



DEVELOPMENT

- D1: Higher and medium density housing to the core of the development*
- D2: Strong frontage to the central open space*
- D3: Gas pipeline accommodated within a shared surface street linking the central open space and pedestrian entrance from Tiverton Road*
- D4: Low density development towards the boundary with open countryside*
- D5: Adjoining land which forms the remainder of the allocation*

ACCESS

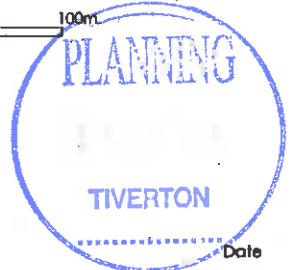
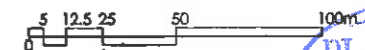
- A1: Vehicular access from Kingfisher Reach to the northern part of the site*
- A2: Vehicular access from Kingfisher Reach to the southern part of the site*
- A3: Pedestrian/cycle access from Ponsford Lane/Tiverton Road*
- A4: Pedestrian/cycle access from Ponsford Lane*
- A5: Pedestrian/cycle access from Knowle Lane*
- A6: Primary vehicular loop with glimpse to St Andrew's Church tower to the east*

LANDSCAPE

- L1: Overlooked central green corridor (including Crow Stream) to provide for informal recreation and accommodate the floodplain*
- L2: Wildlife area incorporating retained oak tree and hedgerow and providing an entrance space from Knowle Lane pedestrian/cycle access*
- L3: Provision of a Sustainable Drainage System to deal with all surface water*
- L4: Entrance space from Tiverton Road accommodating gas pipeline and providing a sensitive response to Norlands*
- L5: Local Equipped Area of Play*



NORTH



Amendments

D	MD	Aerial photo added / title revised	02.01.12
C	MD	Southern wildlife space added	11.12.12

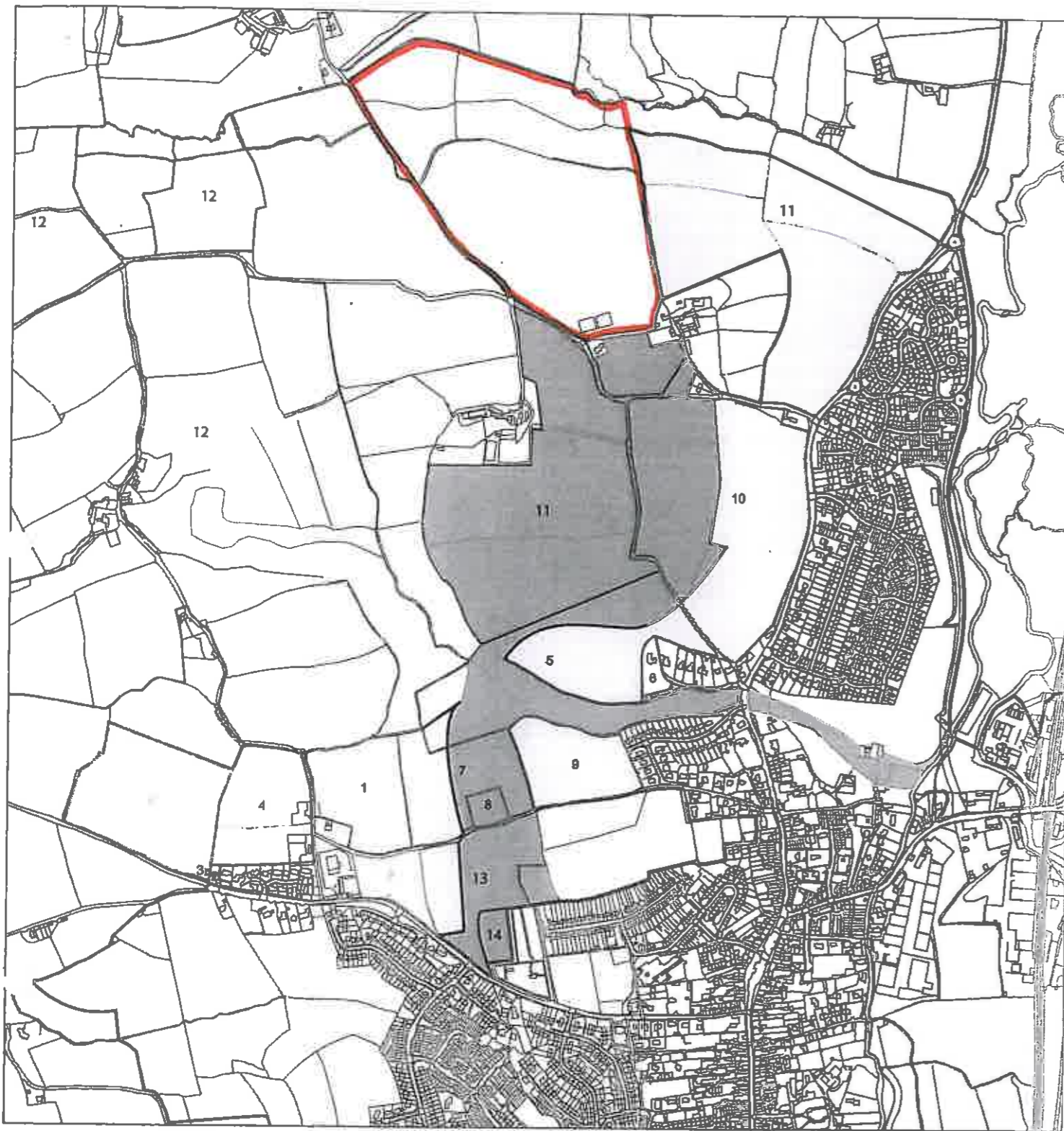
Job No/Drawing No Job Title
13080/3011/D **CU/8 Cullompton**

