

CABINET

4TH JANUARY 2022

REPORT OF DIRECTOR OF PLACE

CULLOMPTON CONSERVATION AREA ASSESSMENT AND MANAGEMENT PLAN

Cabinet Member Cllr Richard Chesterton, Cabinet Member for Planning and Regeneration

Responsible Officer Richard Marsh, Director of Place

Reason for the Report: To approve the Amended Draft Cullompton Conservation Area Assessment and Management Plan (CAMP) to be forwarded onto Full Council for adoption.

RECOMMENDATION:

That Cabinet recommends to Council that:

The draft Cullompton Conservation Area Assessment and Management Plan (Appendix 1 to this report), including proposed alterations to the extent of the Cullompton Conservation Area be approved.

Financial Implications: Cullompton has been awarded a High Street Heritage Action Zone (HAZ) status by Historic England. This has secured money in the form of a grant from Historic England to be invested in a core area at the centre of the Conservation Area. This money will be invested in the form of grants and public realm work. The Draft Cullompton CAMP is a key document in the partnership with Historic England. It has been produced in house as part of the match funding by Mid Devon District Council towards the High Street Heritage Action Zone (HAZ) agreement with Historic England.

This report does not identify the funding sources or arrangements that will be needed to deliver the regeneration opportunities or for the redevelopment sites that are identified within the Draft Cullompton CAMP, but can be used to help guide and support public and private sector investment.

Budget and Policy Framework: The preparation of the Draft CAMP has been undertaken as part of match funding from Mid Devon District Council for the Cullompton High Street HAZ (funded by Historic England). The document has been produced in house with the help of staff from ICT and redeployed from Leisure services.

The Policy Framework is extensive and is listed in section 2.4 of the CAMP. In summary it includes Statute, The National Planning Policy Framework, the adopted Mid Devon Local Plan and other documents that have been adopted or approved by the Council as well as locally determined policies and strategies, and national guidance that form an integral part of the decision making process.

The area defined within the conservation area boundary would have statutory protection under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) where the Local Planning Authority is required, with respect to any buildings or other land in a conservation area, to give special attention to the desirability of preserving or enhancing the character or appearance of that area.

Legal Implications: The CAMP, which includes alterations to the extent of the Cullompton Conservation Area, needs to be compatible and adopted in accordance with relevant legislation, national guidance and Council policy, of which the principal elements are the Planning (Listed Buildings and Conservation Areas) Act 1990; the Council's Statement of Community Involvement; and the Conservation Area Appraisal, Designation and Management, Historic England Advice Note 1, 2019. Following the public consultation on the draft CAMP earlier this year, before adopting the CAMP, as the local planning authority the Council should have regard to relevant views expressed, making any amendments it considers appropriate before proceeding to adopt the plan and advertising the relevant changes to the conservation area.

The CAMP will not form part of the Development Plan; nor will it be a Supplementary Planning Document. Instead once it is adopted, it will be a material consideration in the determination of planning, listed building consent and advertisement consent applications relating to Cullompton Conservation Area.

District Solicitor (Ref:C081221)

Risk Assessment: Failure to review the conservation area and to formulate proposals for preservation and enhancement could be seen as a failure by the LPA to carry out its statutory duties. The production of the CAMP is also to support regeneration of the Cullompton Town Centre as part of the High Street HAZ, and it is a key document in this respect. Failure to produce it may harm the High Street HAZ going forward. Overall there could be deterioration in commercial activity, a less vibrant centre, less coordinated development and uncertainty over essential infrastructure. Since the initiation of this project COVID-19 has introduced a significant risk to economic prosperity.

The CAMP is considered to be a key document by Historic England with regards to the High Street HAZ project. Its production is part of the agreement with Historic England, and a decision to not approve it could have a detrimental effect on the partnership with them.

Equality Impact Assessment: No equality issues are identified for this report. However, in the consideration of proposals for development affecting the conservation area, there will be a need to balance accommodating accessibility for people with disabilities with the need to preserve the historic environment.

Impact on Climate Change: The implementation of the CAMP will be considered part of a suite of documents produced by the District Council such as the Cullompton Town Centre Masterplan SPD that is currently being prepared, where climate change is a core principle, and advice and guidance from Historic England on Climate Change and Heritage.

Relationship to Corporate Plan: The CAMP includes a suite of 29 principles to help guide management in the Cullompton Conservation Area. It will ensure the delivery of the 3 key priorities as relating directly to the Corporate Plan 2020-24 including:

- Homes: to promote the regeneration of the town centre by working with landlords and property developers to improve and increase the supply of quality housing;
- Economy: to identify strategic and tactical interventions to create economic and community confidence and pride in the places we live, and;
- Community: to promote new and more integrated approaches to better health and living.

1.0 Introduction: Background

- 1.1 A draft CAMP was approved for public consultation by the Cabinet at its meeting on 8th April 2021 (minute 358).
- 1.2 The public consultation was undertaken between the 28th June and 13th August 2021, and was in accordance with the Council's Statement of Community involvement.
- 1.3 The purpose of this report is to approve revisions to the draft CAMP which are proposed following the public consultation.

