

**From:** Local Plan Review  
**Subject:** FW: land at Honiton Road , Cullompton  
**Attachments:** cullompton reps feb 2017.docx; cullompton plans.pdf; cullompton 2014 reps.pdf

**From:** Iain Bath [REDACTED]  
**Sent:** 13 February 2017 11:45  
**To:** Local Plan Review  
**Cc:** [REDACTED] Mike Dove  
**Subject:** land at Honiton Road , Cullompton

Dear Sirs , please find attached representations submitted on behalf of my clients

I would be grateful if you could confirm receipt of these representation today

Kind regards

4216/CU17  
4216/CU7-CU12  
4216/CU19  
4216/DEVSTRA  
4216/S1  
4216/S2/mod  
4216/S3  
4216/S4  
4216/S6  
4216/S8  
4216/S11  
4216/CUMAP

## IAIN BATH PLANNING

Local Plan Review Consultation  
Forward Planning  
Mid Devon District Council  
Pheonix House  
Tiverton  
EX16 6PP

13th February 2017

Dear Sirs,

Re : Land at Honiton Road , Cullompton

I write on behalf of my clients , the landowners of the above site.

I previously submitted duly made representations on their behalf to the Local Plan Options Consultation in March 2014 a copy of which are attached to this letter.  
I enclose a site plan for your background information indicating my client's precise ownership boundaries edged red.

The following comments are submitted as part of the formal public consultation exercise on the Mid Devon District Local Plan Review Proposed Submission ( incorporating proposed modifications ) Document, and specifically relative to the Plan's proposals set out within the document in relation to the settlement of Cullompton which includes reference to my client's land.

For clarity the relevant Plan references associated with my client's land are as follows –

- GI – proposed green infrastructure
- CU17 – proposed commercial allocation
- CU7 – CU12 –proposed mixed use allocation
- CU19 – proposed area for town centre relief road

A copy of the Plan's policy map is also attached to this submission with my client's landholding overlaid onto it for clarity.

### 1 Local Plan Spatial Strategy

The Local Plan document currently contains the following details relevant to consideration of the development potential of my client's landholding –

- In the medium to long term Cullompton will become the strategic focus of new development reflecting its accessibility, economic potential and environmental capacity. This is proposed to include sustainable urban extensions containing a mix of uses and transport and infrastructure improvements.

My client's support this objective but suggest that reference should also be included within the Plan to short term provision as Cullompton will need to provide the envisaged scale of development throughout the Plan period.

- Cullompton has limited environmental constraints and long term growth potential to the east of the town. The Town Council is supportive of increased growth rates and as such Cullompton is the appropriate focus for the District's growth.

Again my client's support this objective but suggest that development to the east of the town should be envisaged now and throughout the Plan period and not just referenced as long term potential.

## 2 Development Strategy

- 7860 dwellings are required over the Plan period within the District and the residual requirement is stated as 4924 dwellings. The requirement for Cullompton is 3930 dwellings with a currently stated residual requirement of 3323 dwellings. The mixed use allocation reference CU7-CU12 envisages provision of 1750 dwellings over the Plan period but with no provision coming forward until 2024-25.

My client's support the identified focus and scale of residential development put forward for the town but suggest that it should come forward in the early years of the plan and throughout the Plan period as a whole. Such an approach would give early impetus to the strategic growth of Cullompton.

It is noted that part of my client's land is included within this overall mixed use allocation and this is supported.

My client's would welcome early discussion with the LPA on the overall Masterplan proposals for the CU7-CU12 site to properly identify and agree the most appropriate land use(s) for their land.

- In relation to commercial allocations the Plan makes it clear that these are consistent with the overall strategy and housing locations for longer term growth at Cullompton. My client's support the general principle of this but consider that shorter term growth should also be encouraged within the Plan.

