

MID DEVON DISTRICT COUNCIL

LOCAL PLAN REVIEW – OPTIONS CONSULTATION

Response by:

**S J Barrett
20 Great Close
Culmstock
EX15 3HQ**



In relation to:

**Policies Map – Option – Culmstock (January 2014)
and
Local Plan Review Options Consultation Document**

- 1 The purpose of this document is to register an objection to the change of the Settlement Limit of Culmstock to encompass Culmstock Glebe and Rackenfields as proposed in the Local Plan Review Options Consultation by Mid Devon DC. (SHLAA Site ref. Culmstock 3).

- 2 The objection is based on:
 - a) The proposal conflicts with MDDC Core Strategy COR 17;
 - b) The development proposal involves an area outside the current settlement limits and the proposals are therefore contrary to Core Strategy COR 18;
 - c) MDDC have not demonstrated that the settlement limit change proposal provides substantial public benefit in accordance with the requirements of the National Planning Policy Framework Para. 133, which is included as a requirement of the MDDC Development Management Policy DM27;
 - d) The effect of the proposal and potential future development on the character of the neighbourhood, which is a designated conservation area;
 - e) The detrimental visual impact of potential future development on the site;
 - f) The overall proposed increase in the settlement area is overbearing and out of scale to the existing settlement limits of the southern part of the village of Culmstock.

 - g) The written information provided in the Strategic Housing Land Availability Assessment (Dec 13) Schedule 2 for the Culmstock 3 site is in conflict with the information provided on the Plan of the site;

- 3.1 The proposals for Culmstock 3 provide a conflict between the application of COR 17 and COR 18. However, the proposal to move the settlement boundary and thereby avoid having to meet the criteria of COR 18 for the proposed development (market housing) means that it must meet the criteria of COR 17, which it fails to do.

3.2 MDDC Core Strategy COR 18 (b)

Under COR 18 development outside the settlements will be strictly controlled. If the settlement limits are not changed then the site could only be developed within the criteria stated in COR 18, none of which are applicable with respect to the proposed development of market housing.

3.3 MDDC Core Strategy COR 17 (a)

Under COR 17 Culmstock is designated as a village and development would therefore be limited to minor proposals within their defined settlement limits and to allocations for:

- a affordable housing meeting a local need;
- b small scale employment and tourism;
- c services and facilities serving the locality; and
- d other very limited development which enhances community vitality or meets a local social or economic need

Currently, the proposed development of the site as set out in the consultation document for Culmstock 3 are contrary to COR 17 in that the area is outside the current settlement limits.

To circumvent this, the proposal is to change the settlement limit to encompass an additional area of 3.5Ha inclusive of the proposed 1.5ha site indicated in the consultation documents. If the change is made to the settlement limit the proposed development as described in the consultation will not meet any of the above the criteria.

4.1 National Planning Policy Framework Para. 133 and MDDC Development Management Policy DM27 (c)

NPPF Para 133 states:

Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

DM27 (part) states:

Heritage assets and their settings are an irreplaceable resource. Accordingly the Council will:

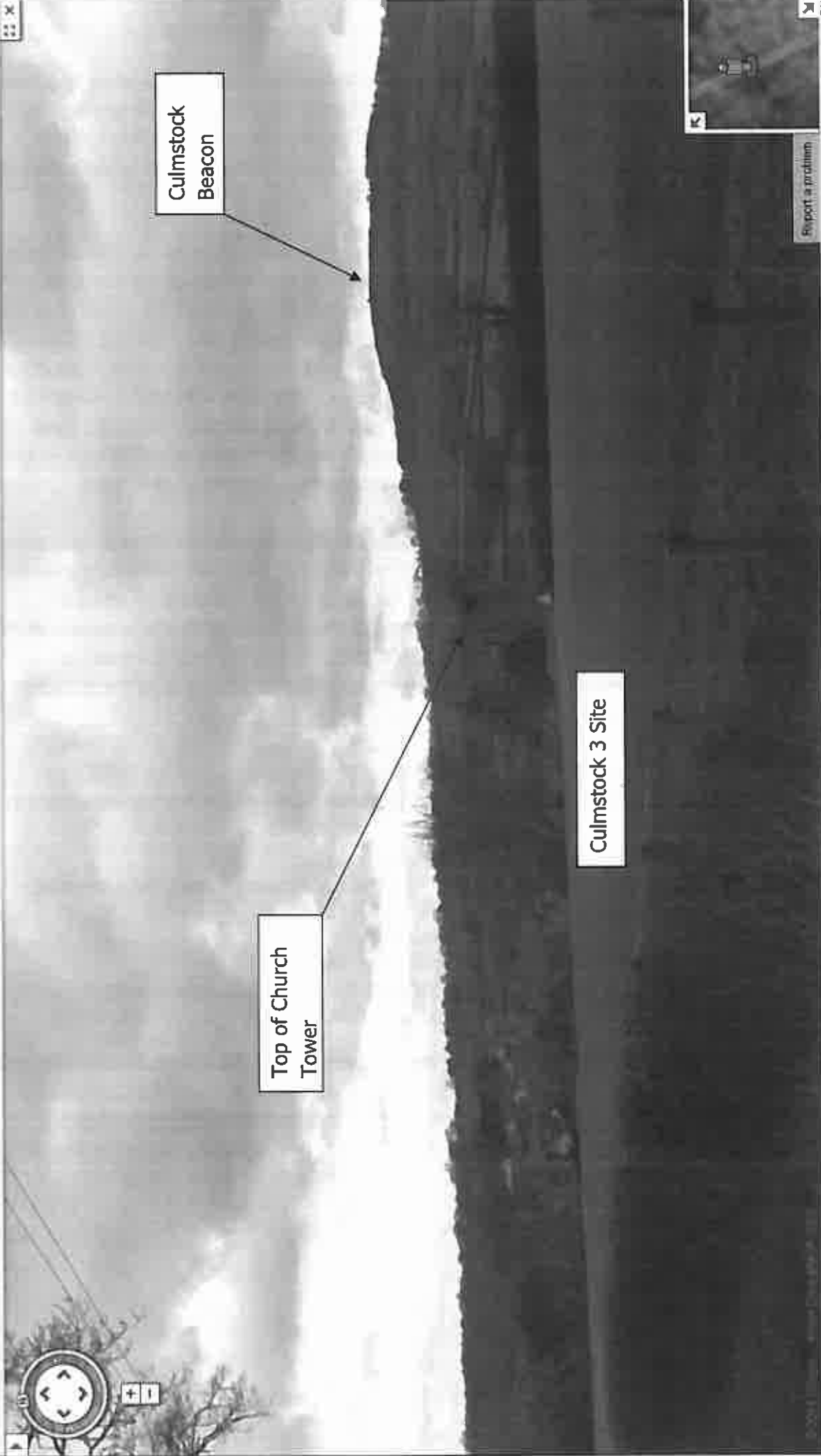
- a) Apply a presumption on in favour of preservation on in situ in respect of the most important heritage assets
- b) Require development proposals likely to affect heritage assets and their settings, including new buildings, alterations, extensions, changes of use and demolitions, to consider their significance, character, setting and local distinctiveness, and the opportunities to enhance them.
- c) Only approve proposals that would be likely to substantially harm heritage assets and their settings if substantial public benefit outweighs that harm or the requirements of requirements of paragraph 133 of the National Planning Policy Framework are met.