2.0 Method of Consultation:

- 2.1 Consultation for the CAMP was undertaken at the same time as a consultation on the Cullompton Town Centre Masterplan and Delivery Plan, and changes to the public realm as part of the High Street Heritage Action Zone (HAZ), and was undertaken in accordance with the Councils Statement of Community involvement
- 2.2 A public meeting as required by the legislation took place on the 27th of July. This was held remotely via 'Zoom' in light of the potential risks to public health through public gatherings from Covid-19. The County Archaeologist and Dr Firth of the Connecting the Culm project also spoke at this meeting. People at that meeting who wished to comment were guided to the online process, or they could post in their comments, or visit the library and leave their comments in the collection box
- 2.3 Additionally, three face to face public consultations took place when Council Officers attended the Farmers Market in Cullompton on the 24th of July; the Art Week at The Walronds on the 26th July; and at Tesco's in Cullompton in the late afternoon on the 26th of July.

3.0 Results of Consultation

- 3.1 The consultation attracted a total of 67 responses.
- 3.2 These are attached to the report at three appendices.
 - **Appendix 3:** Responses received from Organisations
 - **Appendix 4 and 5:** Results of public consultation. Appendix 5 is where individual letters were received. Appendix four is from online comments where people were asked to rate their view from 1 to 5, and could give additional comments.
- 3.3 In each of the appendices the comments made are commented on by the Council Officer.
- 3.4 Changes proposed to the CAMP as a result of consultation are listed in **Appendix 2**
- 3.5 The amended CAMP with the changes proposed in appendix 2 is at **Appendix 1** along with the maps that form part of it.
- 3.6 Given the number of replies and that many of them are multifaceted in response to the questions raised in the questionnaire, it is difficult to summarise them. But the thrust is supportive. Bar graphs have been prepared to summarise where people have given a score between 1 and 5 (1 strongly disagree 5 strongly agree).

4.0 Next Steps

- 6.1 Subject to Cabinet approval the updated CAMP attached in Appendix 1 will be reported to the Full Council for formal adoption.

6.2 The formal adoption of the CAMP by the Council will be advertised in the London Gazette and local newspaper as required by The Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

5.0 Conclusion

The Cullompton CAMP will provide a framework to guide development in a coordinated and comprehensive manner. Once adopted, it will be capable of being a material planning consideration to help guide the decisions made on planning applications. The production of an adopted CAMP for Cullompton is fundamental to the regeneration of Cullompton and moving the High Street HAZ forward.

Consultation has been undertaken in line with Council Policy and statutory requirements and the document has been amended accordingly.

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Circulation of the Report: Members of the Planning Policy Advisory Group (PPAG) and Ward Members

Appendix 1.

Proposed Cullompton Conservation Area Assessment and Management Plan with attached maps with proposed changes found at Appendix 2.

Appendix 2

8 Summary of Changes to draft CAMP post consultation:

Page 8:

Section 2.1: Substitute last para with

“The amended document was then taken to Cabinet on the 4th of January 2022 where the results of the consultation and amendments were considered then to Full Council for Adoption.”

Third and Fourth paragraph in section 2.2. Update to read

“This document was consulted on in accordance with the Council’s Statement of Public Involvement between the 28th June and 13th August 2021. It was part of a wider consultation on Cullompton Planning Masterplan and changes to the public realm as part of the High Street Heritage Action Zone (HAZ).

A public meeting as required by the legislation took place on the 27th of July. This was a Zoom meeting as it was felt that given the high incidence of Covid that there may well be reluctance to attend a meeting in a public building. The County Archaeologist and Dr Firth of the Connecting the Culm project also spoke at this meeting. People at that meeting who wished to comment were guided to the online process, or they could post in their comments, or visit the library and leave their comments in the collection box.

Additionally, three face to face public consultations took place when Council Officers attended the Farmers Market in Cullompton on the 24th of July; the Art Week at The Walronds on the 26th July; and at Tesco’s in Cullompton in the late afternoon on the 26th of July.

The next steps will be to take the revisions to the Council’s Cabinet for approval, then to Full Council for adoption.”

Page 15: Delete second para in section 3.3.1 and insert new paragraph after para ending Tiverton Road to say “The fort was in use from around AD 55 until around AD85, but the civil settlement continued after the military had moved on. Although initially dependent on the military for its existence, as with later periods the Romano-British settlement would have been supported by its advantageous location on the transport network, its farmed hinterland and local industry (e.g., Iron). The siting of the fort and the settlement beside its approach roads has had a lasting influence on the layout of the town.”

Page 15: second para of 3.3.2. Delete “In 1020 Cullompton passed to Gytha, the Danish princess who married Earl Godwin and mother of King Harold.”

Page 15: amend para 4 of 3.3.2 to read Heland (in Kentisbeare - Henland was an enclave in the Parish of Cullompton until the late 19th C.)

