

6782/CUI-CUG/mod

6782/OCU2

6782/CUMAP/mod



**From:** Local Plan Review  
**Subject:** FW: Local Plan consultation reps  
**Attachments:** PMAM Mid Devon Local Plan 2013 - 2033 Proposed Modifications.pdf; 1341.F.001 Location Plan (1).pdf; 1341.F.002 Proposed Allocation Plan.pdf

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**From:** Adrian Welsh  
**Sent:** 15 February 2017 09:59  
**To:** Local Plan Review  
**Subject:** FW: Local Plan consultation reps

Please log this representation which was received in time.

**From:** James Turner [Redacted]  
**Sent:** 14 February 2017 15:36  
**To:** Adrian Welsh  
**Subject:** Local Plan consultation reps

Hi Adrian,

I trust you are well.

Please find attached Local plan reps for NW Cullompton.

**Kind regards**  
**James Turner**  
**Land Director**

**Mob:** [Redacted]  
**Tel:** [Redacted]

Office - 16 Riverside, Omega Park, Alton, Hampshire GU34 2UF



Forward Planning,  
 Mid Devon District Council,  
 Phoenix House,  
 Phoenix Lane,  
 Tiverton EX16 6PP  
 Dear Sir/Madam,

Mid Devon Local Plan 2013 - 2033 Proposed changes

The representations below set out the response of PM Asset Management to the Proposed Modifications to the Mid Devon Local Plan Review.

PROPOSED MODIFICATION(S)	
73	POLICY CU1 NORTH WEST CULLOMPTON
180	POLICIES MAP, CULLOMPTON

**OBJECTION**

Whilst the expansion of the North West Cullompton allocation is supported, objection is raised to the extension of land to the west through reinstatement of land adjacent to, and north of, Tiverton Road that was previously removed from the designation. Objections are also maintained to inclusion of the elevated land in the vicinity of Rull Hill / St George's View that was is allocated for Green Infrastructure in the adopted Local Plan. For reasons raised in previous representations, the focus should be on a more compact and integrated allocation focused on additional land at Growen Farm, in preference to land more distant from the town centre of Cullompton and the proposed new local centre and associated community facilities, and more elevated land previously considered unsuitable for development and allocated as green infrastructure in the adopted Local Plan.



The arrangement and distribution currently shown on the Local Plan Proposals Map is sub-optimal in terms of land that is identified for development and that which is set aside for green infrastructure. It is not a sustainable distribution in land-use terms, and departs, without justification, from clear environmental protection principles established through the adopted policy in respect of which there has not been a material change in circumstances. As currently shown, the Plan is unsound since the provisions of a key policy are neither 'justified', nor are they likely to be 'effective', as required in accordance with the provisions of the NPPF (para. 182).

Therefore, whilst strongly supporting the proposals for an urban extension to the north-west of Cullompton as set out in Policies CU1-CU6, objection is raised to their current configuration on the accompanying Proposals Map. The representor's particular concerns relating to the provisions of the Plan in its current form are set out below.

### **Objections to Current Site Configuration**

The evidence from the Masterplanning exercise undertaken pursuant to the adopted Local Plan policy indicated that the allocation as currently configured in emerging Policy CU1 and associated Proposals Map is not sustainable. It is unsustainable to the extent that it fails to afford priority to development of land that is of gentle topography with minimal visual impact over that which is more sensitive owing to its slope and prominence. Between 4-5 hectares is considered to be unsuitable for development, in addition to which, the apportionment between development land and that identified for green infrastructure is neither justified nor supported by the emerging evidence base.

GE's land (hereinafter referred to as the 'Growen land'), is identified (yellow shading) on the plan at Annex 2, and exemplifies the deficiencies in the current site configuration. Whilst part of the Growen land is allocated for development, more than half of it is identified for green infrastructure, with a small portion outside the allocation altogether. The use of the majority of the Growen land for green infrastructure would be inappropriate given that it is one of the most sustainable parts of the urban extension area for reasons that are summarised below.



### *Visual / Recreational Amenities*

The Growen land is comparatively level and low-lying. Its visual impact is therefore minimal compared with other parts of the urban extension area.

