

6 - Sustainable Development

Ensure all new developments contribute to the overall sustainability of Cullompton as a town and a community

Introduction

6.1 Sustainable development is development which meets the needs of the present while not preventing future generations meeting their own needs. The Neighbourhood Plan policies are intended to ensure that new development brings benefits to all the communities and settlement areas in the parish area whilst not worsening the lives of future generations. This includes protecting precious natural resources and increasing resilience to the short and long-term effects of climate change. Achieving sustainable development is the theme of the NPPF. Mid Devon District Council’s vision and spatial strategy sets out how “the sustainable development of Mid Devon will bring positive benefits to local communities through promoting community well-being, supporting economic success, conserving and enhancing the area and respecting environmental limits”¹. The Cullompton Neighbourhood Plan seeks to contribute by facilitating the sustainable development that we judge is needed in a manner that minimises its negative impact on the environment.

Aims and Objectives

6.2 The following aims and objectives relating to sustainable development have emerged following a programme of community consultation. They have been used to help

formulate the neighbourhood plan policies and inform a programme of other community actions. The policies in this section reflect a widespread concern about the adequacy of infrastructure to ensure that major growth does not threaten the overall sustainability of the town; and a determination that new development should not harm or deplete our environment or natural resources.

Sustainable Development	
Planning Aims	Planning Objectives
Ensure new development has the appropriate infrastructure in place	<ul style="list-style-type: none"> • Ensure adequate infrastructure is in place before new development takes place • Plan new development road layout to help reduce vehicle use of town centre • Link new housing development to town centre facilities and amenities
Ensure new development avoids increasing the risk of flooding	Ensure flood risk and drainage are built in to development agreements
Increase use of renewable energy	<ul style="list-style-type: none"> • Ensure new developments achieve high levels of energy efficiency • Control impact of renewable energy installations



Traffic Impact of Major Development

6.3 Cullompton has long suffered from traffic congestion, particularly in and around the town centre. The current situation is not at all satisfactory and is of major concern to the local community, as is evident from the results of the

1 Local Plan Review 2013 – 2033 Proposed Submission, Mid Devon District Council, Feb 2015
22



Community Survey 2014; 79% of respondents told us the motor vehicle should be far less dominant in town. Town centre congestion, and the concomitant problems it causes, is made worse whenever the M5 is closed and the town centre serves as a relief route. We want to minimise this congestion and its resulting pollution, which has an impact on air quality in the town centre.

6.4 The NPPF (para. 181) encourages us to identify “opportunities to improve air quality or mitigate impacts such as through traffic and travel management, and green infrastructure provision and enhancement.”

6.5 PolicySD01 seeks to ensure that major new development (as defined by the and Town and Country Planning Act 1990²) does not contribute further to the problems we experience, by increasing the volume of traffic that needs to

² Development prescribed under section 62A(2) of the 1990 Town and Country Planning Act as major development is any development involving one or more of the following—

- (a) the provision of dwelling houses where—
 - (i) the number of dwelling houses to be provided is 10 or more; or
 - (ii) the development is to be carried out on a site having an area of 0.5 hectares or more and it is not known whether the development falls within sub-paragraph (a)(i);
- (b) the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more;
- (c) development carried out on a site having an area of 1 hectare or more.

use town centre roads. Under Local Plan Policies DM3 and DM4, most large developments are required to carry out integrated transport assessment, travel plan, traffic pollution assessment and low emission assessment. The highways authorities³ will expect developers to assess the impact of development on the M5 and junction 28 as well as the town centre and local road network. We expect any traffic impact assessment prepared by developers to demonstrate clearly and specifically how their proposals will help minimise

the need for such traffic to use

the town centre roads of Cullompton before any approval for a major development is given. Reducing the volume of traffic requiring use of town centre routes is a key objective of the Neighbourhood Plan. We do not want this negated by the impact of new development.

6.6 Our policy is consistent with the Cullompton Air Quality Management Area Action Plan 2009 which recognised the need to bring effective traffic relief to the town centre and introduce town centre traffic management measures.