- d) Where a development proposal would lead to less than substantial harm, that harm will be weighed against any public benefit, including securing optimum viable use.
- e) Require developers to make a proportionate but systematic assessment of the impact on setting as set down in the guidance from English Heritage: "The Setting of Heritage Assets".
- 4.2 The proposed change in the settlement limit is immediately adjacent to the Culmstock Conservation Area and will have a substantial effect on the setting of the area and the landscape. The proposed area forms the high point to the rear of the church and the height of a standard house is such that the ridge line will be above the top of the church tower and adversely affect the view of the village from the nearby Culmstock Beacon, in the Blackdown Hills AONB, together with the approach on the roads from both Uffculme and Ashill. This is demonstrated in the photograph (from the road adjacent to the site) on Page 4 below showing the reverse view of the Beacon in the back ground and the top of the Church tower at the northern end of the site.
- 4.3 The Church is an important, historic heritage asset for the community with its literary links and the well publicised tree growing from the tower set within the conservation area and MDD , as the 'developer' in the context of DM27 has failed to make a proportionate assessment of the significance of the settlement limit change and as the 'Council', similarly in the context of DM27 MDDC should apply a presumption on their own proposal in favour of preservation of the setting and landscape of the adjacent conservation area.
- 4.4 MDDC have stated in Section 1.37 (Vision and Spacial strategy) of the Local Plan Review Options Consultation document that their overall strategy for development in villages is:
- ...locations for limited development, targeted to:
 - provide for local need, with affordable housing, shops, local services, community
 - facilities and low impact businesses;
 - avoid significantly increased travel by car; and
 - protect and enhance their environmental assets, including their character, biodiversity, heritage and setting.

The area of the current settlement of the southern end of the village bounded by, and including, Silver Street (west), the cemetery (east), the Bridge and the Culmstock 3 northern boundary is **6.5Ha**. The proposal is to increase the settlement limits by **3.5Ha** which represents an increase of 54% which proportionally cannot be described as 'limited development'.

Google

Culmstock Beacon Views



4.5 The Strategic Housing Land Availability Assessment (SHLAA) Schedule 2 includes the following statement:

'The site is hard to see/access so assessment was limited'

This statement means that the requirements of DM27 (e) that a 'proportionate but systematic assessment of the impact on setting' should be carried out has not been met.

5. 1 Potential changes to the character of the neighbourhood (d)
- 2 The detrimental visual impact of potential future development on the site (e)
- 3 The overall proposed increase in the settlement area is overbearing and out of scale to the existing settlement limits of the southern part of the village of Culmstock. (f)

The SHLAA states that 'the C391 is unsuitable to provide access due to inadequate visibility with its junction to Uffculme Road. An adequate access is achievable direct from Uffculme Road but, due to junction proximity, the C391 would need to be diverted through the site.'

