

**Mid Devon Local Plan Review 2013-2033  
Hearings 2 and 3, 15<sup>th</sup> February (Strategy and  
Site Allocations)**

Statement for Gallagher Estates Ltd

January 2019

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**Client**  
Gallagher Estates Ltd

**Our reference**  
GALA3002

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# 1. Introduction

- 1.1 This hearing statement has been prepared on behalf of **Gallagher Estates Ltd** ["Gallagher"] in response to Matter 1 of the **Mid Devon Local Plan Review 2013-2033** ["the Draft Local Plan"] examination.
- 1.2 Gallagher Estates has land interests within Mid Devon, specifically at Willand, which includes part of site WI1 (Land east of M5, Willand) which is allocated for 42 dwellings within the Draft Local Plan. In addition to this Gallagher Estates is promoting additional land beyond that which is proposed for allocation, which represents a further sustainable and deliverable opportunity for additional residential development.
- 1.3 Representations were previously submitted on behalf of Gallagher Estates to the Proposed Submission Local Plan in April 2015 and the Proposed Main Modifications in February 2017.
- 1.4 This hearing statement provides written responses in respect of those matters to be considered at Hearings 2 and 3 (15<sup>th</sup> February 2019) only. Gallagher Estates welcomes the opportunity to participate in the examination.

## 2. Response to Inspectors Questions (Hearing 2)

### Question 3 - Is the approach to Cullompton in Draft Policy S11 a reasonable one?

- 2.1 The Housing Strategy that is embedded in Policy S11 seeks to improve access to housing through urban extensions. As has been evidenced by the very slow progress delivering any development at North West Cullompton to date, this strategy risks perpetuating the under delivery of housing, and the failure to deliver the plans vision for Cullompton as a fast growing market town.
- 2.2 It is considered highly unlikely that 3,903 dwellings will be delivered during the plan period at Cullompton, based on the strategy set out in the plan, and that therefore further deliverable sources of supply will be required (in both the short and longer term). This is likely to require other/further sources of supply on a greater range of sites, in order to provide appropriate choice and competition for land, including additional sites and capacity away from the main towns (in the Rural Area).
- 2.3 As set out in our previous representations dating back to April 2015, it remains the case that the key parts of the North West Cullompton Urban Extension still do not have Planning Permission, despite the initial allocation(s) being made for this development in January 2011 (Allocations and Infrastructure DPD, LDO02) and this development having been foreseen in the much earlier Core Strategy (LDO01), adopted in July 2007, where at 7.55 it is stated that:
- “In order to achieve the relief road (which is likely to be either to the north-west or to the east of the town), it is likely that development will be primarily in the form of a single, large mixed use urban extension, possibly to the north west of the town.”*
- 2.4 It remains the case that in excess of 10 years later there has been no substantial development commenced at North West Cullompton and there are not yet final proposals for the required relief road (whilst a preferred route has now been identified, there is much further work to be done to secure both planning permission and the full funding to realise the delivery of this). There also remains further work to be undertaken and completed in respect of the possible acquisition of land for the relief road (potentially requiring compulsory purchase), in addition to time for physical construction/delivery on site. As noted below a separate note on this issue by Jubb is appended to this statement.
- 2.5 There are also no firm plans for any other junction improvement works at M5 J28, despite the Council knowing the importance of these works to the delivery of their plan strategy, and the concerns raised in representations to the plan made in 2015 and 2017.
- 2.6 The Council’s approach at Cullompton (Policy S11) risks perpetuating under delivery of housing and other growth across Mid Devon, and although the principles around securing key infrastructure and comprehensive development via large scale interventions is understood, the balance struck by the plan at Cullompton will not deliver the outcomes that are required, particularly in respect of ensuring the provision and maintenance of the required supply of housing land during the plan period (including the provision of a five year housing land supply).

**Question 4 - Are the allocations and draft policies relating to Cullompton (Draft Policies CU1 to CU21) sound?**

2.7 As set out in previous representations Gallagher Estates has concerns in respect of the soundness of allocations for East Cullompton (CU7-12) and Ware Park and Footlands (CU14), in addition to the overall approach being taken by the plan (including the reliance on housing delivery from North West Cullompton). Critical in this respect is the lack of information within and supporting the plan in respect of infrastructure delivery (including timescales and costs), which are fundamental to the successful realisation of large scale development of this type, and where there are direct interactions with the ability to meet other plan objectives (such as the delivery of affordable housing) and the need for other funding sources, beyond only S106 or CIL derived developer contributions.

