

6121/DOV/REA/MOD

Acc. 6121.



PERSIMMON HOMES SOUTH WEST
Mallard Road
Sowton Trading Estate
Exeter
Devon
EX2 7JN

Our Ref: RT/cb

14 February, 2017

Mid Devon Council
Local Plans Team
Phoenix House
Tiverton

Ex16 6 PP



Dear Sir or Madam,

Re: Local Plan Representations Mid Devon Local Plan Review February 2017

Please find enclosed the company's representations to the above. Due to the size of the file in the Appendices we have submitted the actual representation on line but please find herewith a full copy including the Appendices which we are submitting today by hand

Yours sincerely

Robert Taylor
Strategic Planner

6121/VSS
6121/S11
6121/CU7-CU12
6121/S3/MOD
6121/CU1-CU6/MOD
6121/GV
6121/CU13/MOD
6121/CU14/MOD
6121/CU15/MOD
6121/CU16/MOD
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6121/TIV-TIV5
6121/JA

Representations to the Mid Devon Local Plan

Persimmon Homes South West

14th February 2017

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Executive Summary

Persimmon Homes South West **opposes** in the strongest terms the proposed content and strategic strategies and policies as proposed within the Modification Version of the Mid Devon Local Plan. The Company does not consider that the current proposals are sound nor deliverable and has grave concerns on a number of fundamental matters including:

- Overall approach and duty to cooperate;
- Housing Numbers;
- Strategic housing distribution and delivery;
- Highways constraint and policy in respect of Junction 28 Cullompton;
- Cromwells Meadow Crediton; and
- Gypsy and traveller sites.

1.0 Context

1.1 Persimmon Homes South West wish to submit the following representation to the Mid Devon Local Plan Review hereon referred to as the 'Plan'. We note that there have been a number of further revisions to the Plan since the consultation in February – April 2015. At that time, it was intended that once these comments had been considered, the Plan would have been submitted to the Planning Inspectorate later that year. However following the consultation, the need for additional technical work was identified in order to ensure that the evidence base would be more robust prior to submission. We note that the Council felt that since the spring 2015 consultation there have also been changes to national guidance and the supporting local plan evidence base, the Plan was also changed again to reflect the Full Council decision taken on 22 September 2016 to propose an allocation of land at Junction 27 of the M5 for tourism, leisure, retail and associated additional housing.

1.2 Our representations also take in to account recent indications of potential policy change from Central Government contained with the White Paper "Fixing our Broken Housing Market" dated February 2017. Whilst we appreciate that the White Paper was not able to be referenced at the time the Plan was published for comment, these recent indications of the likely changes to bring about improvements should in our opinion be considered in the light of the fact that the Plan is forward facing in terms of policy.

2.0 Overall Approach and Duty to Cooperate

2.1 Paragraph 1.7 of the Plan refers to national guidance identifying that local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change - unless the adverse impacts of this significantly outweigh the benefits when judged against the policies in the National Planning Policy Framework (NPPF) and taken as a whole or where specific policies in the NPPF indicate development should be restricted.

2.2 Paragraph 1.9 of the plan mentions the former Heart of the South-West LEP as a strategic plan which has a bearing on the strategic planning in mid Devon. The Plan does not reference the Greater Exeter Plan which has a based date of up to 2040 and to which the combined authorities of Exeter, Teignbridge, Mid Devon, East Devon and Exeter City have signed up to as providing the strategic guidance for growth.

2.3 At present work is ongoing with this and a new strategic plan with a strategic housing market assessment is expected within the next year 2017 -2018. In the circumstances we believe it would have been appropriate for the council to reflect and review on the forthcoming new strategic guidance directed by the Greater Exeter Plan rather than continuing with the Mid Devon Plan. The Plan covers the period 2013 – 2033, but more importantly the strategic guidance offered by an emerging plan that covers the Greater Exeter Sub Region is not referenced nor acknowledged. A new Strategic Housing Market Assessment and a strategy for the combined sub region does in our view have a bearing on the Plan.

2.4 The Company questions whether Mid Devon has appropriately applied its duty to cooperate – the importance of which is highlighted within the recent Housing White Paper (February 2017). It is notable that Exeter City Council has stalled the preparation of any further SPD or policy documents until such time as the Greater

Exeter Plan is consulted and adopted. Persimmon would expect a consistent approach from Mid Devon DC.

2.5 Rather than pre-determine the outcome of an emerging process or indeed ignore its preparation all together it appears counter-intuitive to continue with a plan that fails to address the housing market area as a whole. It is also observed that the plan periods do not align with the emerging Greater Exeter Plan.

2.6 We would draw your attention to the Paper presented to the joint authorities that are to prepare the new Greater Exeter Plan. In July 2016 the Councils signed up to produce that Plan (appendix 1 email from Jill Day at Exeter City Council) and Exeter City Council ceased work on its Delivery Plan Document.

3.0 Spatial Strategy

3.1 In terms of the overall spatial strategy, the Plan intends to direct the focus of growth for the forthcoming plan towards Cullompton away from Tiverton. To do this the Plan identifies significant urban extensions at North West and North East Cullompton as well as other proposals within the Crediton area to deliver growth.

3.2 At paragraphs 2.1a onwards the council identify the overall provision of housing and employment for the district and states it intends to increase the housing target to 393 dwellings per annum above the housing need range set in the SHMA to deliver flexibility in the plan to achieve the required growth. The SHMA was published in 2015, and again for the reasons stated above given that the Greater Exeter plan is producing a wider strategic plan for the future period up to 2040 we do not understand why further progress with this plan is being considered given that there will be new base date shortly for a longer period.

3.3 The Plan indicates some 10% more housing allocations are being provided than is required to meet the predicted growth to provide flexibility to account for unforeseen circumstances that might prevent some sites from coming forward as expected. This is a sensible approach which is supported. However in doing so the council must also take into account the infrastructure delivery requirements needed to deliver such growth and the ability for that to actually happen. Reserve sites are allocated in Cullompton. The draft Infrastructure Delivery Plan (IDP) for the Mid Devon Council is dated December 2016 (appendix 2) and identifies that critical improvements are required to J28 of the M5 to provide signals to accommodate development in existing plans (p8-9). Additional requirements are also identified for improvements to alleviate J28, including an eastern relief road which is stated to cost approximately £50- 55 million to construct. Secured funding for that is identified as being funded contributions from developers for the improvements to J28 for signalling and a range of funding sources for the wider more expensive requirements. Given that the LP is providing flexibility in terms of additional potential allocations, the issue of the ability to deliver those sites is now predicated on an as yet unknown highway contribution. The IDP is not clear whether the J28 improvements alone cost £50-55m or whether the additional proposal for a second over bridge as identified later in the plan has been considered. There is an uncertainty whether the funding identified for the J28 improvements is sufficient to take account of this alternative option for infrastructure capacity development. As a new direction of strategy of placing growth at Cullompton has been chosen by the council, the council should be sure it is deliverable. It is not clear on when or much the costs of the J28 proposals might be and therefore the strategy is not soundly based.

3.4 As will be shown later all of the allocations at Cullompton are required to contribute to the junction improvements and therefore no growth can happen without that investment. The strategy is therefore flawed in terms of its delivery and is unsound in this regard.

3.5 The late inclusion of a major allocation at Cullompton (East of the M5 J28 CU7 – CU12) is opposed. The allocation is understood to be approximately 5,000 in total, 2100 to be delivered in the plan period. Persimmon Homes requests additional information and evidence on the feasibility of this project given Mid Devon has never successfully delivered on a single site of such size and scale. The approach appears to be heavily reliant on this allocation performing consistently high levels of housing output (at least 200 – 250 dwellings per annum) over a long period. Persimmon is not aware of any site in recent history in Mid Devon that has achieved a yield anywhere near this level. This over reliance is unsustainable and provides no flexibility in the plan for localised dips in market conditions, infrastructure delivery, planning delays and other influences. Housing delivery levels in Cullompton historically have not supported this level of growth and the strategy should be reconsidered to spread commitments over a greater number of locations to limit such market exposure.

4.0 Housing Strategy and Delivery Rates

4.1 Table 6 on page 25 of the Plan shows the Housing Forecast 2013-2033 (appendix 3). The council has published its Annual Monitoring statement showing the Five Year Housing supply situation from April 2016 to 31st March 2021 which references the Uffculme Appeal decision wherein the Inspector found the Council had a 4-4.5 year housing land supply (appendix 4). The Council has reflected on this decision and decided that the housing requirement should now be calculated as 390 per annum for 2006-2013 and thereafter 370 units to make up the for the previous under delivery (page 13 of that Document) . In order to provide for the under delivery page 5 of the Five Year Housing supply paper shows that 590 homes per annum need to be provided. The current five year supply is 2,583 homes in this paper (slightly higher at 2,656 in the LPR page 26 housing trajectory table). In any event both the trajectory in the Five Year Supply paper and the Plan propose a spike in completions in 2018/2019 of over 700 completions and 600 in 2019/2020 under the housing strategy. However the Inspector in to the Uffculme appeal noted the district is only achieving an average of 356 per annum. For the council to achieve a target of almost double that when the historic completions from 1981 to date (page 16) shows that the highest completion rate ever achieved before is in 1987 of 540 (page 16 Historic Housing completions Five Year Supply paper April 2016) is a drastic increase. By limiting the development of sites in Cullompton by the imposition of yet to be established levels of costs of the M5 improvements (see later comments) calls in to question the delivery strategy of requiring Cullompton to be the single point of major strategic delivery within the District.

4.2 The Company also makes the following observations in no particular order:

- In Cullompton between 2006 - 2016 724 dwellings were completed (72 per annum). The forward forecast in the housing trajectory from 2016 – 2033 is 215 per annum. Persimmon respectfully requests Mid Devon to provide evidence that the market can support a three fold increase in delivery than has historically ever been achieved in Cullompton. Further Persimmon notes that the trajectory is already out of date in respect of delivery for 2017 none of which will happen.

- It is assumed that Persimmon Homes on Cullompton NW will deliver 50 dwellings per annum. There are two other promoter / developers on this site and the annual yield therefore increases to 150 per annum once all three outlets are operating. In the period 2025 – 2029 Cullompton East is also developing 200 dwellings per annum. Given the assumption is 50 dwellings per developer this equates to 7 developers building and selling houses in Cullompton at any one time. There is no evidence to suggest the Cullompton market can support anywhere near this level of competition and market activity. It also assumes that a single developer will not own and control the market and delivery of Cullompton East (CU7 – CU12) and therefore in doing so reduce delivery. Again, the Company opposes the reliance on this single allocation.
- The above commentary is immaterial in the event the Grampian conditions (as discussed within the body of this representation) related to all allocations in Cullompton are not immediately removed as it will prevent the forward delivery of any of housing.
- Over the last 10 year period 2006 – 2016 Tiverton completions total 880 (88 per annum). Again there is a stark increase in delivery within the forward period 2016-2033 of 134 per annum.

4.2 The Company suggest that the existing allocations as identified under the strategic allocation at NW Cullompton (given it has an adopted SPD with identified infrastructure) should not be subject to such a blanket imposition of additional costs which will put in jeopardy the delivery strategy as set out in pages 24–26 of the Plan.

5.0 Cullompton – Policies CU1 – CU16

5.1 For the reasons stated in this submission, we believe that the recent additions to the policies for the provision of significant infrastructure at the chosen location for growth within Cullompton, call in to question the ability of the plan to deliver a strategy that provides flexibility. All sites within Cullompton have now had added to them policy provision for developer led funding to provide improvements to Junction 28 (J28). These are as yet unknown in terms of cost, timing and the specific source and type of funding. The plan makes no provision to adapt to or change any of those allocations to allow them to proceed without the Junction improvements, which further increases the under delivery of housing within the district. In addition, the Council have an adopted SPD for Cullompton (appendix 5) which is less than a year old and the imposition of these conditions flies in the face of the delivery of existing adopted policy.

5.2 For Cullompton the plan as modified fails to provide any detail or justification for such onerous Grampian conditions to be applied other than a basis and broad acknowledgement of an existing highways problem. The plan is therefore inadequate in its current form and cannot be robustly demonstrated that it is deliverable – there is no known highways solution nor contribution sum that would enable this matter to be resolved. Further, it is understood that in excess of five separate developments have now contributed towards works to improve J28 and surrounding junctions. The Company query whether this pooling of contributions has now exceeded its limit.

5.3 The policy modification is poorly defined and is applied broadly across all housing developments. This is simply unsustainable and opposed in the strongest

regard. The Plan does not provide any suitable mechanism through which infrastructure may be delivered to resolve existing highways constraints. The current and proposed strategy is opaque.

5.4 The Local Authority has failed to provide any certainty as to the delivery of such highways works and as a result the deliverability must be questioned of all development which has any impact whatsoever on the highways in and around Cullompton.

5.5 Policy CU 7 Paragraph 3.7 the Company objects to the additional wording added to this paragraph where it is stated that traffic management on the Willand Road and Tiverton Road will be required. We object to the further additions to policy. These state that the development will need to mitigate the impact upon the capacity of J28 of the M5 junctions capacity through implementation of an improvement scheme, in the form of extension junction improvement works involving the second over bridge required in connection with the development east of Cullompton on the policy CU7. "The development will need to mitigate its impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second over bridge required in connection with development east of Cullompton under policy CU7."

5.6 It is unreasonable to link the development of the North West Cullompton site with the North East Cullompton scheme. Both are separate proposals and given the designation of the latter site as the Culm Garden Village, its delivery can be seen to be many years away. Such a condition is unrealistic and puts at risk the delivery of the council's housing trajectory. The current infrastructure delivery plan identifies a figure of £1.3 million for junction improvements required as part of the execution of existing development policy. The table proposes developers contributions as the source, the Plan also refers to the NW Cullompton proposal as being led by a S 106 and other development being sourced from CIL. As there is no defined arrangement as to how that will be apportioned or phased, there is no way of knowing when that junction cost will be sourced or delivered. Furthermore, point G has been added as an additional part of policy requiring financial contributions towards the town centre relief road and other measures together with the financial contributions and point H for capacity improvements at J28 of the M5. Again for the reasons stated above, these costs are unquantified and therefore again pour doubt on the ability of the scheme to be delivered.

We object on the basis that the financial contributions being unknown have yet to be justified and demonstrated to be effective and therefore we do not believe this element of the plan has been positively prepared.

5.7 In paragraph 3.76 a further addition has been made stating that applications will be expected to respond to these aspirations and as set out in the adopted master plan SPD for the site. We object to this additional wording as the quantity of the cost of these are unknown and therefore the effects upon viability and delivery of the project is still to be established. The wording should be removed from the Plan and the commentary policy. Only a year ago the council adopted a new SPD for The N W Cullompton Sustainable Urban Extension. Part of the SPD identifies a detailed delivery strategy which was agreed between the developers and the council which worked to ensure the delivery of housing and the infrastructure for the area. There is no reference to the need for further contributions to fund improvements at J28 in that SPD. The SPD was widely consulted upon and the SPD is now adopted policy. The proposed modifications are now are at odds with this adopted policy which is newly adopted.

5.8 Policy CU6 North West Cullompton phasing we object to the changes to the wording and in particular the imposition of point I) - the provision of M5 access improvements before any houses are occupied. At this stage we are given no details of what those improvements might be and it is unreasonable for this request to be added which again flies in the face of the delivery of the plan. It is assumed that Mid Devon will be reliant on developer led contribution to deliver the highways solution – such contribution can only become feasible when coupled with live on site and delivery to release capital for off site infrastructure. The current proposal is unsustainable and is opposed in the strongest regard.

5.9 Paragraph 3.94, we object to the additional wording requiring the development to mitigate its impact upon junction capacity to improvement schemes, existing junction or informal extension improvements requiring the second over bridge. At this point the cost of these infrastructure requirements are unknown and have not formed part of previous policy within the SPD. It is clear that all planning allocations within the Cullompton are required to make these contributions and yet the delivery and phasing requirements of this work are unknown at this stage therefore we object to this preamble and policy change in that it is not effective nor is it consistent and justified as no quantities for these requirements are as yet known. Paragraph 3.95 suggests changes requiring the land of the school to be transferred to the local education authority with the right of access before any development commences. This change is not logical or deliverable. By its very location the school can only be developed in parallel with the development and it can be delivered once development commences, but not prior to that.

5.10 Housing allocations CU13 – CU 16 are all constrained by the same requirements for no further development to take place until significant improvements on J28 have been implemented. The current infrastructure delivery plan does not identify what those costs might be nor the delivery partners involved or how it will be phased or delivered. Therefore there are significant concerns for junction improvements which put in jeopardy all of the applications at Cullompton. It should be remembered that the council are intending to change the direction of travel of the delivery strategy from Tiverton to Cullompton during the lifetime of this plan and yet the plan is unclear in that it does not identify any opportunity for flexibility or adaptability should highway junction improvements not be workable or undeliverable at certain times in the plan periods. The Plan is not sound as growth is predicated on infrastructure directed at one settlement the amount of which and the timing of which are unknown - hence all allocations are restricted.

6.0 Crediton, Cromwells Meadow

6.1 The Company opposes in the strongest possible terms to the modifications identified local planning allocation CRE3 for Crediton. This allocation has been brought forward from the existing Core Strategy into this Plan however the allocation is proposed to reduce from 50 – 35 dwellings, 28% affordable housing instead of 35% affordable housing. The gross allocation area remains the same size, the environmental impact remains the same and all other influencing factors on density, design and infrastructure remain the same as had previously been evidenced, examined and adopted within the existing plan.

6.2 Persimmon Homes South West has recently acquired an interest in this property and will shortly be submitting a detailed planning application for circa 50 dwellings 35% of which affordable in accordance with the adopted planning policy (appendix 6).The proposals as enclosed are policy compliant against all national policy on space, density and housing criteria. The same net and gross assumptions are applied and consistent with policy.

6.3 This site is 2.4 ha gross and assumed to be approximately 1.4 ha net. Paragraph 3.162 and 3.163 on the policy preamble give no indication as to why there is a requirement to deliver such a low number of houses from the site and provides no commentary on its reduction – nor does any of the supporting evidence base. In normal parlance a development area of 1.4 ha (3.56 acres) could be expected to deliver somewhere of around 50 units + using nationally accepted standards of development density. This is clearly supported by the fact the site is currently allocated for 50 dwellings. The White Paper Feb 2017 and NPPF are very clear in respect of densities, optimising Greenfield land, affordable housing and community benefits related to housing delivery. The reasons for the reduction in housing allocation size is therefore totally unclear and has no evidential justification what so ever. The Company therefore objects to any modification to this policy from that which currently exists.

6.4 The existing Local Plan went through its stages of consultation, testing the soundness and the Inspector considered the allocation to be sound for approximately 50 dwellings in its current adopted form. This is supported by a raft of evidence including sustainability appraisal which has subsequently been updated to support this new plan. The existing allocation policy provides that no development can take place until such time as the Crediton relief road is completed. This condition has now been satisfied and development may come forward unrestricted from existing policy constraint.

6.5 It is therefore concerning to understand that now the relief road condition has been satisfied and the site's delivery can come forward unrestricted that this allocation appears to have dropped in dwelling numbers through each stage of this plan's consultation from the adopted 50 dwellings, to 40 dwellings and more recently 35 dwellings. Further the affordable housing requirement on site has yo-yoed from 25%, 28% and 35%. These proposed modifications appear to be inconsistent, ad-hoc and unsubstantiated. It is evidential in respect of this site that Mid Devon has no clear understanding of the physical constraints of the site and likely housing yield.

6.6 Having considered the existing adopted planning policy and having undertaken the Company's own due diligence and testing feasibility layout work Persimmon Homes can see no reason that the existing allocation should be watered down in any way, on the contrary, additional housing should be supported. There are no new material considerations that would further prevent the delivery of this site or result in the reduction of dwellings. The site is available under contract to Persimmon Homes South West, developable and deliverable and therefore meets the primary development criteria.

6.7 The NPPF is very clear where development land is allocated its use should be optimised. Para 15 states "Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally ". The lack of justification for departing from a clear policy in the adopted plan is not

substantiated, the site is and has been demonstrated as “sustainable” this fact is not disputed by Mid Devon. NPPF provides no guidance on density which was purposefully removed from earlier national guidance to encourage good design to lead density.

6.8 The Company expressed its concerns by letter dated 19th October 2016 addressed to Jenny Clifford, Head of Planning and Regeneration (appendix 7). Mrs Clifford's response (appendix 8), dated 18th November 2016, clarified that the proposed changes are based on the most recent evidence base to support the Local Plan, in particular the impact on Shobrooke Park. Upon further review, we see no evidence within the evidence base that would have resulted in such a change of opinion, especially considering the site and situation has not changed. Clarity from Mid Devon DC has been sought on this matter but not provided. As stated within the HEA appraisal Dec' 16 additional mitigation measures can be provided. The site is evidently sustainable (this is not disputed by Mid Devon as the allocation is protected). The character of the site has not changed, nor has its planning setting or environmental constraint. Within the Sustainability Appraisal 2015 (appendix 9) which forms part of the evidence base, it is acknowledged 'There will be some visual impact when heading into the settlement, but some housing is already visible from the existing Cromwells Meadow estate, which is on higher ground than the proposed site, and which thereby mitigates against any impact'. There is no evidence to support reducing the number of total dwellings due to visual impact. More recently (January 2017) the Council provided an addendum to the Sustainability Appraisal, suggesting that appropriate landscaping be incorporated into the design of the site and that a full archaeological investigation be completed – both of which will be included within the forthcoming application. It stands, that there is no evidence that any other heritage or archaeological influence from or on to the site should impact the proposed development considering the existing built environment.



(View of existing industrial area from Shobrooke Park, Jan '17)



(View of completed development and CRE3 from Shobrooke Park, Jan '17)



(View of Shobrooke Park from Willow Walk, CRE3, Jan '17)

6.9 It is already recognised and agreed that the completed Cromwells Meadow development is in a more visually apparent position than the low lying allocation CRE3. The images above demonstrate that any additional development adjoining CRE3 would be inconsequential, especially considering the natural screening of the existing hedge line and arboriculture. A reduction in dwellings based on visual impact is nonsensical considering the more visually detrimental industrial area; if this location is as sensitive as portrayed, then why was an industrial area allowed?

6.10 Critically the allocation is not reduced in size (area). The same gross allocation size is proposed, consequently the same development footprint between modifications must be assumed. Whether the net area provides a higher number of

2 and 3 bed smaller dwellings against larger 4 and 5 bed homes is immaterial. The developable footprint and therefore visual impact between the modifications and the adopted policy are identical.

6.11 The amendments to CRE 3 suggested by Mid Devon District Council are unjustified and contradictory to Government strategy. The stated intention of government to produce solutions to fix the broken housing market within the recently published Housing White Paper (February 2017) published by the Department for Communities and Local Government should be considered. In particular paragraph 1.53 of that White Paper is worth noting and has a bearing on the proposed changes. A clear emphasis within the Paper is the delivery of allocated sites as soon as possible to meet the current and future housing needs and avoiding building schemes at low densities. The stance taken by the council is only aiding to the deficient and under delivery of housing, 'authorities should have a clear strategy to maximise the use of suitable land... their identified requirement should be accommodated unless there are policies elsewhere in the NPPF that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly outweigh and demonstrably outweigh the benefits' (1.22, p24). No robust evidence suggests that this allocation is contrary to NPPF policy; on the contrary additional housing should be **supported**, 'the Government proposes to amend the NPPF to make it clear that plans and individual development proposals should: make efficient use of land and avoid building homes at low densities' and 'take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives' (1.53-4, p32). It should be noted, that a number of existing allocations are controlled by land promoters, resulting in a backlog of required housing caused by the delay and under delivery of housing schemes.

6.12 The Company objects wholeheartedly to the modifications and will continue to do so at any opportunity provided. The Company's testing layout (appendix 6) is for 50 dwellings, which is a policy compliant scheme in all regards and will be submitted shortly to Mid Devon. Thereon the Company intends to present evidence at the local plan examination to the Inspector to demonstrate that nothing materially has changed since its allocation within the last plan was considered sound. In fact in the time period from the Local Plan's original adoption to present, its delivery has now become more certain with the opening of the link road.

6.13 In light of the substantial concerns and objections raised by Persimmon in respect of housing numbers and delivery of the proposed plan as a whole it appears critical that Mid Devon utilise efficiently all other allocations to bolster housing supply across the Authority.

7.0 The ability to deliver new Gypsy and Traveller Facilities within Major Urban Extensions

7.1 Persimmon Homes is aware of recent developments and meetings held with Mid Devon DC, banks, lenders, developers and other local planning authorities with regard to Gypsy and Traveller sites to be delivered within allocations. It is now apparent that mortgage lenders will not be able or willing to support sites which include any provision for such Traveller facilities, accommodation or sites – whether that be on or within the wider immediate vicinity of an allocation. Persimmon Homes therefore opposes the inclusion of any traveller facilities within proposed allocations. The immediate impact of the lenders position is that any site with such facilities are indefinitely unviable. Persimmon Homes therefore proposes the removal of all such wording and requirement from policy.

7.2 Persimmon Homes understands that Mid Devon DC are currently consulting central government on this matter but as yet no suitable outcome has been found. It has been suggested by Mid Devon DC that a compromise may be for developers to find, plan and purchase appropriate alternative sites outside of the allocations. This view is totally unsustainable and opposed. It is unreasonable to expect a developer to take such steps when Mid Devon DC has all necessary resource and legal power through CPO to deliver such land. Any delivery may be sourced through pooled S106 or CIL contribution only.

7.3 We are aware of the fact that the Council are urged by central government to provide new provision within sustainable urban extensions being promoted as part of the plan – for example at Tiverton and Cullompton. This provision is part of the planned uses within these areas. As part of the intentions within the February 2017 White Paper it is noted and welcomed that the government recognise the need for an Infrastructure Fund which will assist in the delivery of a range of requirements and we would urge the Council to lobby for funds within this financial mechanism to assist in the specific delivery of Gypsy and Traveller facilities as noted at paragraph 2.19 of the White Paper and the involvement of the HCA /Homes England at paragraph 3.36.

8.0 Conclusion

8.1 Persimmon Homes objection to the items identified above is directed at the Council's lack of recognition of the emerging new strategic coordination of growth as represented by the Greater Exeter Plan.

8.2 The recent changes to policy wording put in doubt the delivery strategy of the Plan. Insufficient evidence has been presented by the Council to demonstrate that the strategy is soundly thought through, feasible and critically deliverable against the trajectory proposed.

8.3 The allocations at Cullompton and Crediton are not objected to per se but the ability of these sites to deliver growth in accord with the Council's intentions and policy mechanisms is put in doubt by the detailed elements of the policies as drafted and are therefore opposed to in their current form.

8.4 Given the thrust of recent Government guidance in the form of the Housing White Paper to boost housing supply and deliver the much needed housing stock Persimmon Homes view the policies as currently drafted at odds and unsound when compared with National guidance . The stance taken by the Council is only aiding to the deficient and under delivery of housing, 'authorities should have a clear strategy to maximise the use of suitable land" (Housing White Paper).

Appendix 1

Taylor, Robert

From: Day, Jill
Sent: 14 July 2016 17:16
To: Taylor, Robert
Subject: Re: Exeter Local Plan Development Delivery Document (your ref: RT/cb)

Dear Robert,

I have left a message with one of your colleagues, but I'll also summarise the position below.

A report titled 'Proposed Greater Exeter Strategic Plan' went to Executive Committee last Tuesday:

<http://committees.exeter.gov.uk/documents/s52597/EXECUTIVE%20-%20Proposed%20Greater%20Exeter%20Strategic%20Plan%20-%2012%20July%202016%20-%20FINAL.pdf>

The report includes the following paragraph:

10.1.3. In the City's case the focus must move away from progressing the Development Delivery DPD and towards getting a new Strategic Plan in place. The Development Delivery DPD will not be taken forward to submission; there is little prospect of it being found sound without a five year supply; and with the Core Strategy in need of review. However, the work on this document has not been wasted and in time will feed into the plan making process. This approach was endorsed by Planning Member Working Group on 21 June 2016.

Accordingly I was not intending to respond to your letter dated 11 July, but please give me a ring if you wish to discuss.

Kind regards
Jill Day
Principal Project Manager – Strategic Policy
Exeter City Council | Civic Centre | Paris Street | Exeter EX1 1NN



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Appendix 2

621

From: Local Plan Review
Subject: FW: Representations By Persimmon Homes to the Local Plan Review 14th Feb 2017
Attachments: Persimmon Homes Mid Devon Council LPR Reps 14 02 17

From: Taylor, Robert
Sent: 14 February 2017 15:36
To: Local Plan Review
Subject: Representations By Persimmon Homes to the Local Plan Review 14th Feb 2017

Please find attached a copy of the companies representations to the Local Plan Review . Due to the size of the Appendices that accompany the representations a paper copy will be submitted to the council this by hand this afternoon.

Could you please acknowledge receipt of this representation

Robert Taylor
Strategic Planner
Persimmon Homes South West
Mallard Road
Sowton Trading Estate
Exeter
EX2 7LD

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Representations to the Mid Devon Local Plan

Persimmon Homes South West

14th February 2017

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Executive Summary

Persimmon Homes South West **opposes** in the strongest terms the proposed content and strategic strategies and policies as proposed within the Modification Version of the Mid Devon Local Plan. The Company does not consider that the current proposals are sound nor deliverable and has grave concerns on a number of fundamental matters including:

- Overall approach and duty to cooperate;
- Housing Numbers;
- Strategic housing distribution and delivery;
- Highways constraint and policy in respect of Junction 28 Cullompton;
- Cromwells Meadow Crediton; and
- Gypsy and traveller sites.

1.0 Context

1.1 Persimmon Homes South West wish to submit the following representation to the Mid Devon Local Plan Review hereon referred to as the 'Plan'. We note that there have been a number of further revisions to the Plan since the consultation in February – April 2015. At that time, it was intended that once these comments had been considered, the Plan would have been submitted to the Planning Inspectorate later that year. However following the consultation, the need for additional technical work was identified in order to ensure that the evidence base would be more robust prior to submission. We note that the Council felt that since the spring 2015 consultation there have also been changes to national guidance and the supporting local plan evidence base, the Plan was also changed again to reflect the Full Council decision taken on 22 September 2016 to propose an allocation of land at Junction 27 of the M5 for tourism, leisure, retail and associated additional housing.

1.2 Our representations also take in to account recent indications of potential policy change from Central Government contained with the White Paper "Fixing our Broken Housing Market" dated February 2017. Whilst we appreciate that the White Paper was not able to be referenced at the time the Plan was published for comment, these recent indications of the likely changes to bring about improvements should in our opinion be considered in the light of the fact that the Plan is forward facing in terms of policy.

2.0 Overall Approach and Duty to Cooperate

2.1 Paragraph 1.7 of the Plan refers to national guidance identifying that local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change - unless the adverse impacts of this significantly outweigh the benefits when judged against the policies in the National Planning Policy Framework (*NPPF*) and taken as a whole or where specific policies in the *NPPF* indicate development should be restricted.

2.2 Paragraph 1.9 of the plan mentions the former Heart of the South-West LEP as a strategic plan which has a bearing on the strategic planning in mid Devon. The Plan does not reference the Greater Exeter Plan which has a based date of up to 2040 and to which the combined authorities of Exeter, Teignbridge, Mid Devon, East Devon and Exeter City have signed up to as providing the strategic guidance for growth.

2.3 At present work is ongoing with this and a new strategic plan with a strategic housing market assessment is expected within the next year 2017 -2018. In the circumstances we believe it would have been appropriate for the council to reflect and review on the forthcoming new strategic guidance directed by the Greater Exeter Plan rather than continuing with the Mid Devon Plan. The Plan covers the period 2013 – 2033, but more importantly the strategic guidance offered by an emerging plan that covers the Greater Exeter Sub Region is not referenced nor acknowledged. A new Strategic Housing Market Assessment and a strategy for the combined sub region does in our view have a bearing on the Plan.

2.4 The Company questions whether Mid Devon has appropriately applied its duty to cooperate – the importance of which is highlighted within the recent Housing White Paper (February 2017). It is notable that Exeter City Council has stalled the preparation of any further SPD or policy documents until such time as the Greater

Exeter Plan is consulted and adopted. Persimmon would expect a consistent approach from Mid Devon DC.

2.5 Rather than pre-determine the outcome of an emerging process or indeed ignore its preparation all together it appears counter-intuitive to continue with a plan that fails to address the housing market area as a whole. It is also observed that the plan periods do not align with the emerging Greater Exeter Plan.

2.6 We would draw your attention to the Paper presented to the joint authorities that are to prepare the new Greater Exeter Plan. In July 2016 the Councils signed up to produce that Plan (appendix 1 email from Jill Day at Exeter City Council) and Exeter City Council ceased work on its Delivery Plan Document.

3.0 Spatial Strategy

3.1 In terms of the overall spatial strategy, the Plan intends to direct the focus of growth for the forthcoming plan towards Cullompton away from Tiverton. To do this the Plan identifies significant urban extensions at North West and North East Cullompton as well as other proposals within the Crediton area to deliver growth.

3.2 At paragraphs 2.1a onwards the council identify the overall provision of housing and employment for the district and states it intends to increase the housing target to 393 dwellings per annum above the housing need range set in the SHMA to deliver flexibility in the plan to achieve the required growth. The SHMA was published in 2015, and again for the reasons stated above given that the Greater Exeter plan is producing a wider strategic plan for the future period up to 2040 we do not understand why further progress with this plan is being considered given that there will be new base date shortly for a longer period.

3.3 The Plan indicates some 10% more housing allocations are being provided than is required to meet the predicted growth to provide flexibility to account for unforeseen circumstances that might prevent some sites from coming forward as expected. This is a sensible approach which is supported. However in doing so the council must also take into account the infrastructure delivery requirements needed to deliver such growth and the ability for that to actually happen. Reserve sites are allocated in Cullompton. The draft Infrastructure Delivery Plan (IDP) for the Mid Devon Council is dated December 2016 (appendix 2) and identifies that critical improvements are required to J28 of the M5 to provide signals to accommodate development in existing plans (p8-9). Additional requirements are also identified for improvements to alleviate J28, including an eastern relief road which is stated to cost approximately £50- 55 million to construct. Secured funding for that is identified as being funded contributions from developers for the improvements to J28 for signalling and a range of funding sources for the wider more expensive requirements. Given that the LP is providing flexibility in terms of additional potential allocations, the issue of the ability to deliver those sites is now predicated on an as yet unknown highway contribution. The IDP is not clear whether the J28 improvements alone cost £50-55m or whether the additional proposal for a second over bridge as identified later in the plan has been considered. There is an uncertainty whether the funding identified for the J28 improvements is sufficient to take account of this alternative option for infrastructure capacity development. As a new direction of strategy of placing growth at Cullompton has been chosen by the council, the council should be sure it is deliverable. It is not clear on when or much the costs of the J28 proposals might be and therefore the strategy is not soundly based.

3.4 As will be shown later all of the allocations at Cullompton are required to contribute to the junction improvements and therefore no growth can happen without that investment. The strategy is therefore flawed in terms of its delivery and is unsound in this regard.

3.5 The late inclusion of a major allocation at Cullompton (East of the M5 J28 CU7 – CU12) is opposed. The allocation is understood to be approximately 5,000 in total, 2100 to be delivered in the plan period. Persimmon Homes requests additional information and evidence on the feasibility of this project given Mid Devon has never successfully delivered on a single site of such size and scale. The approach appears to be heavily reliant on this allocation performing consistently high levels of housing output (at least 200 – 250 dwellings per annum) over a long period. Persimmon is not aware of any site in recent history in Mid Devon that has achieved a yield anywhere near this level. This over reliance is unsustainable and provides no flexibility in the plan for localised dips in market conditions, infrastructure delivery, planning delays and other influences. Housing delivery levels in Cullompton historically have not supported this level of growth and the strategy should be reconsidered to spread commitments over a greater number of locations to limit such market exposure.

4.0 Housing Strategy and Delivery Rates

4.1 Table 6 on page 25 of the Plan shows the Housing Forecast 2013-2033 (appendix 3). The council has published its Annual Monitoring statement showing the Five Year Housing supply situation from April 2016 to 31st March 2021 which references the Uffculme Appeal decision wherein the Inspector found the Council had a 4-4.5 year housing land supply (appendix 4). The Council has reflected on this decision and decided that the housing requirement should now be calculated as 390 per annum for 2006-2013 and thereafter 370 units to make up the for the previous under delivery (page 13 of that Document). In order to provide for the under delivery page 5 of the Five Year Housing supply paper shows that 590 homes per annum need to be provided. The current five year supply is 2,583 homes in this paper (slightly higher at 2,656 in the LPR page 26 housing trajectory table). In any event both the trajectory in the Five Year Supply paper and the Plan propose a spike in completions in 2018/2019 of over 700 completions and 600 in 2019/2020 under the housing strategy. However the Inspector in to the Uffculme appeal noted the district is only achieving an average of 356 per annum. For the council to achieve a target of almost double that when the historic completions from 1981 to date (page 16) shows that the highest completion rate ever achieved before is in 1987 of 540 (page 16 Historic Housing completions Five Year Supply paper April 2016) is a drastic increase. By limiting the development of sites in Cullompton by the imposition of yet to be established levels of costs of the M5 improvements (see later comments) calls in to question the delivery strategy of requiring Cullompton to be the single point of major strategic delivery within the District.

4.2 The Company also makes the following observations in no particular order:

- In Cullompton between 2006 - 2016 724 dwellings were completed (72 per annum). The forward forecast in the housing trajectory from 2016 – 2033 is 215 per annum. Persimmon respectfully requests Mid Devon to provide evidence that the market can support a three fold increase in delivery than has historically ever been achieved in Cullompton. Further Persimmon notes that the trajectory is already out of date in respect of delivery for 2017 none of which will happen.

- It is assumed that Persimmon Homes on Cullompton NW will deliver 50 dwellings per annum. There are two other promoter / developers on this site and the annual yield therefore increases to 150 per annum once all three outlets are operating. In the period 2025 – 2029 Cullompton East is also developing 200 dwellings per annum. Given the assumption is 50 dwellings per developer this equates to 7 developers building and selling houses in Cullompton at any one time. There is no evidence to suggest the Cullompton market can support anywhere near this level of competition and market activity. It also assumes that a single developer will not own and control the market and delivery of Cullompton East (CU7 – CU12) and therefore in doing so reduce delivery. Again, the Company opposes the reliance on this single allocation.

- The above commentary is immaterial in the event the Grampian conditions (as discussed within the body of this representation) related to all allocations in Cullompton are not immediately removed as it will prevent the forward delivery of any of housing.
- Over the last 10 year period 2006 – 2016 Tiverton completions total 880 (88 per annum). Again there is a stark increase in delivery within the forward period 2016-2033 of 134 per annum.

4.2 The Company suggest that the existing allocations as identified under the strategic allocation at NW Cullompton (given it has an adopted SPD with identified infrastructure) should not be subject to such a blanket imposition of additional costs which will put in jeopardy the delivery strategy as set out in pages 24–26 of the Plan.

5.0 Cullompton – Policies CU1 – CU16

5.1 For the reasons stated in this submission, we believe that the recent additions to the policies for the provision of significant infrastructure at the chosen location for growth within Cullompton, call in to question the ability of the plan to deliver a strategy that provides flexibility. All sites within Cullompton have now had added to them policy provision for developer led funding to provide improvements to Junction 28 (J28). These are as yet unknown in terms of cost, timing and the specific source and type of funding. The plan makes no provision to adapt to or change any of those allocations to allow them to proceed without the Junction improvements, which further increases the under delivery of housing within the district. In addition, the Council have an adopted SPD for Cullompton (appendix 5) which is less than a year old and the imposition of these conditions flies in the face of the delivery of existing adopted policy.

5.2 For Cullompton the plan as modified fails to provide any detail or justification for such onerous Grampian conditions to be applied other than a basis and broad acknowledgement of an existing highways problem. The plan is therefore inadequate in its current form and cannot be robustly demonstrated that it is deliverable – there is no known highways solution nor contribution sum that would enable this matter to be resolved. Further, it is understood that in excess of five separate developments have now contributed towards works to improve J28 and surrounding junctions. The Company query whether this pooling of contributions has now exceeded its limit.

5.3 The policy modification is poorly defined and is applied broadly across all housing developments. This is simply unsustainable and opposed in the strongest

regard. The Plan does not provide any suitable mechanism through which infrastructure may be delivered to resolve existing highways constraints. The current and proposed strategy is opaque.

5.4 The Local Authority has failed to provide any certainty as to the delivery of such highways works and as a result the deliverability must be questioned of all development which has any impact whatsoever on the highways in and around Cullompton.

5.5 Policy CU 7 Paragraph 3.7 the Company objects to the additional wording added to this paragraph where it is stated that traffic management on the Willand Road and Tiverton Road will be required. We object to the further additions to policy. These state that the development will need to mitigate the impact upon the capacity of J28 of the M5 junctions capacity through implementation of an improvement scheme, in the form of extension junction improvement works involving the second over bridge required in connection with the development east of Cullompton on the policy CU7. "The development will need to mitigate its impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second over bridge required in connection with development east of Cullompton under policy CU7."

5.6 It is unreasonable to link the development of the North West Cullompton site with the North East Cullompton scheme. Both are separate proposals and given the designation of the latter site as the Culm Garden Village, its delivery can be seen to be many years away. Such a condition is unrealistic and puts at risk the delivery of the council's housing trajectory. The current infrastructure delivery plan identifies a figure of £1.3 million for junction improvements required as part of the execution of existing development policy. The table proposes developers contributions as the source, the Plan also refers to the NW Cullompton proposal as being led by a S 106 and other development being sourced from CIL. As there is no defined arrangement as to how that will be apportioned or phased, there is no way of knowing when that junction cost will be sourced or delivered. Furthermore, point G has been added as an additional part of policy requiring financial contributions towards the town centre relief road and other measures together with the financial contributions and point H for capacity improvements at J28 of the M5. Again for the reasons stated above, these costs are unquantified and therefore again pour doubt on the ability of the scheme to be delivered.

We object on the basis that the financial contributions being unknown have yet to be justified and demonstrated to be effective and therefore we do not believe this element of the plan has been positively prepared.

5.7 In paragraph 3.76 a further addition has been made stating that applications will be expected to respond to these aspirations and as set out in the adopted master plan SPD for the site. We object to this additional wording as the quantity of the cost of these are unknown and therefore the effects upon viability and delivery of the project is still to be established. The wording should be removed from the Plan and the commentary policy. Only a year ago the council adopted a new SPD for The N W Cullompton Sustainable Urban Extension. Part of the SPD identifies a detailed delivery strategy which was agreed between the developers and the council which worked to ensure the delivery of housing and the infrastructure for the area. There is no reference to the need for further contributions to fund improvements at J28 in that SPD. The SPD was widely consulted upon and the SPD is now adopted policy. The proposed modifications are now are at odds with this adopted policy which is newly adopted.

5.8 Policy CU6 North West Cullompton phasing we object to the changes to the wording and in particular the imposition of point 1) - the provision of M5 access improvements before any houses are occupied. At this stage we are given no details of what those improvements might be and it is unreasonable for this request to be added which again flies in the face of the delivery of the plan. It is assumed that Mid Devon will be reliant on developer led contribution to deliver the highways solution – such contribution can only become feasible when coupled with live on site and delivery to release capital for off site infrastructure. The current proposal is unsustainable and is opposed in the strongest regard.

5.9 Paragraph 3.94, we object to the additional wording requiring the development to mitigate its impact upon junction capacity to improvement schemes, existing junction or informal extension improvements requiring the second over bridge. At this point the cost of these infrastructure requirements are unknown and have not formed part of previous policy within the SPD. It is clear that all planning allocations within the Cullompton area are required to make these contributions and yet the delivery and phasing requirements of this work are unknown at this stage therefore we object to this preamble and policy change in that it is not effective nor is it consistent and justified as no quantities for these requirements are as yet known. Paragraph 3.95 suggests changes requiring the land of the school to be transferred to the local education authority with the right of access before any development commences. This change is not logical or deliverable. By its very location the school can only be developed in parallel with the development and it can be delivered once development commences, but not prior to that.

5.10 Housing allocations CU13 – CU 16 are all constrained by the same requirements for no further development to take place until significant improvements on J28 have been implemented. The current infrastructure delivery plan does not identify what those costs might be nor the delivery partners involved or how it will be phased or delivered. Therefore there are significant concerns for junction improvements which put in jeopardy all of the applications at Cullompton. It should be remembered that the council are intending to change the direction of travel of the delivery strategy from Tiverton to Cullompton during the lifetime of this plan and yet the plan is unclear in that it does not identify any opportunity for flexibility or adaptability should highway junction improvements not be workable or undeliverable at certain times in the plan periods. The Plan is not sound as growth is predicated on infrastructure directed at one settlement the amount of which and the timing of which are unknown - hence all allocations are restricted.

6.0 Crediton, Cromwells Meadow

6.1 The Company opposes in the strongest possible terms to the modifications identified local planning allocation CRE3 for Crediton. This allocation has been brought forward from the existing Core Strategy into this Plan however the allocation is proposed to reduce from 50 – 35 dwellings, 28% affordable housing instead of 35% affordable housing. The gross allocation area remains the same size, the environmental impact remains the same and all other influencing factors on density, design and infrastructure remain the same as had previously been evidenced, examined and adopted within the existing plan.

6.2 Persimmon Homes South West has recently acquired an interest in this property and will shortly be submitting a detailed planning application for circa 50 dwellings 35% of which affordable in accordance with the adopted planning policy (appendix 6). The proposals as enclosed are policy compliant against all national policy on space, density and housing criteria. The same net and gross assumptions are applied and consistent with policy.

6.3 This site is 2.4 ha gross and assumed to be approximately 1.4 ha net. Paragraph 3.162 and 3.163 on the policy preamble give no indication as to why there is a requirement to deliver such a low number of houses from the site and provides no commentary on its reduction – nor does any of the supporting evidence base. In normal parlance a development area of 1.4 ha (3.56 acres) could be expected to deliver somewhere of around 50 units + using nationally accepted standards of development density. This is clearly supported by the fact the site is currently allocated for 50 dwellings. The White Paper Feb 2017 and NPPF are very clear in respect of densities, optimising Greenfield land, affordable housing and community benefits related to housing delivery. The reasons for the reduction in housing allocation size is therefore totally unclear and has no evidential justification what so ever. The Company therefore objects to any modification to this policy from that which currently exists.

6.4 The existing Local Plan went through its stages of consultation, testing the soundness and the Inspector considered the allocation to be sound for approximately 50 dwellings in its current adopted form. This is supported by a raft of evidence including sustainability appraisal which has subsequently been updated to support this new plan. The existing allocation policy provides that no development can take place until such time as the Crediton relief road is completed. This condition has now been satisfied and development may come forward unrestricted from existing policy constraint.