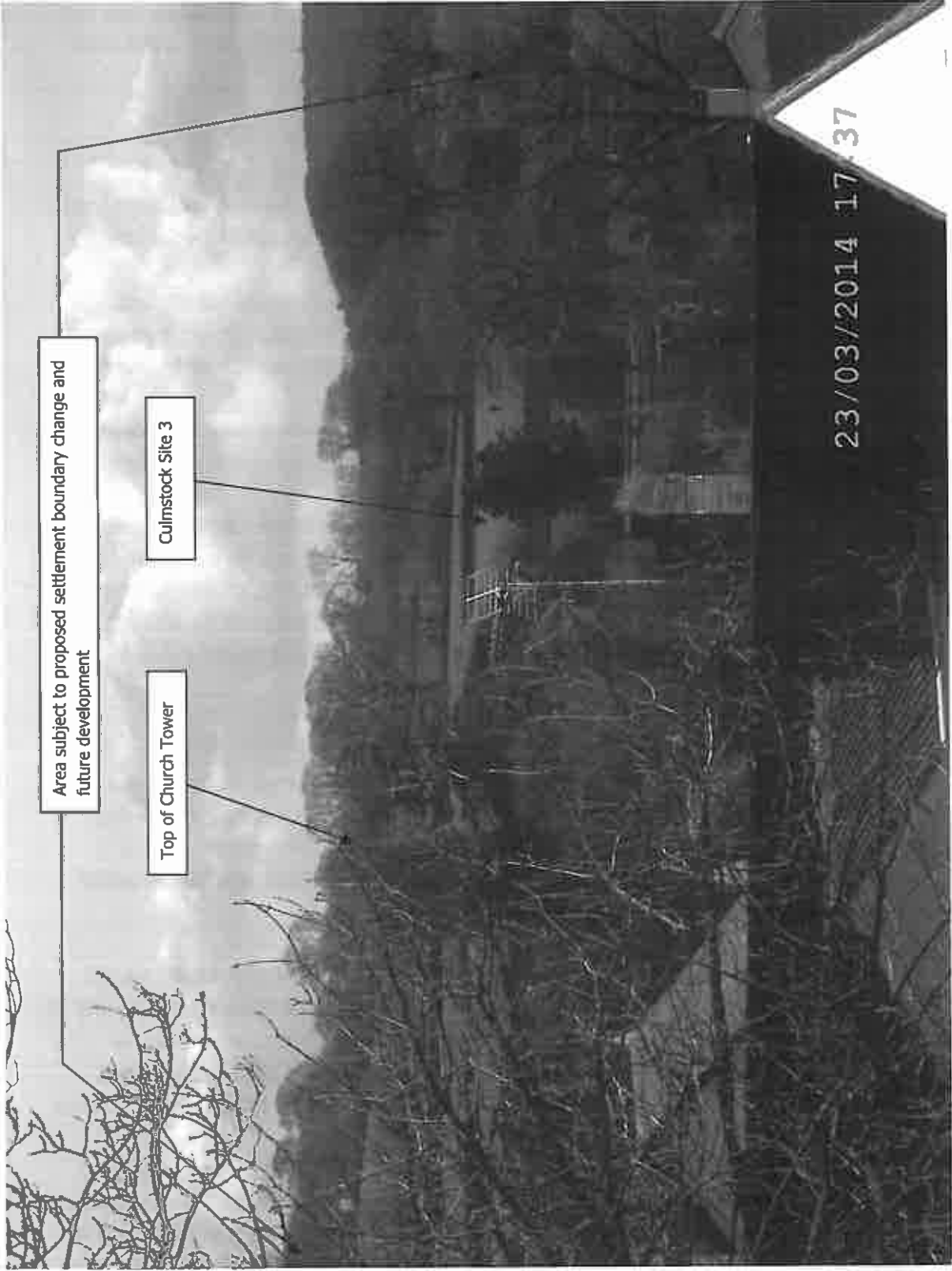
Diverting one of the roads into the village through the site with a new junction within the conservation area would alter the character of the neighbourhood considerably.

The total area of the proposed settlement limit change is 3.5Ha with potential for a maximum of 60 houses on the 1.5Ha element of market housing, as stated in the documentation. In the existing area bounded by Fore Street, Hemyock Road and Uffculme Road there are approximately 30 dwellings so the proposal for a minimum of 20 houses on the site would be out of proportion to the existing housing density and visually overbearing.

As noted previously, the area of the current settlement of the southern end of the village bounded by, and including, Silver Street (west), the cemetery (east), the Bridge and the Culmstock 3 northern boundary is 6.5Ha. The proposal is to increase the settlement limits by 3.5Ha which represents an increase of 54% which is not a proportional increase and provides an area for potential development that is out of scale to its surrounding and the neighbourhood.

By altering the settlement limits and putting a road through the area MDDC would present the opportunity for developers to present proposals for future development to build over the whole 3.5Ha site – potentially in excess of 120 houses at 35h/Ha. This would be totally out of proportion to the adjacent conservation area, which totals 6.1Ha south of the bridge and would alter the whole character of this neighbourhood.

The following photograph shows the view from the northern end of the village and illustrates the elevation of the area subject to the proposed settlement limit increase and clearly demonstrates that development on this site would alter the landscape as viewed from the north – belying the statement in the SHLAA Schedule 2 for the site that 'new dwellings are not likely to be visible from village as site is screened from the North'.



CULMSTOCK PARISH COUNCIL
Response to MDDC Local Plan Review

Local Plan Review Consultation

Forward Planning

Mid Devon District Council

Phoenix House

Tiverton, EX16 6PP



Response to MDDC Local Plan Review

Date 23RD March 2014

Dear Planning Department

Further to the Parish Council's earlier objection, we write to outline specific concerns brought to the attention of the Parish Council by parishioners along with a list of parishioner's signatures supporting their comments and the original objection.