2.8 It remains the case that a large volume of housing and employment growth is already being constrained by the needed strategic highway improvements that are required. A separate note on strategic transport issues prepared by Jubb is appended to this statement. Whilst some progress has been made towards the definition and delivery of strategic infrastructure to support this development and the plan (the interim relief road scheme), there remains uncertainty around key elements of the design, funding and delivery of this, and how specifically it will facilitate the substantial strategic scale development proposals envisaged at Cullompton. This is a fundamental issue for the plan as a whole and where available evidence does not provide the justification required for the strategy adopted by the Council. In summary:

- Initial delivery of housing at the identified allocations at North West Cullompton and East Cullompton is reliant on the envisaged link road proposals;
- Despite making some progress the link road proposal remains subject to a number of technical and practical constraints that remain to be resolved, via the preparation, submission and determination of a planning application for this development;
- The timescales for the approval and construction of the link road are unclear and most likely to be subject to further delay whilst issues such as land assembly are resolved (in the absence of robust evidence to the contrary);
- Funding for this infrastructure is highly dependent on delivery taking place based on the obligations placed on HIF funding allocated to it, which requires that the benefits of the scheme are realised by March 2021. There is a considerable way to go in order to provide clear evidence that this programme would be achieved.

2.9 In addition to understanding and evidencing the delivery of the 'intrim' relief road scheme, which is under consideration, it is as important to understand the issues associated with the long term design, funding and delivery of the full new M5 J28 improvement proposals, on which the delivery of development across the plan period is reliant. This is a key soundness issue for the plan as a whole.

**NW Cullompton (CU1-6)**

2.10 Despite the previous adoption of an SPD to help co-ordinate development at NW Cullompton (North West Cullompton Urban Extension Masterplan SPD, SSE02)

development at NW Cullompton continues to be delayed with a number of submitted planning applications for major development awaiting determination, with prospective committee dates in 2018 passing without consideration by the Council.

- 2.11 The delivery trajectory for NW Cullompton set out at Table 6 of the submitted plan (as proposed to be modified) will not be met, and therefore the contribution of these sites in the next five year period (2019-2024) is most likely to be significantly reduced (as currently drafted expected to be 600 dwellings).
- 2.12 As noted in respect of the housing land supply questions for hearing one, the Council expects to publish an updated housing trajectory as part of their Hearings Statements, and we look forward to reviewing this in respect of Cullompton in advance of the hearing sessions.

#### **East Cullompton(CU7-12)**

- 2.13 Whilst it is said that this site may have the long term potential for 5,000 dwellings, together with associated employment opportunities and other local infrastructure, in order to deliver the sustainable 'Garden Village' envisaged by the government's endorsement of this proposal, there is little evidence presented with the plan which supports the specific quantum and delivery trajectory that is expected by the Council.
- 2.14 The constraints summary in the draft SPD shows numerous issues across the site, including power lines, challenging topography, heritage assets, and watercourses with associated areas of flood plain. Whilst these issues can be considered to be typical of most major development areas of this scale in some form, it highlights that there is much progress to be made, and limited existing evidence in respect of specific site capacity and delivery to support the fact that the indicated trajectory for the plan period to 2033 is likely to be achieved.
- 2.15 1,750 dwellings in the plan period to 2033 at a rate of 200-250 dwellings pa once the scheme is up and running (as identified at Table 6 within the plan), with this delivery overlapping with delivery also taking place to the West of the town, will mean that in some years some 350 completions are forecast, at a market town where delivery rates since 2001 have only been an average of 72.5 dwellings. The prospects for a step change in delivery is recognised as being ambitious and rooted in comprehensive development and infrastructure planning that is being planned for, but evidence throughout the region and wider country shows this to be challenging to achieve. The evidence presented by the Council, and the track record bringing forward other large scale development, does not give confidence that this will be achieved with the necessary speed to support the heavy imbalance in the spatial strategy being proposed by the plan (50% of all new development at Cullompton in two large strategic allocations).

#### **Ware Park and Footlands (CU14)**

- 2.16 There are a number of concerns about the suitability and deliverability of this site, which is programmed to only be delivered in the later years of the plan in any event. Given the concerns and delay about the large scale developments which are the focus of the Council's strategy for Cullompton it is not clear what benefit is to be derived (in land supply terms) from a smaller scale allocation which is not capable of making a contribution in more timely manner.

### 3. Response to Inspectors Questions (Hearing 3)

#### **Question 3 - Is the approach to rural areas and the countryside in Draft Policies S13 and S14 a reasonable one?**

- 3.1 Representations made to the plan have set out concerns about the lack of clear justification and evidence for the overall spatial strategy and distribution of development being proposed, and this is particularly relevant to the consideration of the rural areas, which is to see only some 10% of the total development requirement.
- 3.2 Despite identifying some 22 settlements that are considered to be appropriate to accommodate a more limited quantum of development, the policy makes no attempt to distinguish between the extremely varied settlements/locations that will be covered by Policy S13, nor does the supporting evidence justify a 'one size fits all' approach to these places. There are clearly settlements within the 'spine' of the district around the M5 corridor and with access to a greater range of services/facilities, which exist and would be provided as a result of the strategic scale growth provided by the plan, to warrant a more differentiated approach.
- 3.3 At some 1,400 households (2011 census data) Willand is the largest of the District's rural villages (behind only the main towns of Cullompton, Tiverton and Crediton) in terms of scale. Given its comparative scale, and location Willand is underprovided for in respect of new growth, as compared to other villages covered by Policy S13. It is noted specifically here that the Council specifically chose to amend the supporting text at 2.80 to reference demand for employment in Willand, with reference to the retained allocation at Willand Industrial Estate (one of the few designated 'villages' possessing this feature).