6.5 It is therefore concerning to understand that now the relief road condition has been satisfied and the site's delivery can come forward unrestricted that this allocation appears to have dropped in dwelling numbers through each stage of this plan's consultation from the adopted 50 dwellings, to 40 dwellings and more recently 35 dwellings. Further the affordable housing requirement on site has yo-yoed from 25%, 28% and 35%. These proposed modifications appear to be inconsistent, ad-hoc and unsubstantiated. It is evidential in respect of this site that Mid Devon has no clear understanding of the physical constraints of the site and likely housing yield.

6.6 Having considered the existing adopted planning policy and having undertaken the Company's own due diligence and testing feasibility layout work Persimmon Homes can see no reason that the existing allocation should be watered down in any way, on the contrary, additional housing should be supported. There are no new material considerations that would further prevent the delivery of this site or result in the reduction of dwellings. The site is available under contract to Persimmon Homes South West, developable and deliverable and therefore meets the primary development criteria.

6.7 The NPPF is very clear where development land is allocated its use should be optimised. Para 15 states "Policies in Local Plans should follow the approach of the presumption in favour of sustainable development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally ". The lack of justification for departing from a clear policy in the adopted plan is not

substantiated, the site is and has been demonstrated as "sustainable" this fact is not disputed by Mid Devon. NPPF provides no guidance on density which was purposefully removed from earlier national guidance to encourage good design to lead density.

6.8 The Company expressed its concerns by letter dated 19th October 2016 addressed to Jenny Clifford, Head of Planning and Regeneration (appendix 7). Mrs Clifford's response (appendix 8), dated 18th November 2016, clarified that the proposed changes are based on the most recent evidence base to support the Local Plan, in particular the impact on Shobrooke Park. Upon further review, we see no evidence within the evidence base that would have resulted in such a change of opinion, especially considering the site and situation has not changed. Clarity from Mid Devon DC has been sought on this matter but not provided. As stated within the HEA appraisal Dec' 16 additional mitigation measures can be provided. The site is evidently sustainable (this is not disputed by Mid Devon as the allocation is protected). The character of the site has not changed, nor has its planning setting or environmental constraint. Within the Sustainability Appraisal 2015 (appendix 9) which forms part of the evidence base, it is acknowledged 'There will be some visual impact when heading into the settlement, but some housing is already visible from the existing Cromwells Meadow estate, which is on higher ground than the proposed site, and which thereby mitigates against any impact'. There is no evidence to support reducing the number of total dwellings due to visual impact. More recently (January 2017) the Council provided an addendum to the Sustainability Appraisal, suggesting that appropriate landscaping be incorporated into the design of the site and that a full archaeological investigation be completed – both of which will be included within the forthcoming application. It stands, that there is no evidence that any other heritage or archaeological influence from or on to the site should impact the proposed development considering the existing built environment.



(View of existing industrial area from Shobrooke Park, Jan '17)



(View of completed development and CRE3 from Shobrooke Park, Jan '17)



(View of Shobrooke Park from Willow Walk, CRE3, Jan '17)

6.9 It is already recognised and agreed that the completed Cromwells Meadow development is in a more visually apparent position than the low lying allocation CRE3. The images above demonstrate that any additional development adjoining CRE3 would be inconsequential, especially considering the natural screening of the existing hedge line and arboriculture. A reduction in dwellings based on visual impact is nonsensical considering the more visually detrimental industrial area; if this location is as sensitive as portrayed, then why was an industrial area allowed?

6.10 Critically the allocation is not reduced in size (area). The same gross allocation size is proposed, consequently the same development footprint between modifications must be assumed. Whether the net area provides a higher number of

2 and 3 bed smaller dwellings against larger 4 and 5 bed homes is immaterial. The developable footprint and therefore visual impact between the modifications and the adopted policy are identical.

6.11 The amendments to CRE 3 suggested by Mid Devon District Council are unjustified and contradictory to Government strategy. The stated intention of government to produce solutions to fix the broken housing market within the recently published Housing White Paper (February 2017) published by the Department for Communities and Local Government should be considered. In particular paragraph 1.53 of that White Paper is worth noting and has a bearing on the proposed changes. A clear emphasis within the Paper is the delivery of allocated sites as soon as possible to meet the current and future housing needs and avoiding building schemes at low densities. The stance taken by the council is only aiding to the deficient and under delivery of housing, 'authorities should have a clear strategy to maximise the use of suitable land... their identified requirement should be accommodated unless there are policies elsewhere in the NPPF that provide strong reasons for restricting development, or the adverse impacts of meeting this requirement would significantly outweigh and demonstrably outweigh the benefits' (1.22, p24). No robust evidence suggests that this allocation is contrary to NPPF policy; on the contrary additional housing should be *supported*, 'the Government proposes to amend the NPPF to make it clear that plans and individual development proposals should: make efficient use of land and avoid building homes at low densities' and 'take a flexible approach in adopting and applying policy and guidance that could inhibit these objectives' (1.53-4, p32). It should be noted, that a number of existing allocations are controlled by land promoters, resulting in a backlog of required housing caused by the delay and under delivery of housing schemes.

6.12 The Company objects wholeheartedly to the modifications and will continue to do so at any opportunity provided. The Company's testing layout (appendix 6) is for 50 dwellings, which is a policy compliant scheme in all regards and will be submitted shortly to Mid Devon. Thereon the Company intends to present evidence at the local plan examination to the Inspector to demonstrate that nothing materially has changed since its allocation within the last plan was considered sound. In fact in the time period from the Local Plan's original adoption to present, its delivery has now become more certain with the opening of the link road.

6.13 In light of the substantial concerns and objections raised by Persimmon in respect of housing numbers and delivery of the proposed plan as a whole it appears critical that Mid Devon utilise efficiently all other allocations to bolster housing supply across the Authority.

7.0 The ability to deliver new Gypsy and Traveller Facilities within Major Urban Extensions

7.1 Persimmon Homes is aware of recent developments and meetings held with Mid Devon DC, banks, lenders, developers and other local planning authorities with regard to Gypsy and Traveller sites to be delivered within allocations. It is now apparent that mortgage lenders will not be able or willing to support sites which include any provision for such Traveller facilities, accommodation or sites – whether that be on or within the wider immediate vicinity of an allocation. Persimmon Homes therefore opposes the inclusion of any traveller facilities within proposed allocations. The immediate impact of the lenders position is that any site with such facilities are indefinitely unviable. Persimmon Homes therefore proposes the removal of all such wording and requirement from policy.

7.2 Persimmon Homes understands that Mid Devon DC are currently consulting central government on this matter but as yet no suitable outcome has been found. It has been suggested by Mid Devon DC that a compromise may be for developers to find, plan and purchase appropriate alternative sites outside of the allocations. This view is totally unsustainable and opposed. It is unreasonable to expect a developer to take such steps when Mid Devon DC has all necessary resource and legal power through CPO to deliver such land. Any delivery may be sourced through pooled S106 or CIL contribution only.

7.3 We are aware of the fact that the Council are urged by central government to provide new provision within sustainable urban extensions being promoted as part of the plan – for example at Tiverton and Cullompton. This provision is part of the planned uses within these areas. As part of the intentions within the February 2017 White Paper it is noted and welcomed that the government recognise the need for an Infrastructure Fund which will assist in the delivery of a range of requirements and we would urge the Council to lobby for funds within this financial mechanism to assist in the specific delivery of Gypsy and Traveller facilities as noted at paragraph 2.19 of the White Paper and the involvement of the HCA /Homes England at paragraph 3.36.

8.0 Conclusion

8.1 Persimmon Homes objection to the items identified above is directed at the Council's lack of recognition of the emerging new strategic coordination of growth as represented by the Greater Exeter Plan.

8.2 The recent changes to policy wording put in doubt the delivery strategy of the Plan. Insufficient evidence has been presented by the Council to demonstrate that the strategy is soundly thought through, feasible and critically deliverable against the trajectory proposed.

8.3 The allocations at Cullompton and Crediton are not objected to per se but the ability of these sites to deliver growth in accord with the Council's intentions and policy mechanisms is put in doubt by the detailed elements of the policies as drafted and are therefore opposed to in their current form.

8.4 Given the thrust of recent Government guidance in the form of the Housing White Paper to boost housing supply and deliver the much needed housing stock Persimmon Homes view the policies as currently drafted at odds and unsound when compared with National guidance . The stance taken by the Council is only aiding to the deficient and under delivery of housing, 'authorities should have a clear strategy to maximise the use of suitable land" (Housing White Paper).



Draft Infrastructure Plan, Regulation 123 list and Section 106 policy

December 2016

1. Introduction

- 1.1 The National Planning Policy Framework requires local planning authorities to work with other authorities and providers to assess the quality and capacity of existing infrastructure and to set strategic policies regarding the delivery of new infrastructure. In doing so the local planning authority is required to plan positively for the development of the following types of infrastructure: transport, telecommunications, waste, management, water supply, wastewater, flood risk and coastal change management, provision of minerals and energy (including heat), health, security, community and cultural infrastructure.

2. Planning for Infrastructure in Mid Devon

- 2.1 At the current time Mid Devon is currently in the process of preparing a new Local Plan for the district, which will cover the period 2013-33. The purpose of this document is to identify what further infrastructure requirements are required over the 20 year period of the plan. The document sets out what infrastructure improvements will be needed to support the additional development set out in the plan, the timescale for when these will be needed, and who will provide them. It also sets out the level of resources needed to deliver the improvements, and how much will be sought from development. Ensuring development is supported by adequate infrastructure is fundamental to delivering the vision as set out in the new Local Plan.
- 2.2 The plan has been prepared by consulting key infrastructure providers across the district and the wider area. Preparation of this document is an iterative process involving ongoing discussions with a number of infrastructure providers.
- 2.3 This document reflects the development strategy in the proposed submission Local Plan, but will need to be kept updated both as the plan goes through various stages of development after that, and after the Local Plan has been adopted to reflect changing resources, priorities and information.

3. Priority of infrastructure

- 3.1 A key element of infrastructure planning is ensuring that the importance of various infrastructure schemes is clear. This enables decision makers to prioritise resources and funding towards those schemes that create the greatest benefit for the area, and unlock development in the most appropriate manner. It is important to note that these priorities relate to the delivery of built development and the Local plan objectives, rather than the over-arching objectives of the local authorities or organisations named as delivery partners.
- 3.2 The following infrastructure priority criteria have been used:

(1) Critical:

Infrastructure required to deliver the strategic vision and objectives of the Local Plan. Critical requirements contribute to delivering the wider strategic aims of the Plan, and may also mitigate the impacts of development schemes. The plan may fail without the delivery of this infrastructure.

(2) Important:

Infrastructure required to deliver specific schemes and provide services and facilities to meet the needs of new residents. The delivery of an allocated site may fail without the delivery of this infrastructure.

(3) Desirable:

Infrastructure required that would enhance the effectiveness, efficiency and quality of infrastructure or services, creating a better place to live and work.

Local Priority

Identified as desirable or beneficial to the local community through Parish and Town Council consultation.

4. Status of this infrastructure plan, Regulation 123 list and Section 106 Policy.

- 4.1 As with all infrastructure plans, this document represents a ‘snapshot’ of an ever-changing and constantly evolving situation. This infrastructure plan and associated regulation 123 list (Annex A) and Section 106 Policy (Annex B) are in a draft format at present and open to consultation. It is possible and indeed quite likely, that as further assessment is undertaken, the costs, timescales and the priority of the items listed below may change. In future, some items may be considered not required, whilst some new items may be added to subsequent versions of the infrastructure plan. The Infrastructure Plan should therefore be considered a “living document” subject to regular reassessment.

Mid Devon Infrastructure Plan (2013-33)

| Settlement / area | Infrastructure Item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | Delivery Partners and possible sources of funding | |
|---------------------|---|-----------|--------------------|------------------|----------------------|---------------|-------------|---|--|
| | | | | | | | | Growth Fund / developer contributions /CIL | DCC. Developer contributions / CIL / bus operator. |
| Strategic provision | Improvements to M5 J27 and A361 Sampford Peverell | Transport | (2) Important | 2022/23 | £10.5 m | £0 | £10.5m | £TBC | |
| Strategic provision | Community transport | Transport | (3) Desirable | Throughout plan | £8.8m | £0 | £8.8m | TBC | |
| District wide | Upgrades to or new waste water treatment facilities. Adequate capacity to accommodate growth to 2020 in terms of sewage treatment and potable water (though some localised improvements subject to discussions with developers on specific sites). Post 2020 capacity to be reviewed in subsequent South West Water Business Plans. | Water | (1) Critical | 2022-27 | Unknown | Unknown | Unknown | Unknown | Expected to be funded by SWW and developer contributions. |
| District wide | Public open space/green infrastructure | | (2) Important | Throughout plan | TBC | | | £0 | MDDC. Funded by developer contributions. |
| District wide | New recycling centre (replacement for Ashley) | Waste | (2) Important | TBC | £3.5m | £0 | £3.5m | £3.5m | DCC. Funded through developer contributions and DCC funding. |

| Settlement / area | Infrastructure Item | Type | Strategic Priority | Delivery Phasing | Estimated Cost | Secured Funds | Funding Gap | CIL Eligible Funding Gap | Delivery Partners and possible sources of funding |
|-------------------|---|--------------------|--------------------|------------------|------------------|---|-------------|--------------------------|---|
| | | | | | | | | | |
| District wide | Criminal Justice Centre | Emergency services | (3) Desirable | TBC | £1.05m | £0 | £1.05m | £1.05m | Police. Funded by police / developer contributions / CIL. |
| District wide | Special educational need provision located in Culmpton | Education | Desirable | | £2.4m + 1ha land | £0 | £2.8m | | Funding from CIL and s.106 |
| Tiverton | Tiverton Eastern Urban Extension Access on to A361 including new junction and highway link from this to Blundell's Road | Transport | (1) Critical | 2016-21 | £19m | £9.2m (from LEP and s106) | £9.8m | £0 | DCC. Funded by developers and Local Transport Board funding (LEP) |
| Tiverton | Public realm improvements/traffic calming to Blundell's Road | Transport | (1) Critical | 2016-21 | £2m | £434k (from Waddeton Park app) + £921k (subject to s106 from Chettscombe) | £645k | £0 | DCC/Developers. To be funded by developer contributions. |
| Tiverton | Works to increase roundabout capacity | Transport | (1) Critical | 2016-21 | £0.55m | £119k (from Waddeton Park app) + £253k (subject to s106 from Chettscombe) | £178k | £0 | DCC/Developers. To be funded by developer contributions. |

| Settlement / area | Infrastructure item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | CIL Eligible Funding Gap | Delivery partners and possible sources of funding |
|-------------------|---|-----------|--------------------|---------------------------|----------------------|---|------------------------------------|--------------------------|--|
| | | | | | | | | £0 | |
| Tiverton | Enhanced public transport to serve development; new / enhanced pedestrian / cycle facilities to serve development | Transport | (1) Critical | In phase with development | £2.4m | £400k (from Waddeton Park app) + £852k (from Chettscombe subject to s106) | £1.148m | £0 | DCC. To be funded by developer contributions/ bus operator. |
| Tiverton | New 420 place primary school at EUF including early years provision. | Education | (1) Critical | 2016-21 | £7m + 1.9ha land | £1.1m + 0.24ha land contribution (from Waddeton Park app) | £3.6m + land equivalent to 1.35 ha | TBC | DCC. Funded by developer contributions from EUF and CIL from wider development in Tiverton |

| Settlement / area | Infrastructure item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | CIL Eligible Funding Gap | | Delivery Partners and possible sources of funding |
|-------------------|---|--------------------|--------------------|------------------|----------------------|--|-------------|--------------------------|---|---|
| | | | | | | | | TBC | | |
| Tiverton | Secondary school expansion to accommodate the needs arising from development in Tiverton and within Tiverton High School's designated area | Education | (1) Critical | 2016-21 onwards | £5.5m | £675k (from Waddeton Park app) + £1.4m contribution to be secured from Chettscombe application | £3.425m | TBC | DCC, Developer contributions from EU plus CIL from other developments | TCAT and Arts Council are potential partners if delivered to also serve the community theatre |
| Tiverton | Energy from waste plant with the potential for a district heat network. | Waste | (3) Desirable | 2016-21 onwards | £30m | £0 | £30m | £0 | Private sector waste management company. | |
| Tiverton | Expansion of Fire Service capacity to support growth of the town. Includes cost of response vehicle, small fire engine and garaging construction and 5 year leasing period. | Emergency services | (2) Important | 2022-27 | c. £0.38m | £0 | £0.38m | £0.38m | DSFS. To be funded through CIL / developer contributions. | |
| Tiverton | GP surgery | Health facilities | (2) Important | TBC | c. £3.2m | £0 | £3.2m | £3.2m | NHS funded via local GP partnerships (Clinical Commissioning Groups) and CIL. | |

| Settlement / area | Infrastructure item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | CL Eligible Funding Gap | Delivery Partners and possible sources of funding |
|--------------------------|---|----------------------|---------------------------|-------------------------|-----------------------------|----------------------------------|--------------------|--------------------------------|---|
| Tiverton | Flood defence measures on the Rivers Lowman (Alms Houses), Exe (Hospital and adjacent industrial site) and Cottet Brook | Flooding | (2) Important | 2016-2021 | Unknown | Unknown (bid of £1.2m submitted) | Unknown | Unknown | EA. Central Government grant money (Flood Defence Grant in Aid). |
| Tiverton | Community hall/provision | Community facilities | (3) Desirable | TBC | c. £0.55m | £0 | £0.55m | £0.55m | MDDC. Funded by CL / voluntary sector grant. |
| Tiverton | Development of Tiverton Youth and Community Centre as a youth hub | Community facilities | (3) Desirable | TBC | TBC | TBC | TBC | TBC | DCC. Funded by developer contributions / DCC. |
| Tiverton | Children's centre facilities | Community facilities | (3) Desirable | TBC | TBC | TBC | TBC | TBC | DCC. Funded by developer contributions / DCC. |
| Tiverton | Enhancement of library facilities | Libraries | (3) Desirable | 2016-21 | £35,000 | 0 | £35,000 | 0 | DCC. Funded by developer contributions / DCC. |
| Tiverton | Extra Care provision of 50 units | Health facilities | (3) Desirable | TBC | c.£7m | £0 | £7m | £7m | DCC / Private sector provider. Funded through developer contributions / private sector. |
| Tiverton | Community theatre, located on school site | Community facilities | (3) Desirable | TBC | TBC | TBC | TBC | TBC | DCC / private/third sector provider. Funded through CL / external funding sources. |

| Settlement / area | Infrastructure Item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | CIL | Eligible Funding Gap | Delivery Partners and possible sources of funding |
|--------------------------|--|-------------|---------------------------|-------------------------|-----------------------------|----------------------|--------------------|------------|-----------------------------|---|
| Cullompton | Improvements to J28 of the M5 to provide signals to accommodate development in existing plans. | Transport | (1) Critical | 2016-21 | £1.3m | £1.3m | £0 | £0 | £0 | DCC. Funded through developer contributions and other sources. |
| Cullompton | Transport Improvements to alleviate M5 Junction 28 (may or may not include Eastern Relief Road depending on final option chosen) | Transport | (1) Critical | Throughout plan period | £50-55m | £0 | £50-55m | £0 | £0 | DCC / MDDC / HA. Funded by developer contributions/LEP/HCA funding. |
| Cullompton | Secondary school expansion | Education | (1) Critical | TBC | £8.8m + land | TBC | £8.8m | TBC | TBC | DCC. Developer contributions from Cullompton development and CIL from other development which requires additional capacity including developments in the school's designated area |
| Cullompton | New 420 place primary school within North West Cullompton allocation including early years provision | Education | (1) Critical | 2016-21 | c. £6.1m + 2.1ha land | £0 | £6.1m | TBC | TBC | DCC. Cost dependent on final development strategy. Funded by developer contributions from NW Cullompton and CIL from development in Cullompton. |

| Settlement / area | Infrastructure Item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | Cllr. Eligible Funding Gap | Delivery Partners and possible sources of funding |
|--------------------------|--|-------------|---------------------------|---------------------------|-----------------------------|----------------------|--------------------|-----------------------------------|---|
| Cullompton | New 630 place primary school within East Cullompton including early years provision (or two schools of equivalent capacity). | Education | (1) Critical | In phase with development | c. £9m + 2.5ha land | £0 | £9m | £0 | DCC.. Cost dependent on final development strategy. Fully funded by developer contributions from East Cullompton. |
| Cullompton | Expansion of St Andrew's and Willowbank to accommodate background growth. | Education | (2) Important | | | | | £0 | DCC. Funded by DCC budgets and s106. |
| Cullompton | Bus improvements to service new development to the north west of Cullompton | Transport | (1) Critical | In phase with development | £1.3m | £0 | £1.3m | £0 | DCC. Funded by developer contributions / bus operator. |
| Cullompton | Bus improvements to service new community options at East Cullompton. | Transport | (1) Critical | In phase with development | £1.3m | £0 | £1.3m | £0 | DCC. Funded by developer contributions / bus operator. |
| Cullompton | New / enhanced pedestrian / cycle facilities to serve development (NW Cullompton & East Cullompton) | Transport | (1) Critical | In phase with development | TBC | £0 | TBC | £0 | DCC. Funded by developer through direct provision. |
| Cullompton | Railway station reopening | Transport | (2) Important | | TBC | £6m | £0 | £6m | DCC. Funded by developer contributions. |
| Cullompton | Air quality improvements | Transport | (2) Important | Throughout plan | £2.1m | TBC | TBC | TBC | MDDC. Funded by developer contributions. |

| Settlement / area | Infrastructure Item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | CL Eligible Funding Gap | Delivery Partners and possible sources of funding |
|-------------------|---|----------------------|--------------------|---------------------------|----------------------|-----------------------|-------------|-------------------------|--|
| Cullompton | Expansion of Fire Service capacity to support growth. Includes cost of response vehicle, small fire engine and garaging construction costs (including some costs for leasing based over 5 year period). | Emergency services | (2) Important | 2022-27 | c. £0.38m | £0 | £0.38m | £0.38m | DSFS. To be funded through developer contributions. Trigger point would be half total housing target in Local Plan for Cullompton. |
| Cullompton | Children's centre facilities (potentially including East Cullompton) - subject to DCC review of provision. | Community facilities | (3) Desirable | TBC | TBC | TBC | TBC | TBC | DCC / alternative provider. |
| Cullompton | Community hall/provision | Community facilities | (3) Desirable | 2016-21 | Unknown | Provided by developer | £0 | £0 | Developer. |
| Cullompton | Expansion of Library to accommodate needs of new development | Community facilities | (3) Desirable | 2016-21 | Unknown | £0 | Unknown | Unknown | DCC / Developer contributions. |
| Cullompton | Extra Care provision of 50 units | Health facilities | (3) Desirable | TBC | c.£7m | £0 | £7m | £7m | DCC / Private sector provider. Funded through developer contributions / private sector. |
| Crediton | Bus improvements to service new development | Transport | (1) Critical | In phase with development | £0.65m | TBC | £0.65m | £0 | DCC. Funded by developer contributions / bus operator. |
| Crediton | New / enhanced pedestrian / cycle facilities to serve development | Transport | (1) Critical | In phase with development | TBC | £0 | TBC | TBC | DCC. Funded by developer through direct provision. |

| Settlement / area | Infrastructure item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | CIL | Eligible Funding Gap | Delivery partners and possible sources of funding |
|-------------------|--|----------------------|--------------------|---------------------------|------------------------|---------------|-------------|----------|----------------------|---|
| Crediton | Crediton air quality. Relates to link road. Will require further testing to define impact and need for further mitigation/works. | | (2) Important | Throughout plan | £0.5m | TBC | TBC | TBC | | MDDC. Funded by developer contributions. |
| Crediton | New 210 place primary school including early years provision | Education | (1) Critical | In phase with development | c. £3.6m 1.1ha land | £0 | £3.6m | £2.8m | | DCC. Cost dependent on final development strategy. Funded by developer contributions and CIL. |
| Crediton | Expansion to Haywards and Landscore Primary Schools to accommodate background growth and some new development. | Education | (2) Important | 2016-21 | £2.3m | £2.3m | £0 | £0 | | DCC. Funded by DCC budgets and s106. |
| Crediton | Children's centre facilities - subject to DCC review of provision. | Community facilities | (3) Desirable | TBC | TBC | TBC | TBC | TBC | | DCC. |
| Crediton | Extra Care provision of 50 units | Health facilities | (3) Desirable | TBC | c.£7m | £0 | £7m | £7m | | DCC / Private sector provider. Funded through developer contributions / private sector. |
| Rural | Uffculme rural - secondary school expansion | Education | (2) Important | In phase with development | £120,000 | £0 | £120,000 | £120,000 | | DCC. Funding from CIL |
| Rural | Uffculme rural - primary school expansion | Education | (2) Important | In phase with development | £125,000 | £0 | £125,000 | £125,000 | | DCC. Funding from CIL |
| Rural | Tiverton rural - primary school expansion | Education | (2) Important | In phase with development | £55,000 | £0 | £55,000 | £55,000 | | DCC. Funding from CIL |

| Settlement / area | Infrastructure item | Type | Strategic Priority | Delivery Phasing | Total Estimated Cost | Secured Funds | Funding Gap | CIL Eligible Funding Gap | Delivery partners and possible sources of funding |
|--------------------------|--|----------------------|---------------------------|---------------------------|-----------------------------|----------------------|--------------------|---------------------------------|--|
| Rural | Cullompton rural - primary school expansion | Education | (2) Important | In phase with development | £160,000 | £0 | £160,000 | £160,000 | DCC. Funding from CIL |
| Rural | Crediton rural - primary school expansion | Education | (2) Important | In phase with development | £800,000 | £0 | £800,000 | £800,000 | DCC. Funding from CIL |
| Rural | Community asset transfer and 5 year running costs for Kennerleigh Village Shop | Community facilities | Local | 2016-21 | £25k | £0 | £25k | £25k | Kennerleigh Parish Council/confederation of parish councils. Funding from CIL. |
| Rural | Improvements to library service in Bampton | Libraries | Local | TBC | TBC | TBC | TBC | TBC | DCC and Bampton library community pilot group, developer contributions. |
| Rural | Boniface Trail cycle route feasibility study | Transport | Local | TBC | £10k | £0 | £10k | £10k | Funding from CIL |

Totals*

Total infrastructure cost: £214.8m

Secured funds: £23.6m

Total gap: £188.2m

CIL eligible: £34.2m

*Figures calculated exclude unknown costs (including land where this is required). If item cost expressed as a range, lower figure used in total calculations.

Acronyms

| | |
|------|------------------------------------|
| CIL | Community Infrastructure Levy |
| CCG | Clinical Commissioning Group |
| DCC | Devon County Council |
| DCLG | Department for Communities |
| DfT | Department for Transport |
| DSFS | Devon and Somerset Fire Service |
| EA | Environment Agency |
| EUE | (Tiverton) Eastern Urban Extension |
| GP | General Practitioner |
| HA | Highways Agency |
| HCA | Homes and Communities Agency |
| LEP | Local Enterprise Partnership |
| MDDC | Mid Devon District Council |
| NHS | National Health Service |
| S106 | Section 106 Planning Contribution |
| SWW | South West Water |

| Draft Regulation 123 List | |
|---|--|
| Types of infrastructure to be funded in whole or part by CIL | Specific infrastructure items excluded from the Regulation 123 list to be funded via developer contributions (i.e. s106/s278 agreements) |
| Education, early years, youth and children's centre facilities; | <p>Excluding any provision required due to the development of Tiverton Eastern Urban Extension</p> <p>Excluding any provision required due to the development of East Cullompton</p> <p>Excluding any provision required due to the development of North West Cullompton</p> |
| Home to School Transport (and vice versa) | <p>Excluding any provision required due to the development of Tiverton Eastern Urban Extension</p> <p>Excluding any provision required due to the development of East Cullompton</p> <p>Excluding any provision required due to the development of North West Cullompton</p> |
| Leisure facilities (sports facilities defined as publicly owned leisure centres, gyms and swimming pools) | <p>Excluding open space provision (publicly accessible open space, allotments, other green infrastructure and sports pitches with associated changing facilities)</p> <p>Excluding any provision required due to the development of Tiverton Eastern Urban Extension</p> <p>Excluding any provision required due to the development of East Cullompton</p> <p>Excluding any provision required due to the development of North West Cullompton</p> |
| Transport improvements; | <p>Excluding specific improvements needed to make the development acceptable in planning terms. These exclusions can include (but are not limited to) highways access to the site and local road junctions, deceleration and turning lanes, measures to facilitate pedestrian and cyclist access, lighting and street furniture needed to mitigate the impact of a particular development. They may also include mitigation works remote from the development site where the need for such works is identified in a Transport Assessment or Junction Capacity Study.</p> <p>Excluding any provision required due to the development of Tiverton Eastern Urban Extension</p> <p>Excluding any provision required due to the development of East Cullompton</p> <p>Excluding any provision required due to the development of North West Cullompton</p> <p>Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)</p> |
| Health and Emergency Services facilities; | <p>Excluding any provision required due to the development of Tiverton Eastern Urban Extension</p> <p>Excluding any provision required due to the development of East Cullompton</p> <p>Excluding any provision required due to the development of North West Cullompton</p> <p>Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)</p> |
| Library services; | <p>Excluding any provision required due to the development of Tiverton Eastern Urban Extension</p> <p>Excluding any provision required due to the development of</p> |

| | |
|---|--|
| | East Cullompton Excluding any provision required due to the development of North West Cullompton |
| Community Care facilities (social care institutions providing for older people and people with mental health or learning disabilities); | Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton |
| Public realm improvements and enhancements. | Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton |
| Community facilities and social infrastructure (community centres and meeting places but excluding places of worship; voluntary sector meeting places and centres; and public cultural facilities); | Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton |
| Carbon offsetting and air quality improvements; and | Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5) |

POLICY ON USE OF SECTION 106 FOR INFRASTRUCTURE

Upon implementation of the Mid Devon Community Infrastructure Levy, the Council will also implement the "Regulation 123 List" which sets out the items of infrastructure which will be wholly or partly funded by Community Infrastructure Levy. After that time, it will not be possible to use Planning Obligations under Section 106 to fund infrastructure items on that list. Accordingly, there will be a scaling back of Section 106 use and it is proposed that this policy will provide a guide to the use of Section 106. The following four sections indicate the areas which may still be subject to planning obligations under Section 106.

1 Non –Infrastructure Requirements

The funding and provision of items which are not defined as infrastructure, such as affordable housing.

Other non-infrastructure requirements such as development phasing, the implementation of travel plans and construction management.

2 Infrastructure for Urban Extensions

The provision of infrastructure within, directly related to or required as a result of development within the defined areas of the North West Cullompton, East Cullompton and East Tiverton urban extensions allocated in the adopted Local Plan Review. This reflects

the fact that these sites are proposed to be zero-rated for CIL. All of the remainder of this policy should be read with this exception in mind.

3 Site-Specific Transport Improvements

Generally, transport provision is included within the Regulation 123 List as a type of infrastructure to be funded wholly or partly by Community Infrastructure Levy. However, excluded from this general limitation are site-specific improvements needed to make a development acceptable in planning terms. These can include (but are not limited to) highways crossovers to access the site and local road junctions, deceleration and turning lanes, measures to facilitate pedestrian and cyclist access, lighting and street furniture needed to mitigate the impact of a particular development. They may also include mitigation works remote from the development site where the need for such works is identified in a Transport Assessment or Junction Capacity Study.

4 Other Infrastructure Provision

Infrastructure provision which meets the necessity, relatedness and fairness tests set out in the CIL Regulations (often referred to as the "CIL Tests") but which is not included on the Regulation 123 list to be funded by CIL may be sought through the use of Planning Obligations. A full list of infrastructure to be sought through planning obligations is not included, since much would depend on the specific development put forward, but the following forms of infrastructure are specifically referred to within the Local Plan.

- Public Open Space -the provision of public open space (publicly accessible open space, allotments, other green infrastructure and sports pitches with associated changing facilities) in accordance with the adopted policies of the Local Plan Review including where necessary replacement provision as a result of the loss of an existing facility.
- Sustainable Urban Drainage Systems
- Wildlife protection, enhancement and mitigation
- Measures related to pollution and contaminated land.

Appendix 3

Local Plan Review 2013 - 2033
Proposed Submission
(incorporating proposed modifications)

| Location | Policy | 2013/14 | 2014/15 | 2015/16 | 2016/17 | 2017/18 | 2018/19 | 2019/20 | 2020/21 | 2021/22 | 2022/23 | 2023/24 | 2024/25 | 2025/26 | 2026/27 | 2027/28 | 2028/29 | 2029/30 | 2030/31 | 2031/32 | 2032/33 | Total | |
|-------------------------------|--------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|------------|-------------|-------------|-----|
| Rural sites | | | | | | | | | | | | | | | | | | | | | | | |
| Newton Square | BA1 | | | | | 5 | | | | 5 | | | | | | | | | | | | | 5 |
| Hollywell | BO1 | | | | | 72 | 8 | 12 | 8 | | | | | | | | | | | | | | 20 |
| Godfrey Gardens | BO2 | | | | 6 | | | | | | | | | | | | | | | | | | 6 |
| Hele Road | BR1 | | | | | 7 | | 7 | | | | | | | | | | | | | | | 7 |
| Barton | CH1 | | | | | 42 | 8 | 12 | 8 | | | | | | | | | | | | | | 20 |
| Land off Church Lane | CB1 | | | | | 12 | 16 | 12 | 8 | | | | | | | | | | | | | | 20 |
| Barnshill Close | CF1 | | | | | 7 | | 7 | | | | | | | | | | | | | | | 7 |
| Land adj school | CF2 | | | | | 42 | 10 | 12 | 10 | | | | | | | | | | | | | | 22 |
| Old Abattoir | CO1 | | | | | 12 | 15 | 15 | | | | | | | | | | | | | | | 30 |
| Linhay Close | CL1 | | | | | 6 | 6 | | | | | | | | | | | | | | | | 6 |
| Hunters Hill | CL2 | | | | | 10 | 10 | | | | | | | | | | | | | | | | 10 |
| Land adj Fishers Way | HA1 | | | | | 10 | | 10 | | | | | | | | | | | | | | | 10 |
| Depot | HE1 | | | | | 10 | | | | | | | | | | | | | | | | | 10 |
| Greenaway | MD1 | | | | | 12 | 8 | 12 | 8 | | | | | | | | | | | | | | 20 |
| Court Orchard | NE1 | | | | | 12 | 13 | | | | | | | | | | | | | | | | 25 |
| Former Tiverton Parkway Hotel | SP1 | | | | | 12 | | 10 | | | | | | | | | | | | | | | 10 |
| Higher Town | SP2 | | | | | | | | | 12 | 25 | 23 | | | | | | | | | | | 60 |
| Fannys Lane | SA1 | | | | | 12 | 15 | 8 | | | | | | | | | | | | | | | 87 |
| Old Butterleigh Road | SI1 | | | | | 6 | | 8 | | | | | | | | | | | | | | | 8 |
| The Garage | SI2 | | | | | 5 | | 5 | | | | | | | | | | | | | | | 5 |
| South of Broadlands | TH1 | | | | | 12 | | | | | | | | | | | | | | | | | 12 |
| West of Uffculme | UF1 | | | | | | 12 | 25 | 23 | | | | | | | | | | | | | | 60 |
| Land east of M5 | W1 | | | | | 12 | 12 | 25 | 5 | | | | | | | | | | | | | | 42 |
| Commitments | | 82 | 144 | 144 | 212 | 144 | 168 | 155 | | | | | | | | | | | | | | | 535 |
| Completions | | 82 | 137 | 128 | | | | | | | | | | | | | | | | | | | 514 |
| Total | | 82 | 137 | 128 | 212 | 180 | 235 | 180 | 3 | 70 | 5 | 12 | 25 | 23 | 0 | 1289 | |
| Total | | 320 | 316 | 288 | 486 | 474 | 714 | 607 | 373 | 579 | 640 | 458 | 383 | 500 | 525 | 513 | 413 | 343 | 200 | 250 | 250 | 8634 | |
| | | 456 | 476 | 562 | 425 | 365 | 341 | 558 | 526 | 433 | 500 | 346 | 299 | 300 | 500 | 346 | 299 | 200 | 250 | 250 | 7628 | | |

Table 6: Housing forecast 2013 - 2033

2.5 The availability, suitability and achievability of the sites have been assessed during the Local Plan's preparation, through the Strategic Housing Land Availability Assessment (SHLAA) in accordance with national policy and guidance. The Council is therefore confident that they can and will deliver sufficient housing to meet Mid Devon's requirements. Delivery of housing will be monitored annually with information published in the Authority's Monitoring Report each December. Where performance falls significantly below the development targets and the Council is no longer able to demonstrate a five year supply of housing in accordance with national policy, the Council will take action as set out in Policy S4. The Local Plan will be reviewed and new sites identified if strategic sites in this plan fail to come forward.

Appendix 4



Appeal Decision

Inquiry held between 2 February and 5 February 2016

Site visit made on 5 February 2016

by **Robert Parker BSc (Hons) Dip TP MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 11 April 2016

Appeal Ref: APP/Y1138/W/15/3025120

Uffculme Road, Uffculme, Devon

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Messrs Persey and Hardling against the decision of Mid Devon District Council.
 - The application Ref 15/00108/MOUT, dated 24 January 2015, was refused by notice dated 23 April 2015.
 - The development proposed is outline application for up to 60 dwellings with access onto Uffculme Road, with all other matters reserved for future consideration.
-

Decision

1. The appeal is allowed and planning permission is granted for outline application for up to 60 dwellings with access onto Uffculme Road, with all other matters reserved for future consideration at Land West of Harvesters, Uffculme Road, Uffculme, Devon in accordance with the terms of the application, Ref 15/00108/MOUT, dated 24 January 2015, subject to the conditions set out in the attached schedule.

Procedural Matters

2. The application was submitted in outline, with only the means of access to be determined at this stage. I have dealt with the appeal on that basis, treating the layout plan as illustrative.
3. The above site address is taken from the application form. However, a more precise description would be Land West of Harvesters, Uffculme Road, Uffculme, Devon. This is the address I have used in my formal decision.
4. A draft agreement under Section 106 of the Town and Country Planning Act 1990 (S106) was submitted in advance of the Inquiry and its terms were discussed during proceedings. An executed copy of the S106 was supplied after the event closed¹. The deed includes obligations relating to affordable housing, education contributions, a Travel Plan and the provision and maintenance of public open space and a sustainable urban drainage system (SUDS) within the appeal site.
5. Prior to the Inquiry the Council confirmed that it was retracting parts of its evidence relating to the walking distance/route to services in the village and the impact of the proposal on the rural character of the area. My decision takes account of this altered stance.

¹ S106 dated 18 February 2016

Main Issue

6. The main issue in this case is whether, having regard to the development plan, the National Planning Policy Framework, the housing land supply of the Council and the scale/location of the development, the appeal scheme would constitute a sustainable form of development.

Reasons

7. The appeal site is situated on the western fringes of Uffculme. It measures some 3.49 hectares and comprises an agricultural field together with part of the rear garden belonging to the property known as Harvesters. The field has a frontage onto Uffculme Road from which access would be taken. The southern boundary is demarcated by the River Culme, the flood plain for which extends across part of the site.

Development plan

8. The starting point for any assessment must be the development plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise.
9. The development plan in Mid Devon comprises three documents: Core Strategy 2026 (adopted 2007) (CS), Allocations and Infrastructure Development Plan Document (AIDPD) (adopted 2010) and the Local Plan Part 3: Development management policies (adopted 2013).
10. The appeal site is located outside of the settlement limits identified for Uffculme. It therefore lies in the countryside for the purposes of interpreting planning policy. Policy COR 18 of the CS states that development outside the settlements will be strictly controlled, enhancing the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural economy. The proposal would not fall into any of the categories of development which the Policy finds to be permissible in the countryside.
11. Policy COR 17 of the CS identifies Uffculme as a settlement with some local facilities and employment and access to public transport. According to the policy, residential development will be limited to minor proposals within the defined settlement limits and to allocations for affordable housing meeting a local need.
12. It is common ground that the proposal would conflict with Policies COR 17 and COR 18. The parties further agree that those policies are relevant to the supply of housing. The case for the appellants is based on the premise that the policies are out-of-date and also that the local planning authority is unable to identify a five-year supply of deliverable housing sites. The Council contends that it is able to demonstrate the requisite supply and argues that the proposal should be rejected on the grounds that it conflicts with the CS and would, in any event, be unsustainable due to its location and scale.

The housing requirement

13. The CS and AIDPD were both adopted prior to publication of the National Planning Policy Framework (the Framework). Paragraph 215 of the latter states that due weight must be given to relevant policies in existing plans according to their degree of consistency with the Framework.

14. Paragraph 47 of the Framework makes clear that local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs (FOAN) for market and affordable housing in the housing market area (HMA) as far as is consistent with the policies set out in the Framework.
15. A housing requirement for Mid Devon is set out in Policy COR 3 of the CS. This makes provision for approximately 6800 dwellings between 1st April 2006 and 31st March 2026. The policy states that delivery will be phased as follows: 390 dwellings per year over the period 2006–2016 and 290 dwellings per year between 2016 and 2026.
16. The Planning Practice Guidance² (PPG) advises that housing requirement figures in up-to-date adopted Local Plans should be used as the starting point for calculating five-year housing supply. It confirms that considerable weight should be given to the housing requirement figures in adopted Local Plans, which have successfully passed through the examination process, unless significant new evidence comes to light. However, the guidance warns that evidence which dates back several years, such as that drawn from revoked regional strategies, may not adequately reflect current needs.
17. It seems to me that this scenario is directly relevant here. Notwithstanding their existence as part of an adopted development plan, the housing requirement figures within Policy COR 3 are outdated. They have been formulated using a 20 year old evidence base and have been influenced by policy factors. As such, they do not equate to the FOAN in the HMA as required by the Framework. Neither can the figures be used as a proxy pending the outcome of the emerging Local Plan process. This has been made clear by the courts³.
18. In my opinion, Policy COR 3 is inconsistent with paragraph 47 of the Framework and its objective to boost significantly the supply of housing. I therefore attach limited weight to the policy.
19. The PPG⁴ advises that where evidence in Local Plans has become outdated and policies in emerging plans are not yet capable of carrying sufficient weight, information provided in the latest full assessment of housing needs should be considered. But the weight given to these assessments should take account of the fact they have not been tested or moderated against relevant constraints.
20. The Council is in the process of carrying out a Local Plan Review (LPR). This is proposing a housing delivery rate of 360 dwellings per annum over the period 2013-2033. However, the document has not yet been submitted for examination and there remain significant unresolved objections in relation to key housing issues. For this reason, the emerging plan carries very limited weight.
21. Part of the evidence base for the LPR includes a Strategic Housing Market Assessment⁵ (SHMA) which has been prepared for the Exeter HMA. This sets out figures for objectively assessed need, expressed as ranges, for the constituent local authorities over the period 2013-2033. For Mid Devon the housing need is estimated at between 359 and 381 dwellings per annum, with a mid-point of 370.

² Reference ID: 3-030-20140306

³ Hunston Properties Ltd v St Albans CDC and SoS CLG [2013] EWCA

⁴ Reference ID: 3-030-20140306

⁵ Final Report 2014/15

22. It was put to me that the latter figure "sense checks" the CS and validates its housing requirement. However, I am not persuaded by this argument. The figures have not been derived in the same manner and they serve different purposes. As such they are not directly comparable. It was not the objective of the SHMA to analyse the housing requirement between 2006 and 2013. Moreover, its mid-point figure is 80 dwellings per annum higher than that identified in Policy COR 3 for the period beyond 2016. This is a significant difference.
23. I note that the SHMA was accepted by the examining Inspector for the New East Devon Local Plan. However, it has not been formally tested in the Mid Devon context and therefore its figures must be treated with some caution. Nevertheless, it is more up-to-date than the development plan and in my judgement it is the best available evidence for the purposes of this appeal. For this reason I consider that it could be an appropriate basis for informing the FOAN from 2013 onwards.
24. At this point in time, it is feasible that the housing need for the next five year period may be in the region of 1850 dwellings to which must be added any shortfall and a buffer.

The shortfall

25. The Council considers that any shortfall in the delivery of dwellings since the beginning of the plan period should be calculated by comparing completions over that period against a housing requirement calculated using the annual average across the whole plan period – a figure of 340 dwellings per annum. It argues that this would be consistent with the AIDPD, the SHLAA⁶ Panel approach and its own monitoring practices.
26. The interpretation of policy is an objective issue and in my view the meaning of Policy COR 3 is clear. The policy is unequivocal in splitting housing provision over the plan period into two discrete phases with a different rate of delivery for each.
27. The local planning authority pursued the argument that there is conflict between Policy COR 3 of the CS and Policy AL/DE/1 of the AIDPD and that this should be resolved in favour of the latter policy, having regard to Section 38(5) of the Planning and Compulsory Purchase Act 2004⁷. However, it seems to me that Policy AL/DE/1 is serving an altogether different purpose to Policy COR 3. It is essentially a monitoring policy which defines trigger levels for action, by reference to dwelling completion numbers. The policy does not seek to redefine the housing requirement or alter the phasing of delivery. In my judgement therefore, there is no conflict between policies.
28. I accept that there are references to the 340 figure within Policy COR 12 of the CS and also within supporting text. However, these are expressed as annual averages and in my view they do not alter in any way the explicit phasing provision set out within Policy COR 3.
29. Having regard to my conclusions above, I consider that, for the purposes of calculating the shortfall, the housing requirement for the period 1st April 2006 to

⁶ Strategic Housing Land Availability Assessment

⁷ This states that if to any extent a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document.

31st March 2015 should comprise seven years at 390 dwellings per annum, followed by two years at 370 dwellings per annum. This equates to 3470 units.

30. There is no dispute that completions over this period equate to 2942. The shortfall is therefore 528 dwellings. The parties are agreed that any shortfall should be spread across the next five year period using the Sedgefield method. I concur on the basis that this approach would be consistent with advice set out in the PPG and the objective of the Framework to boost significantly the supply of housing.

The buffer

31. The Framework states that local planning authorities should add a buffer of 5% to the land needed to meet the five year housing requirement. Where there has been a record of persistent under delivery of housing the buffer should be increased to 20% to provide a realistic prospect of achieving the planned supply. The buffer is not in addition to the housing requirement but rather moves it forward from later in the plan period to ensure choice and competition in the market for land.
32. The PPG advises that the approach to identifying whether there has been a persistent under delivery of housing involves questions of judgement. This is likely to be more robust if a longer term view is taken, since it is likely to take into account peaks and troughs of the housing market cycle.
33. The Council has supplied historic completion figures going back several decades. These can be compared against the development plan requirements which were prevailing at the time⁸. The evidence indicates that since 1995/96, completions have exceeded the relevant policy requirement on only five occasions.
34. The 20 year average of 356 units per annum further illustrates the extent to which the authority has failed to deliver the level of housing required to meet its development plan targets – figures which as I have already found are policy constrained and therefore a potential under-estimate of the actual housing need.
35. I accept that the recent dip in completions is a likely result of economic recession, and this reflects the position nationally. I also acknowledge the delays in bringing forward urban extensions for Tiverton and Cullompton and the pro-active approach to housing supply now being taken by the Council. However, I must make a judgement informed by past delivery rates.
36. For the above reasons I consider that a 20% buffer should be applied. The parties agree that the buffer should also be applied to any shortfall. This seems logical and I have no reason to adopt a different approach.

