. Furthermore, transport modelling undertaken by the highway authority indicates that significant mitigation to the M5 junction would need to be undertaken before any further development takes place. The site is of a scale that is significant enough to affect the cumulative impact on infrastructure and require additional works to the M5 junction which this site alone cannot mitigate. An amendment is proposed to the text to clarify that the site can only come forward if it can be demonstrated that it does not result in a significant adverse impact on the capacity of Junction 28 and also to clarify that it is the completion of the NW Cullompton through route, rather than the Town Centre Relief Road, which sets a limitation on the earliest point that the site could come forward. It is not agreed that CU14 and CU15 are preferable contingency options as they do not have the quantum of development to be effective as a contingency.</p>
	<p>Accompanying appraisal (submitted with rep) states landscape impact is same as other allocated large sites in Cullompton, i.e. negative impact.</p>	<p>Mr Christian &amp; Mr Force c/o Genesis Town Planning (3780)</p>	<p>Submission of landscape impact noted. Generally reaches same scoring conclusions but assumes greater impact with regard to NW Cullompton and less for Exeter Road allocation.</p>