#### **Question 4 - Are the various allocations relating to rural areas (save for Draft Policy SP2) sound?**

- 3.4 As noted in previous representations, and planning applications that have been made on the site, Gallagher Estates site at Willand (part of WI1) could accommodate more development than the 42 dwellings allocated within the plan.
- 3.5 Of specific note in this regard is how the Council has chosen to define this site allocation on the proposals map, without using natural field boundaries, but somewhat artificially and arbitrarily dividing the existing field parcels in two (directly south of Meadow Park). Although not a soundness issue per-se, it would represent a far more logical form of development for the WI1 allocation take in the fuller extent of these field parcels. This is as shown on the masterplan that accompanied a recently determined Outline planning application on this site for up to 125 dwellings. The previous planning application and appeal submitted on this site by Gallagher Estates (c.250 dwellings) confirmed that there was no specific technical or environmental basis to resist the development on this site; with a subsequent further planning application for a smaller scale of development (125 dwellings) being recommended for approval by Council Officer's on the same basis (as shown at Figure 2 below).

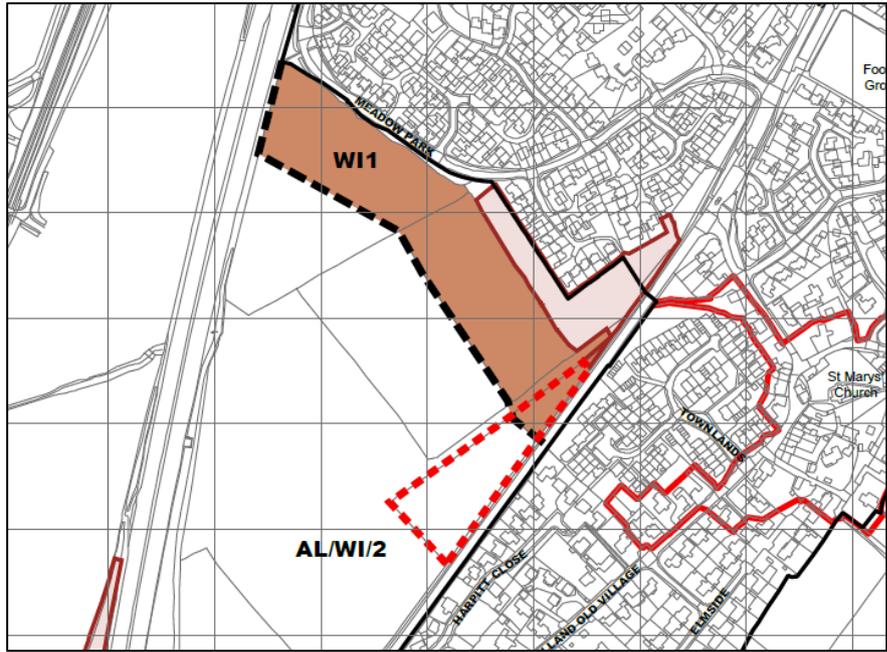


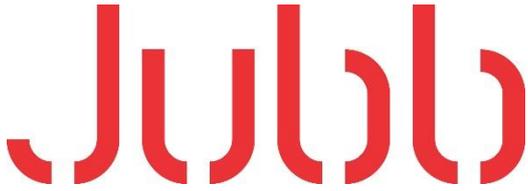
Figure 1 - Proposals Map Extract



Figure 2 - Masterplan Extract (125 dwelling scheme)

## **Appendix 1: Jubb Note January 2019**

[Insert text here]



Title: Cullompton Highway Infrastructure Representation  
for Local Plan Review Examination

Date: January 2019

## 1.0 Introduction

1.1.1 Jubb have been commissioned by Gallagher Estates Ltd to provide further transport and highways advice in relation to the Local Plan Review Examination, based predominately on their interest in a proposed housing allocation (known as "Land east of M5") to the south of the existing urban area of Willand. As part of this commission Jubb have been requested to provide transport and highways representation for consideration at the Local Plan Review Examination.

1.1.2 This note provides further consideration in relation to the proposals for housing delivery within the Cullompton area. In particular, this note considers the identified housing allocations at North West Cullompton and East Cullompton (also known as Culm Garden village).

1.1.3 The note provides further detail in relation to the infrastructure required to deliver those proposals as set out in the "Local Plan Review 2013 – 2033 Proposed Submission" document published in January 2017. The note provides evidence to demonstrate that the timescales for provision of infrastructure required to deliver this housing are still yet to be finalised and that there are still a significant number of technical and practical barriers to resolve before further clarity can be provided on this. This therefore presents significant risk in terms of the housing trajectory of the Local Plan.