Supply contribution from sites

37. It is common ground that the five year land supply should be calculated using a base date of 1st April 2015. The written evidence on behalf of the local planning authority originally projected a five year delivery of 2198 dwellings. However, this figure was increased following a cabinet decision to release the

⁸ Devon Structure Plan First Review 1995-2011 – 450 dwellings per annum over the period 1995-2001
Devon Structure Plan 2001 to 2016: ‘A Sustainable Strategy for Devon’ – 390 dwellings per annum over the period 2001-2016.

- Pedlars Pool contingency site⁹ and a number of other sites which are proposed for allocation in the emerging Local Plan. Together, these are projected to deliver 151 dwellings within the next five years.
38. During the Inquiry the Council provided a spreadsheet summarising the latest supply position. This took account of site specific information from agents/developers for some sites. It also included a further batch of proposed allocations (estimated to deliver 110 units) from the emerging Local Plan. These would bring the overall supply figure to 2540 dwellings – as compared to the appellants' figure of 2032.
39. The respective land supply positions were explored by means of a round table discussion. The Council has adopted build-out rates taken from the SHLAA Methodology. The appellants raised no objections to this approach and I agree that they are a reasonable basis on which to make an assessment.
40. The largest individual sites in dispute are the urban extensions for Tiverton East and North West Cullompton. The Council considers that these sites can deliver 399 dwellings within the five year period, whereas the appellants predict 300.
41. Starting with East Tiverton, an outline planning permission exists for 330 dwellings and I was told that adoption of a Design Guide for this area is imminent. Another part of the site has a committee resolution to grant permission for 700 dwellings subject to the completion of a Section 106 agreement. A signed agreement was expected before the end of March 2016.
42. That said, there is some evidence to suggest that the developer for the 330 unit scheme is yet to acquire the site, notwithstanding the agreement in principle for Mid Devon District Council to buy the affordable element. There is a need to obtain reserved matters approval and discharge conditions on the outline permission. Significantly, this includes a condition regarding design principles, which could impact on the timescale for submission of reserved matters. The 700 dwelling scheme will have similar issues. Accordingly, there is doubt in my mind over the ability of this site to begin delivering as early as predicted. In my judgement, the trajectory for this site should be pushed back by 12 months.
43. The North West Cullompton site is further behind. The Master Plan is due for adoption shortly and the first planning applications are expected in the spring, with delivery projected towards the end of the 2017/18 monitoring year. I heard that two of the three parcels of land have been put forward by promoters and therefore commencement of development will be dependent upon disposal of those sites to a developer. This could affect delivery timescales. However, the Council has adopted a suitably cautious approach in relation to the number of units within the five year supply and on balance I am inclined to accept the trajectory put forward.
44. One of the key differences between the parties is in relation to the inclusion of sites which are proposed for allocation in the emerging Local Plan. The Council's view is that these sites should be included on the basis of the lack of objection. The appellants, on the other hand, contend that there is no certainty regarding delivery and therefore the sites should not count towards the supply figure.

⁹ Identified for potential release within Policy AL/DE/1 of the AIDPD.

45. I was told that there have already been pre-application discussions regarding several of the sites¹⁰. However, this is no certainty of planning permission being granted, particularly in view of the viability issues identified in respect of at least two of the schemes. These sites (totalling 58 units) should be deducted from the supply.
46. As regards Barn Park, Crediton, no decision has yet been made by Devon County Council in respect of whether to apply for planning permission or dispose of the site to a developer. There is an in-built assumption here that the local authority will be keen to secure the capital receipts from land sale having put forward the site within the SHLAA. However, there can be no reasonable certainty that the site will deliver 20 dwellings within the five year period.
47. I understand that Court Orchard, Newton St Cyres has a resolution to grant planning permission for 25 units subject to completion of a Section 106 agreement. From what I heard, the legal agreement is well advanced and there is a reasonable likelihood that the development will go ahead. However, it will be dependent upon the construction of a new primary school and there is no compelling evidence to give me confidence that the projected completion date of spring/summer 2017 will be met. This leads me to question the timing of the housing element.
48. The remainder of sites identified (referred to at the Inquiry as the '110 sites') are predominantly 'greenfield'. The Council explained that they were the subject of a varying number of objections. In its view, these objections are unlikely to preclude the sites from coming forward and on this basis it considers that they should be included within the supply. Notwithstanding this, it has applied a discount to reflect the uncertainty involved. Only 110 out a total of 253 dwellings are being included within the figures for deliverable supply.
49. The appellants expressed significant concern regarding this approach and I concur. The absence of objection to individual site allocations does not prevent an examining Inspector from raising wider issues relating to, for example, the development strategy or site selection methodology. For this reason, these sites cannot be relied upon to deliver housing within the five year period.
50. A footnote to paragraph 47 of the Framework explains that to be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. In my judgement it is questionable whether these criteria are met in relation to sites which lack planning permission and which also fail to comply with an adopted development plan. Therefore, these sites should be discounted from the supply figures.
51. The appellants have sought to challenge the Council's methodology in relation to windfall sites. However, it seems to me that the allowance made for such sites is reasonable, having regard to evidence of past trends. Whilst I acknowledge the concern that future windfalls may not come forward at the same rate, the assumptions included in the Council's figures are conservative. I am therefore content for the allowance of 158 dwellings to remain.

¹⁰ Old Abattoir, Copplestone; Hunters Hill, Culmstock; South of Broadlands, Thorverton; and Linhay Close, Culmstock

Conclusions on housing land supply

52. Based on the above, I consider that the Council's latest predicted five year housing supply figure is overstated. However, I have also found some of the appellants' views to be unduly pessimistic. To my mind a more realistic supply will lie somewhere in the middle. Taking a figure of around 2300 dwellings, which follows from my findings above, this would give rise to a deliverable supply of approximately 4 years. Even using the Council's preferred figure the supply would increase to only 4.5 years.
53. Using the housing figures set out in Policy COR 3 would yield a total five year requirement for 1550 units¹¹ and a backlog of 568. With the 20% buffer applied the overall requirement would be 2542 dwellings. Assuming a realistic supply figure of around 2300 units, the deliverable supply would be in the region of 4.5 years. Therefore even in this scenario the Council would fall short of the requisite five-years.
54. It therefore follows that, even if I revert to the development plan policy figures, a five-year supply of deliverable housing land cannot be demonstrated. This is clearly a snapshot of the current situation based upon the evidence presented for this particular appeal.

Considerations of scale/location

55. I have found that Policy COR 3 is inconsistent with paragraph 47 of the Framework on the basis that it fails to identify, and plan for, the FOAN. In addition, the Council cannot demonstrate a five-year supply of deliverable housing sites, either measured against the CS or the SHMA. Paragraph 49 of the Framework states that in such circumstances, relevant development plan policies for the supply of housing should not be considered up-to-date. Thus, Policies COR 3, COR 17 and COR 18 of the CS are all out of-date. I therefore attach these policies, and the settlement limits upon which they rely, limited weight.
56. Consequently, paragraph 14 of the Framework is engaged. This states that where the development plan is absent, silent or relevant policies are out-of-date, permission should be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or specific policies in the Framework indicate development should be restricted.
57. At the heart of the Framework is the presumption in favour of sustainable development. There are three dimensions to this: economic, social and environmental. The roles are mutually dependent and should be jointly sought to achieve sustainable development.
58. The proposal is for development on a greenfield site at the edge of the village. This in itself is not necessarily harmful. The District is reliant upon such sites to meet its housing needs and there must be an acceptance that this will result in the loss of some agricultural land on the fringes of settlements. In this instance, the Council has not raised any substantive concerns in relation to countryside encroachment or the effect of the proposed development on the character and appearance of the area. Moreover, it has not identified any

¹¹ Comprising one year at 390 dwellings and four years at 290 dwellings.

environmental harm that cannot be mitigated by planning condition. Based on the information before me and my observations during the site visit I have no reason to take a different view.

59. The Council's principal concern is in relation to the scale of the development. It considers the number of dwellings being proposed to be excessive and contrary to its overarching strategy, and that of the Framework, to direct development to the most sustainable locations.
60. Uffculme has a wide range of facilities, including two shops (one of which contains a Post Office), a pair of public houses, hot food takeaway, doctor's surgery, community hall and playing fields, pre-school and primary school. Comparatively speaking, it is better served than the other villages listed in Policy COR 17 and is the only one to have its own secondary school and dedicated library¹².
61. In my view, the appeal site is within an acceptable and safe walking distance of those services and facilities. There are some employment opportunities within the village itself and a number of business parks¹³ within a short cycle or drive. Two of those business parks are in the process of expanding.
62. It would be unrealistic to expect the village to achieve self-containment. Nevertheless, in relative terms and in a rural context, this is a sustainable location for development. Residents may choose to travel further afield for leisure, shopping or commuting purposes. However, there are opportunities to use sustainable transport modes and villagers have a real choice about how they travel. There are bus services to Tiverton, Cullompton, Taunton and Exeter and the timings of these would be suitable for the daily journey to work. Moreover, the Langlands and Mid Devon Business Parks are both on bus routes. To encourage public transport use, the development would provide new bus stops immediately outside the appeal site.
63. Tiverton Parkway station provides access to the mainline rail service and this is within cycling range along a recognised cycle route. A proportion of residents will almost certainly prefer to drive, but even in that scenario the journey would be reasonably short. I noted that Uffculme is closer to Tiverton Parkway station than Tiverton itself so comparatively it is no less sustainable insofar as distance to the rail network is concerned.
64. The appellants did not seek to argue that the development would be 'minor' in the context of Policy COR 17. Self evidently, it would be of a more significant scale. Nevertheless, in my view the proposal would not be disproportionate to the size of Uffculme. The village contains an estimated 1043 households and a scheme of 60 dwellings would represent a relatively modest 6% increase on top of this.
65. Paragraph 55 of the Framework states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The PPG¹⁴ advises that a thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities. Rural housing is essential to ensure viable use of these local facilities.

¹² Other settlements listed within Policy COR 17 have a mobile library service

¹³ Langlands Business Park, Hitchcocks Business Park and Mid Devon Business Park

¹⁴ Reference ID: 50-001-20140306

66. Having regard to the above, I am not persuaded that the proposal would be inherently unsustainable, either by virtue of its scale or location. It would bring social benefits in terms of delivering much needed housing against a background of historic undersupply and an absence of a five-year supply of deliverable sites. This carries considerable weight in the overall planning balance.
67. The proposal would also deliver up to 21 affordable dwellings which equates to 35% of the total number of units. Given the level of need for affordable housing in the District, this would constitute another significant social benefit of granting planning permission. I give weight to the fact that policy requirements alone will not be sufficient to meet the identified level of need¹⁵.
68. The Framework places great emphasis on the need for economic growth. The proposal would create or sustain employment during the construction phase and there would be further benefits through increased spending in local business arising from additional residents in the village.
69. Drawing matters together on this issue, neither the scale nor location of the development would render the scheme unacceptable. The proposal would bring forward a number of social and economic benefits with no demonstrable environmental harm.

Other Matters

70. I am referred to the fact that the site has been 'rejected' for development as part of the LPR. However, for the reasons explained above, the emerging plan can be attached very limited weight at this stage.
71. Local residents have raised concerns regarding highway safety and the impact of traffic generated by the development. However, in my view the scheme would not generate a significant level of additional traffic in comparison with the status quo. The new access would provide satisfactory visibility and the 30mph limit would be extended across the site frontage.
72. I am told that there has been at least one fatality on this section of road. I do not know the causal factors leading to this incident. Nevertheless, there is no compelling evidence before me to clearly demonstrate that the scheme would result in highway safety issues or congestion from increased traffic volumes. Accordingly, I have no reason to disagree with the assessment of the Highway Authority that the proposal would be acceptable.
73. Concerns have also been raised about flooding. The southern part of the site lies within the floodplain for the River Culm. However, the illustrative layout plan demonstrates that development can be confined to Flood Zone 1 (Low Risk). The Environment Agency does not object to the development and nothing in the evidence before me persuades me to take a different view.
74. There is no firm evidence to support the assertion that the doctor's surgery would be unable to cope with the extra population. The Education Authority has confirmed that the primary school has capacity and the development would make a financial contribution to mitigate its effect upon the secondary school. As such, there are no grounds to dismiss the appeal for reasons relating to the impact upon local facilities.

¹⁵ Paragraph 11.1.14, SHMA

75. At the Inquiry I heard from one local resident who had a particular concern about the loss of agricultural land. This is a factor to which I have had regard, but it is not one which I can give great weight in this instance. The Council did not seek to argue that the proposal would compromise the best and most versatile agricultural land and, as I have already mentioned, the District is reliant upon the release of 'greenfield' sites in order to meet its need for housing. The delivery of new homes is a key policy objective and this would outweigh any limited harm arising from the development of farmland in this case.
76. Whilst I have no doubt that adjacent residents will experience some disturbance during the construction phase, the effects would be temporary and there is no reason to believe that they would be particularly severe in this case. Effects can be mitigated by imposing a condition to require the submission of a Construction Management Plan. There is no substantive evidence to suggest that neighbours would experience unacceptable levels of noise once the dwellings are occupied. The layout of the scheme would be a reserved matter in any event.
77. I can see no reason why foul drainage to the mains sewer would cause contamination or pollution. South West Water has raised no objection to the proposal and a condition can be used to ensure that no dwelling is occupied until it has been demonstrated that there is sufficient capacity in the public foul sewage network.
78. No substantive evidence has been put forward to support the concerns regarding the effect on wildlife. Surveys have identified the presence of bats but activity levels were low and the proposal would retain existing linear hedgebank features and in-field trees. Furthermore, the watercourse and pond corridor would provide a buffer to the development and planting would present the opportunity for ecological enhancement. Landscaping would be addressed at the reserved matters stage.
79. I am aware that land within the curtilage of Harvesters has been the subject of a previous appeal in relation to a proposal for two dwellings. The Inspector in that case commented that woodland provides an important and attractive natural feature defining the end of the village and functioning as an appropriate settlement boundary. Whilst I have no reason to disagree with that observation, it was made in a different context. In the current appeal, the Council is not contending that there would be material harm to the character or appearance of the area and I agree.
80. Concerns are raised regarding the linear 'ribbon' nature of development and the erosion of the rural setting between the villages of Uffculme and Willand. However, the development would not materially close the gap between the settlements and they would each retain their individual identity.
81. My attention is drawn to other refusals of planning permission locally. However, I have not been provided with details of those cases and therefore I cannot determine whether there are any parallels with the appeal proposal. I have therefore determined the case on its own merits.

Planning Obligations

82. The affordable housing obligations respond to identified needs within the District and are supported by Policy AL/DE/3 of the AIDPD which applies a target of 35% affordable housing on relevant sites. The scheme would make

this level of provision and as such it would be policy compliant. The S106 gives the Council control over the size and tenure mix to ensure that the affordable housing meets local needs.

83. The education contributions are also justified given the fact that Uffculme School is over capacity. The monies would be used to provide secondary school facilities required as a result of the development. This would accord with Policy AL/IN/5 of the AIDPD and the methodology contained within the Devon County Council publication 'Education Section 106 Infrastructure Approach' (2013). The Council has confirmed that the contribution would be compliant with the pooling restrictions introduced under Regulation 123(3) of the Community Infrastructure Levy Regulations 2010.
84. The requirement for an on-site open space scheme responds to Policy AL/IN/3 of the AIDPD which requires new housing development to provide at least 60 square metres of equipped and landscaped public open space per market dwelling or an off-site contribution. I concur with the Council's assessment that on-site provision would be preferable in this instance.
85. There is also a planning obligation to secure the ongoing management and maintenance of the public open space. This would extend to the SUDS. In my view, such provisions are justified and would ensure that the areas remain fit for purpose.
86. In addition, the S106 would require the implementation, monitoring and review of a Travel Plan to be first agreed with the County Council. This would accord with the sustainability objectives of the Framework and as such it is a benefit which I have weighed in the balance.
87. Overall, the obligations within the S106 are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Therefore, they meet the tests within CIL Regulation 122. I have taken them into account in the decision. I consider that the conditionality provisions set out in Paragraph 2.5 of the agreement are satisfied and that the obligations should become effective.

Conditions

88. Suggested planning conditions were set out in the statement of common ground. However, the Council included a separate list within its statement of case. The conditions were discussed in a round table session and amendments were subsequently agreed between the parties. I have considered the revised list having regard to paragraphs 203 and 206 of the Framework and advice contained in the PPG. Where necessary I have adjusted the wording to improve precision and enforceability.
89. Given the outline nature of the application, conditions are necessary relating to commencement and the submission of the reserved matters. This will comply with the requirements of planning legislation¹⁶. Conditions are also needed to control the maximum number of dwellings and to specify the plans to which the permission shall relate. This will provide certainty and ensure that the new access onto Uffculme Road is constructed in accordance with the approved details.

¹⁶ Section 92 of the Town and Country Planning Act 1990, as amended

90. The Council has requested a condition requiring details of materials, boundary treatments, finished floor levels, existing and proposed site levels and proposed road and footpath levels to be included within the reserved matters. I agree that such a condition would be reasonable to ensure that the development has a satisfactory appearance and to address flood risk.
91. In the interests of highway and pedestrian safety, a condition is necessary to ensure that the vehicular access and the footway linking the site to the village are constructed prior to any other part of the development going ahead. The same condition would secure the provision of a site compound and car park, to discourage parking on the public highway during the construction phase.
92. I agree that a condition should be used to require the submission of a Construction Management Plan. This will ensure that the development is carried out responsibly and with minimal disruption to local residents.
93. A condition is also needed to ensure the provision of the new bus stops on Uffculme Road, in the interests of ensuring that occupiers have a choice of transport mode. For reasons of highway safety, the same condition would require that the internal roads, parking areas and footways within the site are provided prior to occupation of the dwellings. To make sure that they are adequate in functional terms, are safe and have a satisfactory appearance, detailed drawings of the highway infrastructure are required before construction begins.
94. The site lies within an area known to contain evidence of prehistoric activity and therefore I have attached a condition to secure a scheme of archaeological work with the aim of recording of any features of heritage interest.
95. A condition is also necessary to require the submission of an arboricultural method statement and tree protection plan. This will ensure the retention of existing trees in the interests of public amenity and the character and appearance of the area.
96. A condition is necessary to ensure that the site is properly drained. To this end, I agree that a surface water drainage scheme is required for the Council's approval and that this should be based on SUDS principles. Foul drainage is proposed to the mains sewer. However, a condition is required to ensure that dwellings are not occupied until sufficient capacity exists within the public sewerage network.
97. A phasing condition is included within the Council's list of suggested conditions. However, this was not pursued at the Inquiry and I do not consider that such a condition can be justified in this instance, having regard to the scale of the scheme. Likewise, a condition to require a management plan for areas within the site is unnecessary as this objective is secured via the S106.

Conclusion

98. To conclude, the proposal would be in conflict with Policies COR 17 and COR 18 of the CS. However, the development plan is inconsistent with the policies of the Framework by reason of its failure to properly identify, and plan for, the full objectively assessed need for housing in the District. Moreover, the Council has been unable to demonstrate a five-year supply of deliverable housing sites. In such circumstances, paragraph 49 of the Framework deems that relevant policies for the supply of housing should not be considered up-to-date. I have

therefore attached limited weight to the policies upon which the Council has sought to rely in refusing planning permission.

99. The proposal would bring important social benefits in terms of delivering market and affordable housing and it would also promote economic activity. I attach considerable weight to these matters, in light of the Council's current housing land supply position and the need for economic growth. No environmental harm has been identified which is not capable of being mitigated through the use of planning conditions and the submitted S106.
100. Accordingly, it is my view that there are no adverse impacts that would significantly and demonstrably outweigh the benefits of the development when assessed against the policies in the Framework taken as a whole. There are no specific Framework policies indicating that development should be restricted. I therefore consider that the proposed development should be regarded as sustainable. This is a significant material consideration sufficient to outweigh the development plan conflict.
101. For the above reasons, and having had regard to all other matters before me, including the various court judgments which were drawn to my attention during the Inquiry, I conclude that the appeal should be allowed and that outline planning permission should be granted.

Robert Parker

INSPECTOR

Attached – Schedule of Conditions

APPEARANCES

FOR THE APPELLANT:

Mr Giles Cannock MA LLM (Cantab) of Counsel Instructed by Neal Jillings

He called

Mr Neal Jillings BSc (Hons) MA MRTPI Jillings Heynes Planning Ltd

FOR THE LOCAL PLANNING AUTHORITY:

Mr Gary Grant of Counsel Instructed by Simon Johnson,
Solicitor with the Council

He called

Mr Dean Titchener BSc (Hons) MSc Principal Forward Planning Officer

Ms Tina Maryan BSc (Hons) MA T&CP MRTPI Area Planning Officer

INTERESTED PERSONS:

Mr A Samuels Local resident

Councillor R Evans Ward Member

DOCUMENTS SUBMITTED AT THE INQUIRY

1. Opening remarks on behalf of the LPA
2. Opening submission of the appellant
3. Adopted Mid Devon Core Strategy 2026 (2007)
4. Adopted Allocations and Infrastructure Development Plan Document (2010)
5. Local Plan Review Options Consultation (January 2014)
6. Local Pan Review Options Consultation (extract: pages 94-96)
7. Local Plan Review 2013-2033 – Proposed Submission (February 2015)
8. Policy H1 of the Devon Structure Plan First Review 1995-2011
9. Policy DM9 of Local Plan Part 3: Development management policies (2013)
10. Ivan Crane v Secretary of State for Communities and Local Government, Harborough District Council [2015] EWHC 425 (Admin)
11. Extract from Planning Practice Guidance (Reference ID: 50-001-20140306)
12. Extract from Planning Practice Guidance (Reference ID: 2a-019-20140306)
13. Exeter Housing Market Area SHLAA Methodology (Adopted September 2013) (extract: pages 6-8)
14. Exeter Housing Market Area Strategic Housing Market Assessment 2014 (extract: pages 85-108)
15. Housing Supply Schedule (referenced at Inquiry as Document ID1)
16. Email from Dean Titchener dated 27 January 2016 (@ 16:41) re. updated supply information – with spreadsheet attachment
17. Email from Dean Titchener dated 28 January 2016 (@ 09:25) re. updated supply information
18. Email from Dean Titchener dated 28 January 2016 (@ 17:15) re. updated supply information – with sites evidence attachment
19. Email from Katie Furner dated 6 January 2016 (@ 16:33) regarding Housing Need figures on Devon Home Choice for Uffculme
20. Five year land supply calculation (340 requirement to 2013, 370 thereafter)
21. Definition of 'Designated Persons' in the context of affordable housing
22. Consultation response from Education Authority dated 3 February 2015
23. List of suggested conditions (taken from Council's Statement of Case)
24. Closing on behalf of the LPA
25. Closing submissions of the appellant

SCHEDULE OF CONDITIONS

- 1) The site hereby approved for development shall be as shown on the submitted location plan (1913. SK01. Rev. A) and site access arrangements plan (0172. PHL/002 Rev. A).
- 2) The development hereby permitted shall be limited to a maximum of 60 dwellings.
- 3) Details of the appearance, landscaping, layout and scale (herein after called the "reserved matters") shall be submitted to and approved in writing by the local planning authority before any development begins and the development shall be carried out as approved.
- 4) The detailed drawings required to be submitted by condition 3 shall include the following additional information: boundary treatments, existing and proposed site levels, proposed road and footpath levels, finished floor levels, materials and sustainable urban drainage system.
- 5) Application for approval of the reserved matters shall be made to the local planning authority before the expiration of three years from the date of this permission and the development shall begin no later than 3 years from the date of this permission or not later than 2 years from the approval of the last "reserved matters" to be approved.
- 6) No development shall commence on site until a surface water drainage scheme based upon sustainable urban drainage principles (including a full drainage masterplan and associated drainage calculations) has been submitted to and approved in writing by the local planning authority. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may be agreed in writing by the local planning authority.
- 7) No development shall commence on site, other than in relation to a, b, c & d of this condition, until:
 - a) the access road has been laid out, kerbed, drained and constructed up to base course level for the first 20 metres back from its junction with the public highway;
 - b) the ironwork has been set to base course level and the visibility splays required by this permission laid out;
 - c) the footway on the public highway frontage linking the estate to the existing footway network to the east of the site has been constructed up to base course level; and
 - d) a site compound and car park have been constructed in accordance with details to be first submitted to and approved in writing by the local planning authority.
- 8) No development shall commence on site until a Construction Management Plan has been submitted to and approved in writing by the local planning authority. The plan shall include, but shall not necessarily be limited to, details of the following:
 - a) parking for vehicles of site personnel, operatives and visitors;

- b) loading and unloading of plant and materials;
- c) storage of plant and materials;
- d) programme of works (including working hours and measures for traffic management);
- e) provision of any hoarding or temporary fencing; and
- f) measures to control construction noise, the emission of dust and the deposit of materials on the public highway.

The development shall be carried out strictly in accordance with the approved Construction Management Plan.

- 9) No development shall commence on site until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted to and approved in writing by the local planning authority. The development shall be carried out in strict accordance with the approved details.
- 10) No development shall commence on site until an Arboricultural Method Statement and Tree Protection Plan, based on the submitted Tree Constraints Appraisal dated 7 October 2014 Devon Tree Services, has been submitted to and approved in writing by the local planning authority. The development shall be carried out in strict accordance with the approved details.
- 11) No development shall commence on site until details of the following pieces of highway infrastructure have been submitted to and approved in writing by the local planning authority: the estate road, cycleways, footways, footpaths, verges, junctions, street lighting, sewers, drains, retaining walls, services routes, surface water outfall, road maintenance/vehicle overhang margins, embankments, visibility splays, accesses, car parking and street furniture. The information submitted pursuant to this condition shall include scale plans and sections indicating, as appropriate, the design, layout, levels, gradients, materials and method of construction. The development shall be carried out in strict accordance with the approved details.
- 12) No dwelling shall be occupied until there has been submitted to and approved in writing by the local planning authority evidence to demonstrate that sufficient capacity exists in the public foul sewerage network to accommodate the foul sewerage discharge from the development.
- 13) No dwelling shall be occupied until the following works have been carried out to the written satisfaction of the local planning authority:
 - a) The spine road and cul-de-sac carriageway including the vehicle turning head within that phase shall have been laid out, kerbed, drained and constructed up to and including base course level, the ironwork set to base course level and the sewers, manholes and service crossings completed;
 - b) The spine road and cul-de-sac footways and footpaths which provide that dwelling with direct pedestrian routes to an existing highway maintainable at public expense have been constructed up to and including base course level;

- c) The cul-de-sac visibility splays have been laid out to their final level;
- d) The street lighting for the spine road and cul-de-sac and footpaths has been erected and is operational;
- e) The car parking and any other vehicular access facility required for the dwelling has/have been completed;
- f) The verge and service margin and vehicle crossing on the road frontage of the dwelling have been completed with the highway boundary properly defined;
- g) The street nameplates for the spine road and cul-de-sac have been provided and erected;
- h) The footway on the public highway frontage linking the estate to the existing footway network to the east of the site has been completed; and
- i) The bus stops and the pedestrian links to the bus stops shown on the site access arrangements plan (0172. PHL/002 Rev. A) have been provided.

Appendix 5

North West Cullompton Masterplan



Supplementary Planning Document
Draft

January 2016



Foreword

This Supplementary Planning Document (SPD) addresses the North West Cullompton Urban Extension. It has been prepared by Mid Devon District Council (MDDC) and in partnership with three land promoters.

The document provides guidance about how the urban extension should be designed and developed. It is informed by extensive survey work and analysis that has been undertaken.

The SPD has been prepared in response to local planning policies within the Mid Devon Development Plan which allocated this land for development and has been informed by consultation with key stakeholders and people in the local community.

It is intended that the document will be adopted by MDDC as a Supplementary Planning Document to guide the shaping of the new neighbourhood at North West Cullompton.

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Setting the Scene

1.0 Introduction

Setting the Scene

1.1 The Purpose and Role of the Document

This masterplan document has been prepared and adopted as a Supplementary Planning Document (SPD) in accordance with MDDC's Statement of Community Involvement, and policies AL/CU/1 and AL/ CU/7 of the Allocations and Infrastructure Development Plan Document. It has been prepared in accordance with national planning policies and has gone through a statutory consultation process. As such it will be used as a material planning consideration in the determination of subsequent planning applications for development on the site.

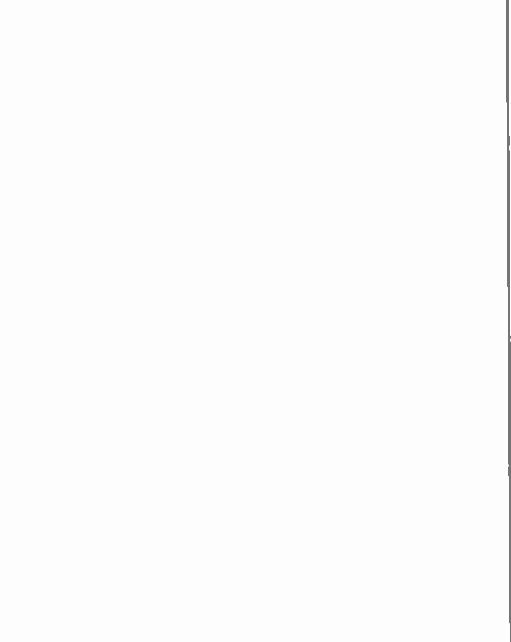
The masterplan document bridges the gap between the aspirations of planning policies for the site as set out in the Development Plan and the implementation of development in order to ensure a high quality of design and a successful place. The masterplan also acts to plan for development in a comprehensive way across the site and to deliver the necessary infrastructure. It is a tool to coordinate and phase development and usually applies to large or strategic sites. The document also sets out the key principles that development will need to have regard to if they are to be considered acceptable.

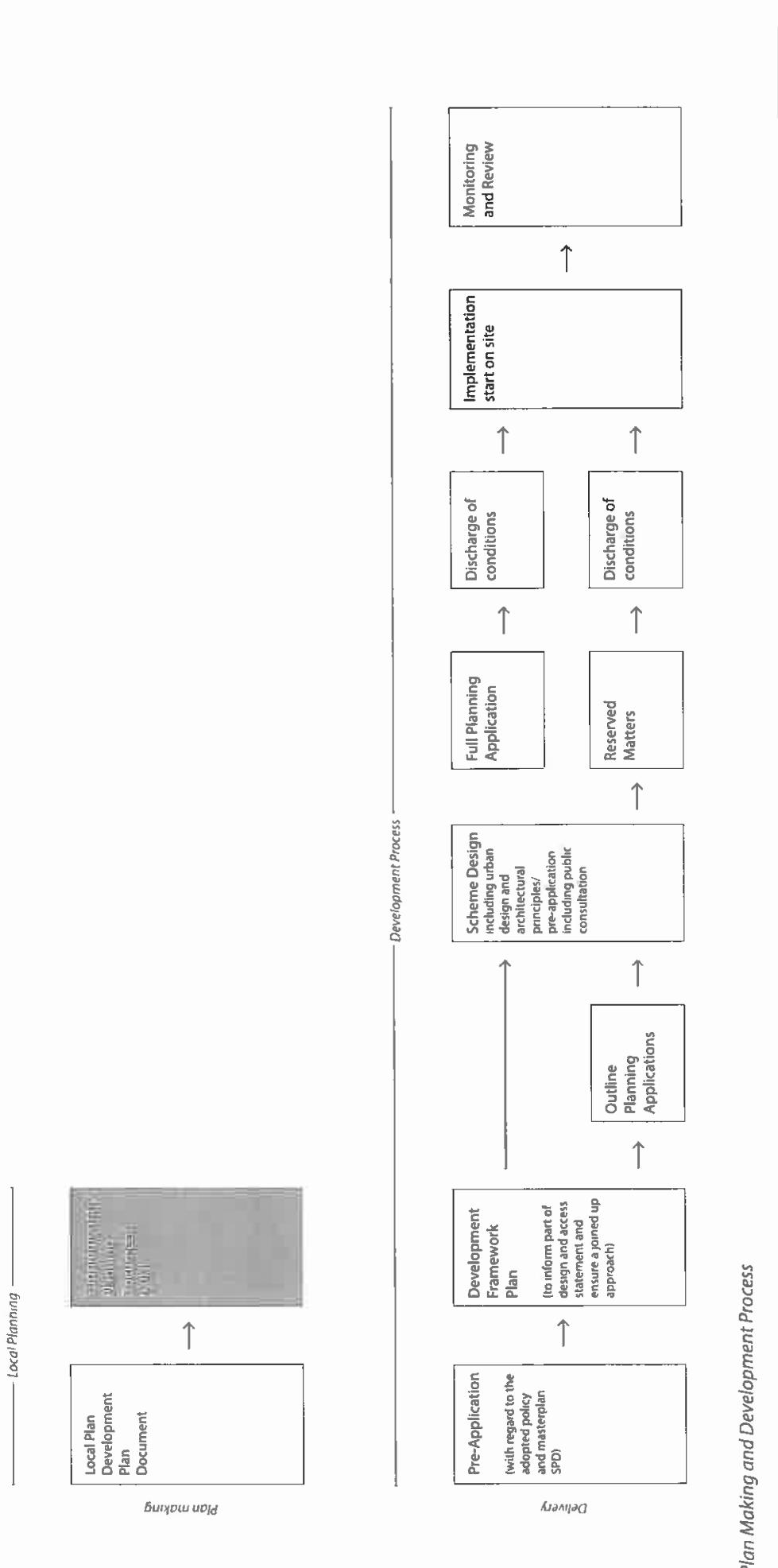
The masterplan is intended to set a vision for the new development, provide detail to strategic development plan policies for the site, set a series of overarching design principles to achieve a high quality, locally distinctive and well integrated development. It sets out the major land uses and infrastructure to be accommodated on the site together with the main features of the proposed development. The masterplan provides coordination and consistency of approach to the development of the site and its design.

The guidance will inform developers and their designers when preparing planning applications, MDDC when considering proposals, stakeholders and the local community when viewing and responding to the emerging scheme.

The flow diagram on page 7 illustrates where the SPD sits in the development process.

The guidance within this masterplan needs to adapt to changing circumstances over time and is intended to include an element of flexibility to allow the development to take account of factors such as changes in the housing market; infrastructure requirements and costs, building costs and affordability. It therefore does not set out a rigid and prescriptive blueprint for the development, but instead sets out a series of key principles and guidance on how the urban extension should be designed and developed. More detailed guidance on urban design and architectural principles will be prepared before the detailed planning permission stage in order to elaborate upon the principles within this SPD.





1.2 Planning Policy Context

Mid Devon's Core Strategy was adopted in 2007 and sets out a growth strategy that seeks to balance social, environmental and economic objectives and concentrates development with the main settlements, including Cullompton. The Core Strategy sets out an overall need for 340 dwellings per year, amounting to 6,800 dwellings over the 20 year plan period up to 2026. Important to achieving the level of development (both housing and employment) identified and adopted within the Core Strategy are two urban extensions, one of which is this site to the north west of Cullompton.

The Allocations and Infrastructure Development Plan Document adopted in 2011 allocates 74.8ha of land to the north west of Cullompton for a mixed-use development including 1,100 dwellings and 40,000 sqm of employment floorspace. Policies AL/CU/1 to AL/CU/7 are relevant and set out the requirements for the development. The preparation of this masterplan SPD is required by policies AL/CU/1 and AL/CU/7.

The existing development at Olympian Way is within the allocation and provides 49 dwellings.

The Devon Waste Plan, adopted by Devon County Council in 2014 and forming part of the area's development plan, includes Policy W4 requiring waste audit statements to support sustainable management of waste from new developments. A separate supplementary planning document has been published by the County Council providing additional guidance on the preparation of these statements.

In summary, the policies require:

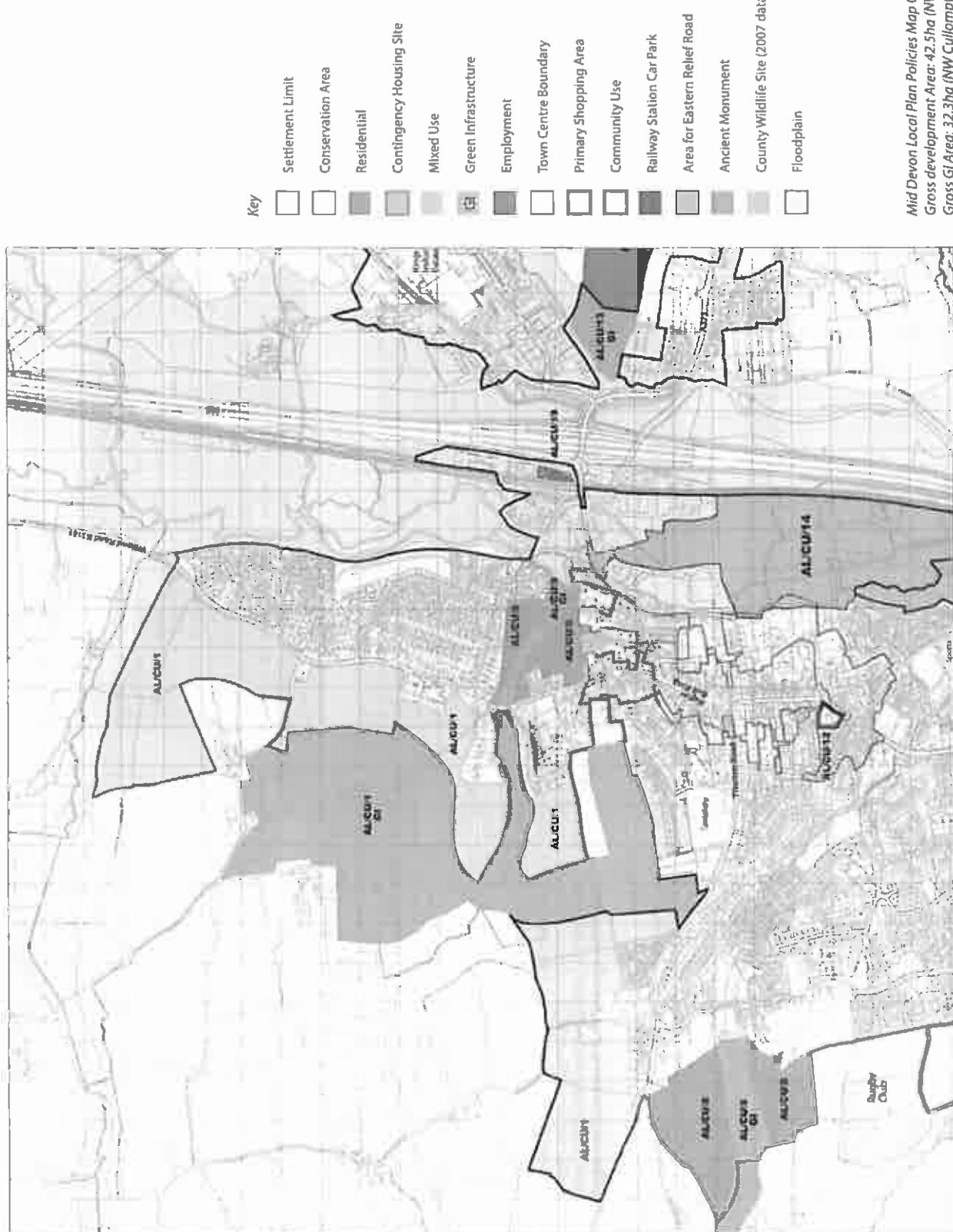
- a. 1100 dwellings with 35% affordable housing (subject to viability) to include at least 5 pitches for gypsies and travellers;
- b. 40000 square metres of B1 or other suitable employment floorspace;
- c. Transport provision to ensure appropriate accessibility for all modes;
- d. Environmental protection and enhancement;
- e. Community facilities to meet local needs arising;
- f. Carbon reduction and air quality improvements;
- g. An agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development;
- h. A public masterplanning exercise to be undertaken before any planning application is made.

Policies within the Allocations and Infrastructure Development Plan Document also include a range of spatial requirements for this site to deliver:

- Transport:** a new through road suitable for buses linking Tiverton Road to Willand Road; bus, pedestrian and cycle routes; cycle and pedestrian links to and from the town centre; a shared use path between Cullompton and Willand along the B3181; a footway and shared use link along Millennium Way, travel plans and other transport measures to minimise carbon footprint and air quality impacts, and bus service enhancements.
- Green Infrastructure:** 28ha for strategic green infrastructure; 0.7ha equipped children's play, 2.8 ha sports pitches and 0.7ha allotments; sustainable urban drainage; strategic landscaping and tree planting; protection and enhancement of existing public rights of way; archaeological investigation, recording and protection where necessary; design respecting Listed Building setting.

Community: 2.1ha new primary school with early years education provision; 1.0ha for youth, children and other community uses; a community building with youth facilities.

Other policies for the urban extension require measures to reduce carbon and emissions associated with development of the site and a phasing strategy to ensure development and infrastructure are delivered in step in order to reduce the impacts of the development. The policy recognises the need to ensure the development remains viable and sets out a range of phasing requirements, variation of which needs careful justification.



1.3 The Supplementary Planning Document

This masterplan SPD responds to adopted planning policies and provides guidance on how their objectives can be delivered and how alterations may need to be made to reflect circumstances on site as now understood following further analysis and studies.

Since planning policies specific to this site have been adopted, further survey work, analysis and public consultation exercises have taken place and a number of key issues have emerged:

1) Developable area and quantum of development

It is apparent that due to site constraints, the amount of development identified for the site will be difficult to achieve within the allocated area for development and Green Infrastructure. Within the allocated area for the development scheme, the promoters estimate approximately 700 houses can be accommodated. The scheme will need to finance a range of infrastructure including a road linking Tiverton Road and Willand Road, off site highway works, a new primary school, community facilities including a new community building and public open space.

There is concern over the ability of this number of houses to deliver the required level of infrastructure whilst still remaining viable. As such the masterplan seeks to redraw the boundary between the development area and green infrastructure and identifies 1120 number of dwellings and a redistribution of green infrastructure that still achieves 32ha. This still meets the policy requirement of 28 ha for green infrastructure.

2) Location and amount of employment land

The Allocations and Infrastructure DPD allocates the site for 40,000sqm (approx. 11.4ha) of B1 (light industrial) or other suitable employment floorspace. The Council's Employment Land Review 2013 recommended that the employment provision within the urban extension be revised to 10,000 sqm (approx. 2 ha). This was on the basis of the market being unlikely to be able to support all the proposed employment floorspace proposed within the Culmpton area and a rebalancing of allocations to increase the number of smaller sites that are not dependent upon significant additional infrastructure and more likely to be delivered in the short-to-medium term. A key issue is therefore the amount of employment floorspace to be provided on the site and its location. The

masterplan identifies 10,000 sqm to be located at the northern fringes of the allocation and within a local centre facility more centrally located within the allocation.

3) Link Road provision and highway works

Policy AL/CU/2 requires the provision of a network of streets linking to the existing highway network including the provision of a through-route suitable for buses linking Tiverton Road with Willand Road. The masterplan indicates a route from Tiverton Road in the south, exiting onto Willand Road just South of Rull Lane. The original proposal to link the road from the Langford Park development in the south to the roundabout at Millennium Way to the north has been ruled out due to topography and because the existing road infrastructure within Langford Park does not allow for a sufficient entrance to a link road. A new southern access to the east of the Langford Park site has been proposed in order to provide a more suitable access. The phasing for delivery of this route is considered further in section 5 of this document. The Highway Authority have indicated a need for traffic calming measures to be provided along Willand Road in a southwesterly direction from the junction, to discourage drivers from accessing the town centre from this direction. The masterplan also includes provisions of a temporary access off St George's View which would be closed off once the link road through the site was provided.

4) Location of sports pitches

Policy AL/CU/3 of the AIDPD requires the provision of equipped and laid out public open space as part of the green infrastructure including 2.8 ha of sports pitches. Pitches require relatively level land which is in short supply on this site. Initial proposals related to provision of some of these facilities on land to the far west of the allocation, adjacent to Tiverton Road. However, there were concerns about the deliverability of this in that the land is outside the control of the development promoters and the current landowner has not contributed to the masterplanning process or acted to release this land for development. As a result, the masterplan identifies that these facilities should, in the main, be centrally located and well related to the primary school as well as linking it with other formal and informal green infrastructure provision. It is also intended that part of the sport pitch provision is to be located off site to

meet local demand.

5) Location of the primary school

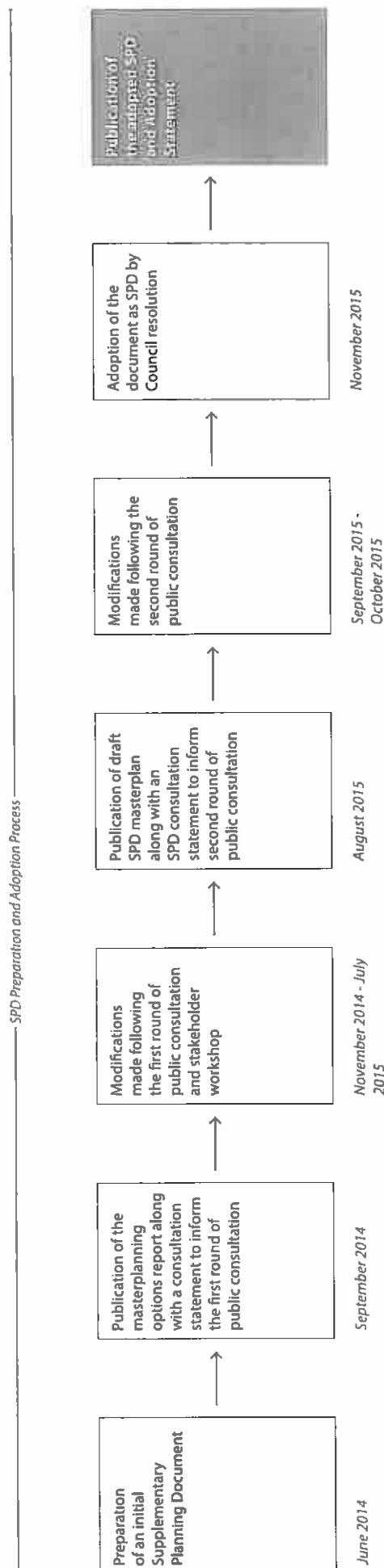
Policy AL/CU/4 requires the provision of a site 2.1ha in size for a new primary school and that the development funds a 210 place primary school within it. The school site is also to accommodate an additional 52 places for early years education. A key issue is where this facility may be best sited and the consultation which has taken place has highlighted a preference for the school facility to be sited at the top of Rull Hill where it can take advantage of the green heart of the site. The promoters are working with the Local Authority and Devon County Council to deliver this facility at an early stage.