In particular the majority of objections we have received span the three option sites you have outlined for the village of Culmstock, these being the Linhay 3rd Phase, Highfield's and the Glebe / Rackfield's land.

- The MDDC local plan review options involves development of land currently outside the settlement limit and to this end MDDC have not demonstrated that the settlement limit change proposal provides a substantial public benefit in accordance with the requirements of the National planning policy framework DM27
- It is anticipated that the building of an additional 50 houses across three sites, as you have outlined will add at least 75-100 cars using the road infrastructure in and around the village, The road system in Culmstock is already fit to bursting point with HGV lorries using our village as a to and from the quarries, commuters from surrounding villages and towns doing the same and in some cases HGV'S using the village as a rat-run to link the A303 to the M5, in the middle of our village we have a listed bridge of extreme historic importance, during

the last few years this bridge has been damaged / repaired numerous times and at substantial cost!

- Particularly, access to the Highfield's site has to pass a local primary schools and the village playing fields entrance and the potential for an incident here is only increase by further development, likewise there is no current road infrastructure suitable for the development option at the Glebe and Rackfield's, this site also suffers from dangerous corners to both sides increasing the danger and likelihood of traffic accidents, there is also no foot path on the Uffculme road and no potential to install one.
- Of the three sites chosen, two of the sites that MDDC propose to build on fields that sit above the village on two sides, Culmstock already suffers from water run- off and our drainage system is already insufficient and cannot cope, refer to flooding issues in 2012 and 2013, by building properties here and increasing the water run- off will only make these matters worse and potentially increase the flood risk lower in the village.
- Culmstock has a poor waste drainage system, in recent years, again refer to floods in 2012 & 2013 raw sewage has been back forced into houses at the lowest point in the village because our system is insufficient, adding additional houses will simply impact this situation.
- Our village primary school is full, adding additional properties will result in children being turned away by the school and/or additional infrastructure being required at the school to increase class sizes; this can only have a detrimental effect on the teaching standards provided.
- The Culmstock church is an important, historic heritage asset for the community with its literal links and well published tree growing from the tower and set within a conservation area. The proposed Glebe and Rackfields land sits to the back of the Church and as such the ridge line of a standard house will be above the height of the Church tower adversely changing the views of the village from the Culmstock beacon and surrounding Blackdown hills within the AONB.
- Due to the historical relevance of the houses in the conservation area around the Church, all the properties along Fore Street (these all back onto the Glebe and Rackfields land) have house wells, so by building on land approximately 40/50 feet above Fore Street, MDDC run the risk of increasing the height of the water table, thus increasing the possibility for internal flooding or problems associated with the water level.
- Generally if the option sites become adopted there will be a huge loss of green fields surrounding the village and with that a loss of flora or fauna will have an adverse effect of lots of bird and animal life.

The points raised here are a true reflection of the feeling of the parishioners within the village and as such hope that sensitivity and common sense will prevail when further investigation of the outlined sites suitability comes under question at the next stage.

Yours Sincerely

D. Harris

David Harris

Chairman – Culmstock Parish Council

Local Plan Review for Culmstock

I have attended the Culmstock Parish Meeting on 18th March 2014 to voice my objections/agreement with the proposed building developments for Culmstock within the MDDC Local plan.