1.1.4 The structure of this note is therefore as follows:

- Section 2 – Provides detail of the allocations within Cullompton as set out in the Local Plan Review
- Section 3 – Outlines potential highway improvements that have been identified by MDDC to enable some of this housing to come forward initially prior to the introduction of major strategic improvements which are also discussed
- Section 4 – Details potential technical issues that may affect the delivery timescales of the highway improvements, which include the requirement for further technical studies and land acquisition
- Section 5 – Provides details of the costs of these highway improvements and the identified sources of funding

1.1.5 In addition, Section 6 of this briefing note provides a summary and appropriate conclusion.

## 2.0 Cullompton Allocated Sites

- 2.1.1 The key allocations within Cullompton as set out in the Local Plan Review are the North West Cullompton site (Policy CU1-CU6) and the East Cullompton site (Policy CU7-CU12). The locations of these allocations are set out in the Cullompton Local Plan policy map (Examination Reference SD02).
- 2.1.2 It is proposed within the Local Plan Review document that these sites would provide the majority of housing at Cullompton during the plan period (i.e. 1,350 at North West Cullompton and 1,750 dwellings at East Cullompton), with only limited housing allocation proposed elsewhere within the Local Plan at Knowle Lane (30 dwellings) and Ware Park & Footlands (38 dwellings).
- 2.1.3 It is noted that for both the North West Cullompton and East Cullompton sites the Local Plan identifies the requirement to mitigate traffic impacts at M5 Junction 28 to minimise any potential subsequent knock on impact (i.e. as a result of queuing traffic from this junction) on the town centre itself. This is emphasised in paragraph 3.94 that states:

*"...Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. 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 overbridge required in connection with development east of Cullompton under policy CU7."*

- 2.1.4 Potential highway schemes to mitigate congestion at Junction 28 are in the process of being developed by MDDC. These highway schemes are discussed in more detail below.
- 2.1.5 It should be noted that these schemes are still in the early stages of development and therefore there is a lack the certainty in terms of design, funding and timescales. This is a key risk given the number of dwellings that are reliant on the implementation of this infrastructure that make up a large proportion of the homes that are proposed to be delivered within the plan period.

## 3.0 Identified Highway Improvements

- 3.1.1 MDDC's long term aspiration is to introduce an additional M5 motorway junction (i.e. Junction 28A) to the south of the existing Junction 28. It is also proposed that this motorway junction would include a link from the B3181 to the west of the Junction 28 that would link with the new junction and Duke Street to the south. The proposal would therefore not only offer an additional access to the motorway, which would reduce the impact on approach to Junction 28, but would also provide an alternative route that would bypass the town and link with areas to the south of Cullompton and east of the M5. A proposed initial general arrangement proposal has been developed by WSP / Parsons Brinkerhoff on behalf of MDDC (Examination Document Reference SSE18).
- 3.1.2 Notwithstanding the above, it is evident, if this scheme were to be implemented, that there would be significant further design, technical study and consultation required before it even meets the stage of a formal application. Furthermore, more importantly, this proposal would require significant capital investment to introduce, with initial estimates within MDDC's Draft Infrastructure Plan (dated December 2016) placing these costs at £50-£55 million. At this stage, it is understood that suitable sources of funding are not yet available for this scheme to cover these costs.

- 3.1.3 Thus, in consideration of the aforementioned constraints, an interim scheme has been developed by MDDC with the aspiration to allow some housing to come forward in the medium term. This interim solution proposes a road connection that would enable a bypass route to be obtained for the town from the north (i.e. in the vicinity M5 Junction 28) to the south at Duke Street. This proposal is referred to as the "Link Road" for the remainder of this note.
- 3.1.4 It is understood that various options have been considered for the alignment of the Link Road which included solutions to the east and west of the motorway. These options were briefly evaluated in a "Route Options Report" which was produced by WSP on behalf of MDDC and Devon County Council (DCC) and published in August 2018. Three key options were then taken forward for further consideration which encompassed two potential routes linking the B3181 with Duke Street on the western side of the M5 (i.e. Option A and B), and proposals for a link that crosses the M5 via an additional overbridge (Option C).
- 3.1.5 A subsequent traffic model was produced to assess the implications in terms of associated improvements to traffic capacity on the local Cullompton network, with the results summarised in a subsequent "Traffic Modelling Report" published in September 2018. This "Traffic Modelling Report" concluded that the potential Link Road options could provide capacity to enable the whole of the North West Cullompton allocation to come forward. In addition, the model also forecasts that the Link Road could enable a first phase of development to come forward at East Cullompton (i.e. 500 dwellings) in addition to this. After this, the report states that a strategic intervention would be required to unlock the remaining dwellings at East Cullompton (i.e. such as the implementation of a new Motorway Junction as previously discussed).
- 3.1.6 It is understood that consultation events were held between the 14 September 2018 and the 6<sup>th</sup> October 2018 to gauge public opinion regarding the potential route options. Since this consultation it is understood that a preferred Link Road route option has been identified by MDDC for further development (i.e. Route Option B). A drawing (Drawing 70047809-Option B P01) showing the broad layout of this route has been produced by WSP on behalf of DCC and MDDC and is included as **Appendix A** of this note.
- 3.1.7 A MDDC cabinet meeting is also being held on the 31st January 2019 to discuss the Link Road. This cabinet meeting is being held to provide agreement that the design of the preferred Link Road option (i.e. Option B) be progressed in more technical detail. Furthermore, agreement would also be sought for £250,000 of S106 money collected for the Link Road project and to undertake air quality mitigation measures in Cullompton be used to fund this design process.
- 3.1.8 As discussed in section 4 below, whilst an initial proposed layout has been identified, there are still a number of technical studies that need to be undertaken prior to the Link Road design being finalised and it is evident that land will need to be acquired to deliver it. Furthermore, as also discussed in Section 5, funding has yet to be confirmed, which could lead to delay in terms of implementation until this is resolved.