Page 16: change first para of “The key phases/components section from Minster /St Andrew’s Parish Church - existing minster church, apparently dedicated to St Mary, was replaced by a new parish church during 15th century (re-dedication to St Andrew granted 1436);” to “Minster /St Andrew’s Parish Church - existing

minster church, apparently dedicated to St Mary, was replaced by a new parish church during 15th century (later rededicated to St Andrew);”

Page 17: second para of Post-mediaeval processing and trading centre Add "The road north towards Wellington from a toll gate near Goblin Lane was also a turnpike managed by the Tiverton Turnpike Trust (this joined the road from Tiverton to Wellington at Waterloo Cross). There was a total of five turnpike roads meeting at Cullompton but only four trusts."

Page 24: Rogue line of text at bottom of map deleted.

Page 30. Remove reference to telephone box in section 8, landmark buildings, in green box.

Page 30. Change Manor Court Hotel to Manor House Hotel in section 8, landmark buildings, in green box

Page 58: Last paragraph of Materials. Change Manor Court Hotel to Manor House Hotel.

Page 61: Third para in Significant Buildings and Groups. Change to read “Former Conservative Club now Frankie’s Sports Bar”

Page 62: Second Para in Key Unlisted Buildings. Add at end:” Add Kings Head now being converted to restaurant”

Page 67: Fourth para of Key Unlisted Buildings. Change “Pen-y-dur” to “Pen y Dre”

Page 68: Forth para of Tree and Green Spaces: Change all “Roman Camp” to “Roman Fort”

Page 80: last para: add ”and some have been removed and not replaced”.

Page 81: Management Plan Principle 7, add War Memorials Trust so to read “the Highway Authority, The War Memorials Trust, and local interest groups”

Page 81: Management Plan Principle 8: Add and “replace where missing” and “Any resurvey to consider anti-theft measures” MPP8 to read "Management Plan Principle 8: That the Council engage with Town Council, the Highway Authority and Local Interest groups to survey and refurbish, and replace where missing the historic street signage and furniture and identify inappropriate street furniture beyond the area to be enhanced as part of the Heritage Action Zone. Any resurvey to consider anti-theft measures"

Page 94: Bibliography: Add

Conservation Area Appraisal, Designation and Management Second edition, Historic England Advice Note 1, 2019

Devon Historic Market and Coastal Towns Survey report on Cullompton (Cornwall Archaeology, 2013: [HYPERLINK](https://archaeologydataservice.ac.uk/archives/view/devon_eus_2017/downloads.cfm) "https://archaeologydataservice.ac.uk/archives/view/devon_eus_2017/downloads.cfm " Archives: EUS: Downloads (archaeologydataservice.ac.uk)).

Appendix 3

9.0 Public Consultation: Responses received from Organisations

9.1 Cullompton Town Council

The Town Council considered the consultation at Full Council on the 26th August 2021. They resolved

Conservation Area Appraisal and Management Plan (CAMP) Consideration was given to a Town Council response to:

- (i) The consultation on the Conservation Area Appraisal and Management Plan (CAMP). (Supporting Paper J to the agenda)*
- (ii) The consultation on the Cullompton Town Centre Masterplan. (Supporting Paper K to the Agenda)*
- (iii) The consultation on the Cullompton High Street Heritage Action Zone Public Realm Enhancement (HSHAZ). (Supporting Paper L to the Agenda)*

RESOLVED

- (i) that the Town Council is broadly in favour of the proposed changes to the conservation area*
- (ii) With regard to the Cullompton Town Centre Masterplan there needs to be provision for the storage and removal of general rubbish*

Officer Comment: Noted.

9.2 Historic England

Overall, we wish to congratulate your authority on the suite of initiatives associated with the regeneration of Cullompton it is responsible for. These very much provide a rationale for our own interest in the town's agenda, channelled principally through the High Street Heritage Action Zone (HSHAZ). All these relevant activities provide a robust and coordinated framework which will not only contribute to the successful delivery of the HSHAZ but create a sustainable regime which can continue to build on this once the scheme has concluded in the spring of 2024.

Conservation Area Appraisal and Management Plan

1. *At the outset we should say how much we welcome this document and being given an opportunity to comment on it as there is no statutory requirement on the part of the Council to consult us. The document is thorough and our thoughts are therefore few, focusing primarily on the issues which have been identified and how the Management Plan aims to accommodate them.*

Officer Comments: Noted

2. *In terms of format etc. the document is obviously quite big and we wonder whether it could be broken down a little more – perhaps by the inclusion of more photos to help illustrate key themes or messages, and whether the Management Plan might benefit from being a standalone document? That way the Appraisal, which is essentially definitive, can remain as a constant, and only the Management Plan need be updated*

from time to time in response to changing circumstances. It will be helpful for the document(s) to be dated on eventual adoption, and to include reference to Historic England guidance on Conservation Areas in the bibliography, if not also at the beginning as a rationale for the structure and contents. It might also be worth considering whether the individual character areas can be available on a standalone basis, as separate pull-outs maybe?