6) Location of gypsy and traveller pitches

The provision of pitches for gypsies and travellers is a government requirement. Policy AL/CU/1 requires that at least 5 such pitches are provided as part of the development's affordable housing requirement in order to contribute towards the need in the District. The masterplan identifies that these could be provided at the north east end of the allocation, where access for caravans is most suitable. The Council has recently concluded its latest Gypsy and Traveller Accommodation Assessment. This has indicated that there will be a need to find land for more pitches across the District than initially thought. There may be an opportunity to provide further pitches within the area indicated on the masterplan.

7) Phasing of development

Given that policies AL/CU/1 – AL/CU/7 require the delivery of a number of types of important infrastructure, phasing, timing and the mechanism for delivery of these has been identified as a key issue. Policy AL/CU/6 sets out triggers for the provision of affordable housing, serviced employment land, green infrastructure provision, bus service enhancements, the linking road between Willand Road and Tiverton Road and the transfer of land for the primary school. The phasing of development together with triggers for the delivery of infrastructure have been reviewed as part of the masterplanning process. This is addressed in section 5 of this document.



1.4 Consultation

Before a planning application is made, the Local Planning Authority will carry out a major public consultation exercise into the masterplanning of the site. There will be full involvement of relevant stakeholders, leading to the adoption of a Supplementary Planning Document.

Policy AL/CLU/7 (p. 118) Masterplanning

The content of the master plan SPD has been informed by public and stakeholder consultations. The comments and feedback gathered from these events are summarised in this section.

First Round Public Consultation

The first round of public consultation took place 12th September - 12th October 2014 and included three public exhibitions.

This consultation presented the emerging key issues and masterplanning options to the public, focusing on:

- Developable area / quantum and distribution of development and green infrastructure
- The alignment of the link road
- Location of playing pitches
- Location of the school
- Location of employment
- Location of gypsy and traveller site
(see Appendix B chapter 7, board no.s 3-8)

First Round Public Consultation
4 weeks
SEPTEMBER - OCTOBER
NOVEMBER
2014

Stakeholder Workshop
6 weeks
AUGUST - SEPTEMBER
2015

65 written representations were received in response to these events. Whilst many individual issues were raised in the representations, a number of issues were more common than others. For example concerns were expressed about:

- Relief road should be built before or very early on in the development
- Concern over lots of rat runs created
- Motorway junction improvements must be completed before or close to beginning of development
- Concern over Air Quality
- Concern over Noise Quality
- Retain current public rights of way i.e. bridleways, footpaths etc. across the site. Goblin Lane in particular to be protected and enhanced

Second round Public Consultation

The second round of public consultation took place between 20th August and 1st October 2015 with 120 valid representations being received. This consultation considered the masterplan SPD document in draft. In particular it set out a vision and concept for the proposal, guiding principles for its design, details in respect of factors including the amount and location of development, density, highways and transport. The consultation also considered proposals for the phasing of the development, infrastructure provision and delivery.

Second Round Public Consultation
6 weeks
AUGUST - SEPTEMBER
2015



First Stage Public Consultation



First Stage Public Consultation



Site Visit with Cabinet Members



Stakeholder Workshop



Stakeholder Workshop

1.5 First Round Public Consultation Feedback

Written representation and feedback from the Public

The first round public consultation ran between the 12th September and the 12th October 2014. A total of 65 valid responses were received. The table below shows a breakdown of responses.

Response to comments

Question: Enhance natural/environmental features of the site and its surroundings. Are there existing environmental features you would particularly like to be protected or enhanced?

| Question | Response | Number of respondents | Percentage of total respondents | Percentage of respondents who answered the question |
|---|--|---|---|---|
| Should the boundaries between the green infrastructure and housing land be amended to increase the amount of housing to compensate for this and pay for these facilities? | Yes No Unhappy with the option of best infrastructure* | 10 13 17 | 15% 22% 17% | 44% 56% - |
| The development will increase traffic. How should this be dealt with and where should the proposed road connect into Trenton Road and Willard Road? | Option 1 - Trenton Road to Roundabout on Millermore Way Option 2 - Trenton Road to Willard Road Link road to meet Trenton Road East of Cemetery Link road to meet Trenton Road West of Turners Orchard | 10 18 1 4 | 15% 26% 2% 6% | 36% 64% - - |
| What types of employment should this include and where should it be located? | Option 1 - Northeast location Option 2 - Split between the North and the South Option 3 - Northeast area Option 4 - Health Centre | 8 3 6 17 | 12% 5% 9% 26% | 73% 27% 15% 44% |
| Where should the new primary school be located? | Option 3 - Rull Hill | 16 | 25% | 41% |
| Where should new sports pitches be located? | Option 1 - Split between Rull Hill and land to the North and South Option 2 - Land to the West Option 3 - Split between Rull Hill and land to North Option 4 - Split between Rull Hill and land to West Questioned the need for new sports pitches - referred to current Collempion facilities | 5 3 5 9 18 | 8% 7% 8% 14% 28% | 23% 13% 23% 41% - |
| The policy proposes a new community centre and youth facilities. What new community facilities are needed? Where should they be located? | Swimming Pool - Invest in Collempion Swimming Pool Campaign Invest in current facilities Altrincham Public House Tennis courts | 7 18 3 2 1 | 11% 26% 5% 5% 2% | - - - - - |
| Please comment on the two emerging development options. Of the two options put forward, do you have a preference? | Opinion 1 Opinion 2 Neither Yes No Gypsy and Traveller Sites | 7 20 6 18 12 2 1 0 | 11% 31% 9% 25% 18% 5% 2% 0 | 21% 61% 10% 57% 43% 57% 35% 0 |
| Overall do you agree with the proposed scope and content of the proposed masterplan document? | Yes No | 16 12 | 25% 18% | 57% 43% |
| Gypsy and Traveller Sites | Opinion 1 - West Opinion 2 - North Opinion 3 - West and North | 2 1 0 | 5% 2% 0 | 57% 35% 0 |

(Option 2) (see Appendix B Chapter 7.1 board no. 10).

You said: The retention of hedgerows, mature trees and public rights of way through the site. The retention of Rull Hill as a green space and the conservation of the Roman Fort on St Andrews Hill. Asked that Goblin Lane be protected. There was concern over the loss of countryside and views due to the proposed development.

We did: The majority of Hedgerows, mature trees, and all public rights of way are proposed to be retained. The proposal is for Rull Hill to remain a green hilltop, with the majority of the Gilled located there. The school and community facilities are also proposed to be located on Rull Hill. A visual impact assessment has been undertaken which has identified key views, and aims to minimise any impact and loss of visual amenity.

Question: Planning policy allocated the site for 110 dwellings and employment. Due to site constraints only 70 houses are likely to be provided on the allocated site. It is unlikely that this will be enough to pay for the infrastructure that would be required including the new road, primary school and other community facilities. Should the boundaries between the green infrastructure and housing land be amended in order to increase the amount of housing to compensate for this and pay for these facilities?

You said: Unhappy about the option of less green infrastructure. The new road and primary school were critical for the development, many would only choose the option of more development to ensure these infrastructure requirements were met. Overall, some felt they were being coerced into choosing the higher amount of housing to achieve all the required infrastructure. Of those, 44% were in favour of increasing the number of houses built and reducing the green infrastructure while 56% were not in favour of increasing the amount of housing to obtain the infrastructure required. As many of the respondents who chose the second option of more development mentioned only doing so to ensure the required infrastructure be delivered, these results are biased towards the more development option (Option 2) (see Appendix B Chapter 7.1 board no. 10).

We did: There is a perceived idea that there is less GI, however, amending the GI and development boundaries is due to the fact that some of the land allocated for development is not suitable for development, and needs to be retained as GI. This includes areas of hedgerows, mature trees, steep land, ecological routes, etc. The amendment of boundaries has not decreased the GI area; moreover, the proposed GI area is per the allocation and policy.

Question: The development will increase traffic. How should this be dealt with and where should the proposed road connect into Tiverton Road and Willand Road?

You said: The current traffic problems within Cullompton were mentioned often in the representations received. Nearly a quarter of respondents expressed the need for either updating or creating a new motorway junction at the beginning of or before any more development occurred while nearly a third declared the need of a 'relief road' to be in use early in the development or before any development occurred.

Development should not result in the creation of new rat runs. It was also mentioned that the amount of car parking for dwellings needs to be adequate to ensure that cars are not parked on the roads.

We did: The delivery of the link road is proposed to be finished within phase 1 (approximately within 2 years of the start of development).

Question: The residential element will provide a range of housing types and affordability. What types of housing would you like to see?

You said: A need for affordable housing, housing for the elderly, eco-housing, some self-build plots. Enough parking for two or more cars per dwelling. 2-3 bed dwellings would be most appropriate. A proportion of larger 5 bed dwellings would pull in families with high household incomes and hence spending power into the local economy and town centre businesses in particular.

We did: A range of densities has been proposed, which will allow a range of house types to be proposed. Parking numbers will be in accordance to MDDC's parking requirements.

Question: The urban extension proposes employment floorspace. What types of employment should this include and where should it be located?

You said: Of all 65 respondents, only 11 chose an option for the location of floorspace (see Appendix B chapter 7.1 board no. 7). Concerns over the increase in large vehicles in Cullompton from employment areas in the new development and a number suggested that there should not be any employment in the new development at all. Many wanted light industry or offices.

We did: The employment is proposed to split between the north of the site and the local centre. This would include a mix of employment uses.

Question: Where should the new primary school/be located?

You said: Many commented that they would like to see the proposed sports pitches next to the school, so they could be utilised by the pupils and that the location of the school should be accessible and safe for cars, pedestrians and cyclists. (see Appendix B chapter 7.1 board no. 6)

We did: The school is proposed to be located on Rull Hill together with the sports pitches and other GI. Early delivery of the school site is recognised as being very important.

Question: The masterplan will provide major areas of green and recreational space. What should this include? Where should new sports pitches be located? (see Appendix B chapter 7.1 board no. 5)

You said: As well as having a few large sports pitches, investment should be made into the current recreational spaces in Cullompton. A large number of respondents were in favour of having larger areas of green space and not having small play areas for children. It was suggested that the following be included: allotments, community garden, orchard, wildlife habitat, landscaped parkland, and skate boarding park.

We did: A wide range of GI uses are proposed and can be seen in chapter 4.5.

Question: The policy proposes a new community centre and youth facilities. What new community facilities are needed? Where should they be located?

You said: Inquired the need for new facilities in Cullompton as there are several community facilities in Cullompton. It was questioned whether developer contributions could go toward other community facilities. Facilities should be located near to the centre of the development and the following community facilities be considered: somewhere for the older generation to meet up for tea, dance, bingo etc., public house, community hall/youth club.

We did: A community facility together with the sports pitches has been proposed on top of Rull Hill.

Question: Do you have any other comments to make on the proposed masterplan document?

You said: Flooding and drainage issues, noise and air pollution, the inclusion of pedestrian and cycle paths, and suggested restricting the development to two stories.

We did: These issues have been taken into account throughout the masterplanning process, and will be looked at in more detail at planning application stage. Pedestrian and cycle paths have been included on the proposal, and are a vital part of the proposals.

Question: Gypsy and Traveller Pitches

You said: There were a number of representations opposed to including Gypsy and Traveller sites or questioning the expected need for them. A few representations believed that the pitches should not be on the outside of the development but more integrated, while others suggested the pitches be away from sports fields and pitches.

We did: The number of gypsy and traveller sites specified in the policies have been accommodated in the north of the site. They are required as part of the affordable housing provision on site.

1.6 Stakeholder Workshop Feedback

1. Transport and Access

You said: Sports facilities need appropriate parking/route planning

We did: Appropriate parking provision needs to be designed as part of any planning application.

You said: Junction with Tiverton Road/Kingfisher Reach/Langlands Road needs detailed consideration - getting team buses to pitches

We did: this junction will be designed in detail, and will take bus access into account.

You said: Willand Road priorities - walking, traffic calming, lorry movements

We did: Along Willand road bordering the site a shared use path is proposed. This would be incorporated within the redesigned street and cater for pedestrians and cyclists allowing safe access to the development site and the commercial site in the north. Shared surface areas would provide safe crossing points and linear SWALEs and tree planting would create an attractive approach to Cullompton. After the link road enters the development site the nature of the road leading on into town would change to become a pedestrian priority street. Shared surface treatments interspersed with a central reservation and tree planting would create safe pedestrian route into town whilst allowing the safe but controlled movement of vehicles.

You said: Employment land - access to employment land - remove weight limit (Millennium Way)

We did: The removal of the current weight limit is an action for the Highway Authority, however the access strategy proposed for the NW sector is consistent with Millennium Way being used for the primary access to J28, in line with the highway strategy put forward by DCC as part of their representations and supporting work for the Local Plan.

You said: Vehicle movement/drop off/parking for school is essential. Pedestrian movement consideration essential (crossing, cycleways)

We did: The design of the road immediately outside of the School will

require careful consideration, the detail will be best considered as an integral part of the design of the school, to ensure that pedestrian access and drop off areas are in the most appropriate location. As the road design is developed further, we will work with Devon County Council to ensure as far as is reasonably possible that the road layout is planned in a flexible manner to accommodate the later implementation of the school.

You said: Phasing - long term traffic issues - J28 - vital to facilitate vehicle movements. Relief Road as well as timetable?

We did: The works necessary to accommodate the traffic generated by this site is currently being implemented by DCC, with completion later in 2015. The development of this site is not predicated upon the delivery of the town centre relief road.

You said: Signage - roads, paths, pedestrian, cycling - critical

We did: As part of the detailed design of this site the signing of all routes will be very important, and a detailed strategy will be prepared in conjunction with the Town Council, District Council and Highway Authority.

You said: Kingfisher Reach (Swallow Way) - needs careful integration

We did: In accordance with the agreed access strategy, the junction arrangement at the southern end of the access road will facilitate the use of Kingfisher Road as one of the options for further access to the roads south of Cullompton. It will be for Devon County Council as Highway Authority to consider if further work is required to Swallow Way.

You said: Road capacity for agricultural vehicles

We did: The layout of the road will be designed to accommodate appropriate road going vehicles for access to adjacent land uses, including agricultural uses

You said: Effective footway access and footpath links - must have links to other facilities in town

We did: The scheme will keep existing footpaths and provide new

footpaths linking the new development to the surrounding area. Routes through the site such as Goblin Lane will be upgraded.

You said: Traffic impact on Willand Road and Higher Street (AQMA) and creating rat run through existing estates/roads

We did: The layout of the access road and the principle of traffic calming of Willand Road towards Cullompton Town Centre is compatible with the highway strategy that has been developed and tested by Devon County Council when they prepared their Local Plan representations. The access road was specifically included to address the traffic issues within the Town Centre including the Air Quality Management Area.

You said: Access to St Georges Well

We did: St George's Well would be connected into the site wide drainage strategy that will attenuate water to green field run off rates.

2. Green Infrastructure, ecology, flooding and drainage

You said: Where are the 3 hill top parks that were mentioned?

We did: St. Andrew's Hill, and two mounds on Rull Hill.

You said: Allotments and orchards proposed but where are the parks - a destination needed

We did: See Green Infrastructure (GI) strategy (chapter 4.5).

You said: Connectivity between all GI and existing development - is it logical and is it for all?

We did: See GI strategy (chapter 4.5).

You said: Flood risk and SuDS - sympathetic proposals being put forward. Good design and management needed. Good evidence base needed to support design and capacity

We did: Above ground surface ponds/basins will provide water quality and treatment as well as requisite attenuation to improve downstream flood risk.

| | | | | | | | | | |
|---|--|---|---|---|---|---|---|---|--|
| <i>You said: Long term maintenance concerns about SUDS – who? – Cost? And during construction of whole site</i> | We did: A Management Company will be set up specifically for the development. As for during construction - the sustainable urban drainage features will be put in as part of initial site works - and PG 5 and 6 will be specified (Pollution Prevention Guidance) as part of the ground works contract. | We did: Dead with current drainage issues at Rull Lane/Willand Road - find out causes and use SUDS to resolve. Will need to assess soil type. | We did: The catchment area of the Leat that drains to this area will be diverted and drained to the north and into Fulford Water (instead of its current route under Rull land to the south), which will significantly improve the drainage in this area by removing the flows from upstream. | <i>You said: Consider impact on otters, bats and badgers and provide appropriate mitigation</i> | We did: The impact has been considered, and ecological routes and buffers have been allowed | <i>You said: Retention of hedgerows and trees and remove only where necessary for access</i> | We did: The majority of hedgerows and trees are retained, only being removed where no other option available (e.g. to get the link road in). | <i>You said: Ensure pedestrian visibility where roads cut through bridleway – visibility for and of all</i> | We did: The roads and pedestrian routes will be designed to be safe for crossing. |
| <i>You said: Early delivery of the school</i> | <i>You said: Possible use proposed playing fields indicated to far west for housing and provide playing fields off site at rugby club</i> | We did: A serviced site for the school will be delivered in phase 1. | We did: The site to the far west is no longer being masterplanned due to ownership issues. MDDC proposes to remove this part of the site from the allocation (Local Plan Review). | <i>You said: Show density more clearly</i> | We did: Density plan shown in chapter 4.3. | <i>You said: Community building/place of worship/multi purpose – St Andrews have very high congregation numbers</i> | We did: Community building proposed on Rull Hill, in close proximity to the school. | <i>You said: Character zones – density – not shown</i> | <i>You said: More than 1 corner shop</i> |
| <i>You said: Built environment, character and placemaking</i> | <i>You said: Early delivery of the school</i> | We did: A serviced site for the school will be delivered in phase 1. | We did: The site to the far west is no longer being masterplanned due to ownership issues. MDDC proposes to remove this part of the site from the allocation (Local Plan Review). | <i>You said: Show density more clearly</i> | We did: Density plan shown in chapter 4.3. | <i>You said: Community building/place of worship/multi purpose – St Andrews have very high congregation numbers</i> | We did: Community building proposed on Rull Hill, in close proximity to the school. | <i>You said: Character zones – density – not shown</i> | <i>You said: Playing fields in close proximity to school</i> |
| <i>You said: 4. Vision</i> | <i>You said: Needs to be integral part of town – linked well, supporting and growing existing centre</i> | We did: Connectivity is a vital part of the proposal, with cycle and pedestrian connections to existing routes leading to the town centre. | We did: A wide range of GI uses including allotments have been proposed (see chapter 4.5 for more information). | <i>You said: Design – renewable, sustainable energy, south facing gardens, solar panels</i> | We did: The design of the individual houses and plots will be determined by any planning application. | <i>You said: Integrity of scheduled ancient monument</i> | We did: St. Andrew's Hill is a vital part of the area and the proposal seeks to enhance its setting, allowing GI around the Hill which allow the scheduled ancient monument space in the development. | <i>You said: Nature of employment allocation – size of units, type of employment</i> | <i>You said: Playing fields have been proposed on Rull Hill in close proximity to school</i> |

1.7 Second Round Public Consultation Feedback

The consultation ran between the 20th August – 1st October 2015. A total of 120 valid responses were received. The table below shows a breakdown of responses.

| Question | Response | Number of Respondents | % of Total Respondents (out of 120) | % of respondents who answered the question |
|--|----------|-----------------------|-------------------------------------|--|
| The proposed masterplan document sets out a series of guiding principles which should be followed in drawing up detailed planning applications. These guiding principles are set out in pages 34-39 of the draft masterplan and relate to urban design, movement and transport; landscape, open space and recreation; socially equitable, economic and employment; energy and resource efficiency and character. Do you agree with the proposed guiding principles as set out? | Yes | 21 | 18% | 41% |
| | No | 30 | 25% | 59% |
| Do you agree with the proposed uses? | Yes | 24 | 20% | 46% |
| | No | 28 | 23% | 45% |
| Do you agree with the location of the proposed uses? | Yes | 19 | 16% | 39% |
| | No | 30 | 25% | 61% |
| The Council must ensure that infrastructure is provided in a timely manner alongside the development, without making the development unviable. Of the infrastructure that the development is expected to provide, the masterplan looks to prioritise the delivery of a primary school site and the new road that will link Willand Road with Tiverton Road. Do you agree with the prioritisation of the primary school and the road? | Yes | 31 | 26% | 61% |
| | No | 20 | 17% | 39% |
| In order to reduce the time taken to build the road linking Willand Road with Tiverton Road it is proposed to construct it from both ends at the same time? Do you agree with the proposed way of constructing the road from both ends at the same time? | Yes | 25 | 21% | 54% |
| | No | 21 | 18% | 46% |
| Do you agree with the opening of a temporary vehicular access from St George's View? | Yes | 11 | 9% | 23% |
| | No | 36 | 30% | 77% |
| Access and Transport | Yes | 18 | 15% | 38% |
| | No | 29 | 24% | 62% |
| Education | Yes | 33 | 28% | 75% |
| | No | 11 | 8% | 25% |
| Community Building | Yes | 26 | 22% | 59% |
| | No | 18 | 15% | 41% |
| Employment | Yes | 29 | 24% | 65% |
| | No | 15 | 13% | 34% |
| Local Centre | Yes | 26 | 22% | 63% |
| | No | 15 | 13% | 37% |
| GI | Yes | 27 | 23% | 64% |
| | No | 15 | 13% | 36% |
| Grey and Traveller Pitches | Yes | 14 | 12% | 33% |
| | No | 29 | 24% | 67% |
| The proposed masterplan sets out on page 71 trigger points for when infrastructure is expected to be delivered. Do you agree with the trigger points suggested in the draft masterplan for the following key areas? | Yes | 14 | 12% | 51% |
| | No | 23 | 18% | 49% |
| Supports the allocation of a Community Health Gender Objects to the removal of the Oak Tree | Yes | 30 | 25% | - |
| | No | 14 | 12% | - |
| Concerned about how the Council would adhere to the guiding principles | Yes | 3 | 3% | - |
| | No | 5 | 5% | - |
| Concerned about parking | Yes | 6 | 5% | - |
| | No | 6 | 5% | - |
| Concerned about the capacity of medical facilities | Yes | 6 | 5% | - |
| | No | 6 | 5% | - |
| Commented on the need for additional sports facilities | Yes | 7 | 6% | - |
| | No | 5 | 4% | - |
| Concerned about traffic in Cullompton | Yes | 16 | 13% | - |
| | No | 5 | 4% | - |
| Concerned about the impact on Cullompton High Street | Yes | - | - | - |
| | No | - | - | - |

The proposed masterplan sets out on page 71 trigger points for when infrastructure is expected to be delivered. Do you agree with the trigger points suggested in the draft masterplan for the following key areas?

Any other comments about the draft masterplan?

1. The proposed masterplan document sets out a series of guiding principles which should be followed in drawing up detailed planning applications. These guiding principles are set out in the draft masterplan and relate to urban design, movement and transport, landscape, open space and recreation, socially equitable, economy and employment, energy and resource efficiency and character. Do you agree with the proposed guiding principles as set out?

Guiding principles

You said: You agreed with the guiding principles but were concerned that the developers would not keep to these principles. You were concerned whether there would be a contingency to complete the work should the developers default on their payments.

We did: The NW Cullompton masterplan will be adopted as a supplemental planning document which will carry weight in planning decisions and guide developers in making their outline and reserved matters applications. At the planning application stage the developers will be required to enter into Section 106 legal agreements in respect of their obligations.

Parking

You said: Each dwelling should have parking for at least two cars, with larger homes having additional parking provision.

We did: We will expect reserved matters applications to demonstrate a suitable level of parking for the size of the dwellings, compliant with policy DM8 of the Local Plan 3 Development Management Policies.

Transport

You said: The road should be constructed first and should not interfere with St George's View. A southern link to the motorway should be put in place first before any building to ease congestion through the town.

We did: The development will need to pay for the new road through the site via the sale of development land. It is not viable to deliver the road fully in advance of any development. The proposed funding mechanism will ensure that the new road comes forward as early as possible and in advance of the previously approved planning policy for the site.

Without the access through St George's View, the road would take longer to construct and complete as its funding would be reliant upon house sales. The development is expected to contribute financially towards the

provision of the town centre relief road, but will not be able to fully fund it. It is also expected to provide traffic calming measures on Willand Road.

Other comments

You said: The land set aside for youth, children and other community uses appears to be only 1ha. Given the increased numbers of homes, this should be increased.

Guiding principles

We did: Planning policy for the site requires a 1ha site for youth, child and other community uses. This will be supplemented by open space, sports and recreation provision including part off site to supplement an existing sports provider in Cullompton. A community health garden is also proposed on site.

You said: There will be extra water run off from the proposed development which may cause flooding.

We did: The masterplan incorporates the requirement for a sustainable urban drainage system to deal with surface water run-off. It will be designed to reduce run-off below those existing on the site. There will also be a requirement that this drainage system is adequately maintained in the future.

You said: Is there a strategy to ensure sustainable economic development so that Cullompton does not become a huge commuter town?

We did: Additional employment floorspace is being included within the development and through other measures employment floorspace is being allocated in other parts of Cullompton. Occupiers of the new development will increase economic activity and spend in the town.

You said: Provision should be made for self-build homes.

We did: The Government is likely to make self build a national planning requirement on residential sites and the Council is currently updating its own planning policy on this. We expect a range of housing types to be provided and the masterplan now requires consideration of self build as part of this. It is expected that once revised policies have been adopted this will become a requirement to be secured at the planning application stage.

2. The proposed masterplan envisages 1120 houses, 10,000sq metres of employment floor space, a primary school, community centre, local centre, at least 5 gypsy and travellers pitches and more than 28

hectares of green infrastructure including sports pitches, equipped play areas and allotments. Do you agree with the proposed uses? Do you agree with the location of the proposed uses as set out in the framework plan in the draft document?

Play areas

You said: Existing play areas could be closed and yet the new developments are going to have some. Small play areas are expensive to maintain and are not at all imaginative for children. Would like to see accessible open spaces for picnics and leisure use.

We did: The masterplan includes a large area for sport and recreation including play space near the primary school on Rull Hill. The masterplan proposes to concentrate play provision in fewer, larger sites that will be more sustainable in the future and provide greater play value compared with more, smaller sites. The proposed hilltop park will allow for a range of informal recreation.

Sports facilities

You said: You wanted more facilities for rugby and dual use facilities for community and school uses. Locating a sports field on the top of a hill will make it difficult when wet and windy. There should be a town swimming pool provision as a therapy and leisure pool.

We did: Scheme promoters are in discussions with existing sports providers in the town. The masterplan expects that part of the formal sports provision will be provided off site. We expect that at planning application stage an additional sports pitch will be secured off site for an existing sports club. Dual use of the sports facilities at top of Rull Hill between the school and community will be sought. There is currently no planning policy basis to require the provision of a swimming pool site or funding from this development in addition to other sports provision. In response to Town Council comments, the masterplan recognises that a multi-use games area could be part of the sports facilities to be provided.

Capacity of medical facilities

You said: You were concerned that no new medical facilities are proposed to cater for the additional residents. You wanted to see the provision of a 1 acre community garden attached to the College Rd Surgery and Integrated Health Centre.

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We did: New doctor's surgeries are delivered through clinical commissioning groups and could be accommodated within the local centre area of the site if sought by such a group. The masterplan has been amended to include a community health garden adjacent to the existing medical centre on Willand Road.

Location of School

You said: The position of the primary school adjacent to the main link road is too dangerous for young children. The school is not in a central location to the town.

We did: The most appropriate site for the school was considered at the first consultation stage as a key issue and received support at that stage including from the Town Council. The school is in an accessible location central to the new development and the northern part of the town, which it is primarily intended to serve. The design stage will consider safety issues and it is expected that appropriate pedestrian crossing and speed reduction measures will be provided around the school site.

Other Comments

You said: The location should be on the eastern side. Then all extra traffic could access the motorway without affecting existing residents. The scale of the development is too large... There is a risk of yet more large blocks of indifferent housing bolted in an unwieldy fashion onto the existing community. The residential development immediately south of Rull Lane and north of the proposed allotments and school is inappropriate and should be replaced with further community orchards and allotments.

We did: The location and scale of the development has already been set within adopted planning policy. This masterplan is intended to guide the development so that it does not become a 'bolt-on', but a comprehensive and well-planned new urban extension that respects its surroundings and integrates well with the existing town. The masterplan sets out a series of guiding design principles that will inform subsequent planning applications. Allotments and open spaces have been incorporated into the masterplan.

3. The Council must ensure that infrastructure is provided in a timely manner alongside the development, without making the development unviable. Of the infrastructure that the development is expected to provide, the masterplan looks to prioritise the delivery of a primary school site and the new road that will link Willand Road with Tiverton Road. Do you agree with the prioritisation of the primary school and the road?

You said: You agreed to the prioritisation of the road construction and the link to the school; however, you wanted to see the infrastructure in place and funded before building starts. You wanted to see a wide road to allow buses and cars to pass and to discourage parking on the pavements. You thought a safer route would be to link into the development from the Millend end of Millennium Way and were concerned that the use of Willand Road would cause congestion and have a negative impact on both house prices and saleability.

We did: The masterplan prioritises the construction of the road, including the link to the school in order to reduce impact upon the town centre. The road will be designed to Highway Authority standards so that it is wide enough to allow buses to pass freely. It will need careful design, particularly residential parking arrangements, to ensure that all road users are catered for and that speeds are kept low and communities are not segregated by the highway. The route has also been carefully considered and takes into account the existing contours of the land and the difficulty of crossing Rull Lane which would be required to exit the development further north. Traffic calming measures are proposed on Willand Road to reduce traffic impact and encourage use of Millennium Way as an alternative route to the M5.

4. In order to reduce the time taken to build the road linking Willand Road with Tiverton Road it is proposed to construct it from both ends at the same time and then join these ends together. This will require the formation of a temporary vehicular access from St George's View which would be closed to vehicular traffic when the road opens.

Use of St George's View as a temporary access route

You said: Residents of St George's View were opposed to it's use as a temporary construction access due to a number of reasons, including safety, the narrowness of the road, impact on quality of life and on health and well-being of residents, and devaluation of property. You were concerned that the anticipated 2-3 year timescale would not be kept. You considered that development could be started at each end, avoiding the need to use St George's View.

We did: We have carefully considered the need to use St George's View again. However, this is the only way of achieving funding for the road and hence its delivery at this stage in the development. The alternative is later road delivery with more development traffic using the existing highway network through the town centre until then. The masterplan proposal seeks to ensure the road comes forward as a priority which is of

primary concern for the wider town. The masterplan makes it clear that traffic management measures will be expected (to be agreed at planning application stage) to reduce impact upon St George's View residents and that the temporary access is to be closed to vehicular traffic once the new road is open for use.

Removal of the Tree on St George's View

You said: You were opposed to the removal of the oak tree which is 60 years old, has a tree preservation order on it and is home to wildlife. You did not think that removal of the tree was acceptable for a temporary access.

We did: The greater overall benefit to Cullompton in the earlier delivery of the road is considered to outweigh the loss of the tree. It is expected that replacement planting will be required.

5. The proposed masterplan sets out trigger points for when Infrastructure is expected to be delivered. Do you agree with the trigger points suggested in the draft masterplan for the following key areas?

Access and transport

You said: This many more houses will need better access to the M5, a railway station and an improvement to traffic in Cullompton town centre. Problems with access to Junction 28 and traffic issues in the town centre should be resolved before building new houses. It is worrying that the masterplan states that the transport assessment will need to demonstrate the impacts on Tiverton Road are acceptable. It would be safer for the new road to link directly into the roundabout at the Willand End of Millennium Way.

We did: Work has already been carried out to improve the capacity at Junction 28 and already accounts for traffic from 1100 houses and employment development on this site. Infrastructure improvements are funded by development. The new road will complete an alternative route to the town on the eastern side without reliance upon the town centre. At the northern end, traffic calming will encourage use of Millennium Way to access the M5 rather than through the Willand Road / Station Road junction. The development is also expected to contribute financially to the proposed relief road to the east of the town centre. Transport assessment and modelling has taken place as part of the masterplan process to demonstrate that the impact of traffic associated with the development incorporating measures such as traffic calming and it's phasing on the existing highway network is acceptable. More information on this will also be expected at the planning application stage.

| | | | |
|--|--|---|--|
| | | Education | |
| | | <i>You said: The County Council would expect the freehold of the land to be transferred prior to the commencement of development to ensure that the school can be delivered at an early stage.</i> | |
| | | Community building | |
| | | <i>You said: There is difficulty in keeping existing community venues open and running. Why provide further community facilities rather than promoting existing ones?</i> | |
| | | Community Health Garden | |
| | | <i>You said: A community health garden would be a great asset to the community for a number of reasons including health, education, social and environmental. This kind of initiative is vital for the future and in the best interests of patients.</i> | |
| | | Other comments | |
| | | <i>You said: Timescales and trigger points appear vague as they refer to stage progress and not timescales. What penalties are there for not meeting timescales?</i> | |
| | | Visual Impact | |
| | | <i>You said: A large number of homes constructed will destroy the rural feel of the area. The development will have a large visual impact on Bradninch, but the provision of green areas and parks may ameliorate that. The boundaries of the hilltop park should be extended and any residential development near the park should be bungalows to avoid compromising the skyline. The visual impact at a high level on the steep slopes of Rull Hill and St George's View would appear inconsistent with existing development. The quality of the development must be controlled and should not be put up too cheaply and without adequate space.</i> | |
| | | Other comments | |
| | | <i>You said: The phasing is generally supported, except that residents of St George's View object to its use. Bringing the infrastructure forward early is essential for the town and any agreed phasing should be legally binding. All of the land required for the link road should have completed contracts before it even starts. Ideally the land should be purchased to avoid any one plot not becoming available. The increase in the trigger for the full link road from the occupation of 300 (in the previous version of the masterplan) to 500 dwellings, before the completion of the link road is concerning and not apparently supported by evidence.</i> | |
| | | Green Infrastructure (GI) | |
| | | <i>You said: The proposals provide very little GI between the school and the current town centre. Surely this should be the area where the GI of the allocated land is sited. Why is there so much Green Infrastructure, as all of the adjoining areas to the development are green. The allotments, community facilities and composting scheme should all be on one site.</i> | |
| | | Gypsy and traveller pitches | |
| | | <i>You said: The area chosen would appear to be the best location for a gypsy and traveller site. However, it will need to be well designed for the purpose intended. Concern was raised about the provision of such pitches.</i> | |
| | | 7. Any other comments about the draft masterplan? | |
| | | <i>We did: The design of the gypsy and traveller pitches will be determined at reserved matters stage but will meet the required standards. There is a proven need for additional gypsy and travellers pitches as part of affordable housing and it is a planning policy requirement.</i> | |
| | | Other comments | |
| | | <i>You said: Timescales and trigger points appear vague as they refer to stage progress and not timescales. What penalties are there for not meeting timescales?</i> | |
| | | <i>We did: Whilst we can predict when the construction will commence or how long developers may take to build, it will in part be dependent upon the housing market and economy. The development is expected to be built out over 10 years. Over such a timescale, trigger points are more effective if they relate to stages in the process. The phased approach sets out what infrastructure will be provided, at what stage of the development.</i> | |
| | | 6. The proposed masterplan identifies that the development is expected to come forward in 2 phases. Do you agree with the proposed phasing? | |
| | | <i>You said: The phasing is generally supported, except that residents of St George's View object to its use. Bringing the infrastructure forward early is essential for the town and any agreed phasing should be legally binding. All of the land required for the link road should have completed contracts before it even starts. Ideally the land should be purchased to avoid any one plot not becoming available. The increase in the trigger for the full link road from the occupation of 300 (in the previous version of the masterplan) to 500 dwellings, before the completion of the link road is concerning and not apparently supported by evidence.</i> | |
| | | <i>We did: The masterplan phasing will be taken into account at the planning application stage and will form the basis for planning conditions and legal agreements. Mid Devon District Council will have step in rights to access the money for the road in order to ensure its delivery if progress were to stall. The amendments to the triggers for highway infrastructure provision are necessary to achieve the road within 2-3 years. The build out of 500 dwellings is not expected until year 5-6. The 2-3 year timescale for the road equates to the build out of approximately 160 dwellings or less.</i> | |
| | | Other comments | |
| | | <i>You said: The effect on the use of surrounding residential roads as short cuts by construction traffic and new residents should be considered.</i> | |
| | | <i>Response: Construction management plans to reduce the impact of construction traffic will be conditioned as at the planning application stage.</i> | |

1.8 Design Process

A clear design process that ensures continuity, a comprehensive approach to design, and a focus upon quality, is an important pre requisite of ensuring that a successful neighbourhood is designed and built. This will require attention and flexibility throughout the period of delivery.

The design process outlined here proposes an approach for achieving these objectives and therefore a better foundation for securing a successful new place.

The preparation of more detailed design information comprising urban design and architectural principles prior to the submission of detailed proposals will ensure that there is a consistent approach to the design of key structuring elements across the North West Cullompton area. These elements will build upon the principles established in this document and come together to shape the overall character and appearance of the area. The detailed design information referred to above will not necessarily restrict variety if it is felt to be appropriate but will ensure that the area feels like an integrated community.

The involvement of an independent Design Review Panel in scrutinising the quality of detailed designs as they come forward, at one or more stage in the design process, will provide invaluable support to MDDC as they make planning decisions. MDDC will expect landowners and developers to follow the prescribed design process which is adopted as an integral part of this SPD.

The development framework plan will illustrate in greater detail the development form for the whole of North West Cullompton.

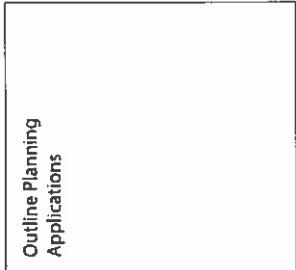
Local Planning Policy Context

| |
|---|
| 1. Mid Devon Local Plan: Core Strategy July 2007 |
| 2. Allocations and Infrastructure DPD October 2010 |
| 3. Development Management Policies October 2013 |

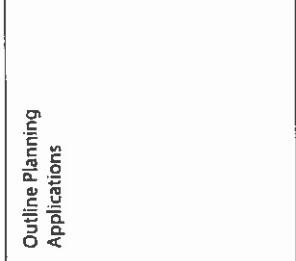
Masterplan SPD



Outline Planning Applications



Outline Planning Applications



Outline Planning Applications

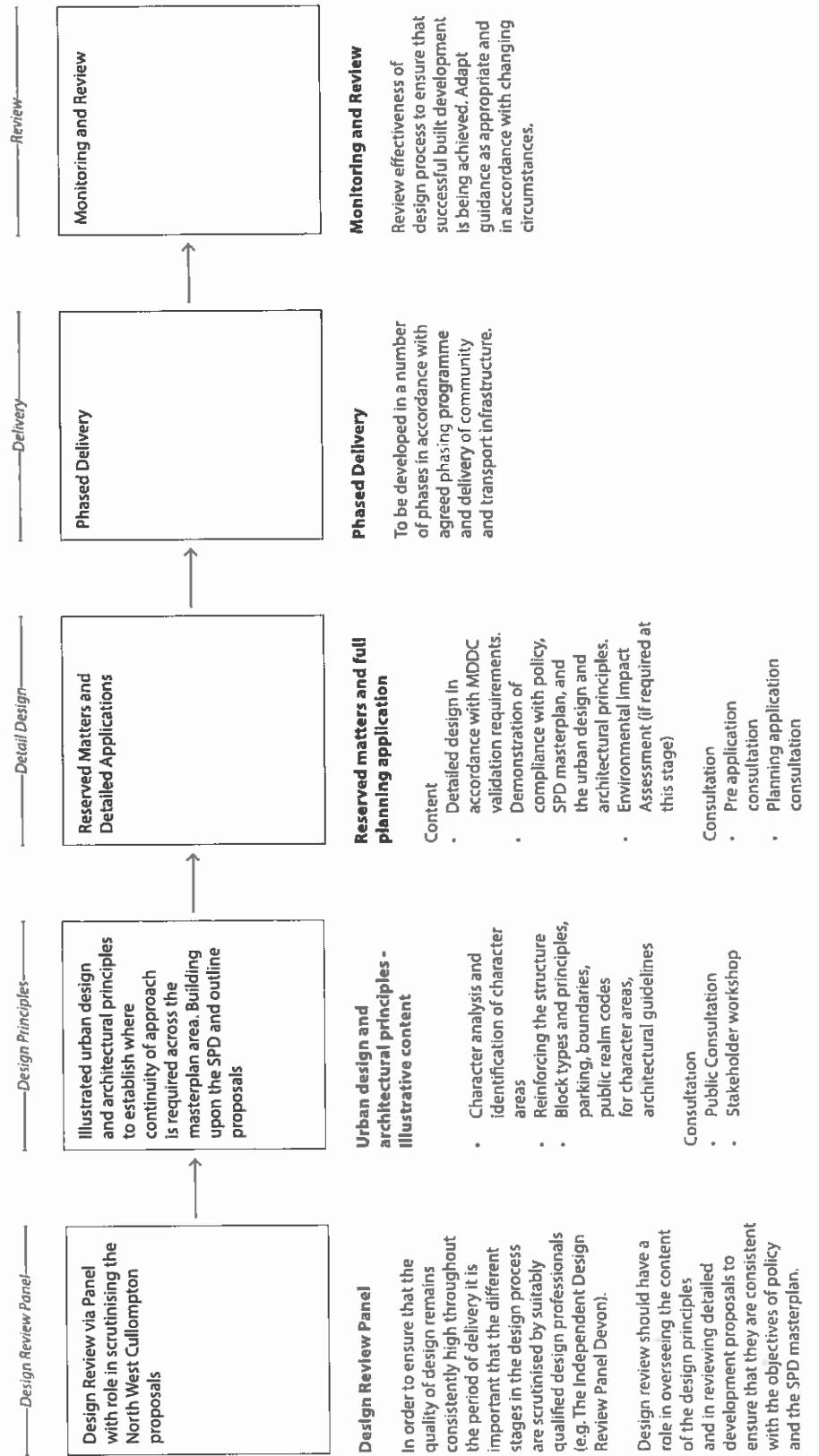
- Content
- Illustrative plan
- Design and Access
- Statement to include proposed character areas, street/space typologies, alternative design approaches, sample blocks and key areas
- Identify how masterplan principles are met
- MDC validation requirements
- Environmental Impact Assessment as appropriate
- Consultation
- Pre application consultation
- Planning application consultation

Framework Plan

- Content
- 1:2500 scale plan covering the entirety of the site. The development framework plan shall illustrate a further level of resolution in terms of development form.

Masterplan SPD

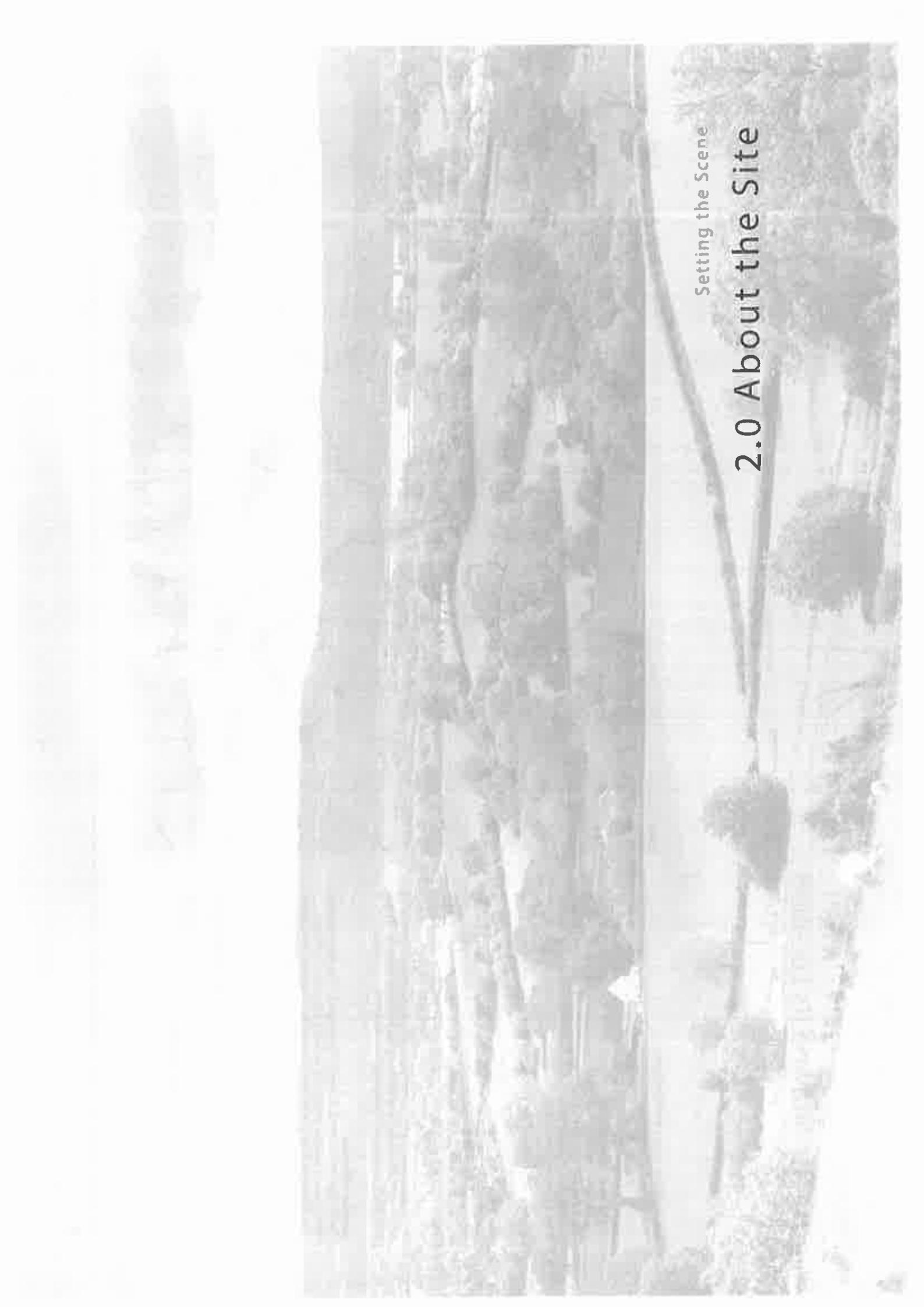
- Content
- Vision
- Concept
- Guiding principles
- Framework Plan
- Phasing and delivery
- Consultation
- 2 stage public consultation
- Stakeholder workshop



A Design Review Panel could be involved at various stages.

A black and white photograph showing a person's lower body from the side. They are wearing light-colored shorts and dark socks with shoes. Their right leg is slightly bent forward as they walk through tall, textured grass. The background is a soft-focus landscape.

Setting the Scene



2.0 About the Site

Setting the Scene

2.1 The Site and its Location

Connections, Access and Movement
 Cullompton is located towards the East of Mid Devon and lies just off Junction 28 of the M5, providing good links to nearby cities such as Exeter and Bristol. Other main roads include the A373 to Honiton and the B3181 to Exeter. It is approximately equidistant between Exeter to the south and Taunton to the north west. The proximity of the town to the motorway ensures that Cullompton has good access and as a result is a popular commuter town. The nearest railway station is at Tiverton Parkway - a short drive away.

For full existing connectivity mapping see chapter 6.3.

The Town

The population of the town is approximately 8500. The town centre is popular, vibrant and has a distinct and cohesive historic character. There is a mix of retail in the town centre, with local shops along the high street. There are also two supermarkets in Cullompton.