Policy SD01 Traffic Impact of Major Development

Proposals for major developments that are required to provide impact assessments under Local Plan Policy DM3 and/or Local Plan Policy DM4 should specifically demonstrate how the development’s vehicular access/egress and circulation arrangements will mitigate the negative impacts of traffic in Cullompton town centre.

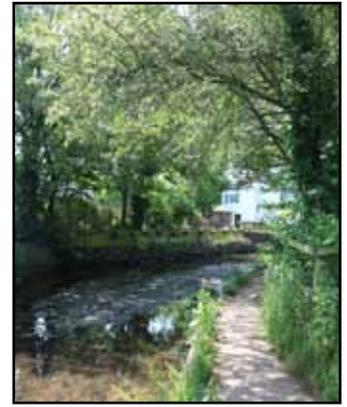
Road infrastructure requirements should be in place in good time so as to prevent an unacceptable impact on the existing road network, and the town centre in particular, as a result of the development.

³ Highways England and Devon County Council

Links to the Town Centre

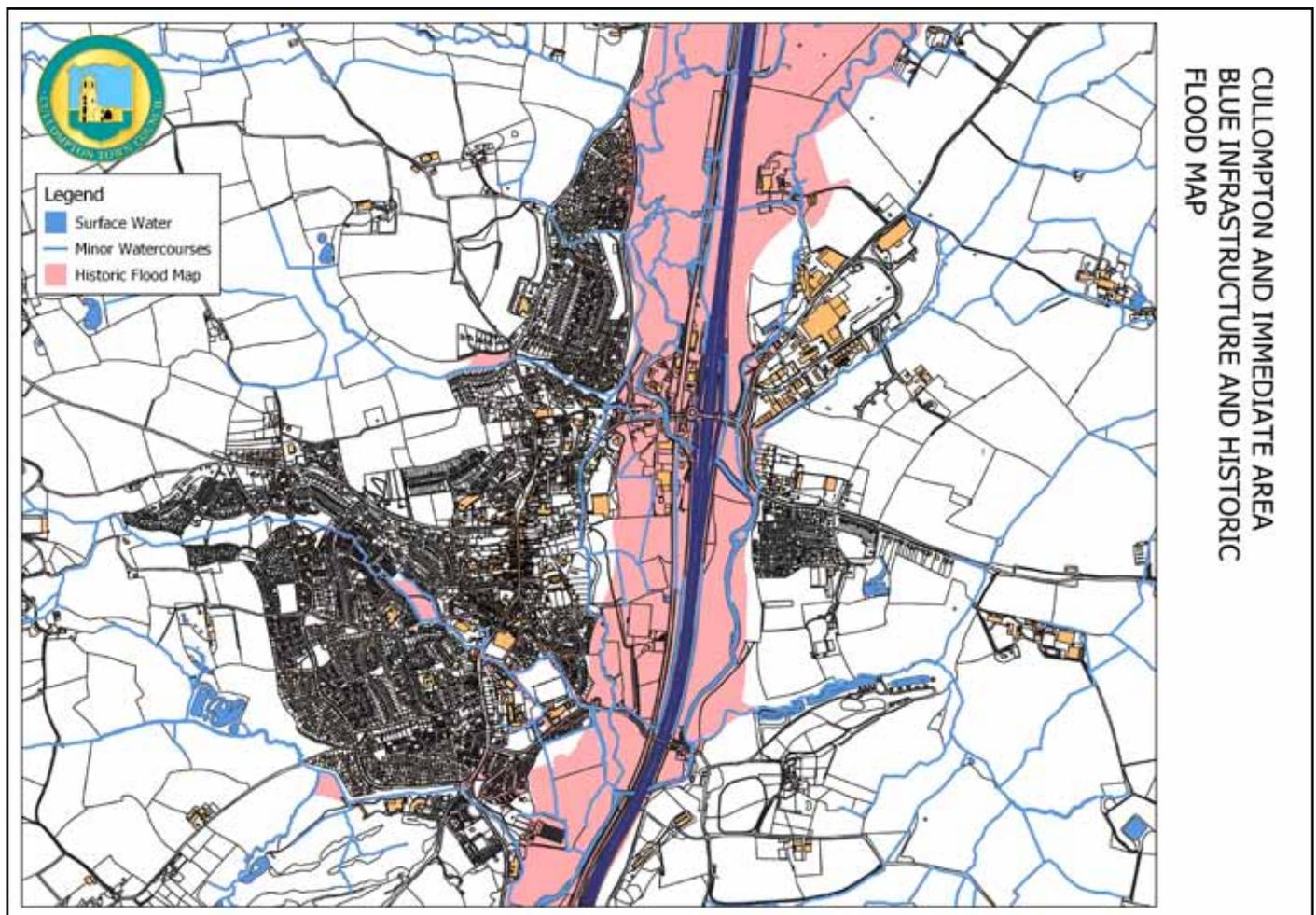
6.7 Cullompton Town Council has made clear⁴ that it would like to see a coherent and extensive all-weather cycle and walking network that provides safe and accessible routes that will encourage local people to walk or cycle within the town as an alternative to using the motor vehicle; thereby realising the health benefits of doing so whilst reducing the amount of local traffic in and around the town. The Town Council is particularly keen to see all major new developments connected to the town centre and public facilities and services, such as GP surgeries and schools, and recreational venues by footpaths and cycle ways. In this way we hope too that the role of the town centre will be strengthened, as local people have asked. The NPPF (para. 91) calls for “safe and accessible developments... the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas”.