Officer comments: 2. It is felt that as there a part 1 – Conservation Area Assessment and Part 2 – Management plan the is effectively two parts and that part 2 can be amended as necessary. There is no need for two discrete documents.

The individual character areas already start on new pages and can be easily extracted.

The comments on what should be referenced are noted and amendments made as necessary.

Historic England's advice is already reference in section 2.3. It is added to the Bibliography

3. *We have no comments on the proposed changes to the boundary. These are suitably reasoned and add value to the Area's designation overall. But as an aside, it will be important to ensure that the parts of the HSHAZ are which are to be funded are within any eventual Conservation Area boundary.*

Officer comments: All of the HAZ area is within the conservation area

4. *There is an impressive and extensive capturing of relevant issues and a correspondingly extensive schedule of proposed management responses. It is not clear why these are called "management principles" rather than proposals or actions, and such a term might risk creating the impression of them being conceptual rather than tasks to be actually pursued. It would be helpful to have these identified as priorities (i.e. high, medium, low), and the timeframe in which they should be pursued (i.e. short, medium and long term) even if specific deadlines for enacting them can't be defined, perhaps in the form of an action plan. In this respect identifying where possible sequencing, connectivity and dependency relationships which might exist between any of the proposals would be helpful too. That way the Management Plan has in-built monitoring and review provisions.*

Officer Comments: A delivery plan will be drawn up with resources to deliver them after the adoption of the CAMP.

5. *Map 5 refers to key negative areas, and responses to these are covered in the Management Plan. But we note that there is no reference to potential for enhancement of the Bullring (though it is identified as a visually important open space in Map 4). This may not be a "key negative area" within the definition of how that term is applied here but the area is identified for enhancement within the emerging Town Centre Masterplan and as a project to be funded within the HSHAZ. It might therefore be desirable to achieve consistency between the two documents in the referencing of the area. The provision of such a "hook" in the Management Plan isn't necessary to substantiate funding through the HSHAZ*

but complementary affirmation may be useful when seeking other funding in the future - particularly if heritage in nature - for the enhancement of this area.

Officer Comments: It is noted that the area of the Higher Bullring it not noted in itself as a key negative. It is though included in a number of the key negatives in the character that relate to visual clutter, dominance of cars and traffic and within the Management Plan in the key principles 1, 2, 3 and 4, and explicitly in 7, which states:

That the Council engage with Town Council, the Highway Authority and Local Interest groups with a view to developing a scheme to redesign and reinvigorate the visually important open space and setting of the war memorial in context with the conservation area and the history of the space, and should seek to reduce clutter, and dominance of the car. Any scheme should adhere to the guidance in the Historic England publication – Streets for All: Advice for Highway and Public Realm Works in Historic Places.

6. *Map 3 identifies important historic buildings and includes proposed additions of important unlisted buildings to add to those already confirmed. If it is possible to establish a correlation/consistency between these buildings and those being identified for grant funding within the HSHAZ that would be helpful.*

Officer Comments: Noted and we are taking this on board as part of the priority matrix regarding grant aid in the HAZ.

9.3 County Archaeologist & Historic Environment Manager

Cullompton Conservation Area Appraisal & Management Plan Consultation:

The Devon County Council Historic Environment Team welcomes the opportunity to comment on the draft Cullompton Conservation Area Appraisal and Conservation Area Management Plan.

We broadly welcome the document and support its recommendations. Our comments on points of detail are as follows:

We very much welcome that the Plan has drawn significantly on the Devon Historic Market and Coastal Towns Survey report on Cullompton (Cornwall Archaeology, 2013: [Archives](#): [EUS](#): [Downloads](#) (archaeologydataservice.ac.uk)). However, we feel that this ought to be referred to in the document text and certainly with an inclusion in Appendix 3 (Bibliography).

Officer comments: The document is referred to in the text of the document immediately below the heading 3, Location and Landscape Setting. The text states: “*Note the following section is largely a reproduction of the Devon Historic Coastal and Market Towns Survey for Cullompton and full acknowledgement is given in that respect*”.

The reference has been added to appendix 3 – Bibliography.

Page 14-15 (Roman Settlement): *This could be clearer that the fort was in use from around AD 55 until around AD85, but that the civil settlement continued after the military had moved on. Although initially dependent on the military for its existence, as with later periods the Romano-British settlement*

would have been supported by its advantageous location on the transport network, its farmed hinterland and local industry (e.g., Iron). The siting of the fort and the settlement beside its approach roads has had a lasting influence on the layout of the town.

Officer comments: Noted and text amended. New para added one deleted.

Page 68, 9.6 (Character Area 6): refers to a 'Roman camp'. This should refer to a 'fort', 'forts' or 'fort with annexes'. A Roman 'camp' is a specific type of temporary field defence for which there is no evidence at Cullompton. Elsewhere the text does describe the fort correctly.

Officer comments: Noted and text amended.

We welcome the proposal to include the open area to the east of the Scheduled Monument within the Conservation Area. This area is important to the setting of the Roman Fort, as it is likely to contain the road approaching it from the east as well as probable below ground evidence of civil settlement. We therefore welcome Page 73, Proposed Addition 7, subject to the replacement of the word 'camp' with 'fort'.