Scale Date Drawn Drawing Title
1:2500 09/12 MD Illustrative Masterplan

All Dimensions to be checked on site

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Title Number	Owners of the land outlined in red	Address	Title Number	Owners of the land outlined in red	Address
1	DN315222 Patricia Evans Andrew Coleman Nigel Coleman	37, Saxon Road, Exeter Mill House, Clyst Hydon, Cullompton Rull Cottage, Ashill	7	DN238917 Patricia Evans Andrew Coleman Nigel Coleman	37 Saxon Road, Exeter Mill House, Cyst Hydon, Cullompton Rull Cottage, Ashill
2	DN318590 Kathryn Handford	2 Trumps Orchard, Cullompton	8	DN543553 Peter Caines	Saddleback Cottage, Axminster
3	DN433620 Wales and West Utilities Ltd	Newport	9	DN547384 Robert Grant Martin McGregor Ross	La Beaumerie, France 2 Belmont Terrace, South Brent
4	DN438056 Jonathan Clement Hill	Weaver Mill Farm, Kentisbeare	10	DN510937 Margaret Hill Avenil Hill	Riverdate, Topsham 8 Higher Street, Cullompton
5	DN417555 Thomas Muir Bayne Colin Bayne Susan Newman	3 Cranley Gardens, London 27 Cairngorm Road, Glasgow 74 Douglas Avenue, Exmouth	11	DN223921 Derrida Emmett	Pond Farm, Halberton
6	DN600245 Nicholas Miles Diane Miles	Redlands, Cullompton	12	DN532431 Susan and Herbert Persey	Fordmore, Plymtree
			13	SHLAA Info Mr Hill, Mr Grocock, Mr Brockthurst	
			14	Town Council	

Areas A and B outlined in blue do not have a Title Number or Map supplied.

Our Ref AG/PCL/9393
Date 21st March 2014



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



Dear Sir/Madam,

LOCAL PLAN REVIEW – OPTIONS CONSULTATION

We write on behalf of our client, Codex Land PCC Limited, who have land interests in Mid Devon district, Cullompton in particular. We enclose representations on our client's behalf in response to Mid Devon District Council's *Local Plan Review – Options Consultation* (January 2014).

Amount and Distribution of Development – Policy S3

Policy S3 proposes the provision of 8,400 dwellings and 154,000 square metres of commercial floor space between 1st April 2013 and 31st March 2033. These figures do not appear to be based on actual evidence. A *Strategic Market Housing Assessment* is currently being prepared and it would have made sense to wait for the findings of this exercise before commencing consultation on the current review. Given this we have little to say on the quantum proposed, although we do reserve the right to comment in detail at a later stage of the plan preparation process, once evidence of actual need is clear.