## 3 Strategic Policies

- Policy S1 – development focused at Cullompton as one of the District's most sustainable settlements with growth to the east of the town is supported by my client's. However, they consider that earlier growth particularly to the east of the town should be explicitly encouraged within the Plan.
- Policy S2 – the concentration of commercial and housing development to Cullompton as one of 3 main settlements of the District is supported by my client's as are the targets of 3930 dwellings and 73,500sqm of commercial floorspace.
- Para 2.21 – central to policy S2 is the role of Cullompton in meeting the District's long term development needs. The expansion of the town being both achievable and supported by the Town Council is supported by my client's. Again however, they consider policy S2 should be worded to enable this objective to be realised in the short term and throughout the Plan period.
- Para 2.22 – new infrastructure investment in Cullompton is envisaged particularly to the east of the town and my client's support this which will assist in delivering the scale of growth envisaged. They do however note that part of the area identified on the policy map as an area for a proposed town centre relief road includes some of their land immediately adjacent to the north of Honiton Road and in this regard they would appreciate early dialogue with the LPA as to progress, route and associated details.
- Policy S3 – the affordable housing targets are noted by my client's and the acceptance of viability detail as part of any discussions on this aspect is noted.
- Policy S4 – housing delivery figures should be reconsidered and apportioned to earlier years of the Plan period for residential development to come forward in Cullompton and particularly to the east of the town.
- Policy S6 – the identification of employment generating uses within the East Cullompton allocation is noted by my client's.
- Policy S8 – my client's acknowledge that this infrastructure policy underpins the proposed East Cullompton allocation and as previously stated they look forward to early discussions with the LPA on these aspects.
- Para 2.54 – my client's note that development as part of the East Cullompton site will not be liable to CIL but will be subject to appropriate S106 obligations informed by viability assessment at the time of planning application submissions.

## 4 Cullompton

- Policy S11 – the town will become the strategic focus of new development reflecting its accessibility, economic potential and environmental capacity. This is supported by my client's and they would appreciate early dialogue with the LPA to discuss the role their landholding will play in delivering the policy objectives for Cullompton set out within the Plan. Within this context the envisaged Masterplan and phasing strategy referenced within paragraph 2.68 of the Plan to ensure the integration of infrastructure and new development is acknowledged as an appropriate approach by my client's who are keen, through discussion with the LPA, to be actively engaged in the process moving forward.
- The table at paragraph 2.69 of the plan identifies 1750 dwellings and 20,000sqm of commercial floorspace as part of the East Cullompton allocation. Whilst my client's support the identification of the allocation they consider that the level of dwellings proposed should be increased to at least the previous figure of 2100 dwellings.
- The table also identifies at policy allocation CU17 another part of my client's land and the provision of 15,000sqm of commercial floorspace. My clients consider that rather than being a separate allocation that CU17 should be integrated into the overall East Cullompton site allocation.

## 5 Site Allocations

- Para 3.62 – my clients note that the Cullompton Town Council is preparing a Neighbourhood Plan and would wish to be actively involved with this process.
- The table within paragraph 3.64 identifies 1750 dwellings within the East Cullompton allocation and as stated earlier my client's consider this figure should be increased to at least 2100 dwellings.
- The table within paragraph 3.67 identifies 20,000sqm of commercial development within the CU7 allocation and 15,000sqm within the CU17 allocation and my client's would welcome the opportunity to discuss site boundaries and the mix and location of land uses within the context of their landholding.

## 6 Policy CU7

East Cullompton – this allocation for mixed use development is supported by my client's but they suggest that the stated dwelling provision be increased to at least 2100 dwellings. Other aspects of the policy are noted and would be addressed as part of the preparation of a Masterplan for the site and subsequently through planning application submissions.

The emerging proposals for J28 M5 improvements at paragraph 3.98 of the Plan are noted and my clients look forward to receiving more details on this aspect and being part of discussions moving forward on the overall CU7 allocation Masterplan. In this regard the mention at paragraph 3.101 of the Plan is acknowledged by my client's who reiterate their desire to be fully involved in this process as it comes forward and the preparation of a supplementary planning document to guide the overall development.

## 7 Policies CU8 – CU12

The requirements of these various policies are all noted by my client's who look forward to being a party to the overall Masterplan discussions on the CU7 allocation in due course.

## 8 Policy CU17

This site of 10.7 hectares is partly within the ownership of my client's who support its identification for development within the Plan which at present suggests 15,000sqm of employment development within the B2-B8 use classes.