Officer comments: Noted

Proposed Additions 1-7: We welcome all these proposed inclusions within the CA as they will contain important Roman, early medieval, medieval, and industrial archaeological evidence as well as reflecting the historic urban character of the town. Areas 5 and 6 will protect some of the last open areas of medieval burgage plots.

Officer comments: Noted

Proposed deletions 8-14: We have no objections to these deletions.

Officer comments: Noted

Un-Listed Important Buildings: We welcome proposed additions 1-18 and have no objections to proposed deletions 19-22, or to proposed changes to adjacent buildings 1-3.

Officer comments: Noted

Management Plan Principles: We support proposed Principles 1-29. Our only comment is that Principle 7 (The War Memorial) could include reference to national organisations such as the War Memorials Trust.

Officer comments: Noted and text amended.

9.4 Highways England

In respect of the draft CAMP, we note that one of the ten main key issues relates to through traffic detracting from the environment of the town centre. As set out above (in their comments on the Masterplan), Cullompton High Street forms part of an agreed strategic diversion route to be used in the event of disruption on the M5 motorway. As such, Highways England and Devon County Council will need to fully understand the transport implications of any measures which may impact the ability of this agreed diversion route to fulfil its strategic function.

Officer Comments: We are aware of this restriction which should be overcome by the construction of the relief road. The consultants who are looking at the public realm improvements in Fore Street and High Street have a transport consultant who is aware of these issues. No change is required to the CAMP.

9.5 Cullompton Leat Conservancy Board

The Leat Conservancy Board are delighted that Cullompton Mill Leat has been recognised as an important historical feature of the town.

Paragraph 9.2 of the Appraisal identifies the 400 year old Leat as being a Special Character Area of historic interest. It is our view that the whole of the Leat from the Head Weir to where it re-joins the River Culm forms a single structure as such, the area to be included in the Conservation Area should be extended to incorporate the entire length of the leat. The document recognises that the weir and sluices outside of the conservation area are 'important unlisted buildings'. We are concerned that if these structures are outside of the conservation area the Council may have no legitimate interest with regard to alterations/works to these structures which may impact the leat downstream? The area downstream of Lower Mill will be particularly vulnerable during and after the proposed relief road works which will cross this important watercourse. It is important that the entire leat is protected.

Management Plan Principle 29 – The Leat Conservancy Board very much welcome this recommendation that a long term management plan be created for the leat. It is important that a body with authority and funding takes on responsibility for leading delivery of such a plan. We would suggest that advice be sought in developing a maintenance plan from those with expertise such as the Rivers Trust and the Connecting the Culm Project.

The following are examples of why such a plan is desperately needed:

The leat currently needs, and has for some time needed, work done to sections of eroding and subsiding banks particularly as it impacts a public footpath. We are aware that the Town Council are holding funds from DCC to get this work done. The length of time it is taking for this work to be agreed and commissioned is now over 2 years, during which time these areas have deteriorated further. Perhaps with a proper plan this work could have been done as required as routine maintenance before the condition of the banks got so bad.

Flow in the leat has declined over time. Until recently it was so reduced by vegetation growing in the watercourse that in hot weather the water levels in the leat and through the town were such that on occasion it virtually ran dry. This had a devastating effect on the wildlife and amenity. The Leat Board had tried for some time to encourage the landowners and Environment Agency to clear their blocked sections of watercourse but without success. After much delay the Town Council stepped in and with a financial contribution from the Leat Board arranged for clearance work to be carried out. The benefit has been immense. Despite a prolonged dry spell this summer the flow has remained at a healthy level and wildlife has flourished. We have never seen so many fish as we have this year and populations of ducks, moorhens, little egret and kingfisher are thriving. Clearance work will need to be carried out regularly to prevent the previous situation recurring. A long term management plan which ensures that clearance work is carried out routinely

will hopefully ensure the leat does not again experience a decline in flow due to lack of upstream maintenance. It is important to note that the works that have been so successful in restoring the flow to the benefit of the town were all done in the part of the leat upstream of area that is currently proposed to be to be in the Conservation Area.

In summary, Cullompton Leat Conservancy Board strongly support the proposed Management Plan Principle 29. We also support the proposal to include additional sections of the Mill Leat in the Conservation Area but feel that the proposal does not go far enough in leaving part of the Mill Leat and associated structures outside the conservation area.

Officer Comment: The conservation officer walked the upper part of the leat to the weir with the ward member after the CAMP went to PPAG. Management Plan Principle 29 was added after that meeting. The leat extends well beyond the historic built town core and into fields beyond. It is not within the remit of the purpose of a conservation area to extend it so far beyond the historic built development and along the water course to the weir where it starts or to where it re-joins the main river channel. This does not prevent the Management Plan Principle, which relates to the management of the leat, meaning that this relates to the whole leat.

9.6 Natural England

Natural England does not have any specific comments on this Conservation Area Appraisal and Management Plan.