A number of recent new residential developments have occurred in the town; furthermore, the Local Authority has indicated in the Local Plan that new housing is acceptable and has allocated land for this.

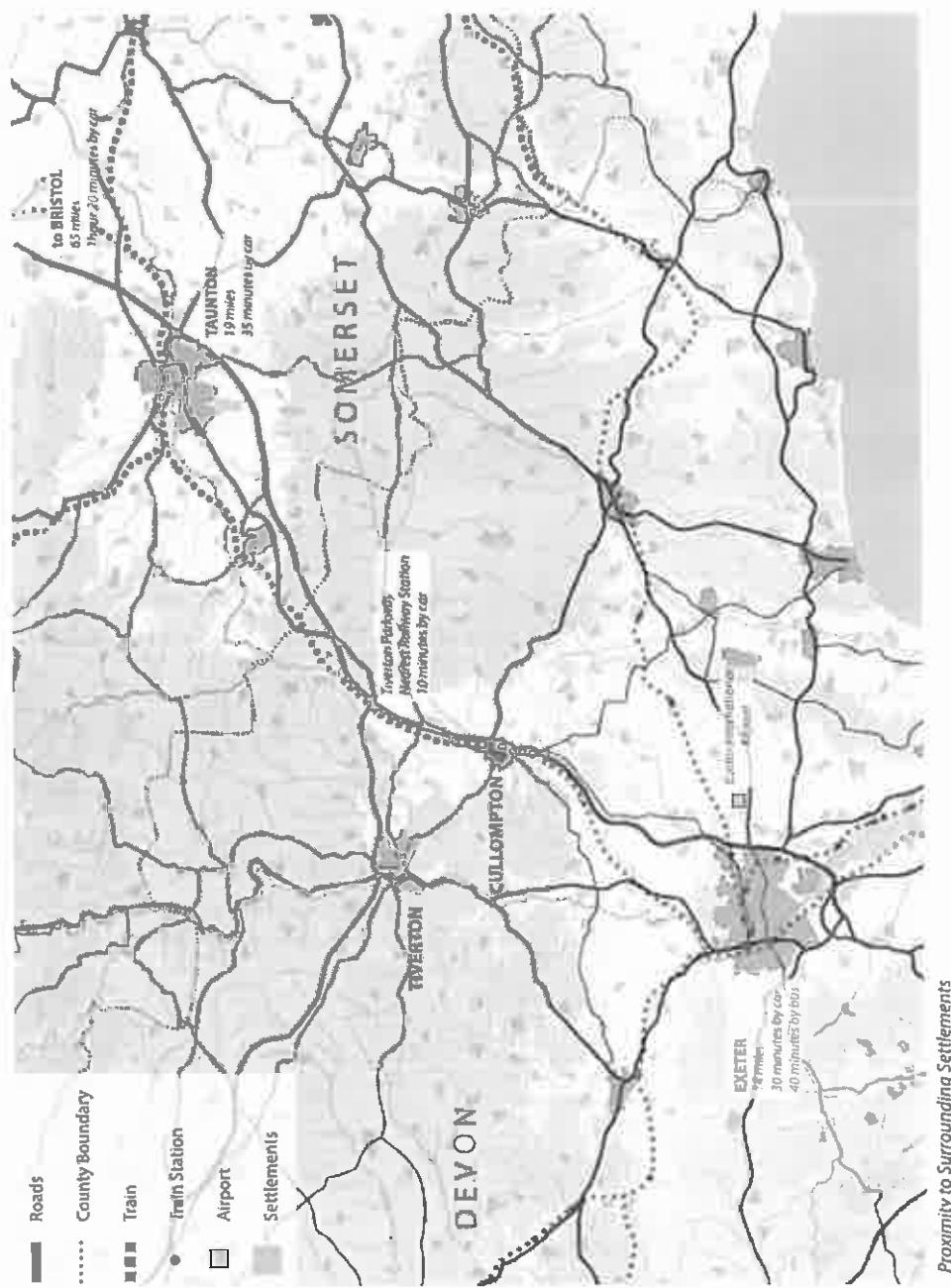
Location of the Site

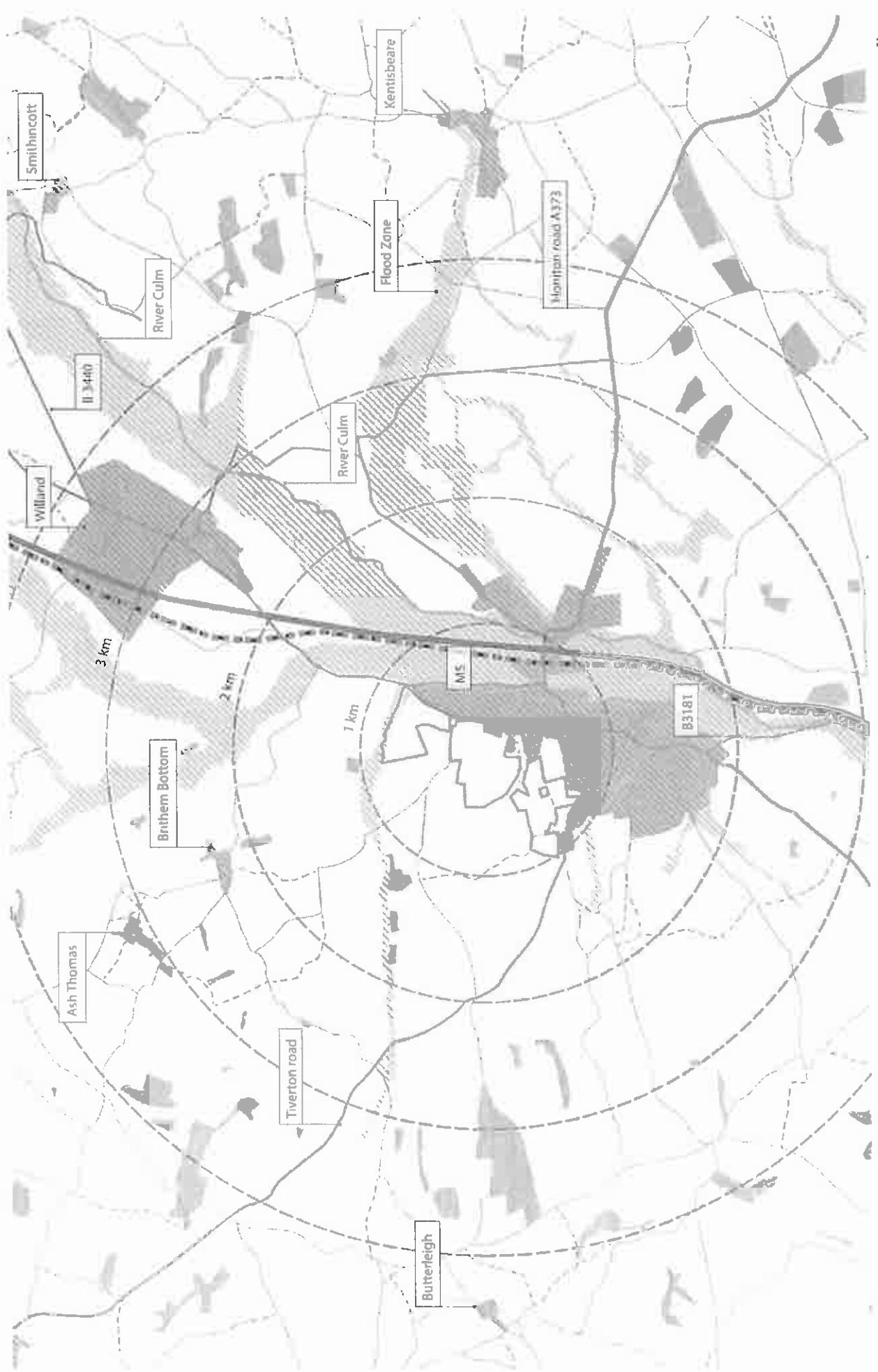
The location of the site to the North West edge of Cullompton has been identified as a suitable location for an urban extension of the town. The western boundary of the site is formed by hedgerows, the eastern, by Willand Road, the southern by hedgerows and development and Tiverton Road, and the northern by a stream.

Topography

The town of Cullompton sits roughly at 70m above sea level. The most notable elements of the topography around the site are three hilltops, the highest of which is Rull Hill that reaches 95m. St Andrew's Hill - an old Roman Fort - reaches 86m. These hilltops are visible from all directions making the site extremely visually sensitive.

See chapter 6.6 for more details.





Location Plan

2.2 Land Control

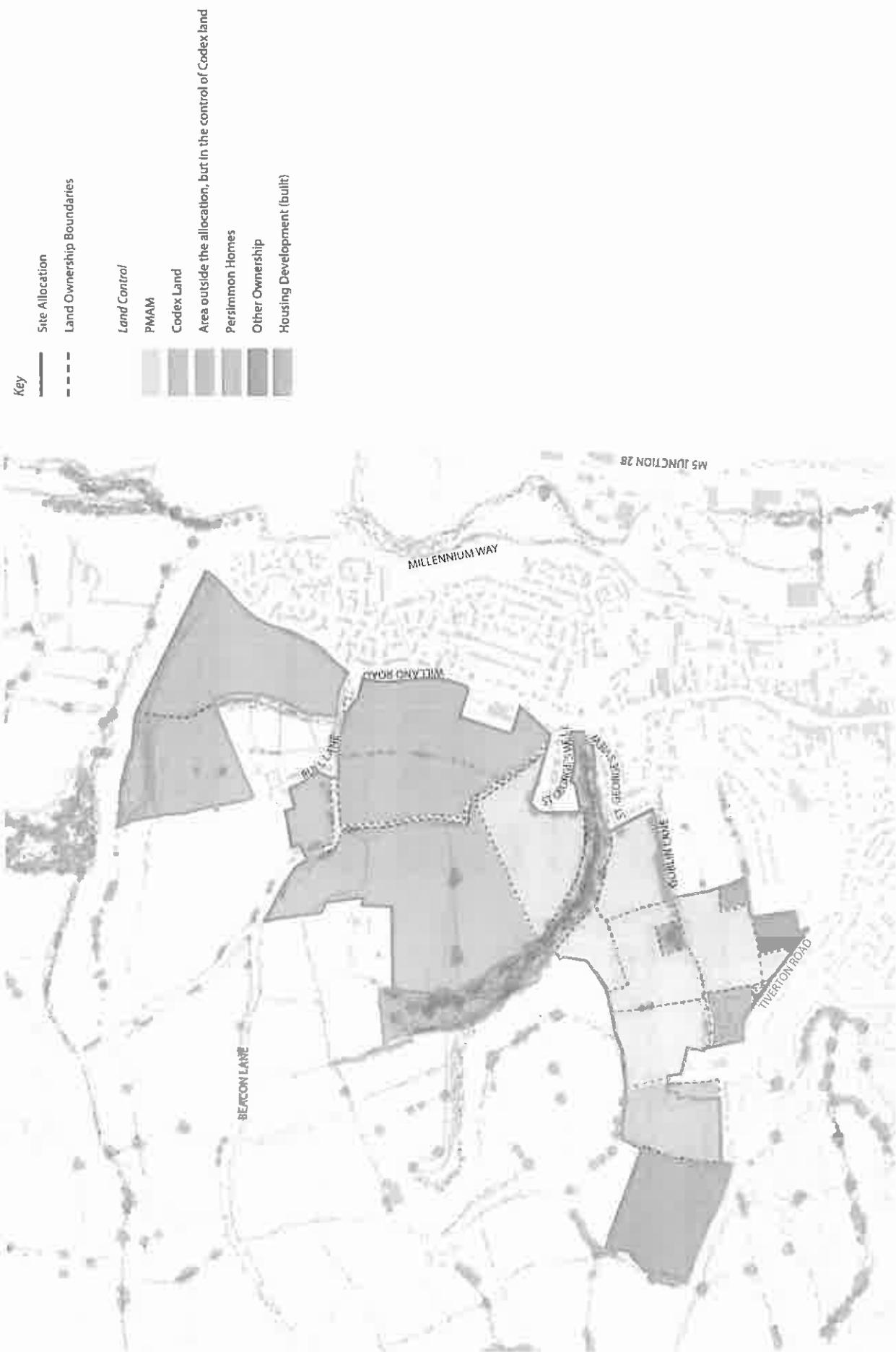
At the time of writing the site is split between a number of land ownerships. The land is also split between three land promoters: PM Asset Management, Codex Land, and Persimmon Homes.

The diagram to the right shows the extent of control of the three land promoters via agreements entered into with land owners.

Whilst the pattern of land ownership is diverse, the masterplan provides a framework within which each parcel of land can contribute towards the delivery of the wider whole. In order for this to be successful different land owners will need to have regard to the role of their land within the wider masterplan and the need to achieve a coordinated approach to the development and delivery of associated infrastructure. Vital to this is an integral approach to phasing and implementation of the development. Proposals for this are set out in Section 5.

In order to deliver a successful new neighbourhood for Cullompton, this document provides land owners and future developers with a clear understanding of what will be expected of them by MDDC when they prepare their proposals.

There are parcels of land within the allocation that do not fall within the control of the land promoters. These are parcels which have either already been developed, have been used for the cemetery extension, currently being used for allotments, or where the land owner has either not brought their land forward for development or participated in the masterplanning process. These areas (coloured in pink), have not been included in the framework plan (which can be seen in chapter 4.1).



2.3 Site Constraints & Opportunities

Extensive, detailed surveys have been carried out, which have informed the masterplanning process. A summary of all the findings can be found in the appendix to this document.

The following constraints have been identified as they are of particular importance to this site and have the most significant impact upon the overall shape of the plan and amount of development that can reasonably be achieved.

Topography

The visual impact of the site as a result of the three hilltops within and near to the site is something that will have to be addressed in detail through this masterplan and at the planning application stage.

The steep gradients surrounding these hills will require careful planning in order to minimise impact on the environment and to achieve acceptable gradients for housing, roads and footways.

See chapter 6.6 for the existing topography and gradients

Connectivity and Movement

The site is positioned with good access to Tiverton Road, the B3181 to Exeter and the M5. However, a north west link road with connections to Tiverton Road and Willand Road is required in order to minimise the impact of traffic on the town centre and to address air quality issues.

There are three bridleways running through the site that will be retained.

See chapter 6.2 and 6.3 for the existing connectivity

Ecology

The habitats on the site include stream and ditch corridors, mature trees and species rich hedgerows. A protected species survey found that bats, dormice, badgers and nesting birds can all be found on the site. Several hedgerows on the site are classified as ecologically important under The Hedgerow Regulations 1997 due to the presence of dormice.

These ecological constraints will be important in shaping the location, form and density of the development in relation to green infrastructure areas.

See chapter 6.7 for the ecology surveys and existing site constraints.

Heritage

About half of the site sits within a Critical Drainage Area where surface water runoff will need to be carefully considered at design stage so as not to increase flood risk elsewhere. The stream running through the land in between Rui Hill and St Andrew's Hill has a narrow floodplain, which must remain undeveloped.

See chapter 6.8 for a hydrology constraints drawing.

The setting of the new road in the landscape, boundary treatment and retention of natural features and existing screening will assist in the reduction of impact of the new development upon the setting of nearby heritage assets including nearby listed buildings at Grown Farm, Little Rull, Paulsland Farmhouse and those associated with the cemetery. The location and planning out of green infrastructure will also assist in reducing impact upon the setting of heritage assets. A comprehensive assessment of proposals upon cultural and heritage assets together with settings assessments will be required as part of the Environmental Statement supporting planning applications.

Development Area

The planning policy allocation for the site identifies areas for development and areas for green infrastructure. The site constraints mean that the amount of development identified for the site will be difficult to achieve within this area. The ability of the development to provide the necessary infrastructure would most likely be compromised as a result. This masterplan provides an opportunity to reassess the boundaries between the development areas and green infrastructure in order to deliver 1 100 homes and fund infrastructure. The requirement for 32 hectares of green infrastructure can still be achieved.

Opportunities

Development of the site provides an opportunity to improve highway links on the northern side of Cullompton, connecting Millennium Way/Willand Road and Swallow Way without going through the town centre to the benefit of air quality and helping to address congestion. The site will provide a range of community benefits including a new primary school and early years education provision. One of the key elements of the site is the potential for delivering 28 hectares of strategic green infrastructure to the benefit of not only new residents of the site but also residents of wider Cullompton. Affordable housing will assist in addressing housing need in the area.

The site is located in an area of prehistoric and Romano British activity together with an Ancient Monument to the south on St Andrew's Hill. Early implementation of detailed archaeological investigation will allow any potential constraints to be identified and allowed for within subsequent planning applications. Any significant heritage assets identified by such investigation could constrain development. Design and layout will need to have regard to potential archaeological interest. There are also listed buildings in the vicinity of the site. The setting of heritage assets will also need to be taken into consideration. Consultation with Historic England will be required.

Key

Boundaries
Site Allocation

Ecology

- Feature Broadleaved Trees
- Potential Habitat for Otters
- Potential Bat Roosts
- Site of Wildlife Interest
- Poor Semi-Improved Grassland
- Improved Grassland
- Arable Land

Access

- Public Footpath
- Bridleway
- Roads
- Bus Stops

Flooding

- Watercourse
- Flood zone

Critical Drainage Area**Landscape Features**

- 1 Rull Hill
- 2 Rull Hill
- 3 St. Andrews Hill

Scheduled Ancient Monument



Achieving a Quality Place

3.0 Development, Vision and Concept

Achieving a Quality Place

3.1 The Vision

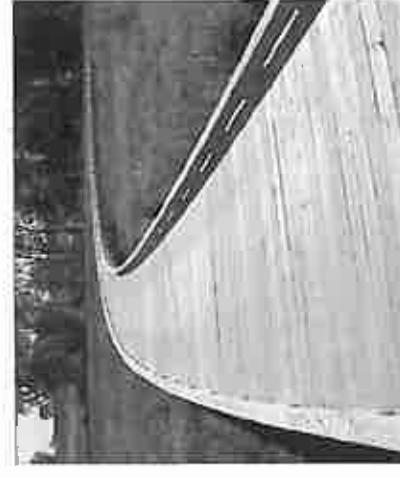
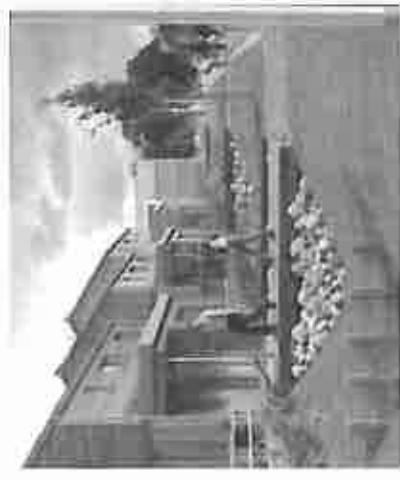
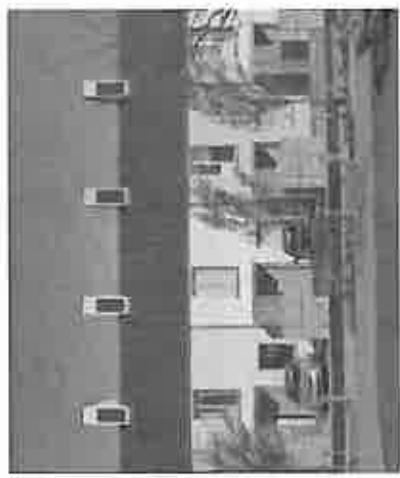
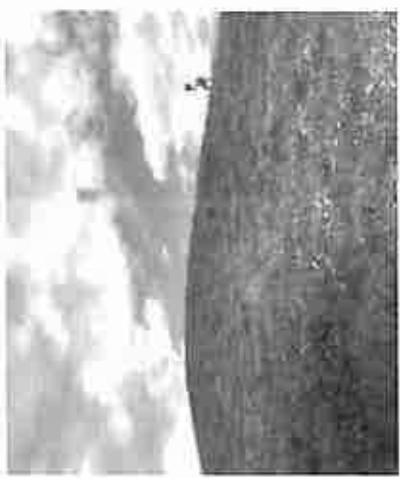
2040. Living in North West Cullompton means being able to enjoy the best of both worlds: enjoying the best of Devon rural living, while also being close to the heart of Cullompton with its associated facilities, employment and leisure opportunities.

The rejuvenated High Street offers everything you would expect from a bustling Devon Market town but with excellent access onto the M5 means working in Exeter, Tiverton, Taunton and beyond is very convenient.

What really sets this place apart though is the large areas of parkland, leafy streets and pastoral feel to the place. The focal point being the primary school, park and community sports centre at Rull Hill.

The parks have community allotments, orchards and places for incidental play. Well connected foot and cycle paths connect town and country, maximising views to the surrounding countryside from the hilltop parks.

The hilltop parks are connected by wildlife corridors, rich in ecology and form an attractive and safe route to the local centre where you will find convenient shops and employment opportunities. From here access to the High Street and the rest of town is all within walking distance.



3.2 Development Concept

The Hilltop Concept

The concept layout for the site has been driven by the dominant landscape features across the site, namely the three hilltops. Parks situated at the top of these three hilltops will afford great views across the Culm Valley and beyond towards the Blackdown Hills. At these vantage points various community uses, a school, public open space and sports uses have been located. The parks are linked by a network of footpaths and cycle paths following the lines of the existing vegetation that is retained and enhanced to provide a key ecological habitat. Green infrastructure including public open space will create a green network connecting the neighbourhood together and will give it distinct identity. The site is accessed by the link road that connects the Tiverton Road through to the Willand Road connecting the neighbourhoods and establishing a clear road hierarchy through the site. Development has been shaped around the green infrastructure set within a clear hierarchy of streets and spaces establishing their own character areas and identity.

Development Concept

The concept layout for the new neighbourhood has three key components which has created the structure for successful place making and a compliant master plan (concept explained with diagrams on opposite page). These three key components are:

- Three hilltops and green infrastructure
- Access and permeability
- Development and place making

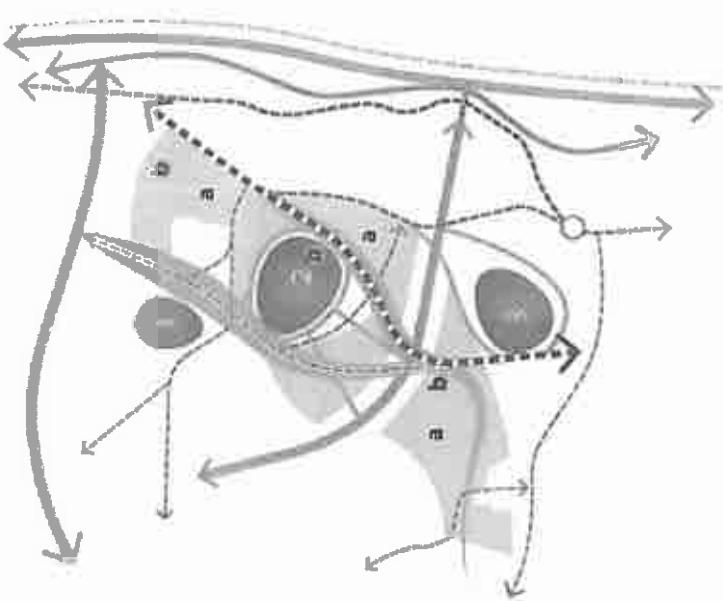
A mixed use neighbourhood centre - At the centre of the southern area, well connected and easily accessible by existing and new residents. The neighbourhoods centre will have a public space focused on the proposed link road with uses that could include shops a care home, bus stop and dedicated pedestrian links into town and out into the countryside.

A new primary school - The heart of the new neighbourhood will be at the top of Rull Hill around the school, community uses, and hilltop park. The school is well connected along the link road with dedicated pedestrian links from the Willand Road and surrounding residential areas. The proposed sports pitches, community orchards, allotments, children's play space and large areas of public open space will provide a healthy and active focal point for the wider area.

Employment areas - The employment areas are located in the north of the site to provide good access to the M5 and avoid bringing lorries into the residential areas, and at the local centre serving local needs. This site will provide much needed employment for the area.

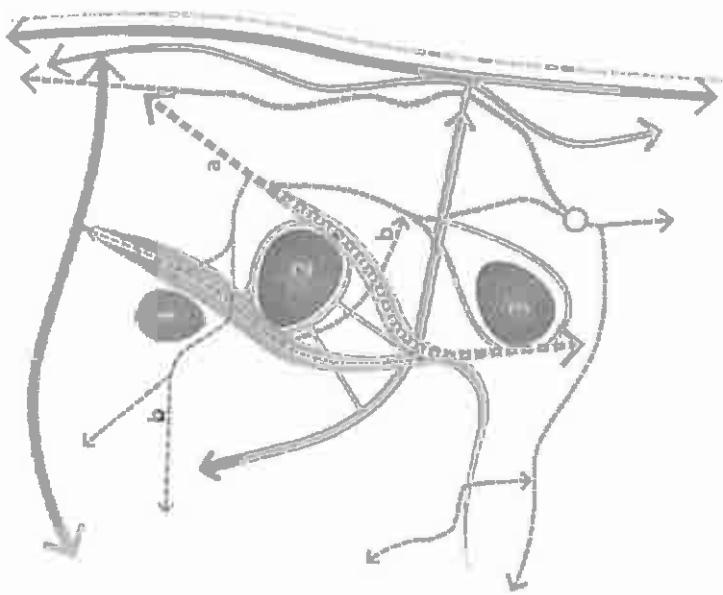
Public open space - Public open space links all the various parts of the neighbourhood together and provide a visual and public amenity promoting sustainable transport within the area and a active and healthy life style. Sporting facilities, community uses, allotments, orchards, play spaces and public open space are all well connected by a network of footpaths and cycle paths. Existing vegetation has been retained and enhanced to improve the ecological potential of the site.

Residential development - Residential development is located around the three focal points of the site forming distinct character areas. Development is shaped to provide enclosure and definition to spaces where needed, at a density appropriate to its proximity to the neighbourhood centre and edge of settlement. A variety of housing types and styles and tenures should be provided helping to meet housing need and ensure that a balanced community is developed.



1. Three Hilltops and Green Infrastructure

- Parks are proposed at the top of the hills
- Parks are linked via green infrastructure, forming the key structure to the site.
- Connections are made into the existing green infrastructure on and around the site maximising ecological and hydrological potential



2. Access and Permeability

- A hierarchy of streets are introduced around the link road that connects the Iverton and Willand Roads.
- Existing public rights of way are retained and connect into a permeable network of foot and cycle paths.



3. Development and Place Making

- Appropriate areas of development are introduced, shaped around the green infrastructure, minimising visual impact. Development is created within a clear hierarchy of streets and spaces establishing their own character areas and identity.
- Place making is reinforced with the introduction of the local centre, school and employment uses, creating a sustainable neighbourhood.

3.3 Guiding Principles

This section draws together the planning policy aspirations from the AIDPD and the key messages from the vision into a series of guiding principles informed by the development concept and from which the subsequent masterplan will be drawn. Any policies noted are from Mid Devon District Council's Allocations and Infrastructure Development Plan Document (AIDPD), January 2011.

The Guidelines set out are:

- A: Urban Design
- B: Movement and Transport
- C: Landscape, Open Space and Recreation
- D: Socially Equitable
- E: Economy and Employment
- F: Energy and Resource Efficiency
- G: Character

Guiding Principle A : Urban Design - Placemaking and Quality Design

The development should be designed in accordance with best practice in urban design and should respond to guidance, Building for Life 12 and Safer Places criteria which remain relevant to creating attractive, liveable places that respond to their context.

Site context: integrating into the surrounding

A1 Connections

The scheme should integrate into its surroundings by reinforcing existing connections and creating new ones; whilst also respecting existing buildings and land uses along the boundaries of the development site.

A2 Facilities and Services

The development should provide and have close links to community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes appropriate to the scale of the development.

A3 Public Transport

The scheme should have good access to public transport to help reduce car dependency.

A4 Meeting Local Housing Requirements

The development should have a mix of housing types and styles and tenures that suit local requirements and needs, ensuring a balanced

community.

Creating a place

A5 Character

The scheme should create a place locally inspired by the characteristics of Cullompton and its immediate surroundings with the aim of achieving a high quality environment.

A6 Working with the Site and its Context

The scheme should take advantage of existing topography, landscape features (including watercourses), wildlife habitats, existing buildings, site orientation and micro-climate.

A7 Creating Well Defined Streets and Spaces

New buildings should be designed and positioned with landscaping to define and enhance streets and spaces. They should also be designed to turn street corners well.

A8 Easy to Find your Way Around

The development should be designed to make it easy to find your way around, through a good network of pedestrian, cycle, vehicular routes, and through nodal areas, such as the local centre, the school etc.

Street & Home

A9 Streets for All

Streets should be designed in a way that will encourage low vehicle speeds and allow them to function as social spaces.

A10 Car Parking

Resident and visitor car parking should be sufficient and well integrated so that it operates functionally whilst not dominating the character of the development.

A11 Public and Private Spaces

Public and private spaces should be clearly defined and designed to be attractive, well managed and safe with long term maintenance arrangements.

A12 External Storage and Amenity Space

Adequate external storage space for bins, recycling, vehicles and cycles should be provided.

Safer Places

A13 Access and Movement

The scheme should have well defined routes, spaces and entrances that provide for convenient movement without compromising security;

A14 Natural Surveillance

Proposals should ensure that all publicly accessible spaces are well overlooked;

A15 Ownership

The development should promote a sense of ownership, respect, responsibility and community;

A16 Physical Protection

The neighbourhood should include any necessary, well-designed security features;

A17 Activity

The scheme should be designed to ensure that the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times;

A18 Management and Maintenance

The place should be designed with management and maintenance in mind, to discourage crime in the present and the future.

A19 Structure

The scheme should be designed to reduce the potential for conflict between different uses.

Guiding Principle B: Movement and Transport

Policy AL/CU/2 sets out the requirements for transport provision to support the urban extension and specifies a series of enhancements including the provision of a new road suitable for buses linking Tiverton Road and Willand Road. The scheme will be required to ensure transport provision allows for accessibility for all modes of travel and will ensure pedestrian and cycle links both to/from the town centre and within the scheme itself. Existing public rights of way should be improved to aid accessibility. Bus service enhancements will also be required. One change is the lack of provision of a shared use path between Cullompton and Willand Road along the B3181 as requested in policy AL/CU/2. This is due to viability and difficulty in delivering it. With this exception, MDDC expects the requirement of this policy and the following guiding principles to be met.

B1 Sustainable Travel

The scheme will have a network of movement corridors and connections with the existing town that ensures the promotion of sustainable modes of transport and the reduction of the need to travel by private motor car.

B2 Walkable Neighbourhood

The structure of the development should create a well connected and walkable neighbourhood focused around a mixed use neighbourhood centre. This should include good pedestrian and cycle connections throughout the area and provision for public transport.

B3 Street Hierarchy

The scheme should have a clear and legible hierarchy of streets and spaces to respond to different travel and movement needs.

B4 Linking to Existing Areas

There should be strong links and connections between the existing community, adjacent neighbourhoods, Cullompton town centre and the new community.

B5 Pedestrian Routes

Where appropriate streets should be designed to provide pedestrian priority. Provision should be made to enhance pedestrian connections.

B6 Cycle Routes

Provision should be made to enhance connections and the ability to travel by cycle.

For existing movement and transport maps see chapters 6.2 and 6.3.

Allocations and Infrastructure Development Plan Document (AIDPD), Mid Devon District Council, January 2011

Policies relevant to Movement and Transport that the masterplan adheres to:

Policy AL/CU/1 (p. 105 of the AIDPD) North West Cullompton

A site of 74.8 hectares to the North West of Cullompton is allocated for mixed-use development, subject to the following:

Policy AL/CU/2 (p. 107) Transport provision

- a. Provision of a network of streets linking to the existing highway network, including a through route suitable for buses, linking Tiverton Road to Willand Road;
- b. Provision of bus, pedestrian and cycle routes at appropriate locations throughout the development, creating an attractive, permeable network for non-car modes travelling within, into and out of the area;
- c. Cycle and pedestrian links to and from the town centre and within the mixed-use urban extension;
- d. Provision of a shared use path between Cullompton and Willand along the route of the B3181;
- e. Creation of footway and a shared use link along Millennium Way, to allow access to retail and industrial estates.*
- f. Implementation of Travel Plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts.

g. Bus service enhancements within, into and out of the mixed use urban extension;

h. Bus service enhancements between Cullompton, Exeter, Tiverton Parkway and Tiverton.

*Policy currently requires the creation of a footway and shared use link along Millennium Way. The development will make contributions to necessary and justifiable improvements to the Millennium Way and Willand Road to be agreed with the Local Authority. It is expected that this will be tested at the planning application stage.

An element of this policy has been identified as likely to be unviable due to the limitations of viability and ability to deliver.

Policy AL/CU/2 (p.107) Transport provision

d. Provision of a shared use path between Cullompton and Willand along the route of the B3181;

Due to the limit in viability of providing these access links, alternatives have been explored such as the upgrading of Willand Road between the termination of the new link road and the town centre.



Photo looking down the High Street in Cullompton

3.3 Guiding Principles

Guiding Principle C: Landscape, Open Space and Recreation

Policy AL/CLU/3 sets out policy requirements for green infrastructure including open space, sports and recreation provision and environmental protection and enhancement to support the scheme. The proposal seeks to provide at least 26ha of green infrastructure including hilltop parks, sports and recreation, children's play areas together with community orchard and allotments. The extension of the cemetery is no longer being provided through the development scheme and it has been secured separately by the Town Council. Delivery of the green infrastructure is addressed in sections 5.3 and 5.5. With the exception of the cemetery extension, MDDC will expect the requirements of policy AL/CLU/3 and the guiding principles to be met.

C1 Existing Character

The structure of the development should be shaped around the existing character and features of the landscape, reinforcing the qualities of the neighbourhood. Green infrastructure and open spaces should include information on the history of the area.

C2 Enhancing Existing Environment

Development should protect and enhance existing important fauna and flora across the site.

C3 Strong Story for Green Infrastructure

Development should ensure that landscape and open space is integrated into the new community, and is used to connect the various parts of the neighbourhood together creating strong green links and corridors into the wider landscape. Existing public rights of way should be improved to aid accessibility.

C4 Multi-functional Green Infrastructure

The landscape and green spaces should be multi-functional incorporating water attenuation (SUDS), food growing (allotments and orchards), informal, formal and children's play and recreation (including sports pitches).

C5 Management

Provision should be made for appropriate management regimes to be put in place to ensure ongoing maintenance and stewardship of the landscape areas and SUDS.

For existing green space conditions see chapter 6.7.

Allocations and Infrastructure Development Plan Document (AIDPD), Mid Devon District Council, January 2011

Policies relevant to Green Infrastructure that the masterplan adheres to:

Policy AL/CLU/1 (p. 105 of the AIDPD) North West Cullompton
A site of 74.8 hectares to the North West of Cullompton is allocated for mixed-use development, subject to the following:

- d. Environmental protection and enhancement.
- a. 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;

- b. An area of 28 hectares for strategic Green Infrastructure, laid out and managed with an appropriate mix of public parkland, open space, landscaping and potential local nature reserve and including an extension to the cemetery;
- c. Areas of equipped and laid out public open space, totalling 0.7 hectares of equipped children's play, 2.8 hectares of sports pitches and 0.7 hectares of allotments;

- d. Protection and enhancement where possible of all existing Public Rights of Way;
- e. Provision of a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;

- f. A Strategic landscaping and tree planting scheme to mitigate landscape impact; enhance biodiversity and the character of development and capture carbon;
- g. Detailed archaeological investigation and measures to record, and where necessary, protect the archaeological interest of the site through appropriate design, layout and mitigation;

- h. Design solutions which respect the settings of Listed Buildings within and adjoining the site.



Guiding Principle D: Socially Equitable

This development will provide an extension to the existing town of Cullompton that needs to respect the wider town and the wider surroundings of the site. It should be designed to be equitable, balanced and fair.

D1 Employment and Community Uses

In the new neighbourhood there should be access for all to employment and community uses. A 1 hectare site will be provided for community uses and employment floorspace will be provided on site. Devon County Council advised that a dedicated youth support satellite unit is no longer required, but such services could be run from the community centre.

D2 Primary School

There should be access for all within the development to nursery and primary education. This should include 210 primary school places and 52 early years education places. This should be within a site of 2.1 hectares. Wider opportunities should be available for secondary, further and adult education

D3 Health

In the new neighbourhood there should be access for all to health facilities, either within the community or within easy reach.

D4 Usable Green Infrastructure

Open space and landscapes should be an integral part of the new community. Opportunities for food growing, safe walking and cycling, sports and play should be available to everybody.

D5 Housing Mix

The new neighbourhood should have a suitable balance and distribution of housing comprising homes of all types and tenures including; affordable housing (policy target 35% subject to viability) intermediate (shared equity) and social rented and at least 5 pitches for gypsies and travellers.

D6 Integrating with Existing Communities

The neighbourhood should be designed so that it respects and integrates positively with existing communities and so that they share the benefits.

For existing facilities and amenities see chapter 6.4.

Allocations and Infrastructure Development Plan Document (AIDPD), Mid Devon District Council, January 2011

Policies relevant to community and social issues that the masterplan adheres to:

Policy AL/CU/1 (p. 105 of the AIDPD)

a. 1100 dwellings with 35% affordable housing* to include at least 5 pitches for gypsies and travellers;

e. Community facilities to meet local needs arising;

Policy AL/CU/4 (p. 111) Community Facilities

a. A site of 2.1 hectares for a new primary school at no cost to the Local Education Authority;

b. A site of 1.0 hectares for youth, children and other community uses.

c. Construction costs for a 210 place primary school;

d. Provision for an additional 52 places at the new primary school for early years education;

e. Provision of a community building and an Integrated Youth Support Services satellite unit.

* the percentage of affordable housing is subject to viability



3.3 Guiding Principles

Guiding Principle E: Economy and Employment

Policies AL/CU/1 and 6 set out a requirement for 40,000sqm of light industrial (B1) or other suitable employment floorspace to be provided during the plan period and phased in relation to the delivery of the housing and infrastructure. The amount of floorspace identified in the policy was considered too high in the Mid Devon Employment Land Review 2013. This recommended reducing the employment floorspace on this site to 10,000sqm in order to avoid over-supply in a single location and provide more flexible, wider opportunities elsewhere. In addition this will assist in overall development viability and infrastructure provision by maintaining levels of residential land. The masterplan therefore rebalances employment provision on this site. With the exception of amount of floorspace, MDDC will expect policy requirements for employment and the guiding principles to be met.

E1 Visibility and connections

The scheme should integrate into its surroundings by reinforcing existing connections and creating new ones; ensuring employment land is located to give businesses the best chance of success. The scheme should provide accessible employment land in a high quality environment.

E2 Facilities and services

The employment land should be located (or be close to) residential areas, community facilities and amenities in the neighbourhood centre as well as being well connected to services in the wider town.

E3 Public transport

Employment land should be positioned so that businesses will be directly linked to the new and existing communities in order that people can walk, cycle and use public transport to get to work.

E4 Meeting local employment requirements

Enterprises in the scheme should where possible support existing business and the wider Cullompton economy helping to meet local requirements and need. The scheme should provide a varied range of employment opportunities from different sectors and at different scales.

E5 Character

The employment area should create a place that is locally distinctive and complements the wider scheme and its surroundings.

Guiding Principle F: Energy, Resource Efficiency and

Air Quality

Policy AL/CU/1, 5 and AL/N/6 set out requirements for carbon footprint reduction and air quality. Carbon reduction and low emission strategies will be required together with air quality assessment and mitigation. These issues are interlinked and will require a comprehensive approach covering construction and operational phases of the development. An Air Quality Management Area for Cullompton was designated in 2006 and an Air Quality Action Plan prepared which identifies measures to reduce air quality problems in the town centre, particularly through the provision of a town centre (eastern) relief road, the funding for which will be by developer contribution subject to agreement with MDDC.

It is anticipated that reduced carbon levels will be achieved across the site through a combination of enhanced building fabric and provision of site renewables where appropriate. Policy currently requires 15% (rising incrementally to 20% by 2020) of the energy to be used in the development to come from decentralised on site renewables and/or low carbon sources (subject to viability). MDDC expects these policy requirements together with the guiding principles to be met and comprehensively considered.

F1 Maximising Solar Access

Development layout and massing should be designed to maximise solar access for domestic properties - allowing passive heating and maximising natural day lighting.

F2 Renewable Energy

Streets, blocks, plots and buildings should be designed to maximise the ability for renewable energy technologies to be introduced. This can be achieved for example by providing south facing roof slopes, large south facing gardens and larger windows on the south facing elevations.

Allocations and Infrastructure Development Plan Document (AIDPD),

Mid Devon District Council, January 2011

Policies relevant to Employment that the masterplan adheres to:

Policy AL/CU/1 (p. 105 of the AIDPD)

b. 40,000 square metres of B1 or other suitable employment floorspace.

The Mid Devon Employment Land Review recommends a reduction in the amount of employment at North West Cullompton from 40,000 sqm to 10,000 sqm. (GL Hearns, 2013, *Mid Devon Employment Land Review*, p81.)

Guiding Principle F: Energy, Resource Efficiency and

Air Quality

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F3 Solar Control

Consider the design of streets and buildings to enable passive solar control - avoiding summer overheating and permitting the benefits of solar gain in winter.

F4 Fabric Efficiency

Better buildings - buildings should be designed with high standards of fabric efficiency to reduce the requirement for space heating.

F5 Energy Efficiency Controls

Consider the introduction of energy efficiency controls so that they are user friendly and can be operated as they are intended by residents. For example provision of solar hot water.

F6 Water Management

A water management strategy should be put in place across the scheme that ensures that SUDS and attenuation ponds are provided reducing flood risk and retaining run off within the site.

F7 Water Harvesting

Water harvesting and reuse opportunities should be incorporated where possible.

F8 Drainage

Opportunities to provide permeable surfacing of streets and landscape should be maximised.

F9 Minimising CO₂ Emissions

Scheme wide initiatives to minimise CO₂ emissions within the new and existing communities should be considered as part of a planning application together with the provision of associated infrastructure.

F10 Waste Recycling and Treatment of Waste

The scheme should be designed to reinforce the importance of waste recycling and the efficient treatment of waste.

F11 Sustainable Travel

The masterplan should be designed and delivered to ensure that residents and employees are encouraged to travel in the most sustainable ways. This should be achieved by distributing land uses, residential densities, public transport, pedestrian and cycle routes and community facilities in convenient and inter-related locations. Planning applications will need to address these issues and submit a comprehensive travel plan. Electric vehicle charging points should be incorporated. Proposals should also consider a wide range of green travel initiatives. This may include the provision of a car club scheme.

F12 Air quality

Development layout and connections should be designed to encourage sustainable travel via walking, cycling and public transport in order to reduce motor vehicle use and associated emissions.

Allocations and Infrastructure Development Plan Document (AIDPD), Mid Devon District Council, January 2011

Policies relevant to Environmental issues that the masterplan adheres to.

Policy AL/CU/1 (p. 105 of the AIDPD)

f. Carbon reduction and air quality improvements;

Policy AL/CU/5 (p. 113) Carbon Reduction and Air Quality

a. Renewable and low carbon energy generation to provide a significant proportion of the sites energy use;

b. Measures to ensure that residents, employees and businesses are encouraged to travel in the most sustainable fashion, including Travel Plans, information, car clubs, lift sharing and infrastructure for low emission vehicles;

c. Measures to encourage the sustainable treatment of waste;

d. Measures to manage the impacts of construction.

e. Off-site tree planting.*

f. Energy improvements to existing buildings;

g. Other measures to capture or mitigate carbon emissions and air quality impacts from development.

* the masterplan provides 32.0ha of usable green infrastructure including strategic tree planting

Guiding Principle G: Character

The scheme will be an extension to the existing town of Cullompton and as such it is important that its character and appearance is derived from this context. The development will need to take its inspiration from the character of the locality. During the design process, the Council will expect character analysis of the site, its surrounding and Cullompton itself in order to identify what features are locally distinctive and what should be reflected in the development. The Council expects the design and access statements at planning application stage to demonstrate an understanding of context; local character and explain how these are reflected in emerging proposals. A key document for this analysis will also be the urban design and architectural principles to be submitted in advance of reserved matters/detail application.

The challenge is to create a scheme that is inspired by the best of the past together with the site and its surroundings and yet is relevant to today's requirements. This means creating a place with suitable densities, guided by sustainable design principles and responsive to the character of the site and locality.

Structuring elements of the scheme will be informed by future character analysis. At this stage it is likely that these will include: a united and cohesive layout; making the most of natural contours and features; a green and leafy open character; a clear overall structure to streets and spaces; views to the surrounding countryside; retention of existing routes; open spaces and recreational areas; existing trees and hedgerows; landscaped streets; rural character towards edge.



Achieving a Quality Place

4.0 Creating the Structure

4.1 Masterplan

Masterplan

A sustainable settlement

The Masterplan provides a spatial representation of Cullompton's new neighbourhood – a physical illustration of how the character areas, streets, parks and open spaces, land uses and transport corridors could be arranged in order to ensure that the vision, concept and guiding principles are delivered in the right way.

The plan is designed around a number of structuring elements that will define the quality and sense of place of the scheme. These are shaped and knitted together by the guiding principles.

Terms of the masterplan

The plan is illustrative and as such is designed to provide guidance about the quantity and location of different land uses as well as where key connections should be made throughout the scheme. The plan is intended as a flexible tool so that the shape of different aspects of the scheme can be designed in many ways to respond to different circumstances. The precise position and alignment of routes, shape of blocks, streets and open space will of course vary from what is illustrated in the plan.

Community Facilities

The plan consists of two main areas of community facilities: firstly, a local centre, and secondly an area containing a primary school; a community building, and playing pitches. The local centre would be an important focal point for life in the area, intended to provide for daily needs through uses that could include, a café, bar, hair dressers, hot food takeaway, a convenience store, some smaller scale employment opportunities, new homes and public open space.

With a combination of town houses and apartments, the residential density in close proximity to the local centre would be in the region of 40 - 50ph. The local centre would also be a hub for bus services into the town centre.

The school, community building and nursery/crèche, and playing pitches would be located in a second focus point, along the proposed link road. In this location it will provide good links to the countryside, and to the existing health-centre along Willand Road. It will also be located closely with main areas of public open space. Whilst there is need for a 420 place primary school, 275 places are expected to arise from this development and be funded from it together with 26 early years spaces.

The development proposal in North West Cullompton offers an opportunity to harness significant health benefits, both for future residents, and for visitors to the site. This SPD acknowledges the importance of healthy and active lifestyles through the provision of sporting facilities, community uses, allotments, orchards, play spaces and public open space connected by footpaths and cycleways. However, in order for the health and active lifestyle aspects to be planned effectively, health impact assessments should be submitted as part of any future planning application. These assessments would need to inform the Design and Access Statements and the Urban Design and Architectural Principles documentation.

Active design principles incorporated into the masterplan approach include access for all, walkable communities, connected walking and cycling facilities, co-location of community facilities, network of multifunctional greenspace, high quality streets and spaces, management and maintenance.