6.8 Local Plan Policies CU2 and CU8 make provision for cycle and pedestrian links to and from the town centre and the large housing extensions to North West Cullompton and East Cullompton when they are developed.



Local Plan Policy CU13 provides for cycle and pedestrian links within the development at Knowle Lane and connections to the wider transport network. Policy SD02 seeks to endorse and extend this approach to new development and make provision for cycle and pedestrian links to and from all major development (as defined by the Town and Country Planning Act 1990⁵) to Cullompton town centre, where it is practical to do so.

6.9 Local people made it plain in the Community Survey 2014 that safety is a key concern. Policy SD02 therefore emphasises the need for safety and accessibility to be a major consideration in design and layout of new development. All new major developments



should make footpath/cycleway provision that facilitates easy and safe movement around the development and establishes links to the town centre. In this way too, we aim to integrate all new developments with the rest of the town.

6.10 This policy is consistent with the approved Cullompton Multi-Use Path Cycle Path Policy Document 2013/14 which sets out the Town Council's preferences and priorities for developing the network.

Policy SD02 Links to the Town Centre

All major developments should include provision for accessible pedestrian and cycle routes and connections that:

- i. link safely to the wider network of routes leading to and from Cullompton town centre and other essential public facilities, such as schools and health facilities; and
- ii. benefit from natural surveillance of public areas as well as satisfactory lighting.



planning; and it gives priority to the use of sustainable drainage systems. Consistent with this, Local Plan Policy S9 requires measures to reduce the risk of flooding and Local Plan Policy S11 is supportive of measures to reduce flood risk within Cullompton.

6.12 Flood attenuation, as part of a sustainable drainage system, is not only important in minimising risk. It provides an opportunity to add to the quality and variety of the local environment and contribute to improving our eco-systems. Policy SD03 requires developers to show how they will take the opportunity, whenever available, to create attractive new water features of the appropriate size to serve the main purpose that will also add positively to the local landscape and the amenity of the surrounding area. Where development proposals lie within flood risk areas or adjacent to a main river, the Environment Agency should always be consulted. Developers are encouraged to follow Devon County Council's guidance on sustainable drainage and flood risk management⁶.

Policy SD03 Flood Attenuation

Flood attenuation on major developments should make use of existing on- or off-site natural water features, or new onsite water features in suitable and safe locations, to contribute to the visual amenity and biodiversity of the area.