Appendix 4

10.0 Public consultation:

The majority of the public comments received can be found in the attached table - **Appendix 5**. The comments from the public both by email and by filling in the paper proforma are recorded in this table. The comments of the Council Officers in response to these comments are added to the table in italic.

10.1 In addition 6 letters have been received. These state

The first letter/email comments

I attended the public consultation on proposals for the changes to the Higher Bull Ring held at the Walronds. I was pleased to have the opportunity to discuss the plans with the Conservation Officer and have the following comments to make.

You will see from my address that I have lived .. in the Bull Ring since 1979 (edited for privacy). Since then a number of changes have been made to the surrounding area but the change I would most like to see is in the parking arrangements. When I mentioned that I would like to see the parking changed to echelon parking I was told that there is a proposal to reduce the parking to parallel parking and a narrowing of the highway. I realise that the new relief road is crucial to the development of all the proposals for change through the town centre and I have several concerns about these ideas. I must admit that reducing the amount of parking in the Bull Ring would improve the view from my property but Free parking in the Town Centre is essential for the vitality of the businesses in High Street and Fore Street. The Disabled Parking was put in the present position as it is the only level area for wheelchair user to safely transfer from their vehicles. The parking is in use 24 hrs a day with those accessing the restaurants, coffee shops and take away venues. I understand the enthusiasm to reduce the number of cars on the road but planning permission has been granted for new housing estates which cannot accommodate buses and the LOTS scheme (Live Over The Shop) has resulted in numerous properties with no amenity areas or parking. The whole purpose of the HAZ scheme, as I understand it, is to encourage activity and footfall in the Town Centre. By dramatically reducing the easily accessible parking in the Town Centre the result is likely to be the loss of many established, but struggling businesses. It is essential that a compromise be found to enable better use of the Bull Ring without compromising the viability of the Town Centre which everyone wishes to regenerate.

Another concern is related to timing of the work. I do not think that any start has been made on the construction of the Relief Road. I fully understand the complexities and frustration relating to this project although I am no longer really up to date on developments. However it would be catastrophic to the businesses in the Town Centre if work were carried out in the Bull Ring at the

same time as the access roads were blocked for construction traffic for the road. What is the District Council intending to do to mitigate these problems?

I recognise that the grant from Heritage England under the HAZ scheme is time limited therefore it is disappointing that the Relief Road is unlikely to be opened in time for the impact to be known. No doubt a great deal of traffic will be diverted out of the town Centre leaving space for those who wish to visit the Town for Business, shopping and leisure activities. It is hoped that the Relief Road will enable people wishing to access the Town Centre to do so and have sufficient parking to encourage visitors to use these facilities. There will still be a number of large vehicles needing to access Tiverton Road including buses and farm machinery. The bus Stops in the Bull Ring are vital and well used.

Officer Comment: This is not a matter for the CAMP. The CAMP sees the area as one that is in need of improvement and does not say what that change should be or how it is managed. There is a separate consultation being undertaken on public realm enhancement in High Street and Fore Street.

With reference to the Conservation Area Appraisal and Management Plan I welcome the intention to overhaul the signage through the Town Centre and improve the street furniture. Many people use the bench seats and they are an important asset for those living in cramped accommodation or needing a rest before walking up St Andrew's Hill.

Office comment: Noted

Policy S11 refers to improvements to the transport Infrastructure and the opening of the Railway Station. As one who lived in Willand Road and used the train to attend school in Exeter I think it will be necessary to provide bus links to the station from the outlying estates. The reason I gave up using the train was because this ex GWR line goes in to Exeter St David's and access to the City Centre was difficult and time consuming. Will the proposed link use the Central Station?

Officer comment: Beyond the scope of the CAMP.

Page 23 includes many of the industrial activities but does not mention the Rope Works in Goblin Lane

Officer comment: A twine works is mentioned in Goblin Lane. No change proposed.

There is also reference Pen y dur which should read Pen y dre.

Officer Comment: This is misspelt on page 67 and has been corrected.

Page 30 refers to The Manor Court Hotel I think this should read The Manor Hotel.

Officer comment: The sign on the front of the building states Manor House Hotel. It is listed as The Manor House Hotel. Planning applications are registered to the Manor House Hotel. The CAMP has been corrected to Manor House Hotel in the two places required.

Page 75 I mentioned to the Conservation Area Officer that the row of properties 56-62 Fore Street and Tower View were built to burn by Charles Reynolds. The insulation provided at the time consisted of dross from Mr. Reynold's feed mills and the second and third storey rooms do not reflect the shops on the ground floor. I felt the Conservation Officer's response was very cavalier in respect of the safety of occupants. I know that the District Council carried out a survey of let properties in High Street and Fore Street, did this include fire precautions and are fire breaks provided between the commercial properties and the residential accommodation? Have fire breaks been included between the flats? If not I think the Council should include a policy to ensure that all these properties have adequate fire precautions installed to improve the safety of residents.