## IAIN BATH PLANNING

Given that reference is made within the policy to both M5 access improvements and the provision of green infrastructure my client's suggestion is to include the CU17 allocation within the wider CU7 allocation thereby benefitting from the overall Masterplan approach.

My clients note that alternative employment generating uses on the site would be considered on their merits and this flexibility is supported.

### 9 Policy CU19

My client's note that the route of the Town Centre Relief Road is as yet undetermined and will be the subject of public consultation.

My client's support the principle of such enhanced infrastructure and look forward to learning more about this proposal as part of ongoing dialogue with the LPA.

### 10 Green Infrastructure

The identified area of green infrastructure to the west of the policy CU17 allocation should also be included within the overall CU7 allocation so that this land too can benefit from an overall Masterplanning approach to this eastern side of Cullompton .

### SUMMARY

It is evident from the Local Plan that my client's landholding forms an integral part of the LPA's strategic focus for new development to the east of Cullompton and as such they wish to indicate their support to this approach and advise of their willingness to be active participants in the delivery of this strategic objective during the Plan period and in particular play a fundamental role as part of the envisaged Masterplan for this area of the town.

My client's confirm their desire to bring forward their land for development at the earliest opportunity and are happy to provide any further detail that would assist the Lpa moving forward.

In the meantime I would be grateful to receive written acknowledgement of these comments as duly made representations to this stage of the Local Plan and to progressing discussions in due course.

Yours sincerely



**Iain Bath BA (Hons) MRTPI**





PLAN 1.