A more appropriate development strategy would be to retain the significant area of green infrastructure in a location that is central within the development area and therefore maximises accessibility to it for both the existing and future populations, and locates development on the less sloping sites, notably the Growen land to the west of the existing proposed green infrastructure. Since development on the Growen land would wrap around the south-western side of the area of green infrastructure as proposed in the adopted Plan, it would be very accessible to the future community, and would retain a green core to the urban extension area whilst providing access to the countryside beyond. It would more accessible to the existing community, and provide a more extensive, coherent and utilisable area of open space for both formal and informal recreational uses. It would therefore enhance the community benefits of the green infrastructure that would be delivered as part of the overall development, and the visual amenities would be enhanced by both avoiding development on rising land, and the outlook from the open space that would be afforded from its slopes.

The revised arrangement suggested by GE would therefore incorporate 'garden city' principles by putting green infrastructure at the heart of the new community. It would derive strong support from the NPPF that espouses town expansion following Garden City principles (para. 52), the emphasis on which has been accentuated through subsequent Ministerial Statements and Government initiatives.

### *Locational Sustainability*

As is outlined in representations to Policy CU4 below, a local centre to serve the Masterplan area is proposed on land immediately adjacent to, and to the south-east of, the Growen land in a location that is strategically positioned within the masterplan area to serve both the mixed use allocation at North-West Cullompton and the residential allocations to the south west at Knowle Lane (Policy CU13) and Ware Park/Footlands (Policy CU14). If the local centre is so located as suggested in previous plans and by the promoters, and as illustrated on the Plan at Annex 2, then nearly all of the Growen land will be within 400 metres of it. As is clear from the Plan, this will not be the case for other land within the urban extension area, not least the land north of Tiverton Road that it is proposed to reinstate through the Proposed



Modifications. The Growen land is therefore one of the most accessible sites within the masterplan area to the proposed local centre and has the propensity to maximise trips by non-car modes. As currently proposed, the green infrastructure provisions of the emerging Local Plan would preclude both the local centre in the optimal, and indeed most viable, location for it to serve the existing and future communities on the west side of Cullompton, and the location of development in the most proximal positions in relation to it.

In addition to proximity to the proposed local centre, Cullompton town centre is to the south-east of the proposed North-West Urban Extension. Development in the southern part of the allocation area is more accessible to the town centre than development to the north, which is remote from it. Therefore, in order to reduce travel demands and avoid exacerbating existing town centre congestion, development on suitable land in the south of the urban extension area should be maximised since it has the greatest potential to promote sustainable modes of travel. Development on the Growen land would be far more accessible to the town centre than development on allocated land in the north of the urban extension area, or spreading further west along Tiverton Road.

### Summary of Benefits of Allocating the Growen Land

In summary, the entirety of the Growen land should be allocated for development, the provisions for green infrastructure reinstated on the more elevated land in the vicinity of Rull Hill / St George's View, and further extension to the west on the north side of Tiverton Road deleted, for the following principal reasons:

- There is a need allocate more land for housing in view of the constraints affecting some parts of the allocation as identified on the Local Plan Proposals Map. The housing requirement in the Local Plan is a minimum requirement, and the NPPF requirement to 'boost significantly' housing land supply necessitates a flexible land supply with contingencies incorporated in land allocations.
- Development on the Growen land would have a low visual impact.

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- The Growen site is level and well-drained. There are therefore no physical constraints on its development, the site is deliverable, and the landowner is willing to release it for the purposes of development.
- Development of the Growen land would ensure a coherent and compact development area, that would support and consolidate the proposed location of the local centre at the heart of the Masterplan area and integral to the residential communities that it is intended to serve.
- The Growen land has good accessibility to Cullompton town centre, and is therefore better placed to minimise travel demands and town centre congestion than land in the north of the urban extension area, or further west along Tiverton Road, which is remote from the town centre.
- Allocation of the Growen land in lieu of the development proposed on part of the green infrastructure provisions identified on the adopted Proposals Map in a central location within the urban extension area, would result in greater community benefits from the use of a greater concentration of higher amenity land for open space purposes. It would create a more compact development area and have better accessibility to the proposed local centre and Cullompton town centre than reinstating the linear extension of the development area to the west along Tiverton Road, which would not integrate well either the existing or future urban area. It would also provide an urban extension embodying Garden City principles, as encouraged by the NPPF.