## 4.0 Link Road Further Requirements

- 4.1.1 It is evident that the development of the preferred Link Road option is still at an early stage. There are still a number of technical studies that need to be carried out before the route is finalised and a planning application for the Link Road is submitted. In addition, once the route has been finalised and planning consent has been granted there is likely to be further detailed design that would need to be carried out prior to tender and construction. Some of the detailed elements that need further consideration are outlined below.

### Ecology Impacts

- 4.1.2 An initial review of the ecological impacts of the Link Road, as outlined within the aforementioned "Route Options Report", has also concluded that the proposals would have an impact on priority habitats and provides the following statement in this regard:

*"Option B also runs through hedgerows that are species rich with mature well-established trees that are identified as adding a significant ecological value to the site. This proposed route also runs through mature mixed woodland that comprises of deciduous and leylandi trees that are used as curtilage between playing fields and screening from the motorway and the railway line.*

*There is a tributary of the River Culm that traverses the west boundary and south-west section of the site. This stream is heavily lined and shaded by deciduous trees on both banks.*

*The wider environment was assessed as high value for bats with a large network of fields, hedgerows and woodland, as well as roosting opportunities in nearby structures. The grassland and woodland provided moderate potential for foraging bats, with the mature trees having high potential for roosting bats.*

*The site was also assessed as having a moderate to high value for birds, with the scrub, grassland and woodland providing suitable nesting and feeding opportunities.*

*The site location was assessed as having a moderate value for reptiles, (the grassland tussocks and scrub fringes) and invertebrates (white clawed crayfish).*

*There was no sign of badgers on site, however the overall site was assessed to hold potential for foraging badgers, hedgehogs and the River Culm had the potential to support otter and water voles. The pond on site provided potential for breeding habitat for great crested newts."*

- 4.1.3 The overall impact of the proposals on ecology was therefore classed as Moderate Adverse. Thus, whilst this assessment does not consider any mitigation that would be implemented to address this impact it is evident that further work would need to be undertaken to develop the proposals to minimise these impacts.

### Flood Risk

- 4.1.4 The preferred alignment is located entirely within a Flood Zone 3b classification. These areas have a high probability of flooding and are effectively part of the functional flood plain where water flows or is stored during flood events. As outlined within the report to the MDDC cabinet in relation to the Link Road (dated the 31<sup>st</sup> January 2019) initial flood modelling indicates that increased flood risk is forecast to occur around Tesco and the Long Meadow industrial estate. In this regard the cabinet report makes the following statement:

*"If this is chosen as the preferred option then further work will be required to demonstrate the acceptability of the final detailed design, mitigation/compensation for lost floodplain, and provision of suitable warning systems and evacuation plans to ensure that road use restrictions and diversion measures can be instigated*

*Compensation and mitigation will also be required from an ecological perspective due to the likely loss of trees, hedge lines and floodplain habitat."*

4.1.5 The initial designs of the Link Road also show an elevated cross section, which is expected given the flood constraints in this area. This would add further potential complication during construction as material would need to be brought in to create this elevated plateau.

4.1.6 It is also noted that due to flood constraints the road may require closure after/during periods of high rain flow once in operation. This is outlined in the aforementioned "Route Options Report" which states:

*"As with Option A the whole of the Option B alignment is within flood zone 3b. Whilst it would be possible to raise most of the alignment length above flood levels, at the tie-ins to the existing highway network at Duke Street and Station Road the alignment would need to return to existing highway levels.*

*Duke Street, at the southern location where Option B is proposed to connect, is predicted to flood in the 50% flood scenario which equates to a probability of flooding once every 2 years.*

*Station Road at the northern location where Option B is proposed to connect, is predicted to flood in the 1% flood scenario, which equates to a probability of flooding once in every 100 years.*

*Whilst flooding of the proposed connection point on Station Road is predicted infrequently and to a depth of less than 200m, with Duke Street susceptible to frequent flooding with depths over 1m there would be periods when the road would need to be closed.*

*Whilst these periods of closure are expected to be short term, it would necessitate that advance warning signs and barriers closing the road for these periods are installed as part of the works. Similarly, there is potential the relief road would be closed in parallel with the M5 motorway, and therefore diverted traffic would still need to use the Fore Street. This would potentially limit options for regeneration of the town centre."*

4.1.7 Thus, it is evident that the need to consider flooding of the road itself would further complicate the Link Road design and have a knock on impact on the future development of the town centre.