Port of Los Angeles

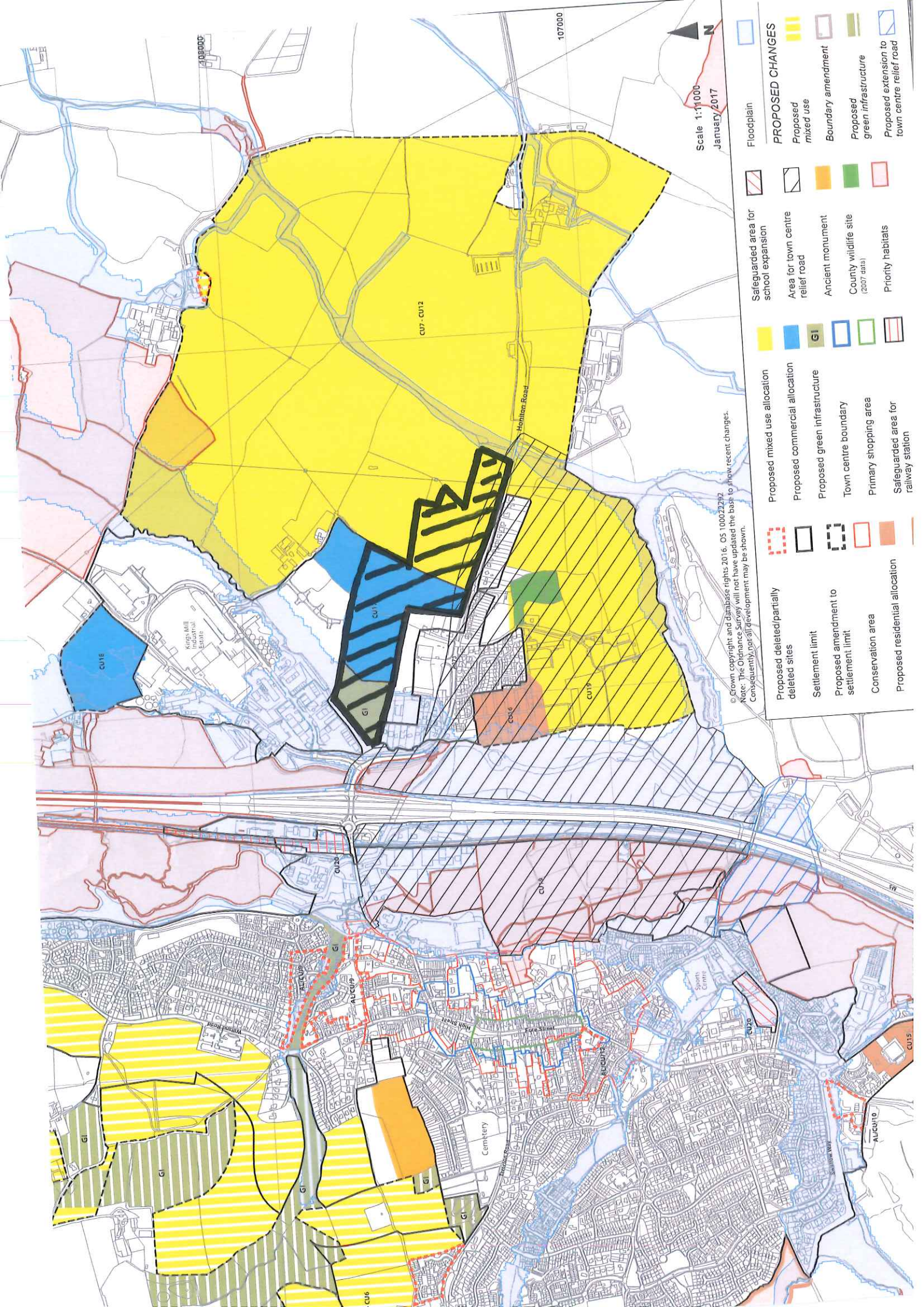
Long Beach

San Pedro

Clients Landholding

## Clients Landholding





Scale 1:11000  
January 2017

- Floodplain**
- PROPOSED CHANGES**
- Floodplain
  - Proposed mixed use
  - Proposed green infrastructure
  - Proposed extension to town centre relief road
  - Boundary amendment
  - Ancient monument
  - County wildlife site (2007 data)
  - Priority habitats
  - Safeguarded area for school expansion
  - Area for town centre relief road
  - Proposed mixed use allocation
  - Proposed commercial allocation
  - Proposed green infrastructure
  - Town centre boundary
  - Primary shopping area
  - Safeguarded area for railway station
  - Proposed deleted/partially deleted sites
  - Settlement limit
  - Proposed amendment to settlement limit
  - Conservation area
  - Proposed residential allocation



## IAIN BATH PLANNING

Local Plan Review Consultation  
Forward Planning  
Mid Devon District Council  
Phoenix House  
Tiverton  
EX16 6PP

FILE COPY

14 March 2014

IGB/ys

Dear Sirs

### **Mid Devon District Council Local Plan Review Consultation (January 2014) Land at Honiton Road, Cullompton, Devon**

I write on behalf of my clients, Messrs Furness, Cann and Family who own land at Honiton Road, Cullompton.

I enclose a site plan for your background information indicating my client's precise ownership boundaries edged red (Plan 1).

The following comments are submitted as part of the formal public consultation exercise on the Mid Devon District Local Plan Review document, and specifically relating to the plans proposals set out within the Site Allocations section of the document in relation to the settlement of Cullompton which references land within my client's ownership.

For information a large part of the land within my client's ownership has been given District Council Site Allocation Reference No: CU12 Week Farm, Cullompton.

The remaining area of their land immediately adjacent to the western boundary of the CU12 allocation is currently shown with a green infrastructure designation.

A copy of the Council's Policies Map Options is also attached to this submission for completeness (Plan 2).

A combination plan (Plan 3) is also enclosed illustrating the Proposals Map detail overlaid onto my clients land ownership plan.

#### **Local Plan Review Context**

The Local Plan Review Document currently contains the following details relevant to consideration of the development potential of my clients land holdings.

#### **General**

- 1 The principal concentration of people is in the eastern part of the district including the market town of Cullompton.
- 2 Mid Devon's population has grown at a significant rate over recent years. Forecasts show that this trend is expected to continue with a further 15% increase to 2031.

Planning Consultancy

Iain Bath Planning, Devonshire House, 39 York Place, Leeds LS1 2EP



## IAIN BATH PLANNING

- 3 The Revised Local Plan suggests an increased strategic target of 8,400 dwellings (up from 6,800 dwellings to 2026) to take account of the population projections to 2033
- 4 The majority of Mid Devon's employment falls within the service sector.