Flood Attenuation

6.11 Cullompton Town Council is mindful of the serious flooding in 2012 and other localised flooding since. It is concerned about the changes to the watercourses, increased run-off and other factors resulting from major house building on green field sites. This could, potentially, increase the risk of flooding and all new development should pay particular attention to flood risk.. Flood risk is on the increase. We want to reduce the risk of flood and be assured that any and all new development will not only avoid heightening the flood risk in future but will actively contribute to minimising the risk of flooding in their vicinity and in the wider area. Reducing the risk of flooding is an imperative in all new development proposals. The NPPF (para. 155) calls for the avoidance of inappropriate development in areas at risk of flooding "by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere". The NPPF (para. 163) requires that any residual [flood] risk can be safely managed, including by emergency

⁶ Currently, SUDS: Guidance for Devon <https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/>

Solar Design in Housing Schemes

6.13 We want the Neighbourhood Plan to contribute to reducing greenhouse gas emissions such as carbon dioxide and minimising the impact of new development on the changing climate. The NPPF (para. 148) says the planning system should...support renewable and low carbon energy and associated infrastructure”.

6.14 We believe that every opportunity should be taken at the development stage to ensure new developments take advantage of Cullompton’s renewable local energy sources, and its sunshine in particular. We share the view expressed in the Planning Design Guide for Mid Devon “It is important that due consideration is given to energy conservation in the design and location of new buildings in accordance with principles for sustainable development, compatible with the need to harmonise the development with its surroundings.”

6.15 Passive solar design refers to making use of the sun’s energy for the heating and cooling of living spaces. Passive solar design is the siting and design of buildings to maximise the use of the sun’s energy for heating and cooling. Passive solar design takes advantage of natural characteristics in building materials and air to help reduce the additional energy needed for heating and cooling. The NPPG says that “policies can encourage sites to be planned to permit good solar access to as many buildings as possible. The potential benefits of passive solar design can only be realised by careful siting and layout... It is important that passive design considers the potential for overheating in the summer, as well as reducing need for heating in the winter.”

6.16 Local Plan Policy CU5 requires “renewable and low carbon energy to provide a proportion of the site’s energy use” as part of the approach to major development in the ‘North West’ extension to Cullompton, in the interests of minimising “the overall carbon footprint of the development”. Policy SD04 requires the principles of passive solar design and renewable energy technologies to be central to the design

and planning of all new housing areas. The policy does recognise that there is a need to achieve a balance between energy efficiency and acceptable standards of privacy and amenity. On the matter of possible noise disturbance, developers are encouraged to seek guidance from the Institute of Acoustics⁹.

Policy SD04 Solar Design in Housing Schemes

The principles of passive solar design and the use of renewable energy technologies and low energy systems should be encouraged for all new housing developments.

Dwellings should be built whenever possible with the orientation of the principal habitable rooms taking account of passive solar gain and energy efficiency maximised whilst ensuring that the site layout provides acceptable standards of privacy and amenity to all residents.

Connectivity

6.17 We want the town to be as well connected as it can possibly be and to take full advantage of future improved technologies. We want Cullompton’s residents, students and businesses to have access to the latest communication technology. The quality of local connectivity could influence local business start-ups and be crucial to the success of local enterprise. We endorse the Government’s view that access to superfast broadband should be a right – absolutely fundamental to life in 21st century Britain and regarded as an essential service just like gas, electricity and water¹⁰. The NPPF (para. 112) states that “advanced, high quality communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications

9 Professional Practice Guidance on Planning & Noise New Residential Development, Institute of Acoustics, May 2017 <http://www.ioa.org.uk/sites/default/files/14720%20ProPG%20Main%20Document.pdf>

10 Expressed in Prime Minister’s speech 7th November 2015 <https://www.gov.uk/government/news/government-plans-to-make-sure-no-one-is-left-behind-on-broadband-access>

7 Page 11, Planning Design Guide for Mid Devon <http://www.middevon.gov.uk/index.aspx?articleid=4219>

8 NPPG Paragraph: 013 Reference ID: 26-013-2014.0306, Mar 2014
26

networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.”