Name	Address	Objection/Agreement
1 Tom Luxton 1078 / 4879	Coburg Cottage, Culmstock, EX15 3JD	Objeit
2 STEVE BAKERST 767 / 4600	20 GREAT ROSE EX15 3HD	In Excess of development area to far out of scale
3 Pam Zoelcer 811 / 4635	1 THREADLEEDLE STREET EX15 3JS.	DIS PRO PORTION OFFER size of development
4 DAUE FISHER 1079 / 4880	Blunne Hoge Culmstock EX15 3JN	TRAFFIC ROAD CONDITIONS FOR PEDESTRIANS SEWER DEARINACT ANIMATE
5 Sally Clark 1085 / 4881	Dove Cottage Henyock & Culmstock EX15 3JD	Traffic - increase object
6 Kay Conblid 1085 / 4532	Bridge meuss Culmstock EX15 3JJ	object - object of Traffic school.
7 MARK GUNDER 1081 / 4882	Bridfte Meuss, Culmstock EX15 3JS	Capacity sewerage, in sewer not looking for a second time.
8 Tristan Gidding 1082 / 4883	L THE STAND Culmstock EX15 3JH	No. LGA HAVE SMALL COAL DORLOT.
9 Kim Howson 1083 / 4884	L THE SRAND Culmstock EX15 3JH	
10 Sarah Mansson 1094 / 4885	9 Blackwaters Rd Culmstock EX15 3HF	I object as houses would not be in scale with the village

Name	Address	Objection/Agreement
11 Angela Butterwood 1067 / 4868	Churchville The Clove EX15 3JR	Object
12 Matthew Harris 678 / 4526	Hunters way 9 Hunters way Culmstock. EX15 3HS	Object?
13 N.E. Myers. 1068 / 4869	2 Pine adweale Street EX15 3SS	object.
14 Svane Lambert 713 / 4557	Caven Cottage, The Clove Culmstock. EX15 3SR	Object.
15 Julie Edmunds 1064 / 4870	Hedgefields EX15 3HL	Object
16 Colin Skuse 1070 / 4971	Silver Stream, Culmstock EX15 3SE	Object
17 Robin Skuse 1071 / 4972	Hedgefields EX15 3HL	Object
18 Nicola Pike 1072 / 4873	Bensington cottage EX15 3HW	object
19 J.E. Skuse 1024 / 4874	Collets, The Clove, Culmstock EX15 3SR	object / input
20 R. THOMAS. 1074 / 4875	Wardens Barn, Silver St EX15 3SE	OBJECT.
21 L. RAUZE 1075 / 4876	1 Paler Cross Culmstock EX15 3SA	objection to town with growth of small villages or spreading infrastructure
22 Auden Mendenhall 1076 / 4877	TOWNHILL cottage, Culmstock EX15 3SA	OBJECT / traffic / slow roads / narrow roads / etc.
23 Amy Willis 1077 / 4878	Cadbury Cottage, Culmstock EX15 3JD	OBJECT / traffic / slow roads / etc.

Please specify your objection or if you'd court!

Local Plan Review for Culmstock

I have attended the Culmstock Parish Meeting on 18th March 2014 to voice my objections/agreement with the proposed building developments for Culmstock within the MDDC Local plan.

Name	Address	Objection/Agreement
1 Alexandra Stanford 1060 / 4861	1 Tyne Barn Cottages, Culmstock, Devon EX15 3HT	Object to market housing in parish boundary
2 Emma Bass		
3 Emelina Oliveira 496 / 4329	Thornbank Farm, Fore Street, Culmstock EX15 3JD	Object to market housing.
4 Timothy Brown 1061 / 4862	THE OLD MILLS, EXIS	OBJECT
5 Julie Wares 1062 / 4863	THE STONES, CULMSTOCK EX15 3JY	OBJECT TO MARKET HOUSING WITHOUT PROX INFRASTRUCTURE
6 Jennifer Day 1063 / 4864	2 Huntley Hill Culmstock EX15 3HH	OBJECT
7 Katarina Hayduk 1064 / 4865	5 The Strand Culmstock, EX15 3H	Object to market housing
8 F 1065 / 4866	BRIDGE FANES, THE SPREAD, CULMSTOCK EX15 3JY	OBJECT
9 Geoffery Sax 681 / 4529	CADDISBY HOUSE FORE STREET EX15 3JD.	Object to extension of settlement limit
10 Christina Fox 1066 / 4867	Wardens Barn, Silver St. EX15 3JE	OBJECT