

NW Cullompton Masterplanning consultation  
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My ref: Arch/DM/MD/22496a

Dear Sir / Madam

## Northwest Cullompton Urban Extension - Masterplanning

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:

- Historic environment
- Education
- Transport
- Community facilities

These are discussed under the headings below.

### Historic environment

The proposed northwest urban extension occupies a landscape with high archaeological potential. The town of Cullompton has Roman origins, with a Roman fort on St Andrew's Hill and evidence for Roman settlement within the town itself. The Historic Environment Record shows the landscape around the settlement to contain evidence of prehistoric activity, in the form of settlement and funerary activity, as well as rarer post-Roman or Saxon activity within the town and surrounding landscape. This has been demonstrated by recent findspots or artefacts from the area under consideration and also includes evidence of Roman and medieval activity. Aerial photography has identified Romano-British enclosures and evidence of prehistoric funerary activity within and around the Masterplan area.

Given the high archaeological potential of the area under consideration the Devon County Historic Environment Team (DCHET) would advise that any proposals for development within the Masterplan area should be informed by the results of a programme of archaeological investigation to enable a consideration of the impact of the development upon the archaeological resource.

This advice is in accordance with guidance in paragraph 5.3 in the supporting text for Mid Devon Local Plan Policy DM27, policy AL/CU/3 of the Mid Devon Allocations and Infrastructure Development Plan Document and paragraph 128 of the National Planning Policy Framework (NPPF).

The additional information required in support of the proposals would be the results of:

- i) a desk-based assessment of the Masterplan area to assess the impact of the proposed development upon the known heritage assets within and around the proposed development area;
- ii) a geophysical survey of the Masterplan area, and
- iii) a programme of intrusive archaeological investigations of heritage assets identified by (i) and (ii) above that will be affected by the proposed development.

The results of these investigations would allow the significance of any affected heritage assets to be understood as well an informed and reasonable planning decision to be made in accordance with para. 129 of the NPPF.

It should be noted that whilst some archaeological work has been undertaken, it does not sufficiently cover the masterplan area. As such, more assessment should be undertaken as the masterplanning progresses.

The DCHET would be happy to discuss the scope of works required, and would also be able to supply a brief setting out the scope of the works required.

## **Education**

### **Primary education**

Primary education facilities within Cullompton are facing considerable pressure in terms of numbers of pupils and the size of facilities to accommodate them. In these circumstances it is critical that a new school of 420 pupil places plus early years provision for ages 2 - 4 be provided within the development area, and the county council is pleased to see that this is recognised in the masterplanning consultation material.

Current policy states that a site the size of 2.1 hectares will be required, however it is considered that if this scale impacts upon the amount of housing or green infrastructure the site can deliver, then a developable site of 1.8 hectares would be acceptable.

The masterplanning consultation material highlights three options for the location of a new primary school, which is needed to accommodate the impacts of development. These are:

- North-east area
- Next to health centre
- On Rull Hill

As stated above, the pressure on pupil places in the town is very high and it will be important for the new primary school to be open at the earliest opportunity. This means that the site, services, buildings and fit out will need to be provided either before or in a very early phase of development occupation and that highway access is secured. The location of the school therefore needs to be able to provide for the early delivery of these requirements including early transfer of the freehold and construction access.

With regards to the options set out, the county council prefer either that next to the health centre or that on Rull Hill. In particular, the site next to the health centre offers the opportunity for access to be provided from the existing highway and this is likely to facilitate its early delivery. However, if it can be shown that suitable highway access to the potential school site on Rull Hill could be provided, and that the school could be complete either before or at a very early phase of development occupation, then this option is also considered appropriate.

For clarity, the development will not need to fund the full 420 places as it will not generate this many pupils. A proportionate contribution will be assessed for primary and early years places at application stage using the county council's established s106 policy<sup>1</sup> or Community Infrastructure Levy (CIL) if required from this development area (current proposals are to exclude major allocations from CIL).

### Secondary education

In terms of secondary education, it will be necessary to ensure that Cullompton College has sufficient facilities to cater for the pupils from this development. The development will need to contribute proportionately towards the expansion of Cullompton College through s106 (or CIL if applicable).

### **Transport**

#### New highway link

The developers of the site have correctly interpreted the county council's position which is that a highway route is required through the site. The layout and design of this route should be established through the masterplanning process. The county council considers the route should be designed in accordance with 'manual for streets' principles. It should cater for pedestrians, cyclists and motorised vehicles and should be of appropriate design to allow two way bus movements.

#### New highway - connection to Tiverton Road

The route of this link should travel between Tiverton Road and Willand Road. There are various options however about where this link joins the existing roads. The proposal for the road to link into Tiverton Road east of Olympian Way but west of the church yard is considered acceptable. It is considered that this junction should re-align the priority, as per 'option 2 road access' of the information presented by the developers - so that priority runs from the west onto the new highway link (and vice versa). Tiverton road east of the new junction (heading into town) would then most likely be used primarily for sustainable modes such as walking and cycling and potentially buses. Further measures to encourage

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<sup>1</sup> <http://www.devon.gov.uk/education-section-106-policy-jan-2013.pdf>

this including changes to the road design to reduce use by general traffic should be investigated.

#### New highway - connection to Willand Road

The location of where the route joins Willand road is less certain. The consultation material sets out two options. Option 1 shows the link joining Willand Road at the roundabout to the north (where Millennium Way and Willand Road link up). Option 2 shows the link joining Willand Road south of Rull Lane. Pursuit of option 2 is likely to lead to the majority of people from the new development travelling south on Willand Road, rather than Millennium Way (and vice versa). This may lead to a significant increase in use of Willand Road and, more importantly, Head Weir Road, which is not acceptable. Significant additional work should be undertaken by the developers to show how such impacts would be minimised / mitigated and, if this cannot be achieved to the highway authority's satisfaction, option 1 should be selected. At present it is not considered that sufficient justification has been provided that option 1 is not deliverable and that the impacts of option 2 are acceptable.

#### New highway - phasing

With regards to the phasing of the new highway route, the through-route should be constructed to standard acceptable to Devon County Council and open to the general public at an early phase of development. Please also note the requirement for the school to be constructed and open at an early phase of development.

#### Sustainable travel

Throughout the allocation site, there are a number of existing public rights of way. These should be used to inform the design and layout of the development and should be improved and enhanced to improve sustainable travel connectivity within and into / out of the site where possible. Routes may be diverted if required but their attractiveness should not be compromised. Pedestrian / cycle permeability should be provided to ensure that people can easily reach the key services and the employment areas - both within the site and outside it, including the town centre and employment areas to the east without the need to use the private car.

The pedestrian and cyclist facilities along Willand Road itself will also need to be upgraded, with a continuous footway / cycleway provided along its length into town. This may be narrowed and informal crossing arrangements be implemented where width constraints exist. In addition, improvements to the footway / cycleway along Millennium Way should be implemented, improving access to the employment opportunities in the east of the town. Local planning policy (AL/CU/2 of the Allocations and Infrastructure document) also requires that a segregated pedestrian / cycle path is provided linking to Willand.

#### Drainage

There are a number of existing drainage issues on the site, which will need to be considered and remedied.

## **Community facilities**

Local plan policy relating to this development allocation requires land for the provision of community uses, potentially including youth services land. The county council would not wish to take on ownership of any such land, however would potentially use a community facility to provide youth services to this area of the town.

The masterplan does not set out options for how this community facility would be provided and it is hoped that future iterations will address this issue.

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

Yours sincerely

Joe Keech  
Chief Planner