Policy S3 identifies two possible options for delivering the quantum of development suggested:

- Option 1 – Town Focus (i.e. Cullompton, Tiverton and Crediton)
- Option 2 – A New Community

Mid Devon is largely rural in character, and because of this, we believe that development should be focussed at the main towns within the district. Therefore, we strongly support Option 1. The main towns provide the greatest level of services and facilities and the greatest opportunity for both existing employment provision and attracting new businesses. This urban concentration strategy ensures that distances between houses, services and jobs are shorter, which reduces reliance on the car and allows those without a car access to services and employment.

Option 1 strongly accords with the Core Planning Principles set out in the National Planning Policy Framework (referred to as 'The Framework' from here on). Specifically, the importance of focussing housing development in locations accessible to the main centres with economic growth potential. This both reduces overall travel needs and maximises the scope for the fullest use of public transport, walking and cycling. The larger settlements in the district offer the greatest potential to achieve this, due to their greater size and the economies of scale that this offers in terms of offering employment and services in the same settlements. At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through the plan making process. It therefore follows that the strategic option with the best sustainability credentials must surely be the preferred option.

Whilst Option 2 (New Community) may seem attractive to some, largely as it would divert development away from other towns, it is not a realistic option as in order to be self sustaining a new community would need to comprise at least 5,000 houses, a far greater number than that currently proposed. A new community would require a massive upfront investment in new infrastructure, facilities and core services and this would impact on the future investment in existing towns and villages. This would have a negative effect as the benefits of growth would not be realised within the existing settlements. Such massive infrastructure investment would require Government support, something which is unlikely in the current climate.

No doubt other new communities in the south west, such as Sherford and Cranbrook, have triggered the identification of such an option for Mid Devon. However, Sherford and Cranbrook are both closely related to the strategic economic scale and growth potential of Plymouth and Exeter respectively, building on that economic base. This is deliberate and ensures that the need to travel is minimised and public transport is an attractive choice between the new settlement and its companion City. The situation is very different in a rural area like Mid Devon. It is also important to consider the experience in terms of delivery of Cranbrook and Sherford. These new communities have had significant lead in times, taking in excess of 15 years from first being considered to planning permission being granted, let alone construction. With a plan period looking ahead to 2033, the main focus for development must therefore continue to be in the three main towns of Cullompton, Tiverton and Crediton (S3 Option1).

The economic growth potential provided for in the current plan at Tiverton, Cullompton and Crediton would undoubtedly be prejudiced by the need to promote a new community, another negative impact of Option 2. In sequential terms a new community is the least sustainable option, a matter that will be explored in more detail in the following section of these representations.

Sustainability Credentials - Policy S3 Option 1 vs. Option 2

The Local Plan Review is accompanied by an *Interim Sustainability Appraisal (SA)*. The SA sets out a framework of indicators used to understand sustainability effects of the policies and allocations contained within the plan. The SA includes the following framework:

- The protection of the natural environment
- The protection and promotion of the built environment
- Mitigating climate change
- Resource use
- Economic growth
- Supporting retail

- Meeting housing needs
- Health and wellbeing
- The infrastructure provision

A score ranging from +3 to -3 identifies the scale of impact in sustainability terms. With +3 being the most significant contribution and -3 the most negative. This scoring system allows the sustainability credentials of different policies to be compared. The following scores are a particular relevance to the overarching strategy of Policy S3:

- Option 1 Town Focus – this scores +14 when compared against the SA indicators
- Option 2 New community – this scores +9 when assessed against the SA framework indicators

It can therefore be deduced that the Option 1 town focus has the greatest positive sustainability benefits and therefore it must be the most sustainable strategic approach. Whilst a new community may well be required at some stage in the future, we believe it would be premature to allocate such a site at this time. Other more sustainable options should be utilised before resorting to a new community. If a new community is needed it will be after the current plan period i.e. post 2033, as current needs can be met through other available sites which represent a more sustainable solution. Any new community post 2033 would need to form part of a wider development strategy for the sub region and, if progressed, address the wider development needs of that area having regard to the ongoing development planned elsewhere.

Cullompton

As set out in the Local Plan Review Tiverton is constrained by its surrounding geography, and Crediton is not only constrained by geography, but also by its poor location relative to the M5 motorway and lack of attractiveness for inward investment. Although there are suitable sites within these towns, such as the

Tiverton Urban Extension and Hartnoll Farm (TIV1 & TIV2), and Wellparks in Crediton (CRE1), one thing is clear – given these constraints Cullompton will have to accommodate a very significant proportion of the district's future growth.

