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15 November 2019

Dear Sir/Madam,

RE – Cullompton Neighbourhood Plan: Submission plan response

Thank you for providing the opportunity to comment on the Cullompton Neighbourhood Plan. This response provides the formal views of Devon County Council in relation to:

- Local education provision;
- Local highway provision;
- Waste planning;
- Waste disposal;
- Minerals planning;
- Flood risk;
- Public health; and
- The historic environment.

The comments are included in the Appendix to the letter which provides the information requested in the response form.

If there is an opportunity to present evidence at the Hearings for the Neighbourhood Plan the County Council would like to be present. The County Council would also like to be notified when a final decision is made on the Neighbourhood Plan.

If you have any questions please do not hesitate in contacting me.

Yours faithfully,

Mike Deaton

Chief Planner

Appendix: Comments

Cullompton Neighbourhood Plan: Submission response

Section/paragraph	Topic	Comments	Nature of representation
2.7	Minerals and waste	This paragraph refers to the Minerals and Waste Plans as 'other important planning documents'. This should specifically refer to these as part of the development plan in the same way the Neighbourhood Plan and Local Plan are.	Comment
6.11	Flood attenuation	It would be appropriate to term the section 'flood risk' as opposed to 'flood attenuation'. 'Attenuation' is a specific term with a defined meaning.	Comment
6.13	Flood attenuation	Paragraph 6.13 refers to 'flood attenuation' playing a role in minimising flood risk and providing opportunities for improving the quality of the local environment. It would be preferable to use the term 'sustainable drainage' as other flood risk management features also have an important role to play here.	Comment
Policy SD03	Flood attenuation	<p>It would be appropriate for the policy to be termed 'flood risk' as opposed to 'flood attenuation'.</p> <p>Cullompton has a history of field drains and watercourses. As such it would be appropriate for the policy to support development which reflects these features. Surface water drainage features such as swales and rills could contain permanent water levels with space for these levels to rise during rainfall events. These features can help promote and increase biodiversity within the site as well as provide features which can be appreciated by the public.</p> <p>It would be appropriate to refer to maintaining and improving water quality within Policy SD03. Fulford Water and Spratford Stream are classified as 'moderate' for ecological performance whilst Ken Stream and the Lower Culm (Uffculme to Stoke Cannon) are classified as 'poor'. New development should aim to improve these classifications by constructing robust SuDS management trains (as referred to within the SuDS Manual). These management trains should contain at least two features (e.g. rain garden and detention basins) to give ample opportunities for treatment.</p>	Comment

		<p>Consideration should be given to requiring signage for surface water drainage features. Interpretation boards can be used to ensure that the public are aware of the features, what they are required for and how they work.</p> <p>Consideration should be given to supporting residential development which includes mechanisms for collecting rain water.</p>	
6.32	Infrastructure – recycling centre	<p>The text here makes passing reference to the potential for a recycling centre to be provided as part of the growth proposals for Cullompton. This should be strengthened to reflect the position of the County Council that a new recycling centre should be considered at Culm Garden Village.</p> <p>The Waste and Resource Management Strategy for Devon which was adopted in 2013 outlines a series of recycling centres which require improvement or replacement in the period to 2023. These proposals include the need for a replacement facility to cover the Cullompton/Tiverton/Willand area as a result of the lack of capacity and outdated provision at the current Ashleigh site. These issues are problematic in themselves however the increased demand to access the site is also resulting in queuing on the public highway at times of peak demand.</p> <p>The County Council position was also articulated through the preparation of the Mid Devon Local Plan Review, including at the Examination hearings, where it was agreed that relevant policies, including CU10 (East Cullompton Community Facilities) and CU20 (Cullompton Facilities), would be updated to include reference to a new recycling centre and the need for development in the area to contribute financially towards its delivery. The County Council response to the East Cullompton Masterplan SPD Stage 1 consultation reinforced the wish to discuss the potential for locating a new facility within the East Cullompton allocation, or indeed the wider Garden Village.</p>	Comment
6.34	SD07 – Timing of infrastructure	<p>Devon County Council understands this objective and would look to deliver infrastructure to appropriately mitigate development impact. However, it should be acknowledged that viability and funding availability can impact on infrastructure phasing. Exploring a wide range of funding sources and funding partners will be helpful to deliver infrastructure in a timely manner and the Town Council are encouraged to play a role in this.</p>	Comment
Policy HT01	Motorway junction	The County Council continues to progress feasibility work regarding an improved	Comment