### **Third Party Construction Impact**

4.1.8 As discussed in the aforementioned "Route Options Report" the proposed alignment will require the demolition of the existing bowling, cricket ground and some of the associated buildings such as the club house and pavilions. In this regard the "Route Options Report" makes the following statement:

*"The Option B alignment would significantly impact Cullompton Cricket Club, Cullompton Bowls Club and to a lesser extent Cullompton Rangers Football Club. Significant costs associated with compensation and/or mitigation are expected beyond the construction costs and typical land purchase prices. Land to relocate the affected sports clubs would be expected to be required."*

- 4.1.9 Consultation would also need to be carried out with the National Rail authority due to the proximity of the alignment to existing railway line to the east. The authority may require that the alignment be moved further west in this instance which could encroach further on the sports facilities to the west. In addition, the drainage impact on the railway line would also need to be assessed and mitigated where appropriate.
- 4.1.10 It is evident that the above third party considerations would need further technical review and consultation, which would take significant time to resolve.

### **Landownership Constraints**

- 4.1.11 As discussed in the aforementioned "Route Options Report" route Option B (i.e. the preferred route) will affect 12 known areas of registered and unregistered land according to the assessed Land Registry information. Details of these areas are included within Appendix F of the "Route Options Report" and is also included within this briefing note as **Appendix B**. Notwithstanding the necessary land compensation required this may result in subsequent further timescale for implementation, particularly, if compulsory purchase powers need to be implemented.

### **Summary**

- 4.1.12 It is evident from the above that there are still a number of practical and technical constraints to address prior to the preferred Link Road being finalised. These constraints could take significant time to resolve prior to the submission of a planning application and any scheme would be subject to further detailed design prior to construction in any case. In this regard, notwithstanding other constraints such as construction timeframes and scheme funding, it is evident that these technical elements would affect the certainty of the delivery of the Link Road in terms of timescale.

## **5.0 Link Road Scheme Costs and Funding**

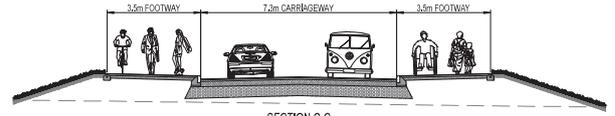
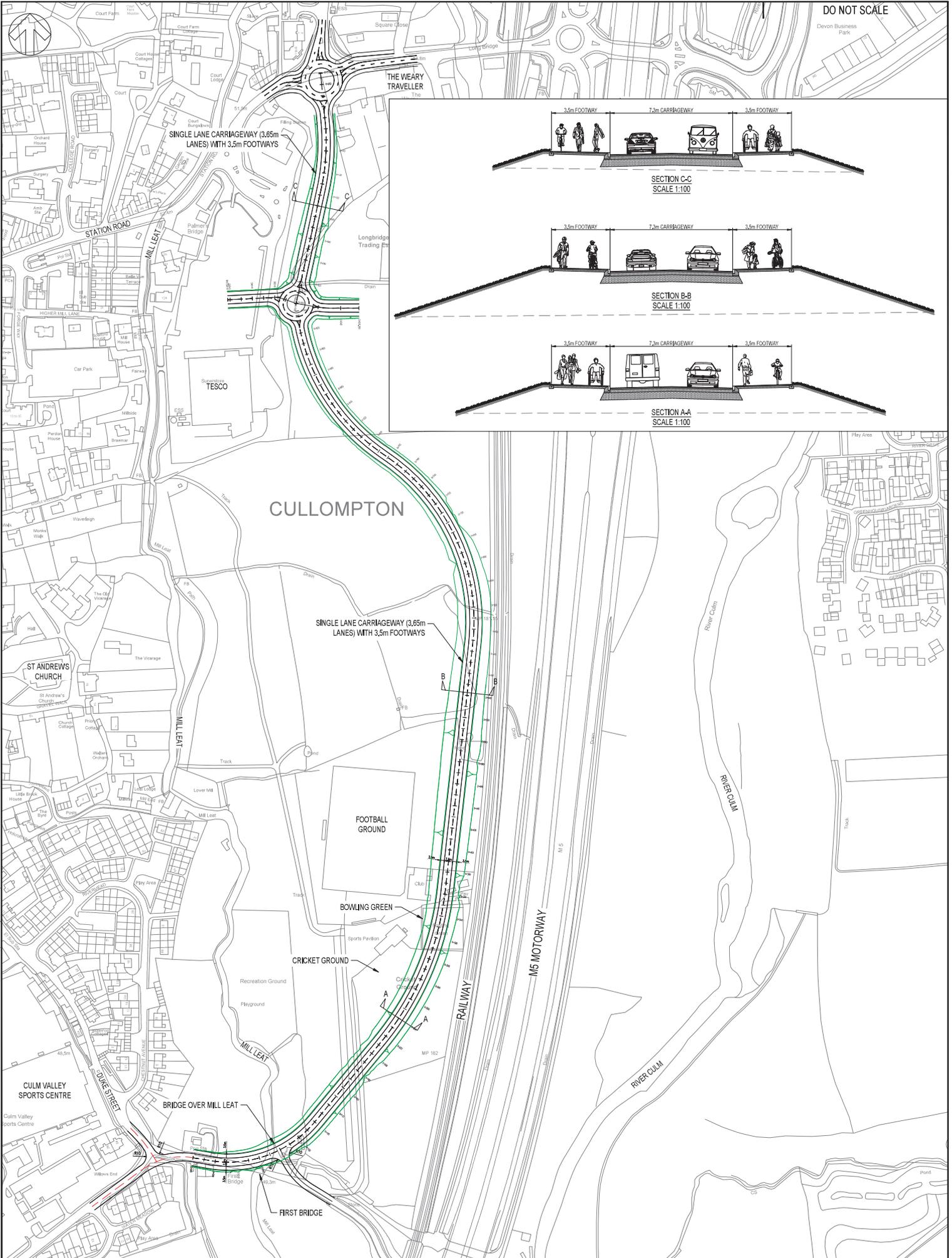
- 5.1.1 Initial cost estimates for the preferred Link Road scheme (i.e. as set out in **Appendix A**) are outlined within the "Preferred Route Options Report" which was produced by WSP on behalf of MDDC and DCC and was published in January 2019. The report states that the projected cost of the scheme would be £14 million which accounts for construction costs and estimated costs associated with land compensation.
- 5.1.2 The predominant source of funding for the Link Road as identified within the aforementioned "Route Options Report" is the Housing Infrastructure Fund (HIF). A bid has therefore been submitted for £10 million worth of HIF funding to Homes England. It is noted that, whilst a decision may be forthcoming, at the time of writing it is understood that confirmation has yet to be received and timescales may slip in this regard.
- 5.1.3 It is also noted that HIF funding is reliant on the benefits of a scheme being realised by March 2021 and therefore the Link Road would need to be for the most part complete and open for use by vehicles by this date. This represents a substantial risk as the Link Road is still at the consultation stage and therefore a planning application for the proposals has yet to be submitted. Furthermore, there are number of issues in terms of design and land ownership that are briefly discussed in the previous section that would need to be overcome. Thus, notwithstanding the timescales for construction, it is evident that there are number of stages that the proposals would need to go through prior to the design being finalised. It should also be noted that, even in the event that funding is confirmed, it is clear that there would still be a shortfall in funding which at present is calculated at £4 million.