6.18 Local Plan Policy S1 states that supporting high quality communications infrastructure by supporting the expansion of telecommunications and high-speed broadband throughout Mid Devon is a priority. Therefore, Policy SD05 requires new buildings to have the necessary equipment i.e. suitable ducting for fibre connectivity and/or other apparatus in place, to enable high speed broadband connections and other media/communication connections to be a simple matter.

Policy SD05 Connectivity

All new residential, educational and business premises development should endeavour to make adequate provision for high speed broadband and other communication networks.

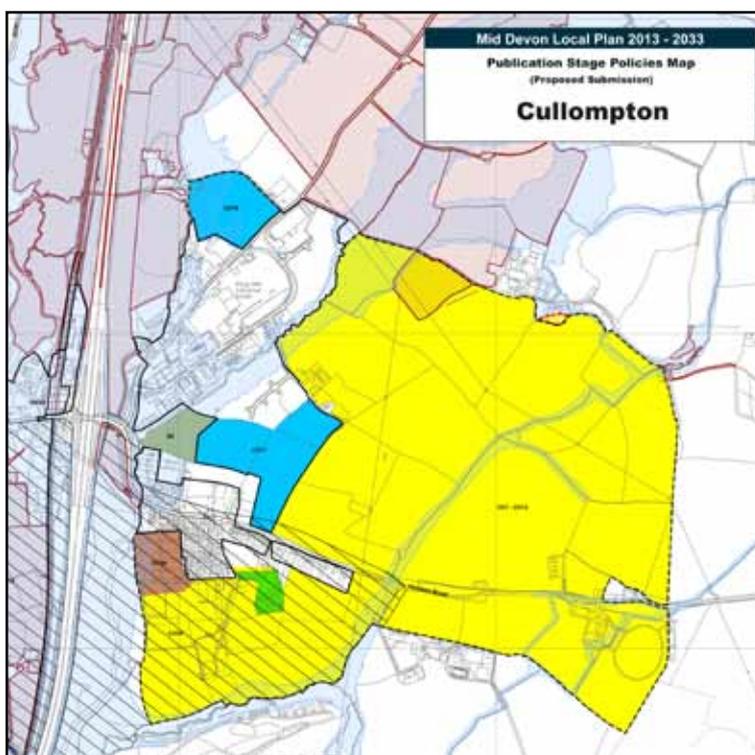
Culm Garden Village

6.19 The Local Plan Review has determined Cullompton will become the strategic focus of new development in Mid Devon, “reflecting its accessibility, economic potential and environmental capacity. This strategy will improve access to housing through urban extensions and expanded employment opportunities. There will be significant improvements to the town’s infrastructure and connectivity, including the reopening of the railway station, and improved services for its population and nearby rural areas. Proposals will provide for approximately 3,930 dwellings, of which 1,100 will be affordable, and 73,500 gross square metres of commercial floor space over the plan period” (Local Plan Policy S11).

6.20 A site of approximately 160ha. to the east of Cullompton has been designated in the Local Plan Review as a development area to provide 1,750 dwellings within the plan period and at least 850 further dwellings beyond 2033. Local Plan Policy CU7 sets out the strategic policy requirements and conditions. These include a “comprehensive master-planning” approach. Other Local Plan policies deal with the key aspects of:

- CU8 – transport provision
- CU9 – environmental protection and green infrastructure
- CU10 – community facilities
- CU11 – carbon reduction and air quality
- CU12 - phasing