Officer Comment: This is beyond the scope of the CAMP. The CAMP relates to the architectural and historic interests of the area and the buildings within it. This does not relate to how they were built and if they are to modern standards. The conservation officer disputes that he was cavalier, simply stating that issues such as fire safety is beyond the scope of the CAMP, and that buildings should not be omitted from being considered of architectural interests if they are perceived to below standards in other respects.

The survey undertaken as part of the HAZ was an external survey from ground level and was only to look at exterior condition.

Part of the match funding for the HAZ comes from Mid Devon's Housing Team, and internal improvements to rented property may be fundable through this. The survey referred to was a survey of properties which they were able to access, and fire safety was a consideration.

All new building works will be required to comply with building regulations which includes fire safety.

I note the intention to address the matter of yellow lines in the Conservation Area and in particular Church Street and I accept these are unsightly. However, these lines were put there because at the time there was no other way of enforcing a No Parking policy in the area. Inappropriate parking presented a huge problem for residents, the Church and emergency vehicles and unless there is another way of ensuring an enforceable No Parking ban removing the yellow lines would be a disaster. The bollards might be of poor design and badly maintained but they have prevented many accidents to pedestrians crossing Church Street and those accessing the opticians on the corner.

Officer Comment: This is raised with regard to the poor design and lack of maintenance of the bollards and how the double yellow lines effect the view of the Church. No decision is made on how this might change.

With reference to the raised concrete kerbing and perhaps this should be replaced by surfacing to mark the line of the town water supply provided by the Bishop of Buckland in the 14th century. This ran on both sides of the street and in to the Bull Ring on the West Side going in to a culvert outside Cottonwood House.

Officer Comment: This is a matter to be covered by the works with regard to the public realm where consultation is taking place.

The second letter/email comments

Page 15. The late 4th century date of the settlement's final occupation phase ties in with it having gone out of use as a result of the fort being abandoned and Roman occupation of Britain coming to an end.

Griffith. Proc. Devon Arch. Soc, 42, 11-33, 1984, Simpson and Griffith, Proc. Dev. Arch. Soc., 51, 149-159 state that the fort went out of use before 75 AD based on finds from fieldwalking and the limited excavation done in the area to the west. The fort going out of use about this time is similar to other Roman forts in SW England. The 2nd Legion Augusta left Exeter around 75AD to go to Wales. The settlement is later and if it was connected to the fort it is more likely to have been outside one of the gates. This all seems to me to indicate that this settlement was not connected to fort – although it going out of use is consistent with the end of the Roman occupation.

Officer Comment: Consulted further with County Archaeologist. Second para of 3.31 substituted.

3.3.2 'Columtune'

The minster lands held by Battle Abbey in 1086 were called the manor of Cullompton in Domesday, and the manor was later known as Upton Weaver. It had its own tithe survey and the map is labelled as "Manor of Upton Weaver" and is described as the district of Upton Weaver in the apportionment.

Officer comment: Consulted further with County Archaeologist, and contacted the consultee for clarification. In reply he stated

In summary - I agreed with the statements there and just wanted to offer some additional evidence.

I agree that the Urban Survey Report is totally consistent with what I put in my response. I think that I was probably just trying to provide some additional evidence. The existence of Henland as an exclave of the parish is an additional piece of evidence for the statement there: "The fact that some of these are in neighbouring parishes may be evidence for Cullompton's previous wider influence"

The fact that even in the 19th century, long after the dissolution of the monasteries, Upton-Weaver was regarded as a separate district from the rest of the parish is additional evidence of the importance of this manor in the past. The tithe survey map and apportionment for Upton Weaver is available from the same site:

<https://www.devon.gov.uk/historicenvironment/tithe-map/cullompton-upton-weaver/>

Officer Comment: No changes proposed.

Henland was an exclave of the parish of Cullompton until late 19th C. (this is still evidence that the original minster was far larger)

Officer Comment: Consulted further with County Archaeologist. Text amended.

P16 re-dedication to St Andrew granted 1436. Orme's English church dedications, pp.9, 152, states that the date of the dedication festival (which is what changed around 1435) is simply the anniversary of the original dedication is not necessarily the same as the date of the patronal festival. The dedication to St. Mary can be seen in many 19th century trade directories and Orme states that Andrew was first postulated only in 1754 and was dominant only from 1873.

Officer Comment: Consulted further with County Archaeologist. Text amended.

P15. What is the evidence for Gytha's ownership? Which Cullompton manor (the one which belonged to Battle Abbey or the one which was part of Silverton in 1086?) Not in lands recorded in Domesday as held by her in 1066 according to Thorn and Thorn. Westcott claims it was held by Godwin but again this isn't consistent with Domesday.

Officer Comment: Consulted further with County Archaeologist. Text amended.

Page 17.

The road north towards Wellington from a toll gate near Goblin Lane was also a turnpike managed by the Tiverton Turnpike Trust (this joined the road from Tiverton to Wellington at Waterloo Cross). So 5 turnpike roads met at Cullompton but only 4 trusts.

Officer Comment: Consulted further with County Archaeologist. Text amended.