For the foregoing reasons it is concluded that the Submission Plan is unsound in that:

- It is not **positively prepared** since it is not based on a strategy which seeks to 'meet' objectively assessed needs in a way which is consistent with achieving sustainable development;
- It is not sufficiently **justified** in that it cannot be demonstrated that the land allocation strategy is the most appropriate, when considered against reasonable alternatives, based on proportionate evidence; and
- It is not **effective** in that there are uncertainties pertaining to the delivery in their current form of the proposed provisions for the Cullompton North West Urban Extension over the plan period.

As such the Plan is unsound.



## REQUIRED CHANGES

The following changes should be made to the Plan:

- Modification of the Proposals Map to include land east of Growen Farm in the North West Cullompton Allocation, and to designate it for residential development, as illustrated on the Plan (yellow shading) at Annex 2 to these representations.
- Consequential amendments as necessary to remove the westward extension of the allocation north of Tiverton Road.

PROPOSED MODIFICATION(S)	
78 & 79	POLICY CU4 NORTH WEST CULLOMPTON
180	POLICIES MAP, CULLOMPTON

**OBJECTION**

The Proposed Modifications to Policy CU4 fail to provide for a local centre and associated facilities, including a new swimming pool, and suitable land is not identified and safeguarded for such facilities on the Policies Map.

The SPD identifies the need for a local centre and identifies a site for it. However, as with the overall allocation, the provisions that it makes are not sustainable and unlikely to be viable, and therefore deliverable, in their current form. The Masterplan provisions show a site that has a frontage onto the proposed link road through the development connecting Willand Road with Tiverton Road. However, the opposite side of road is shown as part of the green infrastructure provisions giving a considerable stretch of undeveloped frontage. This is not conducive with achieving viability for two reasons:

- The cost of road infrastructure fronted by development on only one side is considerably higher than where development abuts it on either side. The length of road which does not have development fronting onto both sides should therefore be minimised.
- A local centre fronting open space is not conducive with maximising footfall and delivering a facility that will provide a hub to the community.

The representors have prepared alternative proposals that are informed by commercial viability imperatives. They show a local centre better integrated with surrounding development, with development either side of the proposed link road (see Annex 3). The Plan further illustrates how allocation of the Grown land to the north and west is much better placed to deliver a compact and coherent development area, that will put a commercial community hub, incorporating local centre, swimming pool and



employment, at the heart of the new community and assist with supporting its viability. Moreover, the Grown land is fundamental to the delivery of the Swimming Pool that has strong community support in the emerging Neighbourhood Plan.



#### REQUIRED CHANGES

- Amend Policy CU4 to include reference to a local centre and other community facilities.
- Amend the Policies Map to safeguard land for a local centre in the position shown on the plan at Annex 3, with additional residential development on the Grown land to the north and west to assist with achieving viability and a new community that integrates well with the facilities by which it will be served and which it will support.

Kind Regards

James Turner

**NOTES**

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**Key**

- Proposed Local Centre Allocation
- Proposed Employment Allocation
- Proposed Allocation for Swimming Pool
- Proposed Residential Allocation
- Proposed Residential Allocation (currently allocated for local centre and employment)
- Proposed Road
- Proposed Access to Site
- Flood Zone
- Existing Trees and Hedgerows

First issue	NS	01/17	01/17
Notes	DR	CH	Dale



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Project	1341 Growen Farm
Drawing	Location Plan
Drawing number	1341.F.001
Scale	1:5000 @ A3
Revision number	



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Rev	Issue	MS	CRG	Date	Rev
1	DR	DR	DR	DR	DR



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Project	1341 Grown Farm
Drawing	Proposed Allocation Plan
Drawing number	1341.F.002
Scale	1:1250 @ A3
Revision number	