6.21 Relevant to the Local Plan’s strategic policies is the ‘expression of interest’ made by Mid Devon District Council in 2016. It responded to a Government initiative launched in March 2016 “to support locally-led garden cities and towns in places where communities want them”. Mid Devon District Council considered that not only did the East Cullompton development strategy meet the eligibility criteria; here was an opportunity, with additional support from Government, “to ‘lock-in’ and maximise Garden Village principles, expedite the delivery of the initial phase and build momentum in respect of a further phase in the context of the forthcoming Greater Exeter Area Strategic Plan”. Mid Devon District Council’s case was summarised as follows: “Culm Garden Village presents a genuinely locally led, credible, feasible and deliverable Garden Village concept. It will emerge and mature as a new settlement of up to 5,000 homes to the east of Junction 28 of the M5 to serve the Exeter Housing Market Area (HMA) and the ‘Heart of the South West’ Local Enterprise Partnership Area”.



6.22 Cullompton Town Council and the Neighbourhood Plan Steering Group supported the Garden Village 'bid' in principle. However, that support was conditional upon establishing a joined-up approach that ensures the planning of a garden village at East Cullompton is properly connected to the planning framework for the rest of the parish area; and enables the community, through the Town Council and its neighbourhood planning group, to participate in a meaningful way. In that way, it will be "genuinely locally led".

6.23 How this can be achieved was considered and discussed at a Community Workshop on 22nd March 2017¹¹. The workshop was attended by over 50 people, and comprised not only a wide cross-section of community and business interests, but a variety of ages from school children and those in their early twenties, to retired residents. The Workshop proved to be both harmonious and positive.

6.24 The 'headlines' from the Workshop are:

- The potential for financial support from the Government's 'flagship' Garden Village Initiative offers a welcome opportunity to plan for and embrace growth, positively.
- There was a strong unanimity about the themes emerging.
- The workshop was willing to express 'emphatic support' for the Garden Village Initiative, if it is advanced and delivered in a way that accords with some important principles.

6.25 The six "community principles" emphasised in the 'bid' are:

- a mix of homes for rent, sale, and shared ownership;
- well-designed homes in beautiful landscaped settings;
- development which enhances the natural environment;
- a wide range of local jobs;
- local leisure, cultural, shopping and community facilities; and

- mobility for all enabling healthy living from an integrated transport system.

We concur with these 'objectives'.

6.26 Policy SD06 also reflects the community principles, we believe should underpin the approach taken to delivering growth of the town and the major development of East Cullompton. These principles mean that:

- it should be design-, not developer led;
- it should be guided by an agreed masterplan;
- every effort should be made to integrate and connect the new development to the existing community – both physically and socially; and
- Adequate infrastructure (including transport, community and environment) should precede housing development.

6.27 In December 2017 Mid Devon District Council was awarded substantial monies from the Planning Delivery Fund to progress the master-planning of East Cullompton. The purpose of the Fund is to support:

- "more and better joint working, across local authority boundaries.
- a step change in the design quality of new development
- innovation to improve the efficiency and effectiveness of processes and enable the delivery of more high-quality homes¹²"

We look forward to working closely with Mid Devon District Council's planning team to realise a sustainable extension to Cullompton of the highest quality, that we can all be proud of.

6.28 The community participated in a series of workshops during 2018 to help inform the vision, principles and concept plan in respect of the whole garden village and to establish the constraints and opportunities in respect of a draft Masterplan SPD¹³. The area subject to the masterplan exercise encompasses the areas of floodplain (to the north and east of land allocated in the Local Plan Policy CU7) to ensure that both the negative and positive impacts of

¹¹ Cullompton NP Garden Village Workshop Report, Hannah Hickman, March 2017. The report can be viewed at: <https://www.cullomptonneighbourhoodplan.co.uk/documents>

¹² <https://www.gov.uk/government/publications/planning-delivery-fund-prospectus>

¹³ SPD = Supplementary Planning Document (see glossary)

the strategic development at East Cullompton on the floodplain can be properly assessed. The Town Council believes that the opportunity to create first class leisure provision for Cullompton, such as a country park and a 'sports hub', on this land should be an integral part of the masterplan.