- 5.1.4 Other sources of funding include S106 contributions from developers. As discussed above the traffic modelling associated with the proposed Link Road has shown that the road would provide additional capacity for 1,350 dwellings associated with North West Cullompton and 500 dwellings at Culm Garden Village. It is noted that these schemes are still in the process of agreement with planning applications being brought forward in a piecemeal manner. Thus, there is likely to be a significant time period before these funds becoming available.
- 5.1.5 It is understood that at present no other sources have been identified. Thus, if the HIF application is not successful this would mean that the only source of funding for the Link Road would be S106 contributions from developments requiring its implementation. On this basis, given that the full £14 million funding requirement would be dependent on the development of North West Cullompton and the first phase of East Cullompton this may bring into question the viability of these housing allocations.

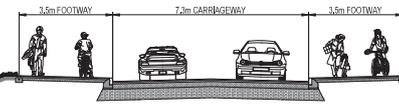
## **6.0 Conclusions**

- 6.1.1 It is evident that initial delivery of housing at the identified allocations at North West Cullompton and East Cullompton are reliant on proposals to deliver a Link Road to the east of the town. As discussed above this Link Road proposal is subject to a number of technical and practical constraints that would take significant time to resolve prior to the submission of a planning application and could therefore affect the subsequent timescales for construction and completion. To date there is no evidence to show how these issues would be resolved and in what timescale.
- 6.1.2 Furthermore, it is also evident that funding for this Link Road is mostly dependent on the delivery of this scheme as per the obligations of the HIF, which requires that the benefits of the scheme are realised by March 2021. On this basis it is likely that the delivery of housing within Cullompton would be held back which would most likely have an impact on housing trajectories within MDDC's Local Plan.
- 6.1.3 It is also noted that traffic modelling reports commissioned by MDDC and DCC have shown that the Link Road would only provide capacity for 1,350 dwellings at North West Cullompton and 500 dwellings at East Cullompton, and after this point more strategic infrastructure improvements would be required. Whilst MDDC's desire in the long term is to introduce a new motorway junction on the M5 to provide the further highway capacity for development at East Cullompton this strategic highway improvement has yet to be developed in detail. Furthermore, no funding has been identified to cover the significant capital investment (previously estimated by MDDC to amount to £50-£55 million) required for this scheme.