Framework Plan



4.1 Masterplan

Walkable neighbourhood

A hierarchy of streets

The residential community has been designed so that all homes are in easy walking distance of the local centre, other community amenities and facilities and in turn to the wider town. Most homes are within 900m or a 10 - 15 minute walk of the local centre, school, and employment opportunities on the north of the site, as well as to local allotments, parks, play areas and orchards. There are safe and attractive parkland and green street and lane walks linking residential streets to all amenities and public transport facilities. The plan ensures that there is good connectivity into Cullompton town centre, via cycle, pedestrian and bus routes. The plan sets out to promote the walking, cycling, and the use of public transport ahead of car use.

An important structuring element of the walkable neighbourhood is that the local centre, school, and employment areas at the heart of the new community have strong and easy connections to the surrounding parts of Cullompton, the town centre and the surrounding countryside.

The overall design of the masterplan is based around a series of design principles that seek to create a new neighbourhood that has a contemporary character and appearance but fits in with the existing fabric of Cullompton. Whilst the plan is designed around modern requirements and standards (including making the most efficient use of land for the provision of new homes) and takes account of sustainability objectives; it also seeks to establish a firm foundation for a place that is green, leafy with generous private gardens, making the most of sunlight and natural daylighting, and creating opportunities for community recycling, composting and food production.

The plan has been designed so that all of the developed areas have an easy, safe and attractive relationship with the beautiful surrounding Devon countryside.

Changes in density

Changes in density are an important structuring element that contributes to the sustainability of the settlement, reinforces the sense of place of character areas across the neighbourhood, and ensures that there is a variety and balance of housing types throughout.

In general, the neighbourhood is designed so that the highest density residential areas are closest to local facilities, the school, employment opportunities and public transport services, and the lowest density areas are furthest away. In response to this simple strategy, the neighbourhood has been designed assuming that densities in the neighbourhood centre would be about 40 - 50dph and that densities would reduce outward towards the parkland to densities of around 20dph in some edge of neighbourhood areas in the southern section of the site. Many of the intermediate housing areas would comprise residential streets with densities of between 25 and 40dph. The average density of the whole site would be 36dph.

The hilltops

Making the Most of Local Features

The green infrastructure (GI) has been designed to sit on and wrap around the hilltops. The proposed development then wraps around the GI. The GI will provide a defining characteristic of the neighbourhood and for this reason the masterplan has been designed so that the residential communities feather out into it at a lower density and are intertwined with it.

The GI would have the character of a country park providing a landscape resource comprising; wetland areas; woodland areas; retained veteran trees; new tree planting in streets, open spaces and in the parkland; flat landscaped areas on top of the hills and steeper areas falling away from the hilltops; attenuation ponds and other SUDS features; allotments and orchards throughout the parkland providing easy access from all parts of the community; formal and informal play areas at different scales – including a NEAP (Neighbourhood Equipped Area for Play), LEAPs (Locally Equipped Areas for Play) and LAPs (Local Areas for Play); new sports pitches; enhanced biodiversity; and retained ecology and enhanced hedgerows.

Some areas of the GI will feel remote from housing and others will be overlooked directly. The new green spaces will provide a fabulous resource for the community and the town, as well as a beautiful setting.

Local employment

The masterplan has been structured in order that an appropriate level of flexible commercial space is allocated; it is to be located in two places: the majority to the North of the site so it can be easily accessed from the M5 and Willand, and is visible from the main road, and a second element within the local centre. The mix of uses within the employment areas of the site will be considered carefully at the application stage in order to ensure that they do not undermine the vitality and viability of Cullompton Town Centre, but complement it.

Policy A1/CU/1 refers to B1 light industrial uses (such as offices) and other suitable employment floorspace. Suitable employment uses could include:

- * B1 (Business): a) offices, other than a use within Class A2 (Financial services) b) research and development of products or processes c) light industry
- * B8 (Storage & Distribution): use for storage or distribution centre Additional elements of wider employment generating uses that could be considered:
 - * A1 (retail): The retail sale of goods to the public: shops, hairdressers, undertakers, travel and ticket agencies, pet shops, sandwich bars, domestic hire shops, dry cleaners, internet cafes.
 - * A2 (Financial & Professional Services): banks, building societies, bureau de change, professional services; estate agents, employment agencies etc.
 - * A3 (Restaurants & Cafés): places where the primary purpose is the sale and consumption of food and light refreshment on the premises
 - * A4 (Drinking Establishments): premises where the primary purpose is the sale and consumption of alcoholic drinks on the premises: public house, wine bar or other drinking establishment.
 - * A5 (Hot Food take-away): premises where the primary purpose is the sale of hot food for consumption off the premises.
 - * C2 (Residential Institutions): provision of residential accommodation and care to people in need of care, for example a nursing home
 - * D1 (Non-residential Institutions): clinics, crèches, day nurseries, day centres, non-residential education & training centres, places of worship
 - * D2 (Assembly & Leisure): area for indoor or outdoor sports or recreation.

4.2 Amount and Land Use (Land Budget)

The masterplan defines a new development that will establish a well-balanced community that is positively integrated with existing facilities in the town. The scheme will include:

| Land in the control of | | | | | |
|--|---|-------------------------------------|-------------------------------------|------------------|-------------|
| | TOTAL (ha) | PMAM | Codex | Persimmon | |
| Gross Area (hectares) | 70.33 | 24.10 | 35.26 | 10.97 | |
| Residential | | | | | |
| A mix of housing types and tenures including affordable housing at a variety of densities, associated community infrastructure, a minimum of five gypsy and traveller pitches will also need to be located within the site as part of the overall affordable housing provision. An appropriate proportion of affordable housing is to be agreed with the Local Planning Authority, subject to viability testing (the policy target is 35%). Whilst the average residential density is calculated at 36dph (giving circa 1120 units), housing will be developed at different densities across the area in response to site circumstances. The number of houses should be considered as a target that may be less subject to a more detailed understanding of constraints. The 1120 houses are over and above the 49 dwellings provided at Olympian Way. | Residential (net developable area in hectares) | 30.56 | 11.33 | 14.22 | 5.00 |
| Total houses circa @36dph | 1120 | 408 | 512 | 200 | |
| Employment including Local Centre (hectares) | 1.8 | 0.85ha (4000sqm floor space) | 0.95ha (6000sqm floor space) | 0 | 0.4 |
| (policy target amended from 40,000sqm to 10,000sqm) | | | | | |
| Community Centre (hectares) | 1 | 0 | 0.6 | 0 | 0.4 |
| (policy target 1ha) | | | | | |
| Primary School (hectares) | 2.1 | 0 | 0 | 0 | 2.1 |
| (policy target 2.1ha) | | | | | |
| Gypsy and Traveller Sites (hectares) | 0.46 | 0 | 0.46 | 0 | 0 |
| (policy target at least 5 pitches) | | | | | |
| Total Developable Net Area (hectares) | 35.46 | | | | |
| Green Infrastructure (hectares) | 31.40 | 10.44 | 18.09 | 2.88 | |
| (policy target 28ha) | | | | | |
| Allotments (hectares) | 0.7 | 0 | 0.7 | 0 | |
| (policy target 0.7ha) | | | | | |
| Equipped Areas of Play (hectares) | 0.7 | 0 | 0.7 | 0 | |
| (policy target 0.7ha) | | | | | |
| Sports Pitches (no.) | 2 | 0 | 2 | 0 | |
| (policy target 2.8ha) | | | | | |
| Link Road Infrastructure (hectares) | 2.07 | 1.48 | 0 | 0.59 | |
| Total Non Developable Area (hectares) | 34.87 | | | | |

Land Budget Table

Local centre
The local centre will provide flexible commercial space which could include uses/facilities such as a café, pub, convenience store and other local shopping, hairdressers and hot food takeaway. There are also opportunities for employment within the centre as well as residential on upper floors on a mixed use basis.

Primary school and community building
Primary school site of 2.1ha and mixed use community building. Uses / facilities within the community building could include a community hall, meeting rooms and a nursery/creche. Recreation and play facilities will also be expected within the area.

Green infrastructure
A new multi functional area of green infrastructure comprising - community orchards and allotments, informal publicly accessible areas, children's play areas, sports pitches, habitat areas and water attenuation ponds. Three playing pitches will be provided as part of the masterplan; one associated with the school, and one within the Rull Hill green infrastructure. Responding to feedback from the first round public consultation, provision could also be made for the third sports pitch off-site to supplement those intended on site in order to enhance existing sports facilities. The on site provision is therefore indicated at 2ha. In the event that off site provision cannot be secured, the amount of sports pitches on site will need to be reassessed.



4.3 Densities

Residential

In order to create different character areas within the site and to reduce walking distance from facilities and services and promote more sustainable travel choices, a range of densities are proposed. Whilst an average of 36 dwellings per hectare has been used to calculate the number of dwellings, an outline planning application will have to look at the housing areas in more detail and specify densities for different character areas. These different densities will respond to specific site circumstances, e.g. edge of site will have a different density to along the link road, the existing topography, minimising visual impact, etc.

The number of houses specified in this document (1120 houses) should be considered as a target that may be less subject to a more detailed understanding of constraints.

Generally, and as illustrated on the plan opposite, a higher density should be adopted around the local centre, along the link road, Willand Road and Millennium Way, as well as any other major roads within the site. This density could be between 40 and 50 dwellings per hectare.

Housing on the edges of the site, or around the proposed green infrastructure areas should be less dense, around 20 to 25 dwellings per hectare. This will help give the feel of a rural edge to the development and softens its margins.

Between the upper and lower density areas, development will be closer to the overall site average of 36 dwellings per hectare.

Local Centre

The local centre may also incorporate elements of residential use. This location will lend itself to consideration of flats/apartments, particularly on upper floor(s). Due to proximity to facilities, services and public transport, residential density in this location will be at the upper end for the site overall.



Densities Plan

High Density (40 - 50 dph)
Medium Density (32 - 38 dph)
Low Density (20 - 25 dph)

4.4 Movement

The strategy for the site for transport and movement is to encourage walking, cycling and public transport ahead of car use, whilst ensuring that the masterplan is pragmatic and designed to ensure that cars are catered for sensibly in the illustrative layout.

The masterplan is based upon walkable neighbourhood principles where all facilities are within easy reach of all houses.

Tiverton Road and Willand Road

The masterplan suggests traffic calming and environmental enhancement measures to improve transport management along Tiverton Road and Willand Road. These will be designed in more detail at the planning application stage.

Local connections

There are a number of new local connections and works that will help to link the scheme with its surrounding area and in turn the wider town. These will reduce the impact of the development and include:

- Enhancement and traffic calming along Willand Road to discourage through traffic from using a route through the town centre.
- Retention and upgrading of Goblin Lane as pedestrian and cycle access throughout the development.
- Temporary construction access from St George's View to be closed to vehicular traffic upon opening of the new link road. Pedestrian and cycle link could be retained. Traffic management measures are to be conditioned at the planning applications stage to reduce the impact upon existing residents.
- Pedestrian and cycle access to Rull Lane (indicated as tertiary routes on the diagram adjacent).
- Opportunity to provide vehicular access through to the existing allotments from the urban extension site to aid its accessibility and community use.
- Provision of bus, pedestrian and cycle routes throughout the development;
- Cycle and pedestrian links to the town centre and nearby public rights of way;
- Bus service enhancements;
- New and improved off site pedestrian and cycle links including improvements to a wider green infrastructure network.

The requirements for implementation in accordance with agreed trigger points are set out in Section 5.

Policy

There are a number of other policy requirements of AL/CUL/2, which MDDC will expect developments to bring forward as part of their proposals. These include improvements to walking, cycling and public transport provision, as well as travel plan implementation to reduce carbon footprint and air quality impacts. The council is also planning for the provision of a town centre (eastern) relief road to help relieve the town centre and improve air quality. The scheme at NW Cullompton will be expected to contribute financially towards the provision of this road. It is expected that this will form part of detailed negotiations at the planning application stage.

Strategic transport proposals

Policy AL/CUL/2 sets out strategic transport proposals that are required in support of the new neighbourhood. The masterplanning process has identified a number of interventions that need to be carried out to make the development acceptable and ensure that transport is properly managed on site and in the surrounding area.

This work has identified the need for:

- Link road including 20mph zones at the proposed primary school and the local centre. The design of these areas will need to be carefully considered and could include a shared surface arrangement;
- Provision of bus, pedestrian and cycle routes throughout the development;
- Cycle and pedestrian links to the town centre and nearby public rights of way;
- Bus service enhancements;
- New and improved off site pedestrian and cycle links including improvements to a wider green infrastructure network.



4.5 Landscape and Open Space

Green Infrastructure

The green infrastructure has been designed as a mix of open space, sport, recreation and community space. It is at the heart of the scheme, and used as a starting point for defining the development boundaries. Using the existing vegetation and landform, the green infrastructure has been shaped to create the key structuring element to the site. The green infrastructure creates key linkages across the site and defines the focal points of the scheme around the three hilltops. Within lies sports pitches, informal/ formal play areas, allotments, community orchards and public open space all accessed by a well connected network of footpaths and cycle paths. Existing vegetation, including trees and hedges, has been retained where possible and enhanced by additional tree planting, wild flower meadows and the creation of wetland habitats that will also help with site wide water attenuation.

As seen in the land budget table in chapter 4.2, there is currently proposed 32.8ha of green infrastructure land. The current allocation proposed 32.3ha of GI, however, does not take into consideration topography, existing hedgerows, trees, ecological areas, routes and other site constraints. Opportunity has therefore been taken to reorganise the boundaries between development area and green infrastructure as set out in relevant planning policies. The development area and green infrastructure locations have been recognised to achieve the requirements of planning policies, but help retain housing numbers and therefore the ability of the scheme principally to meet wider infrastructure requirements. For this reason the shape of the GI proposed is different to the allocation.

Strategic planting

There will be a number of areas of strategic planting across the allocated area. These include:

- Landscape buffer planting between existing and proposed housing;
 - Strengthening of hedgerows and other landscape features and habitats;
 - Areas of ecological mitigation.
- Key:**
- A Hilltop Park
 - B Green Links to the hilltops
 - C Enhanced biodiversity
 - D Attenuation ponds and other SUDS area
 - E Pedestrian and cycle connections
 - F Wetland areas
 - G Woodland areas
 - H Retained hedgerows and veteran trees
 - I Areas for informal recreation
 - J Community Allotments
 - K Community Orchards
 - L Formal and informal play areas - including a MUGA, NEAP, LEAPs and LAPS
 - M New sports pitches
 - N Community health garden
 - O

The green infrastructure and public open space is proposed to principally provide the wider scheme with a parkland setting and will be a local landscape that has a variety of complementary recreational and ecological functions:

*The allocation boundaries can be seen in chapter 6.1.
Existing green space and ecology details can be found in chapter 6.7*



- A Hilltop Park
- B Green Links to the hilltops
- C Enhanced biodiversity
- D Attenuation ponds and other SUDS area, including off site attenuation
- E Pedestrian and cycle connections
- F Wetland areas
- G Woodland areas
- H Retained hedgerows and veteran trees
- I Areas for informal recreation
- J Community allotments
- K Community orchards
- L Formal and informal play areas - including a NEAP, LEAPs and LAPS
- M New sports pitches
- N Community health garden
- O Access onto St Andrews Hill
- P Access to existing allotments

4.5 Landscape and Open Space

A. Hilltop Park

The hilltop parks provide a destination parkland to serve the development and the wider community. Well accessed by dedicated pedestrian and cycle routes to the residential areas and town, the hilltop parks will provide large areas of public open space with opportunities for leisure, recreation, exercise, formal and informal play. Community and recreational uses have been grouped with the school to create a focus for the neighbourhood in conjunction with this area. Excellent views will be afforded across the Cuim valley and beyond towards the Blackdown Hills.

B. Green Links to Hilltops

The Hilltop Parks are well accessed via green links. These routes feature dedicated pedestrian and cycle paths that allow access to the parks and school facilities. It is envisaged that they are marked by swaths of native planting and trees with opportunities spaces for respite and social interaction along the way.

C. Enhanced Biodiversity

By retaining the key existing vegetation on site and by introducing significant new areas of green infrastructure we can enhance the biodiversity of the area. Large areas of public open space will include a number of new habitats designed to benefit the indigenous flora and fauna found on site. New areas of woodland, wetland and meadows area proposed and combined with a planned maintenance program will continue to enhance the biodiversity for years to come.

D. Attenuation ponds and other sustainable urban drainage system (SUDS) area

A fully integrated drainage scheme has been designed into the proposals. Fundamental to the success of the scheme the drainage scheme will provide a betterment to the current greenfield run off rates. A network of swales running along the contours will intercept the run off and transport it into attenuation ponds strategically located around the site. The scheme has been strategically designed in order to not increase wider runoff rates or risk of flooding elsewhere. Detailed design of surface water drainage will form part of the planning application stage.

E. Pedestrian and Cycle Connections

The plan for transport and movement is to encourage walking, cycling and public transport ahead of car use, whilst ensuring that cars are catered for sensibly in the illustrative layout. The master plan is based upon walkable neighbourhood principles and a network of routes are proposed around the site connecting the residents of the wider area to the proposed facilities and back into town.

F. Wetland areas

Wetland areas are proposed as part of the wider surface water attenuation scheme, alleviating flooding and enhancing the existing areas. A series of different wetland habitats will be created enhancing the biodiversity of the site.

G. Woodland areas

Areas of woodland planting are proposed around the site, creating a lasting structure to the neighbourhood. Tree planting at the tops of hills is proposed to reinforce local landscape character and create landscape buffers to development. Woodland planting will also provide enhanced biodiversity and opportunities for leisure and recreation.

H. Retained Hedgerows and Veteran Trees

Where possible hedgerows and trees will be retained to preserve the existing character and biodiversity of the site. The proposed green infrastructure of the site has been shaped around the existing trees and hedgerows to create a strong landscape led structure to the site.

I. Areas for informal recreation

Within the public open space areas have been set aside for informal play. This could take the form of objects to climb, places to hide, open spaces to play and the opportunity for children to express themselves outside of formal play spaces.

J. Community Allotments

Within Rull Hill park, community allotments are proposed. Allotments are in demand and provide an opportunity to promote sustainable living through the production of food, light exercise and social interaction.

K. Community Orchards

Combined with the allotments, the community orchards will allow the residents to grow their own fruit. This will promote healthy living and social interaction and ensure the continuation of a long standing local tradition.

L. Formal play areas - Including a MUGA, NEAP, LEAPS and LAPS

Instead of distributing numerous play spaces throughout the neighbourhood the feedback we had from the local community was the desire for one meaningful centralised play space. Located in the Hilltop park next to the school, community building and sports pitch the play space will offer a variety of play equipment for different age groups. Well connected by foot and cycle paths this play space will form a valuable commodity to the surrounding neighbourhood. There is also opportunity to provide a multi-use games area (MUGA) at this location (specifically requested by the town Council).

M. New sports pitches

Three sports pitches are proposed for the scheme. Centrally located on Rull Hill they will be easily accessible for the new neighbourhood and the wider community via a well connected network of footpaths. One pitch will be located within the school grounds and there would be the opportunity for shared use with the community at the weekend. The senior pitch will also have shared use of a car park with the community building and school to facilitate competitive matches. (The provision of the required third pitch offsite in order to supplement existing sports provision in the town would in principal be acceptable, if not preferable. This reflects community feedback from the first consultation phase.)

N. Community health garden

A 0.1ha community health garden is proposed adjacent to the Medical Centre off Willand Road.



E. Pedestrian and Cycle Connections



I. Areas for informal recreation



M. New sports pitches



D. Attenuation ponds and other SUDS area



G. Woodland areas



L. Formal and informal play areas



A. Hilltop Park



F. Wetland areas



J. Community Allotments

4.6 Drainage Strategy

Surface water disposal for the development will adopt best practice and be based on Sustainable Drainage approaches. The CIRIA SUDS Manual C697 defines best practice advice on the planning, design, construction, operation and maintenance of Sustainable Drainage Systems (SUDS) so as to facilitate their effective implementation within developments.

The fundamental purpose of the SUDS is to ensure that any proposed solutions mimic the natural catchment processes as closely as possible, and in special circumstances (such as within parts of the Cullompton Critical Drainage Area, CDA) provide an improvement to peak runoff rates. A sustainable approach to drainage aims to provide both effective control of the rate and volume of runoff as well as ensure a suitable quality of surface water runoff.

This concept of mimicking and/or improving the natural catchment processes is fundamental to design of a successful SUDS scheme – it uses drainage techniques in series to incrementally reduce pollution, flow rates and volumes. The hierarchy of techniques that are considered in developing the drainage scheme are as follows:

1. Prevention – the use of good site design and site housekeeping measures to prevent runoff and pollution (e.g. sweeping to remove surface dust and detritus from car parks), and rainwater reuse, harvesting. Prevention policies should generally be included within the site management plan.

2. Source control – the control of runoff at or very near its source (e.g. soakaways, other infiltration methods, green roofs, pervious pavements).
3. Site control – management of water in a local area or site (e.g., routing water from building roofs and car parks to a large soakaway, infiltration or detention basin).
4. Regional control – management of runoff from a site or several sites, typically in a balancing pond or wetland.

The approach adopted recognises that the local geology is unlikely to be suitable for infiltration drainage – this being the most sustainable approach possible by restricting all runoff at source. The potential for soakaway systems will however be investigated for each phase of the development so as to allow use if proved practical in order to ensure best practice.

When soakaway drainage is not possible, the surface water strategy for the site is through the use of above ground surface water storage in attenuation ponds and basins, fed directly where practical by either swales (to provide additional quality treatment) or below ground positive surface water drainage networks. The strategy is for each development phase to provide its own surface water drainage solution wherever possible. Attenuation storage is to be designed to allow restriction of all site runoff to the existing greenfield rates up to the 1 in 10 year event and restrict all runoff for events in excess of this (up to and including the 100 year climate adjusted event) to this rate in order to provide a downstream betterment in terms of flood risk so as to meet the requirements of the Cullompton CDA.

Glossary of terms:

Critical Drainage Area: Critical Drainage Areas (CDA) are catchments that are considered to have critical drainage problems, notified to the local planning authority as such by the Environment Agency. In a CDA, new development will need to reduce flood risks downstream, rather than just having just a neutral impact.

Rainwater harvesting: Rainwater harvesting systems collect clean rainwater in underground tanks. The rainwater captured can then be used for flushing toilets, washing clothes, watering the garden, and washing cars etc. resulting in a reduction (as much as 50%) in the amount of mains water used within the home.

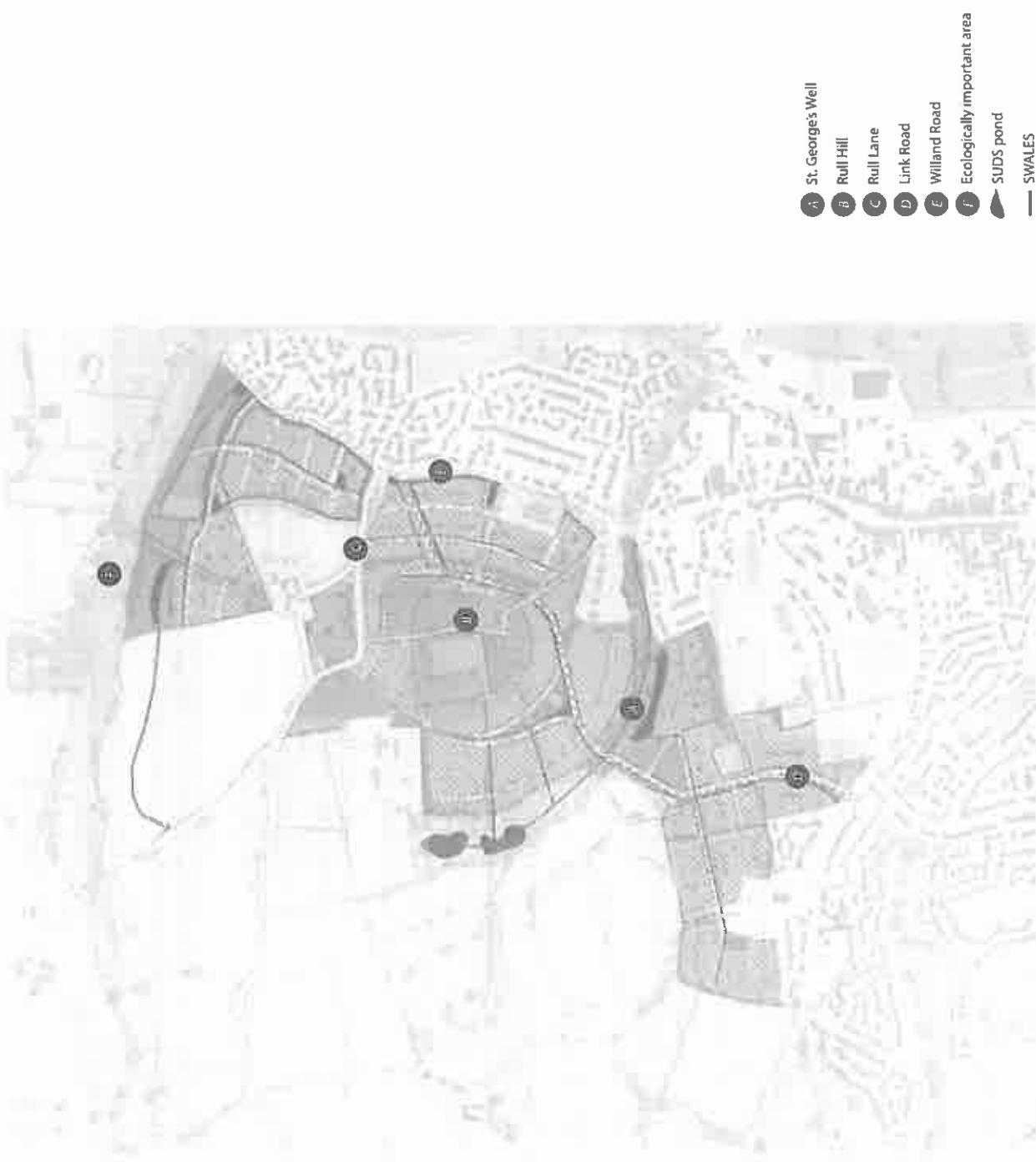
Soakaways: Soakaways are features that are designed to direct surface water to ground where infiltration rates permit. They usually comprise a square or circular excavation that is either filled with rubble or lined with

brickwork, pre-cast concrete or polyethylene rings/perforated storage structures surrounded by granular backfill.

Infiltration and detention basins: Infiltration basins are vegetated depressions designed to store surface water run-off and to encourage such water to infiltrate into the ground. Detention basins are features designed to store excess surface water volumes generated by the controlled release of flows to the surrounding surface water network (natural or man-made). They also facilitate some settling of particulate pollutants so can improve water quality prior to controlled release. Detention basins can be designed to be dry under normal conditions and as such can also function as recreational space.

Balancing ponds and attenuation ponds: Balancing and attenuation ponds are features designed to store the additional volume of water generated by controlling (attenuating) surface water runoff to a specified maximum discharge rate. Any flows in excess to the maximum allowable rate are retained within the ponds. They also facilitate some settling of particulate pollutants prior to controlled release. The ponds are normally designed to be permanently wet.

SWALE: Swales are linear vegetated drainage features in which surface water can be stored and/or conveyed. They can be designed to allow infiltration, where ground conditions allow, and provide water quality improvement through the capture of suspended solids.



4.7 Character Assessment

The masterplan can be subdivided into areas that have a distinctive character of their own and which will come together to define the wider whole. Whilst it is important that the scheme has a continuity and definable sense of place, the different areas of the masterplan respond in different ways to their particular role and location within the development. This SPD does not look at these areas in detail as it is a level of detail which will be expected to be seen as part of an outline planning application. The diagram on the next page identifies three important character areas along the link road, which will need to be considered in more detail prior to planning applications, through urban design and architectural principles, and in more detail at planning application stage itself.

Design approach

The proposed character areas are intended to form the foundation for more detailed guidance that will be prepared as part of a coordinated design approach for the new neighbourhood set out in 1.7 design process and Guiding Principle G: Character. This design approach elaborates on the structuring principles that are illustrated in this SPD to ensure that there is a consistent approach to design across the whole area and that individual character areas reflect to their particular role, function and distinctive position within the neighbourhood.

The character areas should take into account the existing landscape, ecological and topographical characteristics of the site. As such they will be quite different, ranging for example, from the local centre near the base of the hills, by St. George's Well, to the green infrastructure on Rull Hill. Residential densities and therefore the character and appearance of housing areas will graduate across the site as shown in chapter 4.3.

The highest densities will be at the heart of the local centre and along the link road, and lower densities on the edges of the site allowing the built form to leathen into the landscape at the edge of the development.

The design process and additional design work required in chapter 1.8 should use these character area principles as a starting point for more

School and Community Centre

The school, as well as the community building and playing pitches would be located in a second focus point along the proposed link road. It will provide good links to the countryside, but also to the existing health-centre along Willand Road and beyond that to the town centre. The school and community centre are to be within a highly accessible location and on a public transport route. This area will need to be carefully designed to create an integrated community hub of complimentary uses within an attractive and high quality setting.

Rull Hill

Various focal points (nodes) are proposed along the link road. These provide interest along the road, and within the development. These nodes need to be looked at in further detail as part of the design process. The three nodes identified at this stage are: the local centre, the school, and Rull Hill.

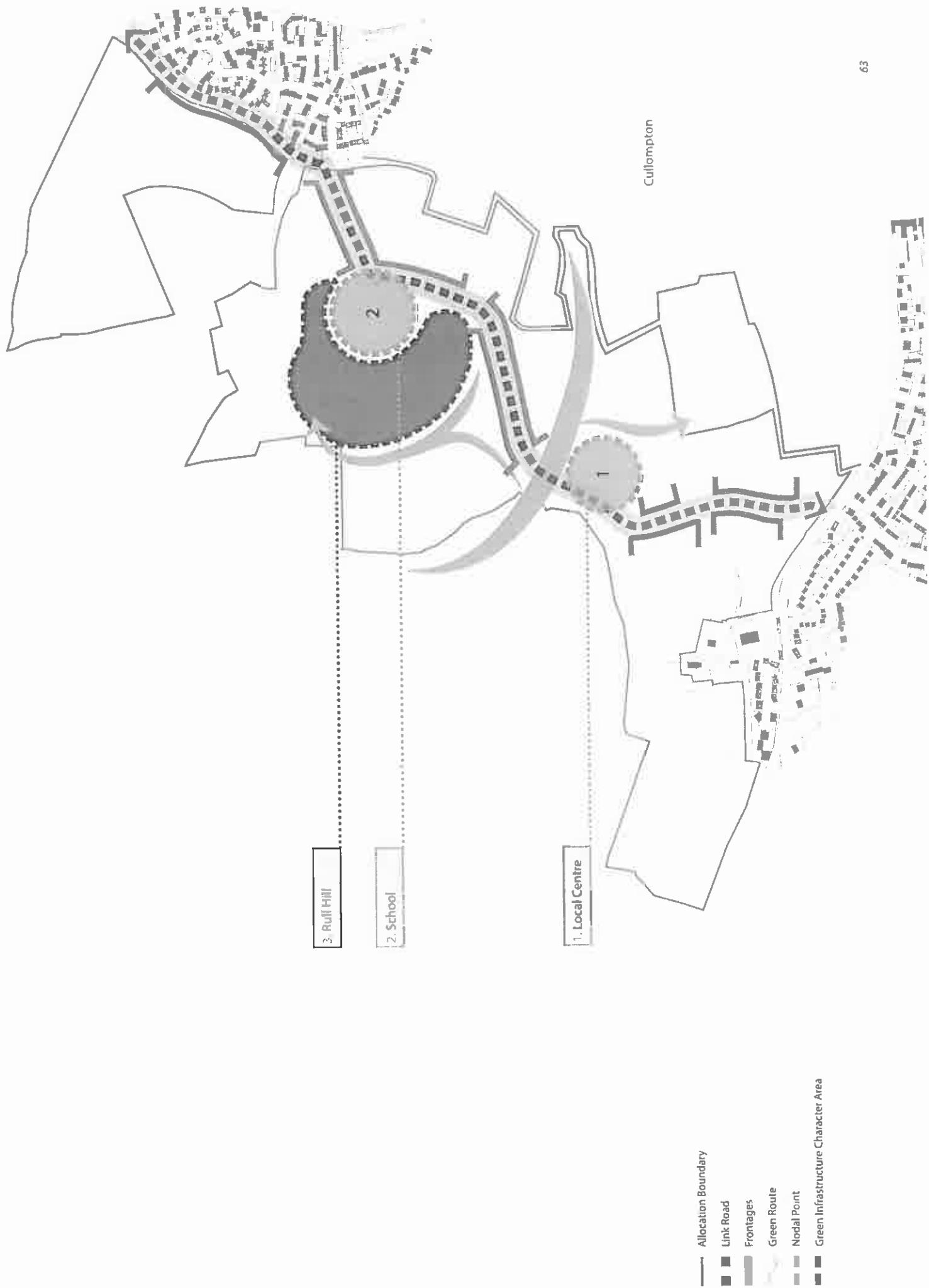
Local Centre

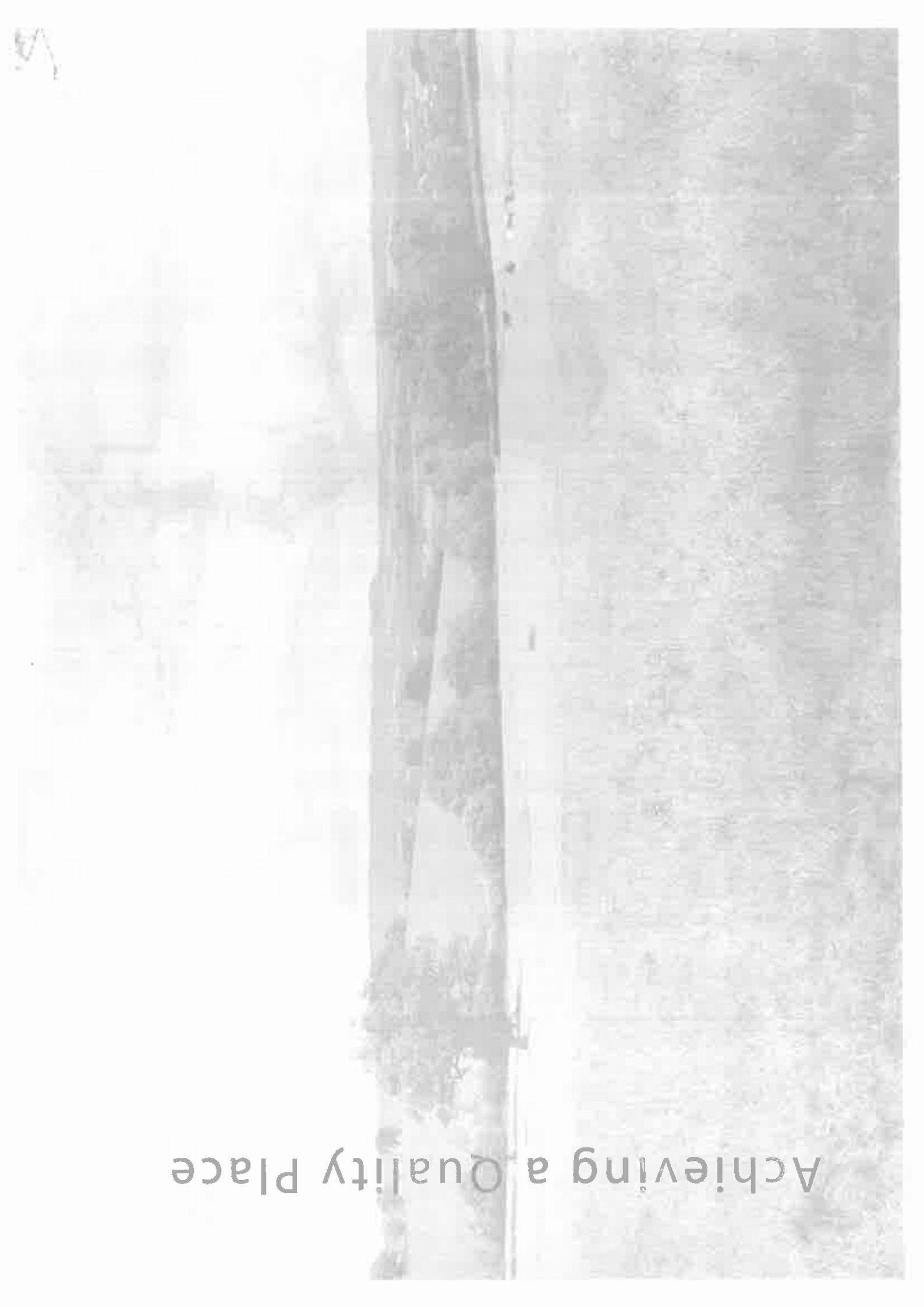
The local centre is located in the valley between the two hilltops: St. Andrew's Hill and Rull Hill. This area is proposed to house employment as well as being a local centre for the development. The local centre is to be designed as an important focal point for life in the area.

It will need to be highly accessible with good pedestrian and cycle connections and form a high quality, attractive location incorporating a range of uses together with public space to interact socially within a landscape setting. Ground floor uses should create variety and vitality, while remaining flexible. Upper floors could accommodate residential uses and appropriate employment uses.

With a combination of town houses and apartments, the residential density here would be in the region of 40 - 50dph. The local centre would also be a hub for bus services moving along the link road and into the town centre.

The character areas, including the residential development, have not been analysed in any detail at this masterplan stage. Further design work will be needed to address this at planning application stage.

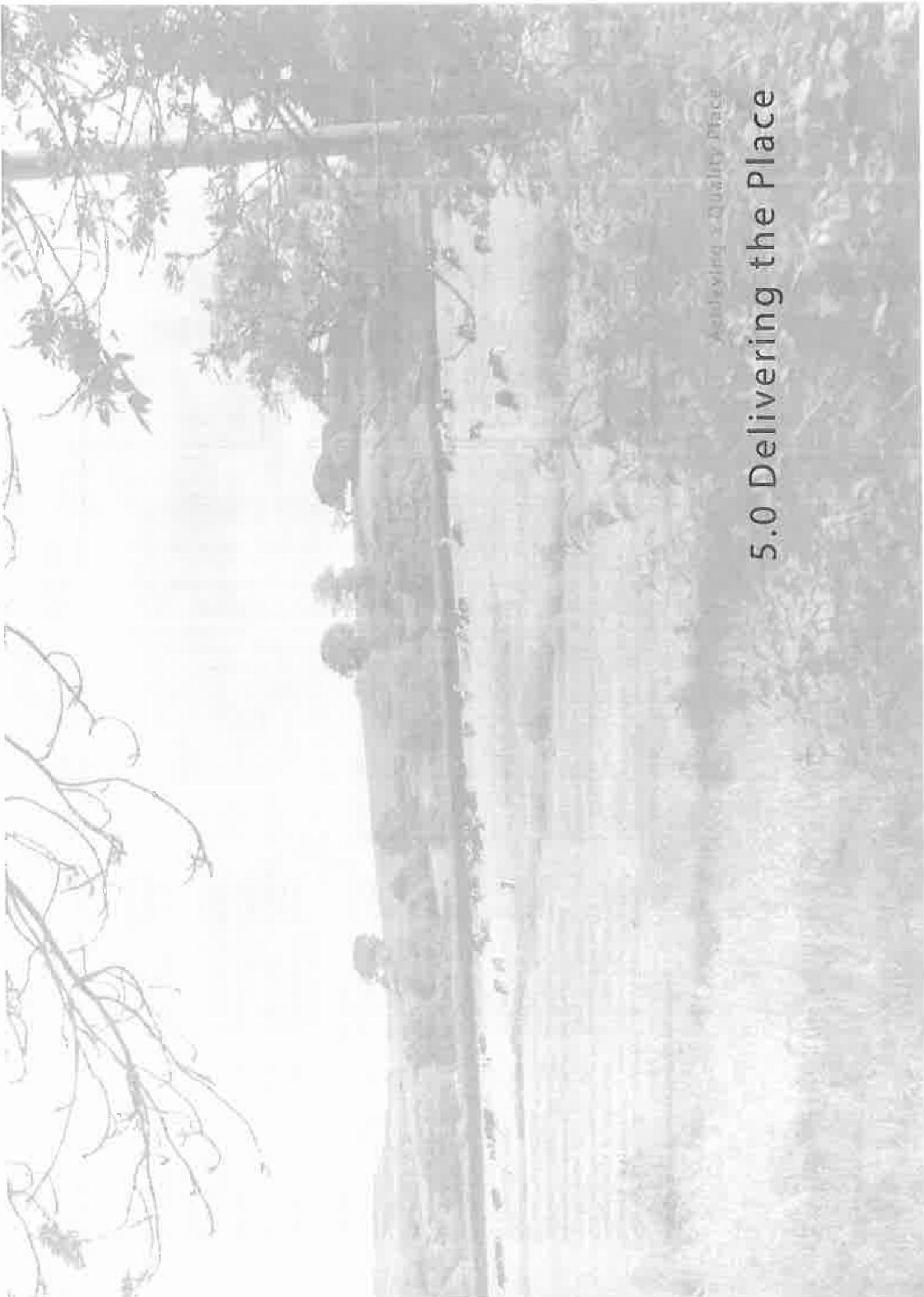




Achieving a Quality Place

Analyzing a Quality Place

5.0 Delivering the Place



5.1 Infrastructure Planning and Delivery

Approach to infrastructure planning and delivery

Policy AL/CU/6 of the Allocations and Infrastructure Development Plan Document states that a phasing strategy will be required to ensure that the development and infrastructure come forward in step, minimising the impact of the development, yet taking account of the need for development to remain viable. It further states that the phasing requirements of this policy should be taken into account and any variation from them carefully justified. It sets out policy expectations for the phasing of employment and housing, green infrastructure, highway improvements, bus service enhancements, transfer of land and funding for the primary school.

Since the adoption of this policy, further studies and consultation with both statutory bodies and the wider community have taken place. These have resulted in the need to reassess the triggers and sequence of infrastructure delivery set out in the policy. For example the policy requires the occupation of no more than 400 dwellings before the transfer of the primary school land. Due to the extent of the pre-existing need for primary provision in Cullompton, in addition to that which will arise from the development, the transfer of accessible and serviced school land, to the Education Authority (Devon County Council), is now proposed prior to first occupation of any dwellings.

At the same time as the Local Plan, the Council had considered a Community Infrastructure Levy (CIL) charging schedule, a way to raise funds for infrastructure projects via developer contribution. The North West Cullompton urban extension is a strategic development site and will be expected to have large infrastructure costs which will be funded via developer contributions. On this site, together with the Council's other strategic sites, it is proposed to achieve this via Section 106 agreements rather than CIL. External funding sources to assist with the delivery of infrastructure will also be identified.

An understanding of the likely number of planning applications to be received for the urban extension as a whole will be important due to the limit on the ability to pool Section 106 contributions for the site's infrastructure

delivery. No more than five Section 106 agreements may be entered into for the funding or provision of an infrastructure project or type of infrastructure. The Council will therefore expect the scheme as a whole to be delivered with no more than five outline or full applications.

In compiling a list of infrastructure in relation to this allocation, the Council has had regard to the infrastructure tests set out in section 122(2) of the Community Infrastructure Levy Regulations which state that it must be:

- necessary to make the development acceptable in planning terms;
- directly related to the development; and
- fair and reasonably related in scale and kind of development.

The success of the masterplan will ultimately be judged by what is delivered and the approach taken to delivery will therefore be key. It is essential that the development is taken forward in a co-ordinated and cohesive manner with the bigger picture clearly in mind, in this way the overall vision and aims of the area can be achieved. Important to the consideration of each planning application or phase will be that it does not prevent or inhibit other areas of the site to be delivered. The site must therefore be approved on a comprehensive basis.

| Allocations and Infrastructure Development Plan Document (AIDPD), Mid Devon District Council, January 2011 | |
|---|--|
| Policies relevant to phasing: | |
| Policy AL/CU/6 (p. 117) North West Cullompton Phasing | |
| Development shall be subject to the following: | |
| a. Provision of affordable housing will be in broad step with the market housing at a ratio of at least 1 affordable dwelling per 2 market dwellings; | |
| b. Provision of serviced employment land in step with housing, at a rate of at least 1 hectare per 100 occupied dwellings; | |
| c. Occupation of no more than 100 dwellings before the transfer of Green Infrastructure to the local authority with necessary financial support; | |
| d. Occupation of no more than 300 dwellings before the implementation of bus service enhancements; | |
| e. Occupation of no more than 300 dwellings before the opening of a 'through route' linking Willand Road to Tiverton Road; | |
| f. Occupation of no more than 400 dwellings before the transfer of land for a primary school with necessary funding to the Local Education Authority. | |

See table on page 75 for proposed trigger points

5.2 Housing Delivery

Assumptions around the rate of housing delivery

| | Assumptions on housing mix and population profile | Annual Completions | Housing Total |
|-----------------------|---|--------------------|---------------|
| Year 1 (2017 - 2018) | 12 | 12 | 12 |
| Year 2 (2018 - 2019) | 75 | 75 | 87 |
| Year 3 (2019 - 2020) | 75 | 75 | 162 |
| Year 4 (2020 - 2021) | 150 | 150 | 312 |
| Year 5 (2021 - 2022) | 150 | 150 | 462 |
| Year 6 (2022 - 2023) | 150 | 150 | 612 |
| Year 7 (2023 - 2024) | 150 | 150 | 762 |
| Year 8 (2024 - 2025) | 150 | 150 | 912 |
| Year 9 (2025 - 2026) | 150 | 150 | 1062 |
| Year 10 (2026 - 2027) | 38 | 1100 | 1100 |

The Allocations and Infrastructure Development Plan Document (AIDPD) sets out an expected year on year trajectory for the provision of housing. On this site it is anticipated delivery of the first 12 units in 2017-18 rising to 75 units per year between 2018 to 2020, rising to 150 units per year by 2020 to 2026 reducing to 38 units per year between 2026 -27. Build out of the urban extension is anticipated to be in the order of 10 years up to 2017-27. Please note these housing completion figures are in addition to the 49 units completed on the Olympian Way development part of the allocation. The expected completion figures assume two or more house builders on site at the same time. Build out of the urban extension is anticipated to be in excess of 10 years and up to, if not beyond 2027. (See table to the right for anticipated housing completions.)

It is assumed that development could potentially start on site in 2017. The first homes will be provided after the up-front provision of accessible and serviced land for the primary school. The time-scale for the provision of the link road between Tiverton Road and Willand Road seek to balance the need to provide it as early in the development as possible to mitigate against the traffic associated with the development (especially its impact upon the town centre) with a need to ensure scheme viability.

The sequencing of development and provision of supporting infrastructure set out in this SPD has been structured to provide appropriate flexibility over where and when development takes place. It seeks to ensure that the necessary infrastructure is provided in a timely and viable way in the interests of delivery of the vision and aims of the area in a co-ordinated and comprehensive manner.