### **Spatial Strategy**

- 1 The overall plan strategy is to:
  - i) Create a prosperous economy which increases inward investment into the district.
  - ii) Guide appropriate levels of development to locations which are, or can be made sustainable, achieving a suitable balance of housing and employment facilities and other uses within towns, villages, neighbourhoods and rural areas.
  - iii) Reduce the need to travel by car increasing the potential of public transport, cycling and walking.
  - iv) Reduce carbon emissions in support of national targets.
  - v) Promote social inclusion and reduce inequalities by enhancing access for all to employment, services and housing.
- 2 The market town of Cullompton will be one of the three main focuses for new development with development targeted to:
  - i) Provide a sustainable mix of homes, businesses, shops, leisure, health, education and many other uses to resolve existing problems where feasible, and to meet rural needs.
  - ii) Protect and enhance their environmental assets including their character, biodiversity, heritage, setting and air quality.
  - iii) Develop under used and brownfield sites within the town in preference to Greenfield land or public open spaces.
  - iv) Enhance town centres as accessible, vital and viable locations for a vibrant mix of uses and as public transport hubs.
- 3 Policy S2 of the plan states a development focus at Cullompton as one of Mid Devon's three most sustainable settlements.
- 4 Policy S3 includes two options currently, the first representing a town focus for new development and the second proposing a new community either at Junction 27 of the M5 motorway (Willand) or at Junction 28 of the M5 motorway (Cullompton).

### **The Settlement of Cullompton**

- 1 Cullompton is the second largest settlement in the district.
- 2 Cullompton has seen significant housing development in recent years and has a good supply of readily available employment land with access onto the M5 at Junction 28. Improvements are planned to Junction 28 which will unlock the potential of the town to expand and regenerate.

## IAIN BATH PLANNING

- 3 The pursuance of Policy S3 Option 2 at Cullompton could deliver significant improvements to local transport and other infrastructure.
- 4 Policy S12 states that Cullompton will continue to develop as a small growing market town with a strategy aimed at improving access to housing within the town and expanding employment opportunities.
- 5 Paragraph 2.51 of the plan confirms that it is likely that additional sites will need to be identified to meet housing needs to the year 2033.
- 6 The new community option proposed at Cullompton to its east has been suggested by the Cullompton Town Council. The Local Plan Review Scoping Report responses received favour this option.

### **Specific Allocation Proposals Cullompton**

- 1 Table 14 identifies under Plan Reference CU11 (gross site area 181 hectares) the potential for 3,000 new dwellings against a SHLAA figure of 4,344 dwellings. This area of land lies to the east of my clients land holding but does include a small area of their land as illustrated on the enclosed plans.
- 2 The Employment Land Review undertaken by the Council has recommended a reduction in the amount of employment land delivered as part of any urban extension given existing employment allocations at Week Farm (my clients land holding) and as part of the north west Cullompton urban extension.
- 3 Table 17 identifies under Plan Reference CU12 Week Farm (gross site area 10.7 hectares) with potential for 22,470 sq m of employment floor space.
- 4 Policy CU11 proposes the option for an urban extension to the east of Cullompton (this includes an area of my clients land holding).

The proposal relates to a site of 200 hectares to the east of Cullompton for:

- A mixed use development comprising principally 3,000 dwellings
- 54,000 sq m of mixed commercial floor space
- 50 hectares of strategic green infrastructure
- Improvements to Junction 28 of M5 motorway

This proposal is a strategic option put forward by Cullompton Town Council for consideration under Policy S3.

- 5 Policy CU12 proposes the preferred option as an existing allocation of Week Farm (which includes a large part of my clients land holding).