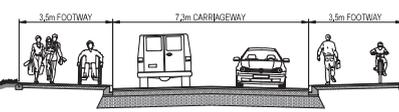
**Appendix A: Preferred Link Road Option (Option B)**



SECTION C-C  
SCALE 1:100



SECTION B-B  
SCALE 1:100



SECTION A-A  
SCALE 1:100

PH	13/04/18	JF	FIRST ISSUE	REV	01
REV	DATE	BY	DESCRIPTION	CHK	APP

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PROJECT: CULLOMPTON TOWN CENTRE  
RELIEF ROAD - ROUTE OPTIONS  
REPORT

SCALE: 1:1500

PROJECT NO: 70047809

DATE: 13/04/18

DESIGNER: AMR

CHECKER: OU

DATE: 26/08/18

PROJECT NO: 70047809-OPTION B

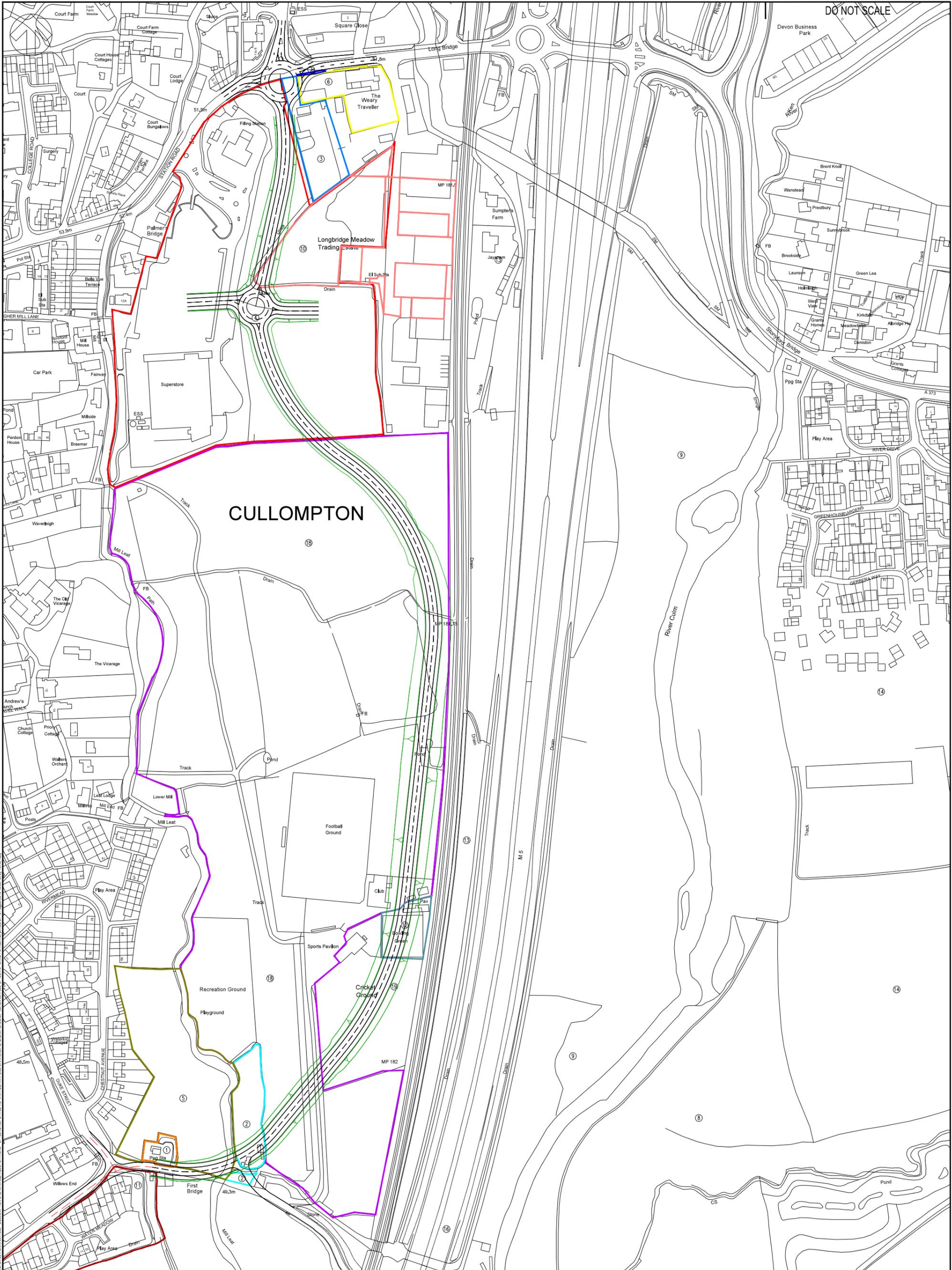
REV: P01

OPTION B - LAYOUT PLAN

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## Appendix B: Land Ownership Constraints of Preferred Link Road Option (Option B)

DO NOT SCALE



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 Date: 26/06/16 15:28:27  
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 CULLOMPTON TOWN CENTRE RELIEF ROAD -  
 ROUTE OPTIONS REPORT  
 TITLE:  
 OPTION B - LAND OWNERSHIP PLAN

SCALE @ A1:	CHECKED:	APPROVED:
1500	AMR	TO
PROJECT No: 70047809	DESIGNED: JY	DATE: 26/06/16
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