6.29 The issue of 'integration', of the existing and new development, physically and socially, is perceived as the most challenging aspect of the East Cullompton development. We regard the Garden Village Initiative as a marvellous opportunity to deliver strategic growth at Cullompton in the public gaze. The Town Council expects the community to be a 'partner' in its planning and delivery. In this way, we can contribute to ensuring the Garden Village area becomes an integral part of the community and

settlement of Cullompton, not a stand-alone settlement.

6.30 Cullompton Town Council feels strongly that the collection and re-use of grey water in new build dwellings should be considered by developers in all new build schemes, especially the Garden Village and the North West Extension.

Policy SD06 Garden Village Initiative

Proposals to develop a major extension to Cullompton based on the principles of a 'garden village' are supported in principle. Any such development should be subject to a comprehensive masterplan that should:

- i. seek to create a new settlement area, of unique character, within an outstanding natural environment;
- ii. foster integration between the existing and new settlement areas;
- iii. secure sufficient physical connection between East and West Cullompton (including bridges, roads, pedestrian links, cycle paths and public transport);
- iv. plan for complementary facilities in and adjacent to the housing areas that can serve the needs of the whole community of the neighbourhood area, including sports, education, health/wellbeing, community and faith spaces;
- v. embrace the principles of accessibility for all;
- vi. provide an appropriate range and scale of spaces for businesses to function effectively;
- vii. deliver a mix of housing types, tenures and designs, that meet high standards of sustainable living; and
- viii. ensure there is a co-ordinated approach to achieving the timely delivery of infrastructure.



Infrastructure

6.31 Cullompton Town Council is very clear that the scale of development proposed for Cullompton requires major infrastructure improvements and new infrastructure projects. Housing development should only proceed if there are clear plans to improve infrastructure, including, but not limited to, green, blue and built infrastructure.

6.32 The Local Plan Review has acknowledged that the town's infrastructure will need considerable improvement, extension and enhancement to support sustainable growth to the scale that is proposed. Policy CU20 in the Local Plan is specifically about 'Cullompton

Infrastructure' and states that Mid Devon District Council will make use of developer funding and planning obligations to deliver the required infrastructure. The list of 'required infrastructure' mentioned in the Local Plan includes: a town centre relief road, extra-care housing provision, green infrastructure, public transport service enhancement (including a railway station and bus interchange), additional community services and facilities. We would add the digital communication network and public utilities to the essential infrastructure list. The condition and capacity of the sewerage system is of particular concern. It has its limitations that "will require detailed investigations to assess what improvements will be required"¹⁴. The Environment Agency has emphasised the need to ensure that adequate flood risk management infrastructure is in place. Kentisbeare Parish Council has told us that it is vital to include a 'recycling centre' in the growth proposals¹⁵. The Garden Village Initiative will place even more demands on local infrastructure, including the means of accessing the motorway network from East Cullompton whilst not overburdening the local road network.

6.33 Local consultations continue to identify widespread concern that the town may suffer as a result of too rapid a growth. This must not occur. The phasing and timing of infrastructure provision must be a critical test as to whether major development should proceed. Devon County Council has recently warned that "it should be acknowledged that viability and funding availability can impact on infrastructure phasing". Policy SD07 is aimed at ensuring that the necessary test is applied and passed by major development proposals and the necessary infrastructure investment is assured.

6.34 The Town Council expects Mid Devon District Council to maintain a consultation-based dialogue with it, and the community at large, to ensure that the planned infrastructure is that which is needed and most likely to bring benefits to the whole of the town and parish area. The Town Council will be particularly concerned about the timing of infrastructure improvements.

Policy SD07 **Timing of Infrastructure**

Major development should be phased logically and in tandem with the timely and co-ordinated provision of infrastructure to help support sustainable growth and ensure that an unacceptable strain is not placed on the existing infrastructure.

14 Email from Development Co-ordinator, South West Water, 5th May 2017

15 Reg. 14 Response, Kentisbeare Parish Council, 14th Nov 2017