The Allocations and Infrastructure Development Plan Document (AIDPD)

sets out a 35% target for affordable housing (subject to viability) within

the urban extension. It is recognised that developments must be viable and that affordable housing may make a considerable difference to

viability. This development will need to contribute significant sums towards the cost of infrastructure which will have a significant impact

upon viability, particularly in the early phases. Further viability testing

and assessment will therefore be needed to establish the level of

affordable housing. The Council will also consider whether the provision

of affordable housing should be deferred, reduced in early phases or

varied between phases as significant transport infrastructure is required

to be brought forward early in the development. Once provided,

affordable housing should be delivered in step with market housing.

Such decisions will need to be based upon the submission of robust viability evidence.

Affordable housing provision will need to have regard to needs assessment within the Cullompton area. The Council has already identified that at least 5 pitches for gypsies and travellers will be needed as part of the affordable housing provision via policy AL/CLU/1 of the AIDPD.

Based on an average household size of 2.3 persons in Mid Devon it is

anticipated that circa 1100 dwellings could result in a population up to

approximately 2,530.

Residential development on the site must have regard to housing mix in terms of type, size, tenure and location (mixing of affordable and market) and be designed so that affordable housing is indistinguishable from market housing.

At the time of writing this SPD the Government has indicated an intention to bring in requirements for self-build and starter homes, although the details of these requirements are not yet known. Requirements for such housing types should be considered.

5.3 Phasing

Approach to development phasing

The delivery of infrastructure and phasing of the development has been approached in accordance with the following principles:

- Infrastructure should be provided in a timely way in order to reduce/mitigate the impact of the development;
- Given the scale of the project, there is a need to balance certainty of delivery of key infrastructure with the need to maintain flexibility over the delivery of the development and infrastructure, especially as delivery is likely to take place over a period of 10 years;
- A coherent and coordinated approach to infrastructure delivery, construction management and development phasing is needed between land ownerships in order to ensure that the overall policy aspirations are met;
- Avoiding in so far as possible the creation of parcels of land or pockets of development that do not relate to their surroundings or are isolated from each other;
- The early provision of transport infrastructure is recognised as being a key requirement in order to reduce the impact of the development upon the existing local highway network. However this must be balanced with the need to maintain development viability;

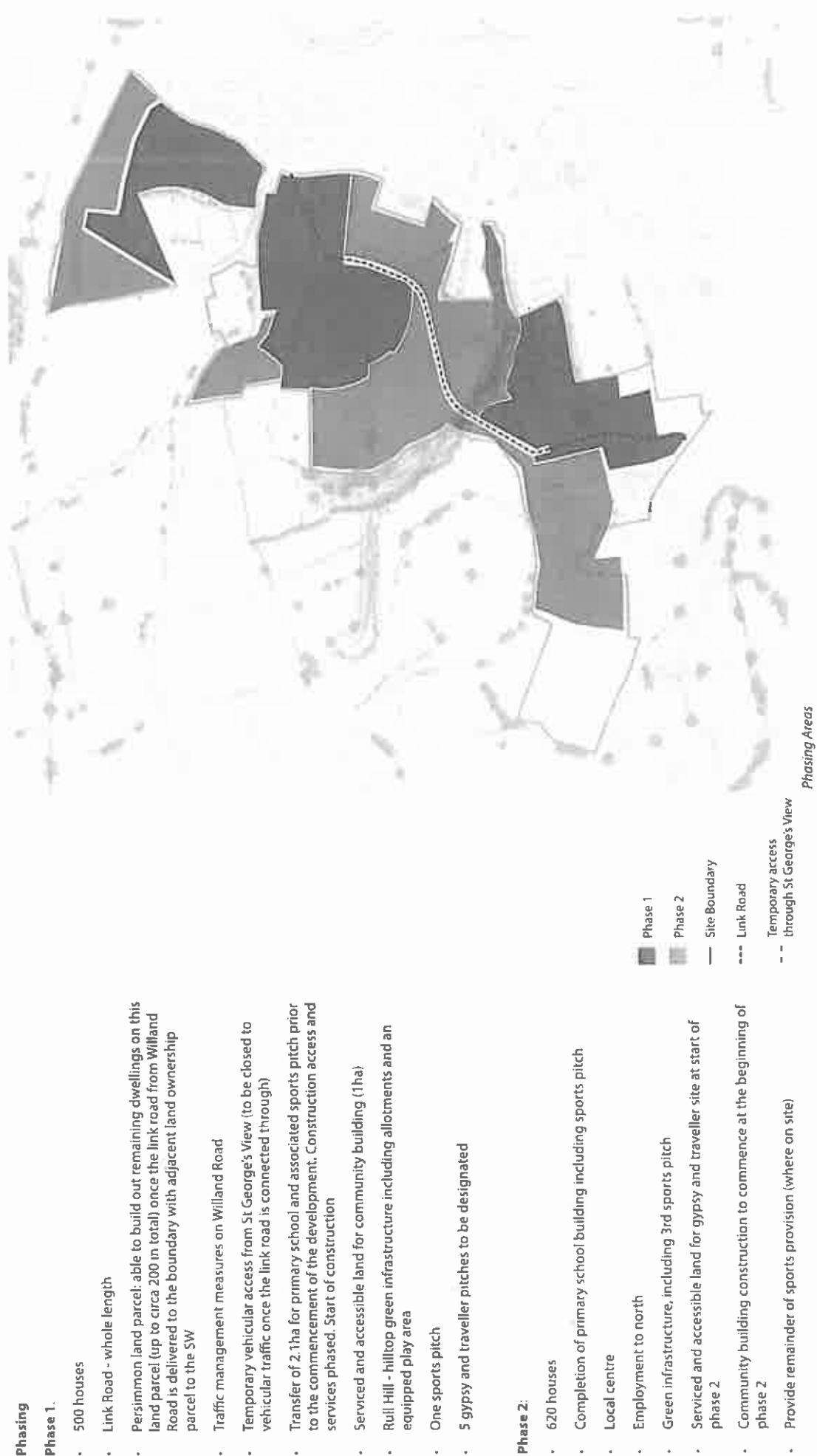
As this development is expected to take place over a period in the order of 10 years, it is recognised as important that an element of flexibility is retained in order that the development can respond to changing circumstances over time.

It is expected that a process of monitoring and review of delivery will be undertaken by the District Council in conjunction with the landowners / developers.

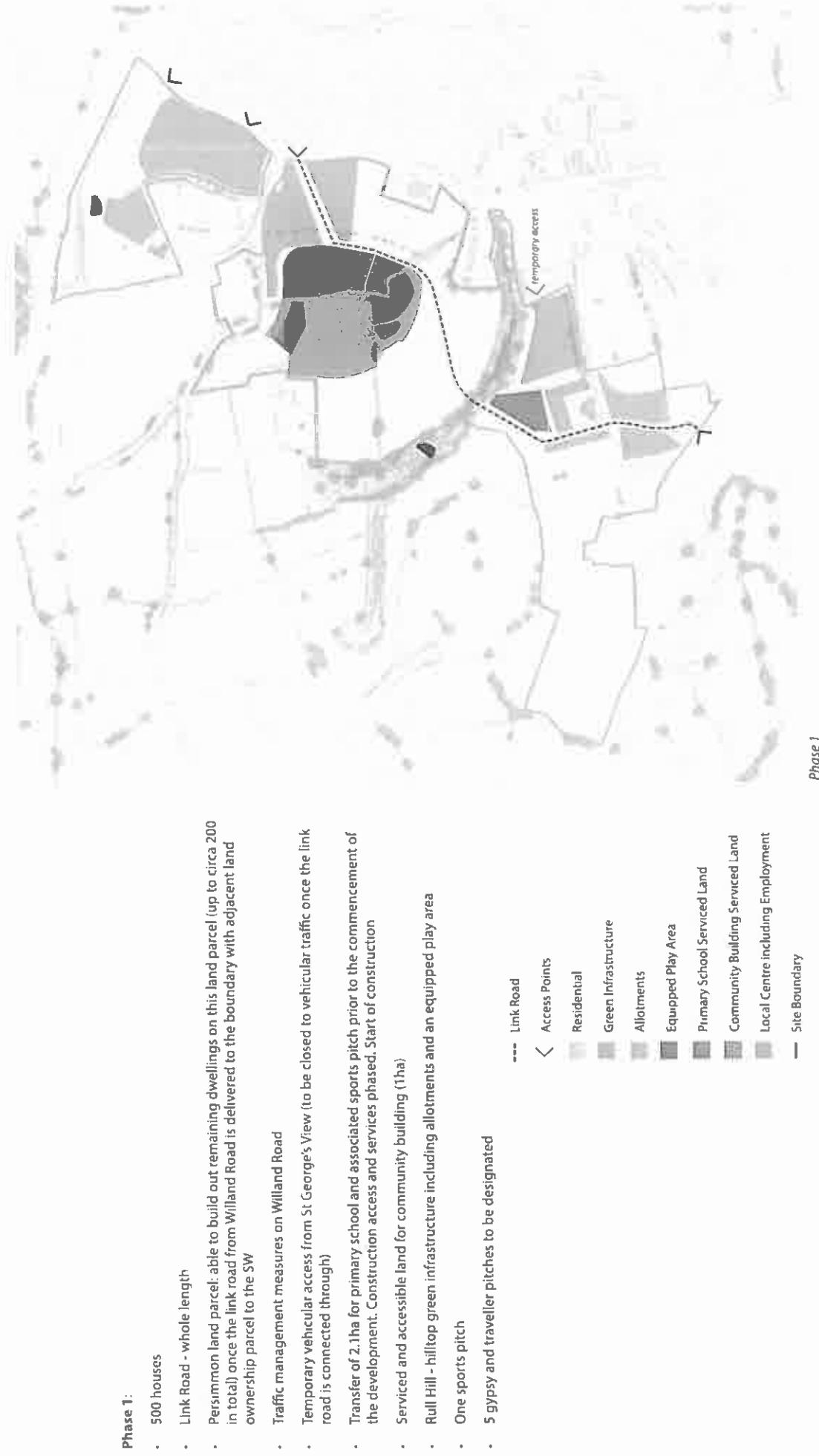
In considering proposals to vary phasing from that set out in this document the District Council will have regard to:

- How the supporting infrastructure specified in this SPD for the specific number of units proposed in the application will be secured;
- How appropriate sustainable access for new residents can be achieved between the housing development and supporting infrastructure (e.g. primary school) where appropriate;
- Whether the development proposed will prejudice delivery of other land holdings within the urban extension or the whole master plan, or result in an unacceptable impact on existing residents;
- How the proposed phasing complies with policy AL/CL/6 and any subsequent review of the Development Plan in relation to it;
- In the event that delivery of an earlier phase, part of a phase or land holding has stalled, proposals to bring forward later planned phases will be considered provided they do not undermine delivery elsewhere within the overall site, the provision of supporting infrastructure and mitigation of the impacts of the development as a result of earlier delivery.

The overall approach taken towards phasing and infrastructure delivery in this SPD is to seek to ensure that each phase of development is as self-sufficient as possible whilst delivering necessary strategic elements of infrastructure in a timely manner and not prejudicing the ability of the following phases to do the same.



5.3 Phasing





5.4 Construction of Road Infrastructure

The proposed time frame for the completion of the link road is 2-3 years from the start of the development. The housing trajectory table on p.67 shows that by the end of year 2 up to 87 houses will have been built, with up to 162 houses completed by the close of Year 3. Although it should be noted that the completion of 162 houses does not necessarily mean the occupation of 162 houses.

In order to finance the completion of the link road within 2-3 years of the start of the development, it is essential that some parcels of land are be sold to secure funding. This SPD proposes a trigger to ensure that no more than 500 dwellings are occupied before the opening of the link road. This figure is necessary as any less will not enable sufficient land sales to fund the road.

To commence phase 1, a temporary access route through St. George's View will be opened. This temporary access will allow the development at the south of the site to start and, therefore, part fund the link road. The construction of the southern point of the link road will start with phase 1.

At the same time the construction of the link road will start from Willand Road and is subject to detailed triggers linked to number of dwelling occupations or time from the commencement of the development, whichever is sooner. By constructing the link road in two locations simultaneously, the timescale for the provision of the whole road can be reduced to 2-3 years, in comparison with a longer construction time should works start from one end only.

This approach will deliver the road sooner than the existing policy trigger of 300 occupied dwellings. As illustrated by the housing trajectory table on p.67, 300 occupations will not occur until sometime during Year 4. This 1-2 years after the road would be delivered through the recommended trigger. Note the 49 housing completions on the Olympian Way development are not included in these calculations and are in addition.

The new road is proposed to act as a distributor type road and will be a minimum of 6.5m wide in order to fulfil this purpose and accommodate large vehicles including buses and agricultural vehicles which are anticipated. In addition to its distributor function, the road will also need to be designed to accommodate an attractive residential environment, walking and cycle movements and control speed, especially in the vicinity of the proposed primary school.





Once the link road reaches St. George's Well, and the two ends are able to be connected, the temporary access through St. George's View can be closed to vehicular access. This route is proposed to stay open for pedestrians and cyclists.

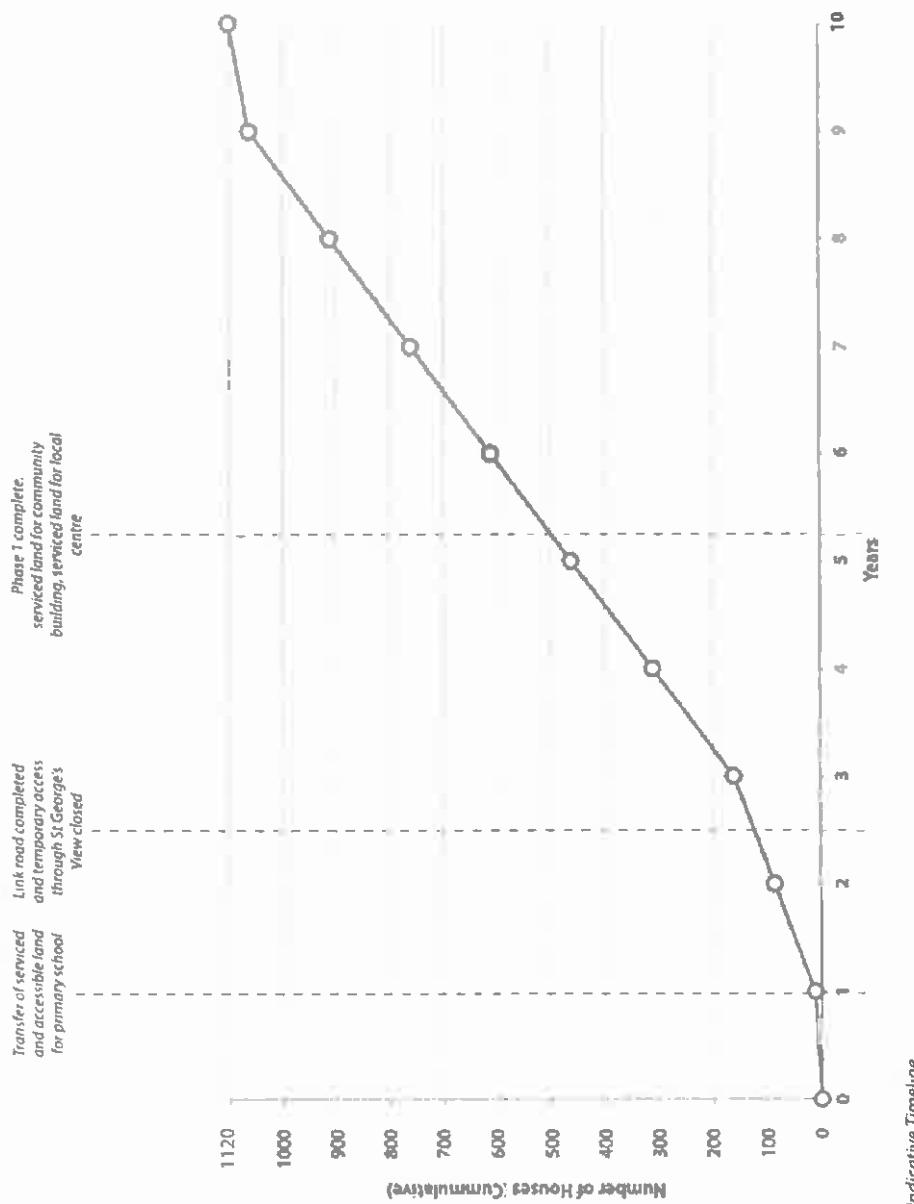
- Link Road
 - Other Roads
 - - - Pedestrian Routes
- Completing the Link Road*

5.5 Infrastructure Requirements

Infrastructure Required and Triggers for Delivery

The key elements of infrastructure required to support the vision and aims of sustainable development at Cullompton's new neighbourhood have been based on requirements set out in the Allocations and Infrastructure Development Plan Document together with information collected from stakeholders and the wider community.

The infrastructure necessary to support the urban extension must be delivered in a timely way in order to reduce the impact of the development. The key infrastructure requirements for the urban extension are identified within the Allocations and Infrastructure Development Plan Document (listed in chapter 5.1). These are listed in the following table in relation to the anticipated phase of development and identified trigger points. This table concentrates upon infrastructure requirements common to different areas and ownerships where coordination over delivery is most required. Further site specific infrastructure will be required on a more local basis, for delivery under individual detailed planning permissions for the relevant phase of the development such as footpaths and streets and non-strategic habitat mitigation. A range of utilities related infrastructure will also be required such as power, water and foul drainage. Provision for these will need to be made in step with the requirements of each phase of development and ensuring that provision is coordinated between phases. It is important that the necessary provision of utilities is borne in mind in considering the viability of the development.



Indicative Timeline

| Key Infrastructure Triggers | | Delivery by Date/Year/Point in Time, and Whether point/when known | |
|---|---|---|----------------------|
| Access and Transport | | | |
| Opening of a through route linking Willand Road to Tiverton Road (In respect of the land control parcel identified as Persimmon in the plan on p.29) Provision of the section of through route from Willand Road to the primary school site ** | Phase 1 - prior to occupation of no more than 500 dwellings* Prior to the occupation of no more than 50 dwellings on his land control parcel or within 18 months of the commencement of the development on this land control parcel, whichever is sooner | Developer | Developer |
| (In respect of the land control parcel identified as Persimmon in the plan on p.29) Provision of the section of through route from the primary school to the boundary with the adjacent land control parcel to the south west *** | Prior to the occupation of no more than 100 dwellings on this land control parcel or within 30 months of the commencement of development on this land control parcel, whichever is the sooner | Developer | Developer |
| Traffic management measures on Willand Road | Phase 1 At commencement of phase 1 | Developer / DCC | Developer |
| Temporary access through St. George's View | Phase 1 - once link road connects through | Developer | Developer |
| Closure of temporary access through St. George's View (left open for pedestrians and cyclists) | Phase 1 - prior to occupation of no more than 500 dwellings | Operator / Developer | Operator / Developer |
| Footway and shared use link along Millennium Way (contributions to necessary and justifiable improvements to the Millennium Way and Willand Road to be agreed with the Local Authority) | Phased with development | Developer / DCC | Developer / DCC |
| Bus service enhancements - strategic buses | Phased with development | Developer | Developer |
| Bus service enhancements - local buses | Phased delivery from occupation of first dwelling | Developer | Developer |
| Bus service enhancements - strategic buses | Phased with development | Developer / DCC | Developer |
| Education Facilities and Community Building | Phase 1 - prior to commencement of the development | Developer | Developer |
| Transfer of land for a primary school (2.1 hectares) with legal right of access | Phase 1 - within 6 months of commencement of the development | Developer | Developer |
| Provision of construction access to the school site | Phase 1 - within 18 months of the commencement of the development whichever is the sooner. | Developer / DCC / Other | Developer |
| Provision of services to the school site | Construction to commence prior to final occupation in phase 1 | DCC | DCC |
| Primary school building, playing pitch and early years facilities | Phased delivery according to need as development comes forward | Developer | Developer |
| Enhancements to secondary education provision | By completion of phase 1 | Developer | Developer |
| Transfer of serviced and accessible land for a community building (1 hectare) | Serviced and accessible land to be transferred by completion of phase 1. Construction to commence at the beginning of phase 2. | Developer | Developer |
| Community building | 5 pitches to be designated by end of Phase 1. Pitches to be provided at beginning of phase 2 | Developer | Developer |
| Employment and Local Centre | | | |
| Provision of serviced and accessible employment land | Phase 2 | Developer | Developer |
| Employment buildings built with demand | Phase 2 | Developer | Developer |
| Serviced land for local centre | By completion of phase 1, once link road is completed | Developer | Developer |
| Green Infrastructure | | | |
| Rull Hill green infrastructure (7.4ha) including allotments (0.7ha) and one equipped play area (0.45ha) with necessary financial support and management | Phase 1 - Prior to occupation of no more than 500 dwellings. | Developer | Developer |
| One playing pitch (1.4ha) with necessary financial support and management | Phase 1 - Prior to occupation of no more than 500 dwellings. | Developer | Developer |
| Other green infrastructure including equipped play areas (0.7ha) and third playing pitch (0.7ha) with necessary financial support and management | Phase 2 - phased with development, and detailed within outline planning application. | Developer | Developer |
| Sustainable Urban Drainage Systems (SUDS) | Phased delivery as development comes forward | Developer | Developer |
| Gypsy and Traveller Site | Serviced land for gypsy and traveller site (sufficient for at least 5 pitches) | Developer | Developer |

Key Infrastructure Triggers Table

* Link road likely to be delivered within 2-3 years of commencement of construction of the development as a whole. The Transport Assessment will need to demonstrate impacts on Tiverton Road are acceptable.

** Road sections to be provided to a standard suitable for use by the public

*** Road sections to be provided to a standard suitable for use by the public. Following the provision of the through road to the boundary of the site with the adjacent land control parcel to the south west, the limit on the total number of dwellings delivered within phase 1 be lifted in respect of this land control parcel. This allows the remaining dwellings on this land parcel to be built out. Total number of dwellings on this land parcel is expected to be 200.

Note: The numbers of dwellings are cumulative from the beginning of the first phase and do not include those provided at the Olympian Way development
Note 2: References to a through route/ road linking Willand Road to Tiverton Road relate to a new distributor type road

5.6 Monitoring and Review

The success of the development will depend to a large extent on the continued partnership working of the landowners, the council and other key stakeholders to secure delivery of a high quality and sustainable place and supporting infrastructure in a timely way.

The Council will monitor implementation of this SPD and the extent to which the strategic policy objectives and vision are being achieved in the Annual Monitoring Report. If implementation / delivery is considered to be failing, this will be reported together with an explanation and proposed remedial steps.

It is possible that during the life of this masterplan, there may be changes to the adopted policy of this Council, given that the Local Plan Review 2013-2033 is already underway. The Proposed Submission document dated February 2015 allocates a larger site area with a similar number of dwellings, a lower percentage of affordable housing, a greater floorspace area for employment and no net change in the amount of green infrastructure (see policies currently referenced as CU1 – CU6).

As a result, and without predetermining the outcome of the Public Examination anticipated to be held in late 2015 / early 2016, this masterplan document includes an 'option B' framework plan for the development (shown on the opposite page). This option seeks to demonstrate that in the event that the allocation area is revised (as proposed within the current Local Plan Review) within the life of this document, the masterplan is capable of responding to such revisions and still deliver a coordinated and comprehensive scheme. In the event that the current adopted policy is superseded, the implications of this on this SPD and its implementation will be reviewed and amended if required. The extent to which the strategic policy objectives and vision are being achieved will be monitored by the Council against the policy prevailing at that time.

Planning applications will be determined against policies within the adopted development plan at the time, together with this SPD.

Note – The plan on page 77 is based on the draft submission Local Plan Review 2013 – 2022 allocation. Representations regarding the extent and location of the additional land have been received as a result of pre submission consultation. At the time of drafting this document, the Local Planning Authority is still considering the content of these representations, some of which (including that by the land promoters) suggest that the allocated area should be enlarged further. The plan is therefore illustrative only and should not be seen as predetermining the outcome of the public examination into the emerging plan.

Option B Framework Plan



5.7 Requirements of Future Planning Applications

It is likely that the extension to North West Cullompton will be delivered over a time period in excess of 10 years. The land is in more than one ownership and accordingly is likely to come forward in more than one outline and /or full planning applications. Outline applications will be followed by reserved matters applications that may be based on a subdivision of the site into smaller sub phases. Each planning stage will require the submission of supporting documents and information. Planning permissions granted are also expected to result in planning conditions, the discharge of which are also likely to require the submission and approval of further reports and documents on topics such as the design, construction and management of aspects of the development.

The Council intends to deliver the required infrastructure associated with this development via site specific S106 agreements. It is considered that this mechanism will be the most effective in delivering the necessary infrastructure. Due to S106 agreement pooling limits, the Council will seek to ensure that there are no more than five separate legal obligations entered into for each infrastructure project associated with the scheme. Key to achieving this will be the number of planning applications in outline or full likely to be received for the allocation as a whole. In order to ensure that options are kept open for the most effective delivery of infrastructure, that infrastructure is provided in a coordinated and timely manner and that individual applications do not prejudice the ability to provide infrastructure on other parts of the site, the Council will require that the whole of the allocation area together with the green infrastructure area come forward as not more than a total of 5 outline / full planning applications.

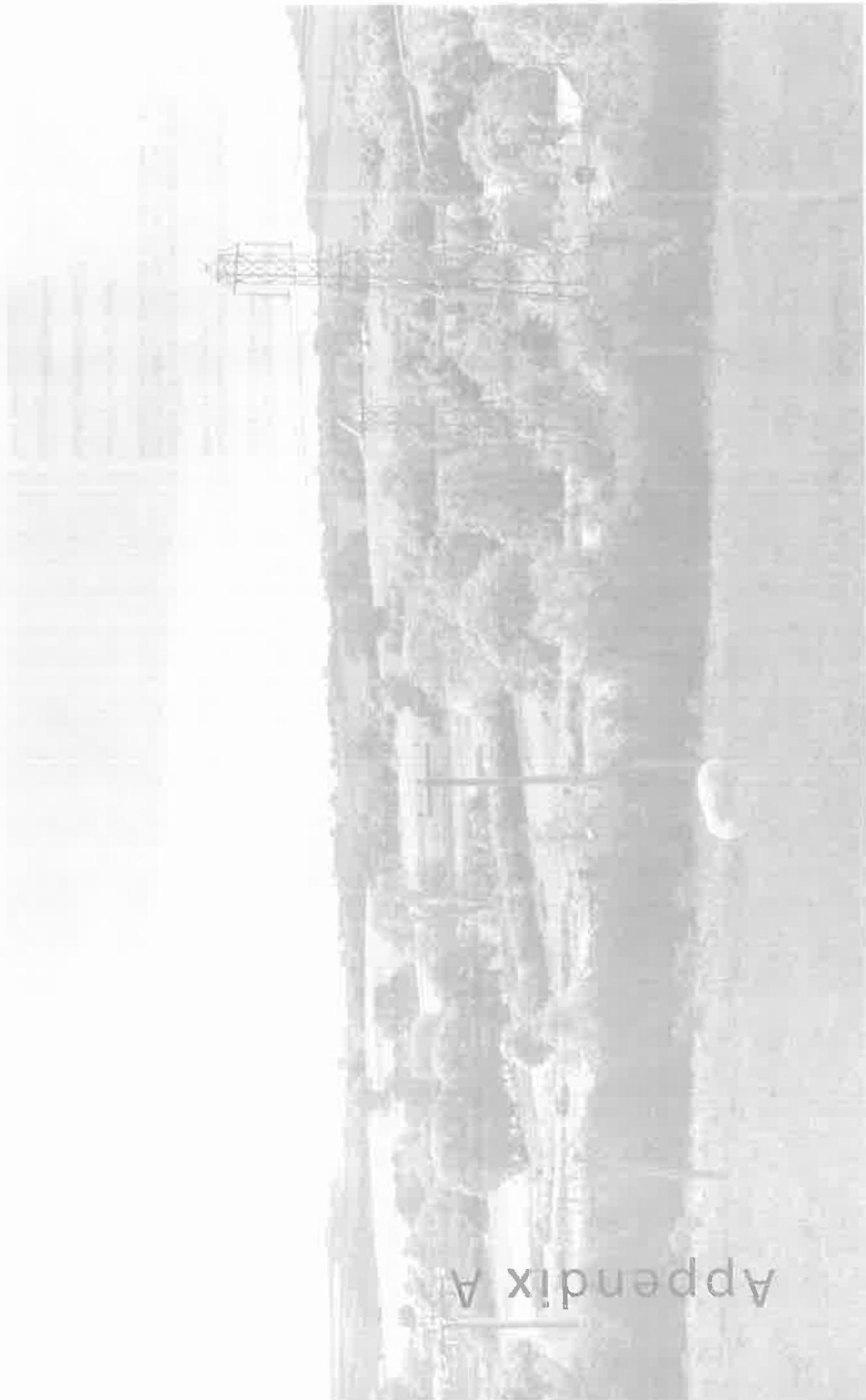
Information forming part of a planning application must meet standard national requirements. In addition the Council's local validation requirements must also be met. These are available here www.middevon.gov.uk/CHtpHandler.ashx?id=20196&p=0. A list of information to be submitted as part of an outline application for the development of the site is provided below. It should be noted that this list is not exhaustive and further requirements may be identified as a result of pre-application discussions. Some elements may also be more appropriately submitted at reserved matters stage dependent upon the scope of the application made at outline application stage.

- | 1. Masterplanning and design | 2. Planning |
|---|--|
| <ul style="list-style-type: none"> Outline application Development framework plan to illustrate development form at a greater degree of resolution as relevant to the application location. Outline application and reserved matters applications: Design and Access Statement to include proposed character areas, street / space typologies, sample blocks and key areas including the community facilities and area of the primary school referring back to this SPD and development framework plan above. Conditions are likely to require the approval of illustrated urban design and architectural principles prior to the submission of reserved matters applications. More details are to be found within the design process section at 1.4. Reserved matters: Detailed design proposals for the area applied for. Compliance with this SPD and subsequent masterplanning and design stages above will need to be demonstrated. Full applications: Will need to meet the requirements of both outline and reserved matters applications. | <ul style="list-style-type: none"> Planning Statement Floorspace schedule outlining indicative scale of proposed land uses at the neighbourhood centre and subject to that floorspace, a retail impact assessment. Draft Heads of Terms for Section 106 Agreement Viability Appraisal and independent review with details to be agreed with Mid Devon District Council Affordable Housing Statement Statement of Community Involvement (SCI) Whole-site Infrastructure Delivery Plan Neighbourhood Management Plans – to cover future maintenance of community spaces and buildings Planning statement including reference to conformity/non-conformity with this masterplan SPD Green infrastructure strategy for the scheme as a whole identifying component elements together with proposals for management and ongoing maintenance. Health Impact Assessment. |

- | 1. Masterplanning and design | 2. Planning |
|---|--|
| <ul style="list-style-type: none"> Outline application Development framework plan to illustrate development form at a greater degree of resolution as relevant to the application location. Outline application and reserved matters applications: Design and Access Statement to include proposed character areas, street / space typologies, sample blocks and key areas including the community facilities and area of the primary school referring back to this SPD and development framework plan above. Conditions are likely to require the approval of illustrated urban design and architectural principles prior to the submission of reserved matters applications. More details are to be found within the design process section at 1.4. Reserved matters: Detailed design proposals for the area applied for. Compliance with this SPD and subsequent masterplanning and design stages above will need to be demonstrated. Full applications: Will need to meet the requirements of both outline and reserved matters applications. | <ul style="list-style-type: none"> Planning Statement Floorspace schedule outlining indicative scale of proposed land uses at the neighbourhood centre and subject to that floorspace, a retail impact assessment. Draft Heads of Terms for Section 106 Agreement Viability Appraisal and independent review with details to be agreed with Mid Devon District Council Affordable Housing Statement Statement of Community Involvement (SCI) Whole-site Infrastructure Delivery Plan Neighbourhood Management Plans – to cover future maintenance of community spaces and buildings Planning statement including reference to conformity/non-conformity with this masterplan SPD Green infrastructure strategy for the scheme as a whole identifying component elements together with proposals for management and ongoing maintenance. Health Impact Assessment. |

| 3. Sustainability | 4. Traffic & Transport | 5. Environmental Impact |
|---|---|--|
| <ul style="list-style-type: none"> Sustainability & Energy Assessment incorporating a carbon reduction and low emissions strategy for the allocation site, as a whole – outlining the approach taken to integrating sustainability during the design process. This can include topics such as water use, materials, surface water run-off, waste, pollution, health and wellbeing, management, ecology and transport. This should also include estimated energy loads and consumption as well as predicted CO2 (carbon) emissions of the overall development and how air quality is to be addressed. Waste audit statement – to demonstrate how waste will be managed according to the waste hierarchy. To cover waste arising from the construction stage and following occupation of the new properties within the masterplan area. | <ul style="list-style-type: none"> Whole-site Transport Assessment Whole-site Framework Travel Plan – outlining measures to encourage new residents and employees on site to use sustainable modes of transport Traffic pollution assessment – to consider the impact of traffic generated nitrogen oxides upon environmental assets including mitigation measures. (See also air quality assessment) Whole-site Public Transport Strategy – outlining a strategy for providing viable sustainable transport options Public Rights of Way Statement – assessing the impact on existing access routes Highway design report and any other reports & modelling as required in consultation with Devon County Council Highways Department. | <ul style="list-style-type: none"> Environmental Statements which should follow the requirements as set out in any scoping opinion Landscape and Visual Impact Assessments Arboricultural Survey & Landscape Plan, including tree and hedgerow removal details Biodiversity & Ecological Reports including Management Plan Archaeology Assessments Air Quality Assessment – to include Low Emission Strategy Noise Assessment Flood Risk Assessment Sustainable Drainage Strategy together with proposals for ongoing management and maintenance. Heritage Statement including description of significance of any affected heritage assets. External lighting Assessments – to include assessment on habitat areas and where details of high-intensity lighting (e.g. floodlights) are included or indicatively shown near to sensitive/residential areas. Land Contamination Assessments Site Waste Management Statement Construction Management Plans Utility Infrastructure Report |

Appendix A



6.0 Factors Shaping Development

Appendix A

6.1 Scope and Extent

This section of the document summarises the survey and analysis work that has been undertaken in relation to the allocated site to inform the SPD Masterplan. The work provides a foundation that has helped to shape the form of the masterplan and inform the quantum of the different land uses that are proposed. The scope and extent of survey work comprises:

- Site within it's context
- Geography
- Cullompton Wide Connectivity
- Access and Movement
- Facilities and Amenities
- Visual Sensitivity
- Topography
- Green space and Ecology
- Hydrology
- Utilities
- Cultural Heritage
- Character and Building Traditions



6.2 Cullompton Wide Connectivity

Survey/Analysis:

Mapping 2014

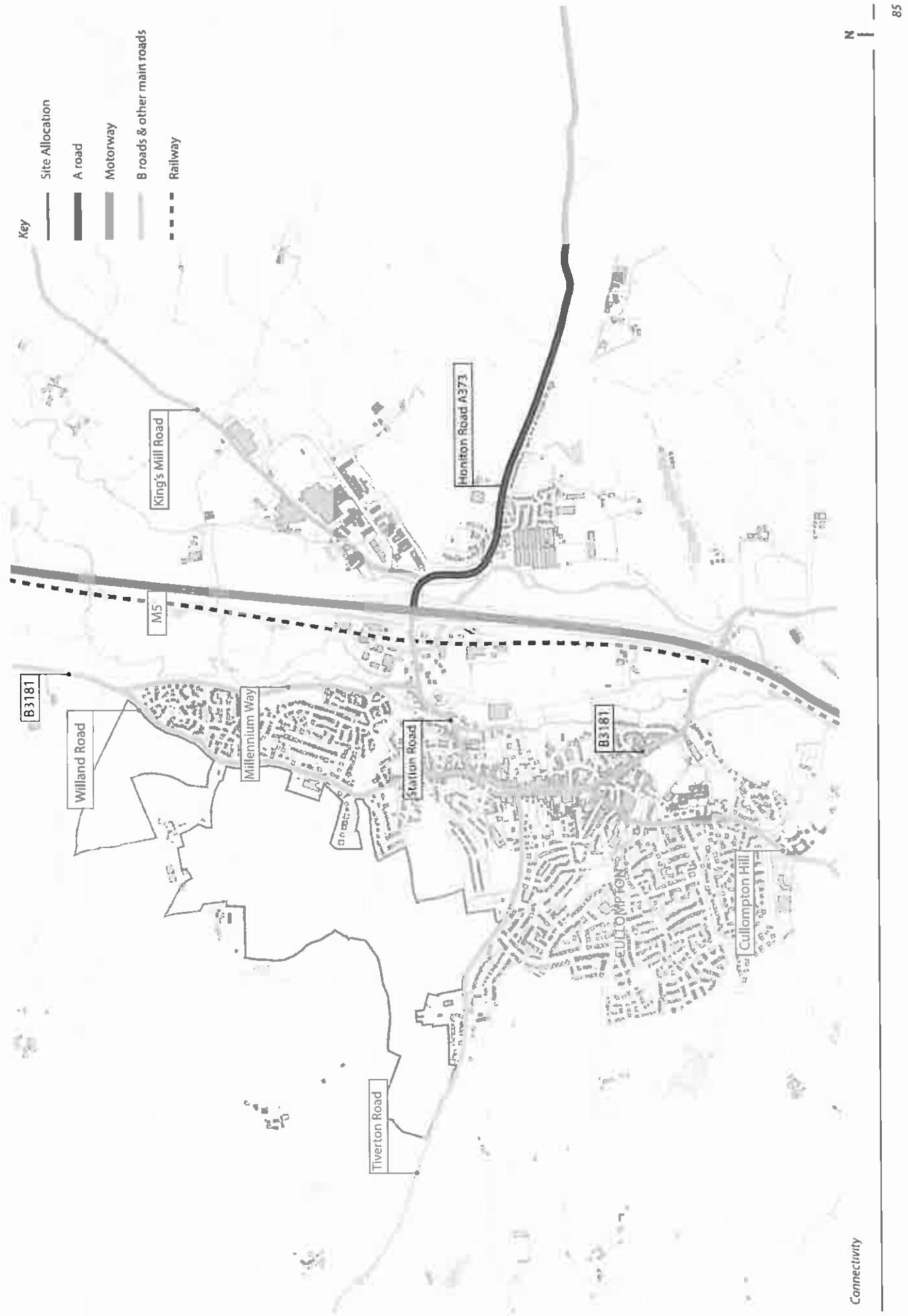
Opportunity/Constraint:

Proposals should seek to provide easy access to facilities, amenities and employment areas by all modes of transport with a particular emphasis on more sustainable options including footpaths and cycle ways.

Situation/Summary:

Cullompton is a well connected and accessible town in Mid Devon. Its location along the M5 provides good links to Exeter and other cities along the M5. It also has good links to neighbouring towns Tiverton and Honiton.

A network of bridle paths and public footpaths link Cullompton into the surrounding countryside.



6.3 Access and Movement

Survey/Analysis:

Mapping 2014

Main routes and connections mapped. Bus stops mapped.

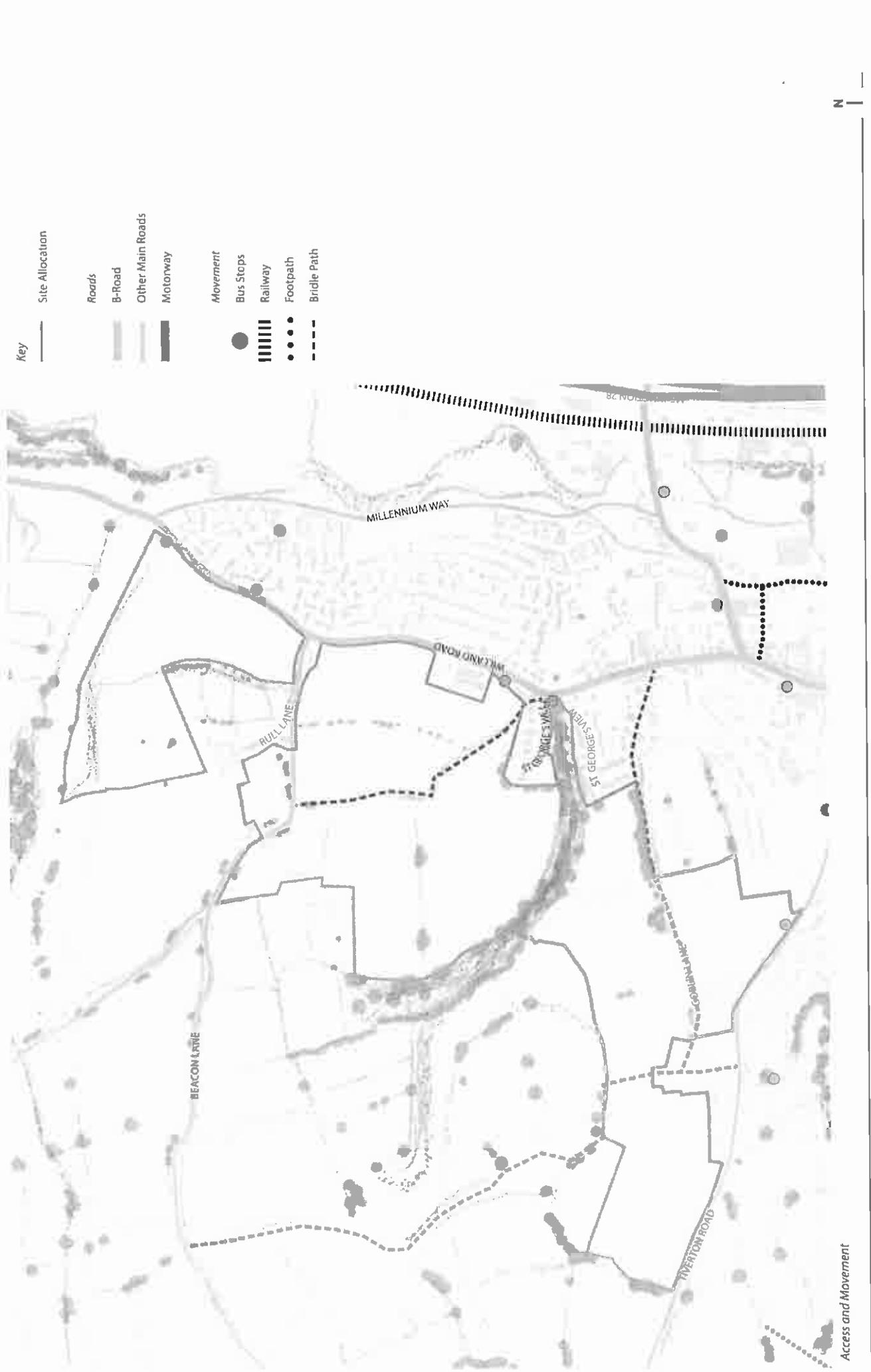
Situation/Summary:

The site is well positioned with access to multiple bus stops. The site lies adjacent to main roads Tiverton Rd and Willand Rd. The site is also within walking distance of the existing town centre.

Three bridle paths run through the site.

Opportunity/Constraint:

Existing bridle paths within the site should be retained with existing character and incorporated into the site wide pedestrian and cycle network strategy.



6.4 Facilities and Amenities

Survey/Analysis:

Mapping 2014

Situation/Summary:

Retail primarily caters for local needs with an indoor market, a street market and a farmers market being held regularly.

The High Street consists of a number of independent shops and food places.

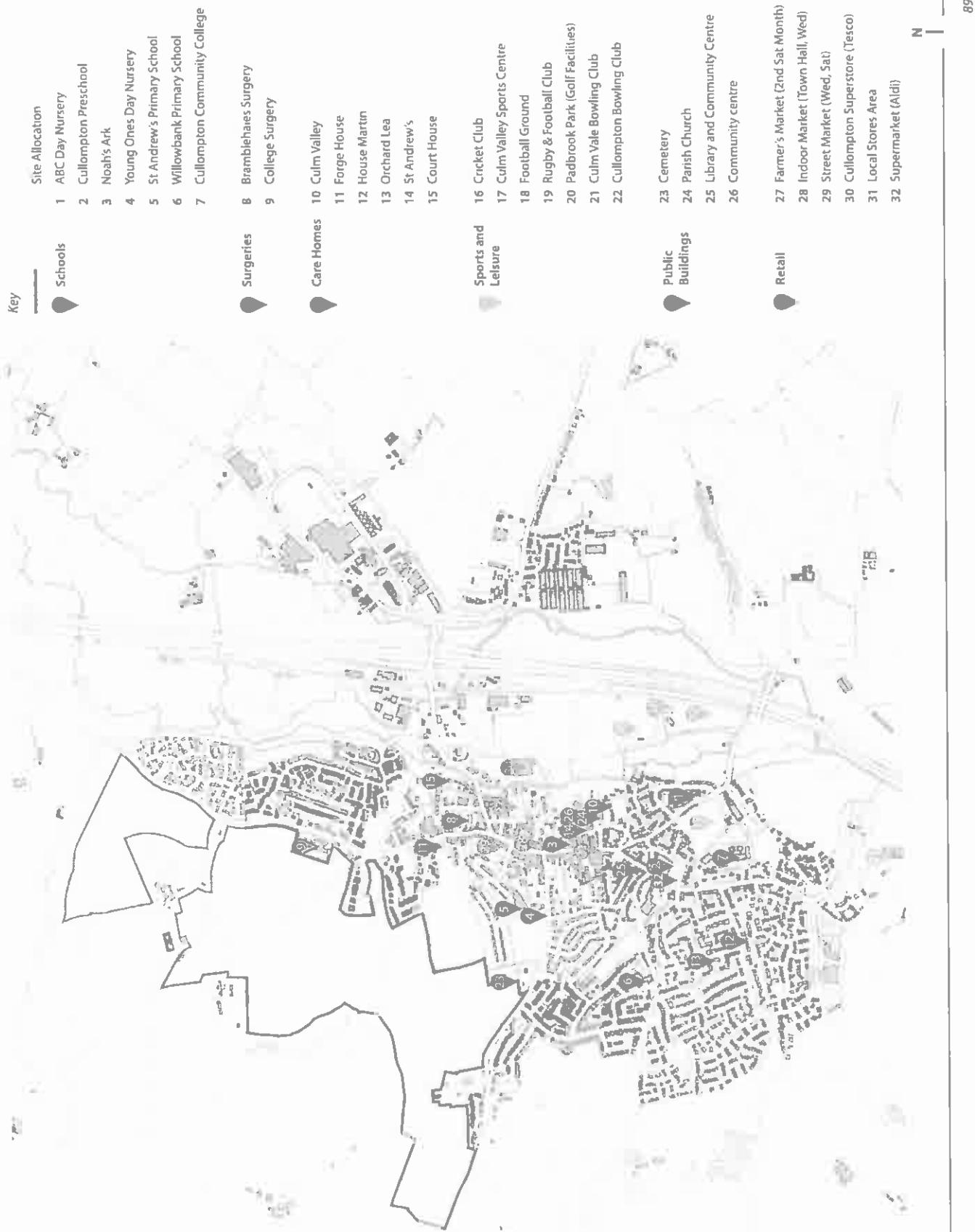
The town currently has two supermarket (Tesco and Aldi).