		junction arrangement at Cullompton. It should be noted that there are a variety of ways to improve motorway access which could include a new junction as well as improvements to J28. Work will continue to determine an appropriate strategy.	
Policy HT02	Improving our public transport network: Interchange	The County Council does not have any plans or funding to deliver a transport interchange in Cullompton. This is demonstrated in the infrastructure delivery plan (IDP) which accompanies the emerging Local Plan; the IDP does not identify this project.	Comment
Policy HT04	Improving our footpaths	It is assumed that this policy applies to footways as opposed to footpaths (e.g. public rights of way). This could be helpfully clarified. The width of footways in the County design guide is 2m and should be the standard sought with reductions justified. However varying widths should be allowed in order facilitate flexibility and comply with the advice in manual for streets	Comment
Policy HS01	Housing mix	The policy would be improved to refer to the need for adaptable homes within local housing needs assessments. This would reflect the likely growth in the numbers of over 65s in the town.	Comment
Policy HS04	Parking on housing schemes	The Highway Authority would have no objection to the parking standards included in the policy and other Authorities have set out parking requirements on the basis of the number of bedrooms in homes. It should be noted that the level of parking provided will have an impact on mode choice.	Comment
Policy EN03	Green space	The inclusion of the Scheduled Roman forts on St Andrew's Hill as green space is supported. However, Map 6 does not have the area correctly plotted. Area 17 (St Andrews Hill) appears to be the same as Upcott Field on Map 9, with the Scheduled forts not actually mapped at all.	Object (mapping requires correction)
Policy TC01	Heritage assets	The enhancement of the designated heritage assets and those on the Mid Devon Register of Local Heritage Assets is welcome, however these represent only a proportion of Cullompton's heritage assets and archaeological potential because the register principally includes buildings rather than archaeology. Many more heritage assets are recorded on the Devon Historic Environment Record, which DCC maintains on behalf of MDDC. Appropriate assessment of the impact of development on all heritage assets, and assessment/evaluation of archaeological potential, should also be required. The latter is particularly important for Cullompton given its Roman, early medieval and later settlement archaeology.	Comment

10.15	One-way proposal in Fore Street	The County Council acknowledges the ambition of improving the public realm in the town centre and the role which managing traffic flows would play in achieving this aim. The concept of an improvement to Fore Street in the Hayridge area is appropriate in principle. However, further consideration is needed regarding the detail of this proposal. A particular issue will be to ensure that private accesses can be maintained if revisions to traffic flows were to be implemented. This would also affect the likelihood of support for any proposals in the area. The timing of any proposals is also important because current traffic conditions are likely to be significantly changed by proposals for the eastern access road and the road through the north west urban extension. Until the impact of these improvements are known, it would be premature to implement changes elsewhere.	Comment
10.16	TC03 – Pedestrian priority in the town centre	The aim of this policy is appropriate however improvements to the public realm and management of traffic in the town centre is reliant on the provision of the eastern relief road being delivered first.	Comment
Policy WL01	Existing recreation spaces	<p>The aspiration to protect existing recreation spaces is understood and it is recognised that the areas are valuable for the local community. However, the development of some recreation spaces may be critical to the delivery of vital infrastructure in the town. For example, the cricket club is protected by this policy but its site is required to enable the provision of the eastern relief road, a key project for the town. In addition, school playing fields at Cullompton Community College and Willowbank primary are protected by this policy. There are no current proposals for these two sites, Government would have to approve any building on the school playing fields and any impact would need to be fully mitigated. However, there could potentially be a scenario in future whereby some additional, built education facilities may be required on the playing fields.</p> <p>In consideration of this context, the policy wording is considered unnecessarily restrictive and could affect vital infrastructure provision. As such, there may be select circumstances in which building on recreation spaces may be appropriate, assuming mitigation is provided for development impact. The policy should be revised to take account of this issue.</p>	Objection
Policy WL02	CCA Fields	The County Council acknowledges the community sentiment towards the CCA fields and wishes to work with the community in the ongoing project to deliver the eastern relief road. In doing so, the County Council aims to minimise loss of the CCA fields and maintain the functionality of the remaining recreation space. As part of the	Objection

		project, replacement recreation space will be provided elsewhere to maintain the amount of space to which the town has access. However, it is not appropriate for the eastern relief road to provide a contribution to the long term maintenance of the CCA and other community recreation space, beyond that required to directly mitigate the impact of the provision of the road. As such the County Council objects to the inclusion in the policy of point X, regarding a long term maintenance contribution.	
Glossary	Devon Waste Plan	The glossary includes the Minerals Plan but not the Waste Plan. The Waste Plan should be added.	Comment