

6122

From: Keegan Ferreday
Sent: 29 September 2015 16:07
To: DPD
Subject: Northwest Cullompton Urban Extension – Masterplan Response
Attachments: 150901_DCC response NW Cullompton_KF.docx

Dear Sirs

Devon County Council thanks you for the opportunity to comment on your Masterplan

Please find attached our consultation response

Kind Regards

Keegan Ferreday
Graduate Trainee Planner
Planning, Transport and Environment

Room AB2, Lucombe House, County Hall, Topsham Road, Exeter, EX2 4QD



Disclaimer: <http://www.devon.gov.uk/email.shtml>

NW Cullompton Masterplanning Consultation
Forward Planning
Mid Devon District Council
Phoenix House
Phoenix Lane
Tiverton
EX16 6PP

Lucombe House
County Hall
Topsham Road
Exeter
Devon
EX2 4QD

Sent by email to

Email:

29th September 2015



Dear Sir / Madam

Northwest Cullompton Urban Extension – Master planning

I am writing with comments on the emerging masterplan for the northwest Cullompton urban extension. Firstly, I would like to thank you for this consultation opportunity. The northwest area of Cullompton is allocated for major development and the county council wish to liaise closely with Mid Devon District Council, Cullompton Town Council and the developers of the site to ensure that a high quality, safe and attractive development is delivered in this area.

The following comments are broken into separate sections, relating to different services which the county council has responsibilities for. These include:

- Education
- Transport
- Minerals and Waste
- Historic Environment
- Gypsy/Traveller
- Youth Services
- Extra Care Housing

These are discussed under the headings below.

Education

North West Cullompton is an allocation of 1100 dwellings. Using the approach set out in Devon County Council's education s106 policy¹, this would generate 275 primary school pupils. The Masterplan identifies a 2.1ha site for a primary school and makes reference to the provision of funding for a 210 place primary school, but development of the scale envisaged in the masterplan area will need to fund primary school places for 275 pupils.. The site has been identified as 2.1ha to enable it to accommodate a 420 place primary. This will allow it to accommodate pupils generated by development elsewhere in Cullompton. It is anticipated that other developments coming forward in the town and surrounding area will therefore need to fund the additional land and pupil places over and above the projected 275 places necessary to mitigate the impact of development in the urban extension. In addition, early year's provision will be required to meet the statutory needs for 2, 3 and 4 year olds, equivalent to 26 full time places. Approximately 1.5% of the children generated by the development will require a specialist placement for which some marginal additional funding will need to be secured.

It is noted that the location for the school site is at the top of Rull Hill. This is in the centre of the site, which provides a focus for the development. There is currently pressure for school places in Cullompton, which means that the new school will be needed early on in the development, and it will therefore be important that the new site can be accessed at an early stage of development Sections 5.1 onwards identify updated trigger points for the primary school land. 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. This would be followed by a construction access with necessary access rights within 3 months of commencing the development and allow for the site to be fully serviced prior to occupation. In addition, the county council would require access to the site in advance of land transfer to undertake relevant surveys. The phasing section of the masterplan should be updated to reflect these requirements. It may be helpful to include a pre-commencement / pre-occupation phase within the table on page 71.

The land for the whole allocation is within a number of different ownerships. It will be important that regardless of which parcel of land comes forward first, the early delivery of the school is secured. The triggers for the acquisition and servicing of the school site will therefore apply regardless of the phasing of the development.

Transport

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 very concerning and not apparently supported by evidence. The delivery of the full link road must be linked to the evidence produced in the Transport Assessment accompanying the applications. The 500 occupations trigger can only be acceptable if the LPA are satisfied with the financial justifications, and that Transport assessments indicate that traffic levels will not cause undue capacity / amenity / environmental concerns.

The masterplan sets out, rightly, that traffic management measures will need to be provided on Willand Road, south of where the new through route connects to it. These

¹ The County Council's education s106 infrastructure approach documents can be found here: <https://new.devon.gov.uk/planning/planning-policies/pupil-place-planning>

traffic management measures should be undertaken for a wider area to encourage use of the new through route rather than using Tiverton Road or Willand Road. This should also be reflected in the phasing section of the document, specifically the table on page 71. Within this table, the phasing for this traffic management scheme should be in phase 1 to complement the opening of the through route.

In addition to traffic management, there is a need for this development to contribute towards the provision of segregated footway / cycle ways on Millennium Way.

The masterplan should also set out in the sections on movement and open space and green infrastructure (pages 35 and 36 respectively) that the existing public rights of way should be improved where possible. If diversion of a public right of way is required then this should only be done along a suitable alternative.

The masterplan sets out that St George's view will form a temporary access. However the principal of this has not been agreed by Devon County Council.

Prior to the use of this road a full capacity assessment of the junction should be carried out to assess its ability to accommodate both construction and operational traffic. In addition, a review of the alternatives which have been considered should be undertaken.

The developers should also note that the section of verge in front of the bank and hedge at the point of entry is not in highway control. Land ownership should be established to ensure the route can be constructed. A site visit showed a resident claiming the land to the west of the centre line and currently gardened as being in their ownership.