Cullompton North West Urban Extension – Policy CU1

We strongly support the retention of the Cullompton North West Urban Extension (CU1), as it represents a sustainable and effective means of delivering the long term housing needs of the town.

Our clients are part of a consortium that is currently in the process of preparing a masterplan for the North West extension. The consortium is, in effect, working in partnership with Mid Devon District Council, the Town Council, and key stakeholders with the intention of having an adopted masterplan in place by the end of 2014. Given this there can be no question regarding the commitment to deliver the urban extension in a timely fashion.

Early masterplan work would suggest that the urban extension will fall short of the 1,100 houses originally envisaged by the site allocation. This, coupled with the future needs of the town, would suggest that the North West Urban Extension area needs to be expanded to allow for a greater quantum of development. Whilst other sites are put forward in Cullompton few of them contribute much in terms of housing numbers. The suggested option at Colebrook (CU9) is the only site divorced from the North West Extension area with the ability to deliver any significant numbers. Whilst Colebrook has its merits we consider that the most sustainable and logical means of meeting future needs is through the expansion of the North West Urban Extension.

One such site is put forward at Growen Farm for 300-400 houses (CU2). Whilst our client has no strong objections to Growen Farm, we contend that there are other more suitable sites available, which are able to deliver the quantum of additional housing needed. One such site is land owned by the Emmett family,

over which our client has control (please see the Appendix 1 plan). This land has a number of advantages over the Growen Farm site.

Growen Farm is divorced from the current urban extension area on its northern, eastern, and western boundaries, and only partially connected on the southern boundary. Given this access and connectivity would be far from ideal. The access would have to be from the south, and this is more likely to impact on the existing town centre traffic problems than a site further to the north, such as the Appendix 1 land. Growen Farm lies to the west of a large swathe of green infrastructure. Development in this location would therefore undermine the function of the green infrastructure when viewed from important public vantage points.

The Emmett land is directly adjacent, and physically adjoined to, the existing extent of the urban extension allocation. The area represents a natural rounding off of the urban extension, and is suitable, available and achievable, and could deliver the housing numbers required. A further advantage to this site is its northern location. This would minimise the impact of traffic on the town centre. We contend that this site is able to accommodate in the region of 400-500 dwellings and as such we request its allocation in the Local Plan Review.

Knowle Lane –Policy CU3

Our client also has an interest in the allocated Knowle Lane site, known locally as Acklands (CU3). There is a committee resolution to grant planning permission for 285 dwellings on part of this allocated site.

A layout has been prepared for the residual area of the allocation based on the parameters of the northern portion of the site, and it is apparent that this residual southern area will contribute in the region of 30 dwellings. Therefore the total number of dwellings delivered on the whole allocation site (315 units) will result in a shortfall of 25 dwellings when compared with the quantum of development originally envisaged by the plan allocation. This shortfall is a result of significant

site constraints i.e. the floodplain, green infrastructure requirements, and a badger sett on site.

Codex Land PCC Limited, have control over land to the south of the CU3 allocation and the land in question is perfectly suited to compensate for the shortfall in housing numbers. We consider that this land is able to accommodate circa 40-50 dwellings. Please see Appendix 2, which illustrates the extent of the land in question. The land is agricultural, although the owner has permitted the nearby rugby club to use the land as an informal practice pitch in recent times. The lease which enables the practice pitch expires in June 2014 and we understand that the rugby club have made alternative arrangements and as such they will not be renewing the lease. Therefore, the land is available for development from June 2014. Not only would this address the shortfall in housing numbers on the CU3 Knowle Lane/Acklands allocation, but the additional land also represents a natural rounding off of the Acklands/Kingfisher Reach developments. There is also a further benefit to this site. It has long been an aspiration of the Town Council and the local community to widen a stretch of Knowle Lane to improve highway safety. The allocation of this additional land would enable this widening to take place. We therefore request that the site be included in the Local Plan Review for up to 50 dwellings.

Thank you for the opportunity of commenting. We ask that you acknowledge receipt of these comments and keep us informed at all future stages of the plan process.

Kind Regards


Alex Graves BA (Hons) PG Dip MRTPI
For PCL Planning Ltd
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