The town has one secondary school, and two primary schools.

Opportunity/Constraint:

With a good mix of existing retail in the town's main shopping area, any new retail in the new development does not want to compete with the existing facilities.

Good access links throughout the new development will allow the new community easy access to all that Cullompton has to offer.



Facilities in Cullompton

6.5 Visual Sensitivity

Survey/Analysis:

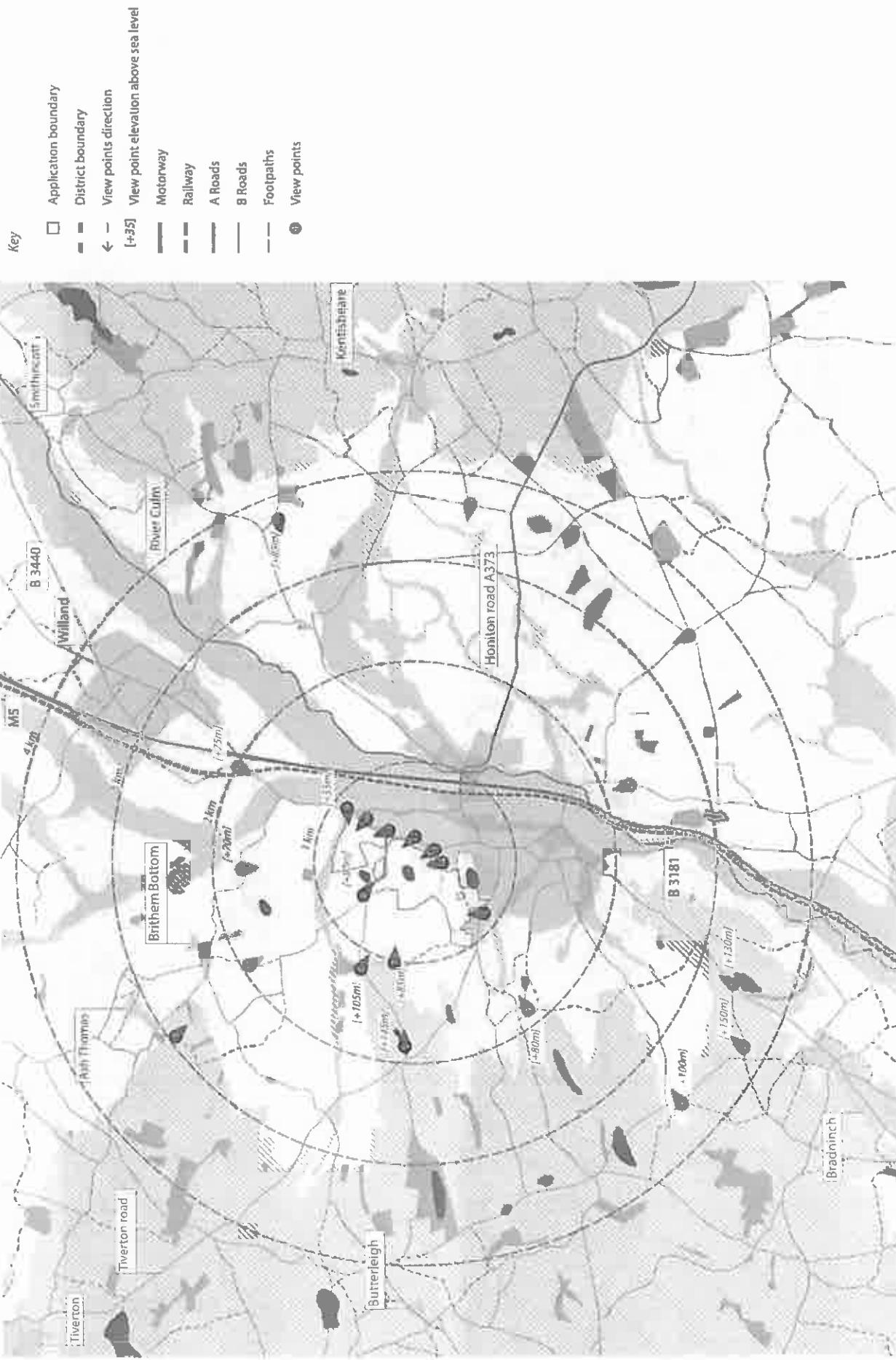
Analysis of views 2014

Situation/Summary:

The most visually sensitive areas of the site are the three hilltops that are visible from all angles. The small valleys and more gradual gradients in between the hills are much less visible and are partially hidden by hedgerows and trees from the rural edge of the site.

Opportunity/Constraint:

The visibility of the site will have to be considered when designing the development, in particular the views from adjacent residential areas, and the rural North and West edges of the site, will have to be addressed appropriately and aim to minimise visual impact.



6.5 Visual Sensitivity





6.5 Visual Sensitivity





Paulsland Farm

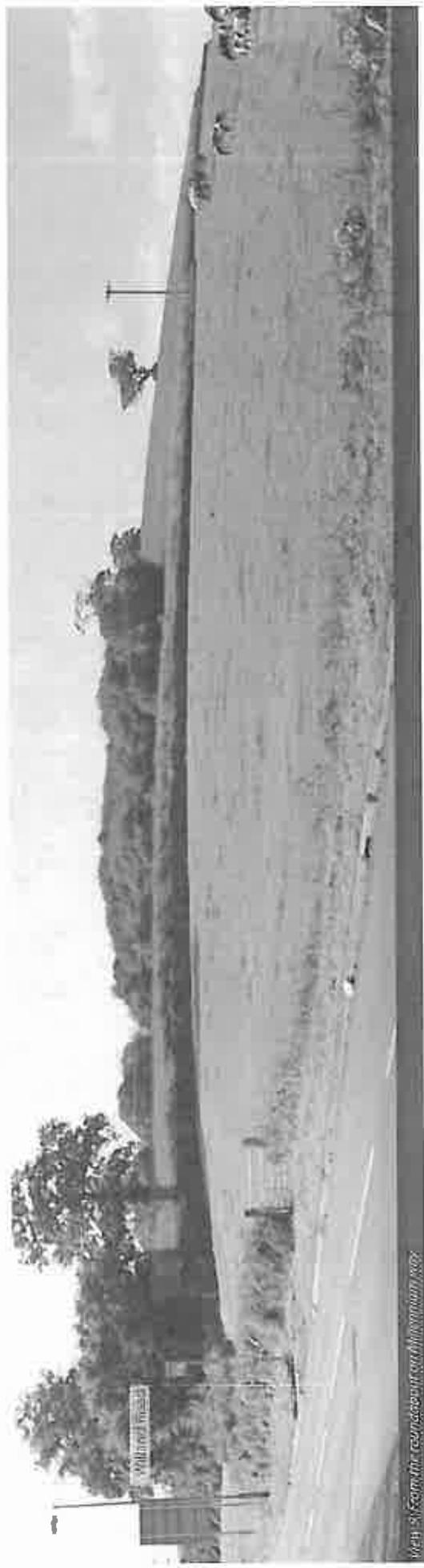
S. George's View

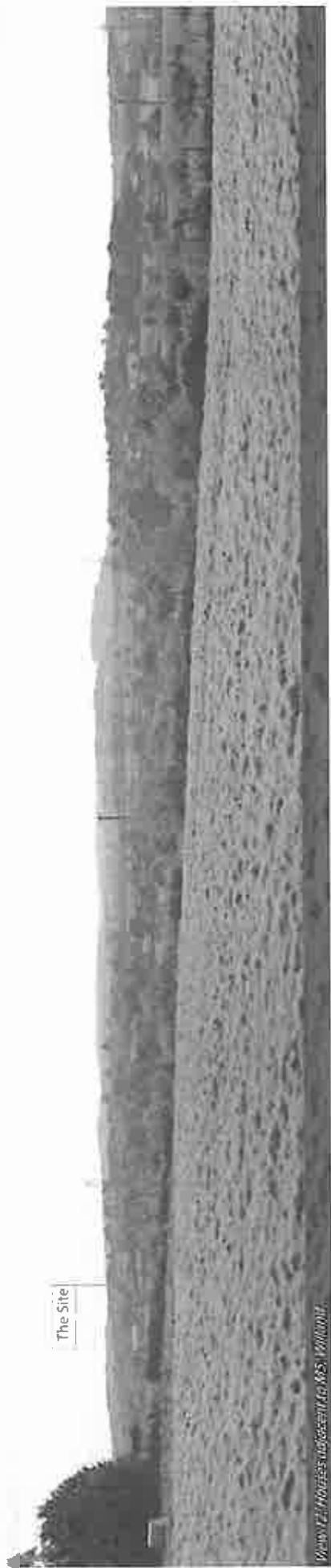


Bridleway going up Rull Hill

View from a bridge on Rull Water

6.5 Visual Sensitivity





6.6 Topography

Situation/Summary:

The town of Cullompton sits roughly at 70m above sea level. The most notable elements of the topography around the site are three hilltops, the highest of which is Ridi Hill that reaches 95m. St Andrew's Hill - an old Roman Fort - reaches 86m. These hilltops have a couple of steep slopes leading up to them.

St George's Well is a small valley, and the lowest part of the site, that has a stream running along it making it a flood zone.

Opportunity/Constraint:

Visual sensitivity created by altitude of hilltops must be carefully considered to minimise impact on the views from existing developments and from the rest of the surrounding landscape.

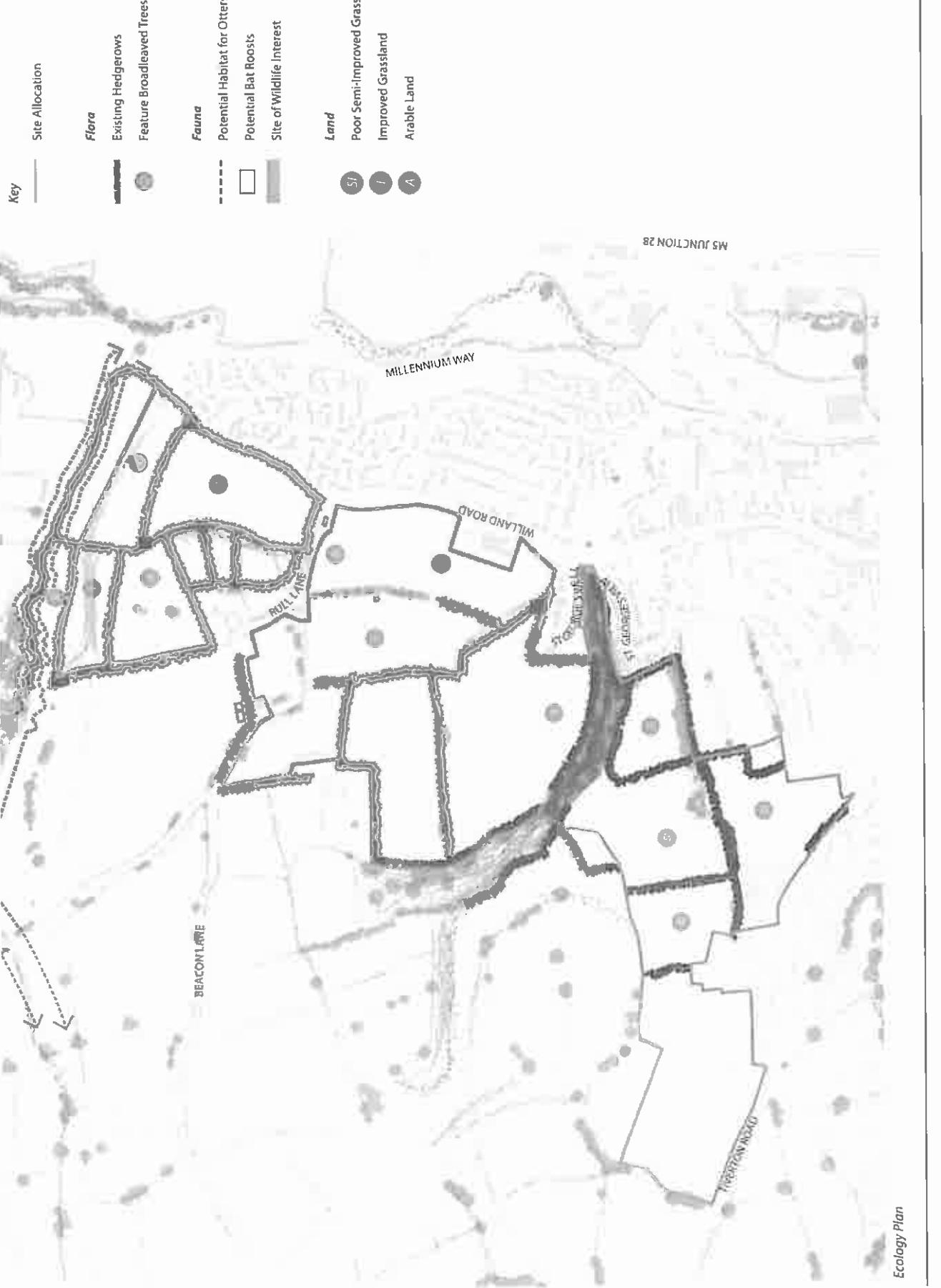
Steep gradients on site must be dealt with in order to be made suitable for footpaths, roads and housing, whilst still minimising need for cut and fill.

Low parts of the site that will be at risk of flooding should be left undeveloped or integrated into part of a green area.



6.7 Green Space and Ecology

| | | | |
|---|--|---|---|
| <p>Survey/Analysis:</p> <p>Surveys undertaken April and August 2014</p> <p>Situation/Summary:</p> <p>The habitats on site are of moderate ecological value overall and include stream and ditch corridors, mature trees and species-rich hedgerows.</p> | <p>There is a badger sett in a central hedgerow, which appears to be a subsidiary sett as it is not obviously connected to another sett by paths and did not appear to be continually used.</p> <p>There are several hedgerows on site that are classified as ecologically important under <i>The Hedgerow Regulations 1997</i>, due to the likely presence of dormice. A number of hedgerows are also ecologically important due to floristic diversity and associated features.</p> <p>Proposed Species Mitigation</p> <p>Vegetation removal will be avoided where possible to maintain connectivity throughout the site for bats and dormice. Some fragmentation will occur due to the creation of access roads and footpaths. Where possible strategic planting will be used to alleviate the impact of these newly created gaps and new connections will be created to the surrounding landscape. Land along the northern edge of the site will be enhanced for dormice and other protected species, as will habitats on site and connecting habitat.</p> <p>Bats forage and commute along hedgerows and stream corridors on the proposal site, and there are dormice and a badger sett in hedgerows. The hedgerows and trees may also be used by nesting birds.</p> | <p>August inclusive an ecologist will check vegetation for nesting birds prior to clearance. Exclusion zones will be implemented near sensitive habitats such as streams, hedgerows and tree root zones.</p> <p>Construction lighting will be directed away from sensitive habitat and pollution prevention measures implemented to protect water courses. Should any trees require surgery or management, these will be evaluated for use by bats and appropriate precautionary measures will be agreed with the planning authority.</p> <p>Biodiversity Enhancement</p> <p>The Construction Environmental Management Plan will describe the precautionary approach to such works, such as vegetation and tree removal, and the measures to protect wildlife including dormice, bats and badgers.</p> | <p>The landscape proposals provide for substantial ecological enhancement that includes new native species planting. Additional enhancement measures will include the following:</p> <ul style="list-style-type: none"> • Installation of bat and bird boxes in existing trees and on new buildings on the site; • Preserving and enhancing habitat features currently present and considered of value, such as mature trees and hedgerows, to improve ecological quality and structure; • Planting of new species-rich hedgerow, scrub and woodland to create new wildlife corridors enhancing connectivity both within and leading off site; and • An Ecological Management Plan outlining the above, which will be agreed with statutory consultees prior to commencing works. <p>Overall, the proposed enhancement will provide a net gain for biodiversity and will contribute to the objectives identified in the Devon Biodiversity Action Plan.</p> |
| | | <p>A total of eleven bat species were found to be using the site for foraging or commuting. Substantial numbers of common and soprano pipistrelle bats were recorded on site, along with much lower numbers of other species. Noctule, serotine and Leisler's bats were recorded in low numbers as well as a number of Myotis species with call characteristics associated with Brandt's Daubenton's, Natterer's, and whiskered bats. Lesser Horseshoe bats were recorded on site during the September, October, May and June activity transect surveys and during the October static data logger recording period.</p> <p>No dormice were found during surveys in 2013 but the remains of a partially completed dormouse nest were found in the southern hedgerow of the central field during the November 2013 survey. Given that the connectivity of the habitat and the quality of the hedgerows it is considered possible that dormice may be present within any of the hedgerows on site.</p> | <p>A detailed mitigation strategy and European Protected Species licence is likely to be required prior to carrying out any works that will affect dormouse habitat, including all hedgerows on site and any wooded areas. Vegetation will be cleared under a phased approach and new native habitats will be established prior to the start of works to allow dormice to move away from disturbance and into neighbouring suitable habitat.</p> <p>Protection measures during construction will be implemented under a Construction Environmental Management Plan, which will be produced by the contractor(s) and agreed with the planning authority. Where vegetation will be cleared between March to</p> |



6.8 Hydrology

Survey/Analysis:

Flood risk and flood zoning.

Opportunity/Constraint:

Proposals should exclude flood risk zones from any developable area. The potential to incorporate these zones into areas of open space should be explored.

Situation/Summary:

The stream running east to west through the valley in between St Andrew's Hill and Rull Hill has a narrow floodplain. There is a stream forming the northern boundary of the site which also has a larger flood plain, most of which is not included in the site.

A part of the site is located within the Cullompton Critical Drainage Area where surface water runoff will need to be carefully considered at design stage so as not to increase flood risk elsewhere.

Key

- Site Allocation
- Flood zone
- Watercourse
- Critical Drainage Area



6.9 Utilities

Survey/Analysis:

Water/ gas mains and overhead power lines

Opportunity/Constraint:

The gas and water mains have been incorporated within the master plan and the overhead power lines would be re-routed and possibly grounded into the fabric of the proposed master plan at detailed design stage.

Situation/Summary:

Investigations with the local utilities providers was conducted across the site. The main concern is the gas main that skirts the site to the west and requires a 5 m easement on either side. A number of overhead power lines cross the site and in addition there are a number of water mains on site that serve the properties off Rull lane. These water mains will require a 4.2 m easement.

The easement to the gas main has been accommodated with a buffer zone in the far south west of the site and the water mains situated within the streetscape/ public open space.



6.10 Cultural Heritage

Survey/Analysis:

Heritage Statement and Archaeological Survey

Situation/Summary:

There are no designations or listed buildings within the site boundary, however, there are a number of listed buildings within close proximity to the site. The most notable of which include the Grade I Listed Moorside Barton is located to the north of the application area, and as a farmhouse does not have any designed views or landscapes forming a significant part of its setting.

In addition, based on current evidence there are known non-designated heritage assets which are likely to be directly impacted upon by development depending on design and layout of the proposed scheme, but there is nothing identified at this level of assessment that would be considered to act as a constraint to developing the land.

The Roman forts and camps situated on St Andrew's Hill are a Scheduled Ancient Monument and are considered to be assets of high significance. This physical setting has undergone significant alteration since the Romano-British period and, in combination with the local growth of trees and hedge banks, the increasing built-up areas of the town make a full comprehension of this topography more difficult in the field. The visual setting of the monument has also been altered by these developments and the setting of this asset is now better appreciated through the additional use of mapping.

Opportunity/Constraint:

Despite the alterations which have taken place surrounding the Scheduled Ancient Monument, the setting of this asset makes a contribution to its significance, so given its proximity to the allocation area it is considered to be susceptible to impact by the proposed development. Proposals will need to ensure that there will be no significant effects on any Listed Buildings located in proximity to the proposed development site via the alteration to their settings. The masterplan has sought to achieve this. Archaeological investigations of the site will be required to achieve this. Archaeological finds in the area include some on site in the area on and around St George's Hill.





6.11 Character and Building Traditions

Cullompton has a historic character and appearance of its own. Many historic areas in the town point to how more densely developed new areas of townscape might be designed to reflect the character of the market town. There are some good examples of simple terraced housing from which inspiration and cues might be taken. There are some distinctive landmark buildings which point to how buildings with a more public function might be designed and positioned in the town. The prevailing facing materials used are brick and render. The scale, form, use of detail in building and landscape design, and townscape quality to the town could provide reference points for new development.





2 Local shops, cafes and Town Hall



4 The Manor House



1 Looking towards St Andrew's Church



3 Higher Bull Ring

Appendix B

Appendix B

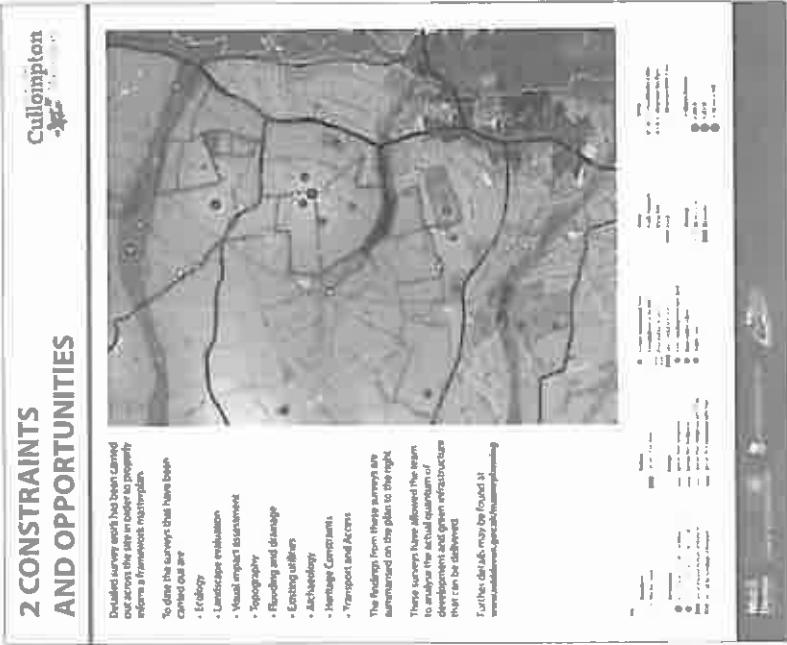
7.0 Consultations

7.1 First Round Public Consultation

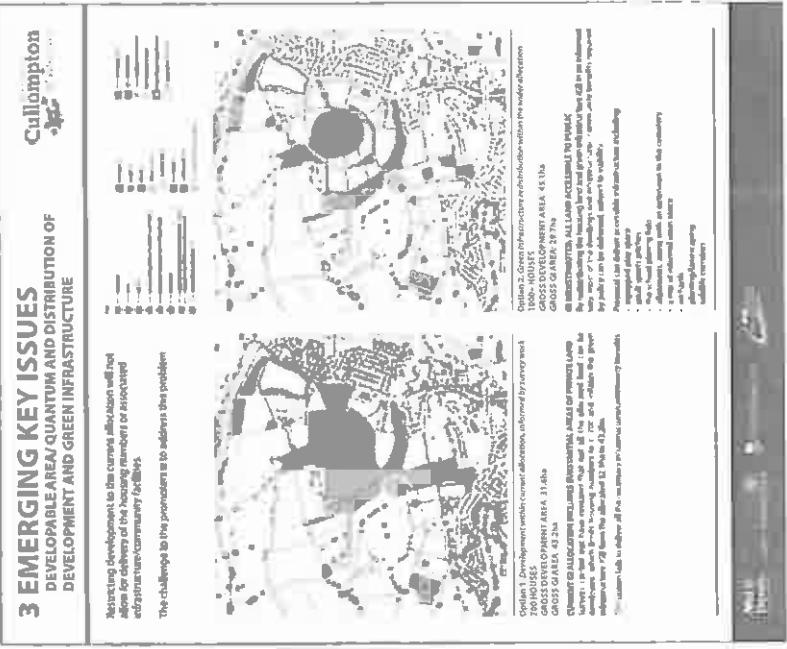
Board No. 1 - Allocation



Board No. 2 - Constraints and Opportunities



Board No. 3 - Emerging Key Issues (developable area)



Board No. 4 - Emerging Key Issues (link road)

Further to the surveys that have been carried out, namely the topographical surveys, road alignments have been designed. Analysis indicates that the position of the road link to Trenton Road should be undertaken extension.

4 EMERGING KEY ISSUES
LINK ROAD

CULLUMPTION
Link Road
4 EMERGING KEY ISSUES
LINK ROAD
THE CULLUMPTION PROJECT IS A PROPOSED 1.5 MILE LONG, TWO LANE ROAD THAT WILL CONNECT THE CULLUMPTION TUNNEL TO THE OLYMPIC HIGHWAY. THE PROJECT IS CURRENTLY IN THE DESIGN PHASE AND IS EXPECTED TO BE COMPLETED IN 2015.

Further to the surveys that have been carried out, namely the topographical surveys, and transport analysis, two options for the road alignment have been developed.

A northern route sees that the portion of the road link to Rayton Road should be located between Olympian Way and the cullumption extension.

Board No. 5 - Emerging Key Issues (Playing Pictures)

5 EMERGING KEY ISSUES PLAYING PITCHES

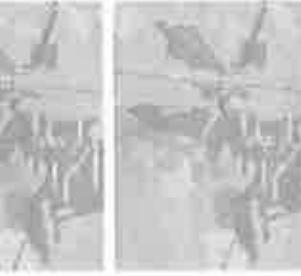
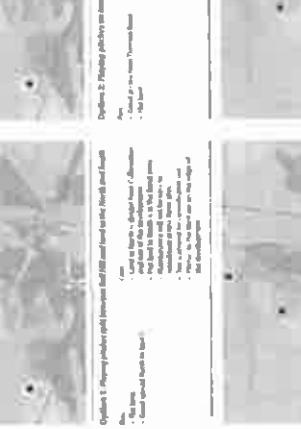
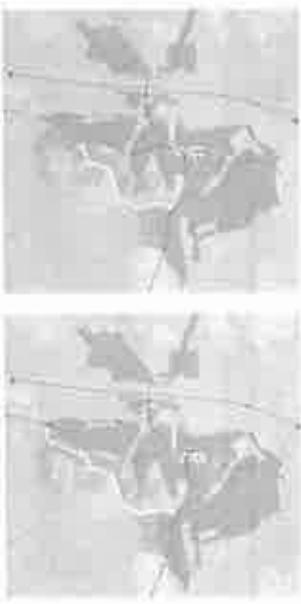
5 EMERGING KEY ISSUES
PLAYING PITCHES

Board No. 6 - Emerging Key Issues [school]

6 EMERGING KEY ISSUES SCHOOL

EMERGING KEY ISSUES
SCHOOL

|  <h1>Cullompton SCHOOL</h1> <h2>EMERGING KEY ISSUES</h2> | <p>Opportunities & Challenges for 2010-11 and beyond</p> <ul style="list-style-type: none"> - New buildings & facilities will open up opportunities. - Our students have many opportunities to succeed - eg. Duke of Edinburgh Award. | <p>Challenges & Issues we must address</p> <ul style="list-style-type: none"> - We are at capacity now and need to increase our intake. - The school needs to be more efficient and effective in its use of resources. - The school needs to be more involved in the local community. |
|---|--|---|
|---|--|---|



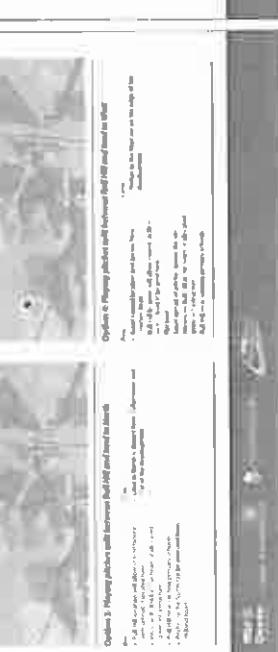
104



| Figure 2: Evaluation of the Population of <i>C. elegans</i> | |
|---|---|
| - | Find the mean weight per animal |
| - | Find the mean weight per female |
| - | Find the mean weight per male |
| - | Find the mean weight per hermaphrodite |
| - | Find the mean weight per hermaphrodite female |
| - | Find the mean weight per hermaphrodite male |
| - | Find the mean weight per hermaphrodite hermaphrodite |
| - | Find the mean weight per hermaphrodite hermaphrodite female |
| - | Find the mean weight per hermaphrodite hermaphrodite male |



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7.1 First Round Public Consultation

Appendix B

Board No. 7 - Emerging Key Issues (employment)

7 EMERGING KEY ISSUES EMPLOYMENT

The Council's Employment Land Scheme recommends a steady rise in the amount of employment at North West Cullompton from 40,250

Further details may be found at
www.cullompton.gov.uk/employment/

8 EMERGING KEY ISSUES GYPSY AND TRAVELLER SITES

5 details need to be provided - the above location is an example:

The gypsy and traveller communities will also be consulted in order to decide which option and layout would be most suitable



9 FRAMEWORK PLAN OPTION 1 Cullompton

OPTION 1

700 HOUSES

Surveys carried out have revealed that not all the allocated land can be developed, which leaves planning numbers to c. 700 and influences the green infrastructure available to the area's infrastructure and community benefits.

The option fails to deliver all the necessary infrastructure benefits.

INTEGRATED PLANNERS BENCHMARK ALLOCATION 2020-04/5

GROSS DEVELOPMENT AREA 7.1 ha



CHARTERED PLANNING CONSULTANT

CONVENTIONAL AREA OF PRIVATE LAND

Option 1: Gypsy and Traveller sites in the West of site

Option 2: Gypsy and Traveller sites in the East of site

Option 3: Gypsy and Traveller sites in the South of site

Option 4: Gypsy and Traveller sites in the North of site

Option 5: Gypsy and Traveller sites in the West of site

Option 6: Gypsy and Traveller sites in the East of site

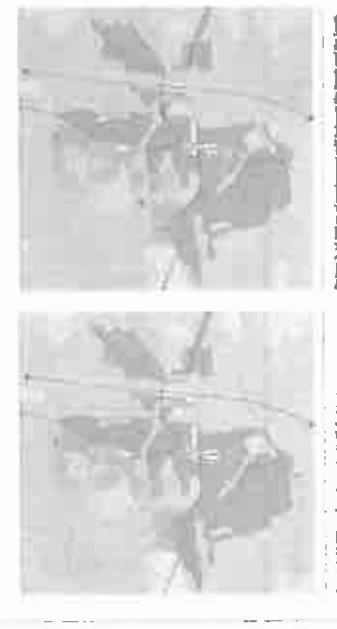
Option 7: Gypsy and Traveller sites in the South of site

Option 8: Gypsy and Traveller sites in the North of site

9 FRAMEWORK PLAN OPTION 1 Cullompton

The Framework Plan Option 1 is a proposal for 700 houses and includes the following:

• Gypsy and Traveller sites in the West of site
• Gypsy and Traveller sites in the East of site
• Gypsy and Traveller sites in the South of site
• Gypsy and Traveller sites in the North of site



CHARTERED PLANNING CONSULTANT

CONVENTIONAL AREA OF PRIVATE LAND

Option 1: Gypsy and Traveller sites in the West of site

Option 2: Gypsy and Traveller sites in the East of site

Option 3: Gypsy and Traveller sites in the South of site

Option 4: Gypsy and Traveller sites in the North of site

Option 5: Gypsy and Traveller sites in the West of site

Option 6: Gypsy and Traveller sites in the East of site

Option 7: Gypsy and Traveller sites in the South of site

Option 8: Gypsy and Traveller sites in the North of site

Board No. 8 - Emerging Key Issues (gypsy and traveller sites)

Board No. 9 - Framework Plan Option 1

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w. www.keeparchitecture.co.uk

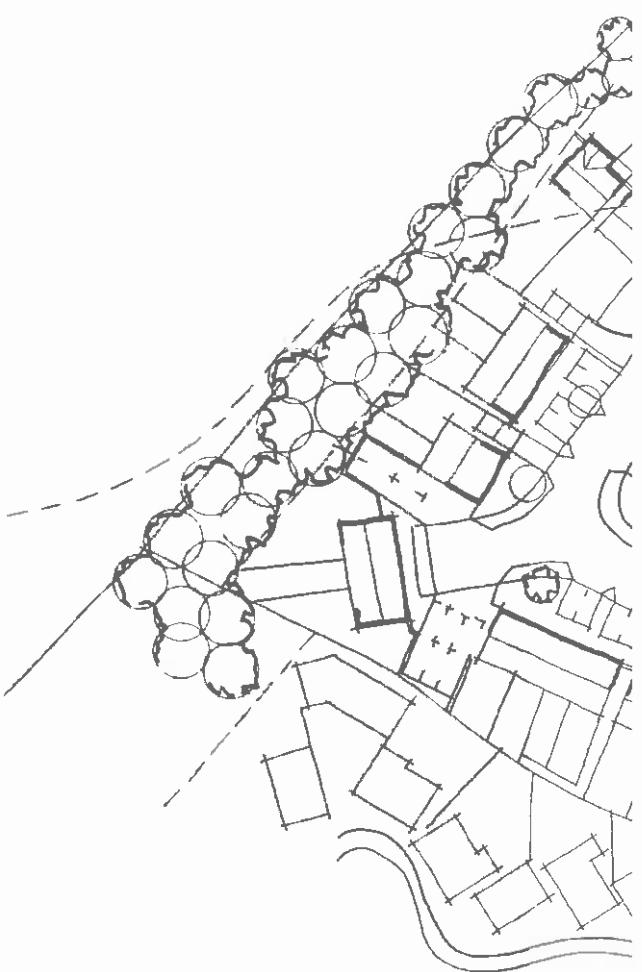
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t. 01392 368 866
w. www.cliftonemerydesign.co.uk

Mid Devon
LAND PROMOTION

PERMISSION



Appendix 6



Appendix 7



PERSIMMON HOMES SOUTH WEST
Mallard Road
Sowton Trading Estate
Exeter
Devon
EX2 7LD

Our Ref: JG/MS

19 October, 2016

Jenny Clifford
Mid Devon District Council
Phoenix House
Tiverton, Devon
EX16 6PP

www.persimmonhomes.com

Dear Mrs Clifford

Re: Cromwells Meadow, Allocation: A/CRE/3

I write in respect of Cromwells Meadow, Crediton. This property currently forms an allocation for 50 dwellings within the adopted Mid Devon Local Plan. Until such time as the new plan is adopted it is therefore the primary Development Plan Document and to be provided greatest planning weight.

The existing allocation provides that no development can take place until such time as the Crediton relief road is completed. This condition has therefore now been satisfied and development may come forward unrestricted.

The Property is a minimum of circa 7.5 gross acres (which can be expanded further) and can provide POS and surface water attenuation within the site outside of the flood zone leaving a net residential area of circa 3.5 acres.

The existing Local Plan went through its stages of consultation, testing and soundness and as you are aware the Inspector considered the allocation to be sound for approximately 50 dwellings in its current adopted form. This is supported by a raft of evidence including sustainability appraisal.

It is therefore concerning to understand that now the relief road condition has been satisfied and therefore the sites delivery can come forward that through the issues and options and submission stages of the new plan review this allocation appears to have dropped in dwelling numbers from the adopted 50 dwellings, to 40 dwellings and more recently 35 dwellings. Further, the affordable housing requirement on site has yo-yoed from 25%, 28% and 35%. These proposed modifications appear to be inconsistent, ad-hoc and unsubstantiated.

Having considered the existing adopted planning policy and having undertaken our own due diligence and testing feasibility layout work on the site I can see no reason that the existing allocation should be watered down in any way. There are no new material considerations that would stagnate development or reduce the number of dwellings on site. Nor has any national guidance been released prescribing density levels. The site is available, developable and deliverable and therefore meets the primary development criteria.

The NPPF is very clear where development land is allocated its use should be optimised. Paragraph 11 of the NPPF states that Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Furthermore the NPPF at Para 15 states "Policies in Local Plans should follow the approach of the presumption in favour of sustainable



development so that it is clear that development which is sustainable can be approved without delay. All plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally ". The lack of justification for departing from a clear policy in the adopted plan is not substantiated.

I can see no evidence within the issues and options or submission draft evidence base that would have resulted in such a change of opinion ↗. The site is very evidently sustainable (this is not disputed by Mid Devon as the allocation is protected). The character of the site has not changed, nor has its planning setting or environmental constraint.

Given the above I would be grateful if you can confirm why this policy amendment has been proposed. The Company objects wholeheartedly to the modifications and will be submitting technical information to demonstrate the sites feasibility within the next stage of consultation which is understood to be in January 2017. Thereon the Company intends to present evidence at the local plan examination to the Inspector to demonstrate that nothing materially has changed since its allocation within the last plan was considered sound. In fact in the time period from the Local Plan's original adoption to present, its delivery has now become more certain with the opening of the link road.

I would be grateful if you can provide me with an overview on this matter and confirm what evidence has led to such a change and confirmation of the next steps of consultation and therefore examination for the new local plan.

Yours sincerely
For Persimmon Homes South West

Matthew Seaman
Head of Land

Appendix 8

Matthew Seaman (Head of Land)
Persimmon Homes South West
Mallard Road
Sowton Trading Estate
Exeter
Devon
EX2 7LD

Planning Services
Phoenix House
Phoenix Lane
Tiverton
Devon
EX16 6PP

Your Ref:

My Ref:



Tel:
Fax:
e-mail:

Date: 18th November 2016

Contact: Mrs Jenny Clifford
Head of Planning and
Regeneration

Dear Mr Seaman

RE: Cromwells Meadow, Allocation: AL/CRE/3

Thank you for your letter dated 19 October 2016 regarding Cromwells Meadow, Allocation, Crediton AL/CRE/3. I apologise for the delay in reply. The Cromwells Meadow policy is proposed to be amended based on the most recent evidence available as part of the Local Plan Review. The evidence base for the Local Plan Review can be found here:

<https://www.middevon.gov.uk/residents/planning-policy/local-plan-review-evidence-base/>

Amendments to the policy were included within the Proposed Submission draft February 2015 to greater reflect the visibility of the site from the historic Shobrooke Park, an area of archaeological potential within the site and latest viability evidence which recommends amendments to affordable housing percentages across the Local Plan Review. These proposed changes were formally consulted on in February 2015.

The consultation process is strictly regulated by Government and only those representations received being 'duly made' during the official consultation period can be taken into account or used as the basis for justifying amendments to the plan as proposed. No representation was received from Persimmon Homes South West regarding this particular site as a result of that period of public consultation. Unfortunately this means that opportunities for amending the plan at this stage are limited and we could not, for example, make a modification based upon the request in your letter.

Further consultation will be undertaken in early 2017 on the Local Plan Review. This follows the decision made at Full Council on 22nd September 2016 to allocate land at

Junction 27 of the M5 for leisure, tourism and retail. The consultation will be focussed on the proposed modifications to the Plan and not elements previously consulted which remain unchanged. At this stage we anticipate this further consultation period as running from 3rd January – 14th February 2017 (subject to formal approval).

It is however agreed that the existing Local Plan still currently commands the greatest planning weight in relation to that emerging. However the new Local Plan Review will gain increasing weight following submission. The opportunity to submit a planning application to meet the criteria of the existing policy still remains.

I hope you find this response helpful. Please note that the Local Plan Review is due to be considered at the meeting of Cabinet on 21st November and papers for that meeting are to be found on our website [here](#)

<https://democracy.middevon.gov.uk/ieListDocuments.aspx?CId=133&MId=751&Ver=4>
It will then be considered at the meeting of Council on 1st December 2016.

Yours sincerely

Jenny Clifford
Head of Planning and Regeneration

Requests for alternative formats will be considered on an individual basis.
Please telephone 01884 255255 or email customerfirst@middevon.gov.uk

Appendix 9

| Sustainability objective | Commentary | Impact | Mitigation | Post Mitigation |
|--------------------------|--|--------|---|-----------------|
| | built, such as Red Hill Cross. These pupils have been included in the projected number on roll for Spring 2017, to reflect anticipated future pupil numbers. Developer contributions will be required in order to fund these improvements. Overall, the infrastructure is already in place, or nearing completion. The delivery of this site may put the primary schools under short-term pressure, but the development could support their longer-term expansion. The overall impact is therefore considered to be neutral. | | facilities; overall a neutral effect is considered. | |

| | |
|---|--|
| Secondary/cumulative/synergistic effects: | At present the extent of the built environment is relatively well contained within the landscape and is not often visually prominent. Allocation of edge of town of sites will help to meet Crediton's housing need but would likely have landscape impacts given the surrounding steep local topography. The development will help meet the housing needs in Crediton including affordable housing. Development could contribute towards traffic in the town with consequential impact on air quality within the town centre. |
| Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years) | Within the short term, construction traffic associated with the development will contribute towards traffic increase within the town. The estimated development time for this site is 4 years. Once developed, development will be permanent. |
| Spatial extent: (District wide / local) | This site option will help provide housing within Crediton including for affordable housing. Development would be focussed in Crediton, the third town in the district. |

Policy CRE3: Cromwells Meadow

A site of 1.3 hectares at Cromwells Meadow is allocated for residential development including provision of 35 dwellings (of which 28% are to be affordable).

| Sustainability objective | Commentary | Impact | Mitigation | Post Mitigation |
|--|--|--------|------------|-----------------|
| A) Protection of the natural environment | The site sits on the border of two landscape character areas, the 'Lowland plains', and 'Sparsely settled valley floors'. This reflects the site's position above but in relatively close proximity to the flood zone around the River Creedy. It is on higher ground than the nearby floodplain, and is partially | 0 | | 0 |

| Sustainability objective | Commentary | Impact | Mitigation | Post Mitigation |
|---|---|--------|---|-----------------|
| | visible when approaching Crediton along the A3072. There will be some visual impact when heading into the settlement, but some housing is already visible from the existing Cromwells Meadow estate, which is on higher ground than the proposed site, and which thereby mitigates against any impact. | 0 | | |
| B) Protection and promotion of a quality built and historic environment | There are no heritage designations in close proximity to this site. A neutral impact is therefore anticipated. | 0 | | 0 |
| C) Mitigating the effects of climate change | The site is located in flood zone 1 with 3% of the site along the eastern boundary being within flood zone 2. The site boundary was amended to make the site smaller taking out the majority of the flood zones 2 and 3. The majority of the site is on rising ground and is unlikely to be at risk of flooding, but surface water run-off from the site could exacerbate periodic flooding of the nearby River Creedy. There are no specific criteria within the policy regarding the inclusion of renewable energy developments. Development on the site may increase surface water run-off, a negative impact. | -2 | A policy requirement in the Local Plan Review seeks mitigation measures through the provision of Sustainable Urban Drainage Schemes to deal with surface water run-off and arrangements for future maintenance. Overall, the inclusion of a Sustainable Urban Drainage (SUD) scheme is considered to mitigate any negative impacts on flood risk or surface water run-off, and therefore a neutral impact has been anticipated. | 0 |
| D) Safeguarding and minimising resource use | Almost all the site (97%) is grade 3 agricultural land, which is the most common grade found throughout the district (approximately 64% of all land within the district is classed as grade 3). The loss of this land, which is not the most productive, is not considered to have a large negative impact. | -1 | | -1 |
| E) Promoting economic | The policy contains no commercial development proposals, however, there is an economic benefit associated with the delivery of sites for housing. | 0 | | 0 |

| Sustainability objective | Commentary | Impact | Mitigation | Post Mitigation |
|--|--|--------|---|-----------------|
| growth and employment | Development of this scale would be a boost to local construction firms and associated trades who would benefit from being able to undertake contract work on the site. However, this is a small scale proposal, and therefore only a neutral impact on this indicator has been scored. | | | |
| F) Supporting retail | The policy contains no retail proposals. Future residents of the site may undertake their shopping within the town centre, providing it with an additional customer base. The town centre is walkable, but is some distance from the site, but buses do pass by the adjoining main road. Whilst there may be some small positive benefit to local retail. | +1 | | +1 |
| G) Meeting housing needs | This site makes a large contribution towards meeting the housing needs of the population of Crediton. The policy contains a requirement for 28% affordable housing. The mix of dwellings to be achieved on site is already specified within a supplementary planning document, and will be tailored to achieve the appropriate balance. The site sits adjacent to existing bus routes ensuring that residents who do not own a car can access services and facilities within the town. | +2 | | +2 |
| H) Ensuring community health and wellbeing | Crediton has a wide variety of services, including doctor surgeries, schools and a non-emergency hospital. The town services are walkable, but some are a distance from the site. Crediton is currently designated as an Air Quality Management Area, due to poor air quality within the town centre. The recent opening of the Crediton link road is expected to alleviate air quality issues. | -1 | The recent opening of the Crediton link road will allow residents living at the new development will not be required to drive through the town centre when accessing Exeter or Tiverton, as other routes will be available, thereby minimising any potential negative impact on local air quality. Overall, the impact is considered to be neutral. | 0 |
| I) Delivering the necessary infrastructure | The opening of the Crediton Link Road represents a significant upgrade to the local road network. It directs traffic away from the town centre and the canyon-like Exeter Road. The Mid Devon Community Infrastructure Evidence Report indicates that there is a pressing need for primary education expansion in the town of Crediton itself, with the two primary | 0 | Policy S8 also provides mitigation by setting out that developers will be expected to contribute to, or bear the full cost of, new or improved infrastructure and | 0 |

| Sustainability objective | Commentary | Impact | Mitigation | Post Mitigation |
|--------------------------|---|--------|---|-----------------|
| | <p>schools there, being Hayward's and Lanscore both admitting more than their planned admission number. In order to support the demographic and housing growth both local schools need to expand to 420 places thus creating an additional 240 places across the towns which will need to be supported by developer contributions/CIL. It should be noted that both schools are on constrained sites which are expensive to expand and may require additional land and buildings to expand across all year groups. The Queen Elizabeth's Academy School is currently forecast to have approximately 297 places available in the medium term. There should be sufficient pupil capacity at Queen Elizabeth's to accommodate the development allocated within its catchment area. Overall, the infrastructure is already in place, or nearing completion. The delivery of this site may put the primary schools under short-term pressure, but the development could support their longer-term expansion. The overall impact is therefore considered to be neutral.</p> | | <p>facilities; overall a neutral effect is considered.</p> | |
| | <p>Secondary/cumulative/synergistic effects:</p> <p>At present the extent of the built environment is relatively well contained within the landscape and is not often visually prominent. Allocation of edge of town of sites will help to meet Crediton's housing need but would likely have landscape impacts given the surrounding steep local topography. The development will help meet the housing needs in Crediton including affordable housing. Development could contribute towards traffic in the town with consequential impact on air quality within the town centre.</p> | | | |
| | <p>Temporary/permanent effects: Timescale: Short (1-5 years), Medium (6-15 years) Long (15+ years)</p> <p>Spatial extent: (District wide / local)</p> | | <p>Within the short term, construction traffic associated with the development will contribute towards traffic increase within the town. The estimated development time for this site is 2 Years. Once developed, development will be permanent.</p> <p>This site option will help provide housing within Crediton including for affordable housing. Development would be focussed in Crediton, the third town in the district.</p> | |