Also, before the development can commence, there are a number of traffic / transport related evidence bases which must be prepared. These should be included in a 'pre-commencement' phase, potentially on an amended table on page 71. These evidence bases include:

- Construction Environmental Management Plan, including routing of vehicles, times of operation (e.g. no construction traffic during peak period of both vehicle and pedestrian movements, no deliveries between 8.00am and 9.30 am and 15.15 and 17.00), road surveys before, during and after to determine damage including CCTV of drainage systems, wheel washing, road sweeping including frequencies, dust suppression etc.
- Consideration of the appropriateness of introducing a TRO to restrict parking on Willand road to ensure suitable visibility is afforded to vehicles at the bends.
- A staff travel plan for construction workers e.g. mini buses
- Provision of suitable off road parking for residents should abnormal loads and larger deliveries require it. Such deliveries should be arranged and residents notified ahead of time.
- Site compound and staff/ contractor parking locations. These should be sufficient for the site and not result in parking on the residential roads.

The impact on the amenity of residents and the environment is a matter for Mid Devon District Council to consider and the above evidence bases will be helpful in coming to an informed decision.

In addition to the direct provision infrastructure, the development of this area is required to provide contributions towards new highway schemes to provide relief to the town centre

and /or the M5 junction 28. The level of these contributions will be negotiated at planning application stage, but the need to make these contributions should be set out in the masterplan.

Page 51 of the masterplan includes an illustrative layout, which shows an access onto Rull Lane. If this was to be provided, Devon County Council would seek the widening of lane and possible drainage improvements. These should also be considered in the trigger table on page 71.

Minerals and Waste

The masterplan should also recognise the minerals / waste local plans which are prepared by Devon County Council and which include policies that apply to the development. To reflect this, it is suggested that Section 1.2 on page 8 is amended to include reference to these plans. Specifically, the following text should be added: "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 SPD has been published by the County Council providing additional guidance on preparation of these statements".

In Section 5.7 on Page 75 the text referring to the Waste Audit Statement should also clarify that this statement should cover waste arising from the construction stage and following occupation of the new properties within the masterplan area.

The development in this area should also contribute towards the improvement / expansion of capacity for recycling in the Mid Devon area. Contributions will be calculated on a fair basis but the masterplan should reference the need for them. This would support the latest version of the Mid Devon infrastructure plan which includes the need to provide a new recycling centre to serve the Cullompton, Tiverton, Willand area.

Historic Environment

The masterplan area occupies a large area in a landscape that contains a Roman fort and evidence of widespread prehistoric and Romano British activity. While it is true that at this stage there are no known constraints from non-designated heritage assets - in the proposed areas for development - it would be worth emphasising that should significant heritage assets be identified by archaeological investigations (geophysical survey and field evaluation) these could represent constraints to development of parts of the site, and may have an impact upon the layout of any development here. As such, the early implementation of a programme archaeological investigation would allow any potential constraints to be identified and allowed for within any future planning applications.

The masterplan should make a clearer reference to Policy AL/CU/3 (g) of the Mid Devon Allocations and Infrastructure Development Plan Document which states that the allocation area will be subject to "*Detailed archaeological investigation and measures to record, and where necessary, protect the archaeological interest of the site through appropriate design, layout and mitigation.*" This should be reflected in the section 5.3 (phasing).

In addition, it is important that the design of the open space and green infrastructure within the developed area takes account of the history of the area. Sections 3.3 (c) and 4.5 of the masterplan should be stronger on the need for green infrastructure and open spaces

to include information about the history of the area, which could include, for example, information boards about the archaeological heritage of the area including St Andrews Hill fort and the finds of the archaeological investigations.

Since the Roman fort on St Andrews Hill is a designated heritage asset Historic England (formerly English Heritage) must be consulted with regard to any comments they will have on the impact upon the setting of this, and other, designated heritage assets in the surrounding landscape

Gypsy / Traveller

The County Council supports the provision of gypsy and traveller pitches within the masterplan area.

Youth Services

Page 37 of the masterplan refers to the community building including a dedicated youth support satellite unit, which was included in the Mid Devon Allocations and Infrastructure Development Plan Document (January 2011). However, due to recent changes in the way that Devon County Council provides youth facilities, there is no longer a need for this specific facility. This said, it is possible that youth service sessions may be run from the community centre and the delivery of this is supported.

Extra Care Housing

Devon County Council has identified the need for a 50+ extra care housing scheme within Cullompton and this is also included in the latest Mid Devon infrastructure delivery plan (Feb 2015). Ideally, this would be within the residential mix of affordable, shared equity and outright sale units within the masterplan area. This provision should be located on the residential land adjacent to the local centre - to ease shop access for frail and elderly residents. This would also help to meet the demands of housing for the elderly addressed as a priority by stakeholders in the first round of consultation. The masterplan should be updated to reflect this.

I trust the above comments will be of use in developing the masterplan for this area.

Yours sincerely

Joe Keech
Chief Planner