The proposal relates to a site of 10.7 hectares and allocates the site for employment development subject to a number of criteria as follows:

- 15,000 sq m of employment floor space within Use Classes B2 and B8
- Provision of a vehicular link from Kingsmill Employment Area to Honiton Road
- Development shall not commence until the completion of necessary improvement to M5 Junction 28
- Provision of a sustainable urban drainage scheme to deal with all surface water from the development and arrangement for future maintenance

## IAIN BATH PLANNING

- Provision of 2 hectares of green infrastructure to include to retention of land in the flood plain
  - Protection and enhancement of the existing public right of way
- 6 Paragraph 3.71 includes text indicating that alternative employment generating uses beyond the B2 and B8 Use Class categories will be assessed in relation to Site Allocation CU12 alongside the option for mixed use development at east Cullompton (Policy CU11).
- 7 Paragraph 3.72 states that the Employment Land Review 2013 suggests that the Council focus employment land provision in Cullompton around the existing development at Kingsmill Industrial Estate which is consistent with retaining Week Farm as an allocation.

### **Local Plan Review comments and suggested Revisions**

Within the context of the current Local Plan Review content as it relates to my clients landholding I would request consideration of the following comments and suggested revisions to assist with the establishment of an appropriate framework within which planning applications can be brought forward on my clients site with appropriate linkage and acknowledgement of the wider option proposals being considered as part of the east Cullompton urban extension.

- 1 It is entirely appropriate given the settlement status for Cullompton to identify and allocate land in this location. My clients support this overall Strategic Local Plan Objective.
  - 2 Given the significant increase in population projection envisaged it is also logical to plan for additional growth in the main settlement which includes Cullompton. Again, my clients support this principle.
  - 3 The spatial strategy set out within the plan and the specific focus of development set out for Cullompton and echoed within Policy S2 is therefore supported by my clients.
  - 4 The option for an urban extension to the east of Cullompton proposed within Policy S3 and which includes some of my clients land is their favoured option and they would support in general terms a mixed use allocation as part of this development with a significant level of residential development.
- Given the employment allocation on their own land (Policy CU12) they consider that the proposed employment component of the urban extension (Policy CU11) is sensibly kept to a reasonably low figure to enable the delivery of the CU12 allocation.
- 5 My clients therefore support in general terms the Policy CU11 proposed option but would suggest that their land holding which forms an element of this identified site be specifically earmarked within the plan for residential development or a combination of residential and retail / leisure uses given the location of the land adjacent to Honiton Road and the employment allocation Policy CU12.
  - 6 My clients support the allocation of their land holding within Policy CU12 for B2 and B8 uses and note that other employment generating activities will be given consideration alongside the option for mixed use development at east Cullompton (Policy CU11). This is welcomed by my clients in assisting site delivery.
  - 7 The identified area of green infrastructure to the west of the Policy CU12 allocation is considered to serve no useful purpose and that the employment allocation should extend to include this area with appropriate text to Policy CU12 referencing the need



## IAIN BATH PLANNING

for appropriate buffer and landscape treatment in this location and to reflect ground conditions and any technical aspects such as drainage.

- 8 Discussions will be required regarding the infrastructure elements detailed within Policies CU11 and CU12 and particularly in relation to any improvements to Junction 28 of the M5 motorway as the extent of these will have a fundamental bearing on overall site viability and consequently delivery.

In conclusion therefore, my clients confirm and request the following:

- Support for the Policy CU12 allocation
- Extension of the Policy CU12 allocation to include the green infrastructure land to its west for employment purposes
- Support for the Policy S3 east Cullompton urban extension (Policy CU11)
- Inclusion of their landholding that is situated within the overall Policy CU11 site for residential development or a combination of residential development and retail / leisure uses
- A request for an appropriate discussion within the relevant context and at the appropriate time for any identified infrastructure works

### Summary

My clients are happy to provide further information in support of this representation to assist in achieving appropriate recognition of this significant land asset if required.

For the time being as will be seen by the attached statement prepared by Dove Haigh Phillips on behalf of the land owners to Mid Devon District Council, there is clear intent to bring forward this land for development purposes.

It is requested therefore that the comments set out within this submission be integrated into the Emerging Local Plan Review to assist in proposals coming forward.

I would be grateful to receive written confirmation that this representation has been duly made within the context of the public consultation period on the Local Plan Review and to progressing discussions in due course.

Yours sincerely

[Redacted Signature]

Iain Bath BA (Hons) MRTPI

Tel: [Redacted]  
Mobile: [Redacted]  
Email: [Redacted]

Cc Messrs Furness, Cann and Family  
Mike Dove