Page 30.

K6 phone box was removed (seems to have been no consultation on this and not offered to Parish Council to purchase AFAIK) [see also page 63]

Officer Comment: Noted. Text amended.

Page 41.

Middle Mill - base of Chimney still remains, now at risk of collapse due to tree growing in it and general neglect. Landowner not on land registry, town council unable to find who does own it despite many attempts over the years.

Officer Comments: Noted

Page 55. Should former workhouse, later the Royal British Legion, now sold, be included as a Key Unlisted building?

Officer Comment: It is felt that the alterations made to the building through the change of uses mean that it is not of sufficient interest. It remains a non-designated heritage asset

Page 58. State of Methodist Chapel and neglect of the potentially pleasant open space in front of it is a real missed opportunity for the town

Officer Comments: Noted. This is included as a key negative and noted as an important unlisted building.

Page 61. 40 High Street (Conservative Club) - Now Frankie's Sports Bar

Officer Comments: Noted and CAMP amended

Page 62. King's Head now being converted to restaurant.

Officer Comments: Noted and CAMP amended

Page 81. Principle 8 should be extended to include protection from theft - reviewing how they are affixed and if this needs to be improved. Also where owners of properties remove signage for refurbishment of property, there should be a responsibility to reinstate it in a timely manner. Recent losses: Middle Mill - stolen, The Green - also stolen, Higher Mill Lane - disappeared when the building it was attached to (then the King's Head PH) was renovated following a large collapse of a cob wall

Officer Comments: last para of 11.5.5 amended to include (and some have been removed and not replaced).

Amend principle 8 to read Management Plan Principle 8: That the Council engage with Town Council, the Highway Authority and Local Interest groups to survey and refurbish, and replace where missing the historic street signage and furniture and identify inappropriate street furniture beyond the area to be enhanced as part of the Heritage Action Zone. Any resurvey to consider anti-theft measures.

Additions to Conservation area

- *Strongly support inclusion of the mills*
- *Not clear why the area around the tannery to the west of Exeter Road not included - historic importance including old leat from the mill which runs from the Antiques centre alongside the road to re-join the Crow Brook Also the row of cottages from the Bell Inn to Colebrook Lane are also of historic interest and are a key part of the gateway to the town*

Officer Comments: Map regression shows little left on the tannery site which is of interest above ground. The one principle building on the west side is added as an important unlisted building. One other building remains as part of the modern buildings, but external inspection suggests there is little of interest left.

There is some merit at looking more closely at the row of cottages referred to. There would need to be a gap in the conservation area. At this stage and the pressing need

to have an up to date CAMP to support the HAZ it is felt necessary to move forward with the CAMP as it is and revisit these buildings in the near future.

The third letter/email comments

Having viewed your pop up display at Cullompton library I noticed that proposed changes to the conservation area could impact on me as I live in the Higher Orchard area of the town and therefore I have a couple of questions.

- 1. The dotted red line runs down the edge of my property and a section of the lane that I own, therefore part of my ownership is excluded from the new proposed area (my house) and part included (the lane outside my house). If adopted how would conservation rules impact on my rights to do anything to the lane, for example having it resurfaced at some point?*
- 2. Once again assuming the proposals are adopted how would conservation rules impact someone who wished to develop the open green area that is directly opposite me and runs for most of the length of the lane?*

Officer Comment: A response has been sent explaining that PD rights are tighter in the conservation area, but to resurface the track as existing will not need permission. Further, with regard to development on the undeveloped field, we have a statutory duty under section 72 of the Listed Building Act to have special regard to the desirability to preserving or enhancing character of the conservation area. Conservation areas are not preservation areas, but they do require a higher level of design and appreciation of the conservation area. Being in a conservation area would make development of the site a more demanding an exercise. On top of that a proposal would need to consider the setting of the SAM adjacent and the below ground arch archaeology which may well be present.

The fourth letter/email comments

I would firmly support the Council and its proposed conservation plan in bringing the land at Higher Orchard off Goblin Lane (that is currently not in use and overgrown) into the Cullompton Conservation area boundaries. There are extensive plans to develop wider Cullompton and this land and my adjacent property have uninterrupted views towards the town centre, the local Church and also the Sidmouth Gap in my opinion this view needs to be preserved and protected for future generations.

Officer comments: Noted

The fifth letter/email comments

I have asked my neighbour (edited for privacy) to send you this email on my behalf supporting the field at Higher Orchard Cullompton being added to the conservation boundary in the newly proposed Cullompton Conservation Plan.

Officer comments: Noted

The sixth letter/email comments

I am writing to support the Council's plan to extend the conservation area by including the land at Higher Orchard which lies between Goblin Lane and the St Andrew's Estate. This area is overgrown at present and as such is a haven for wildlife. I note from the plans that Higher Orchard is adjacent to a Roman Fort. Certainly if there is any possibility of this ancient monument being disturbed or indeed if there might be Roman artefacts to be found at Higher Orchard I would heartily recommend that the Council adopt this proposed extension to the conservation area.

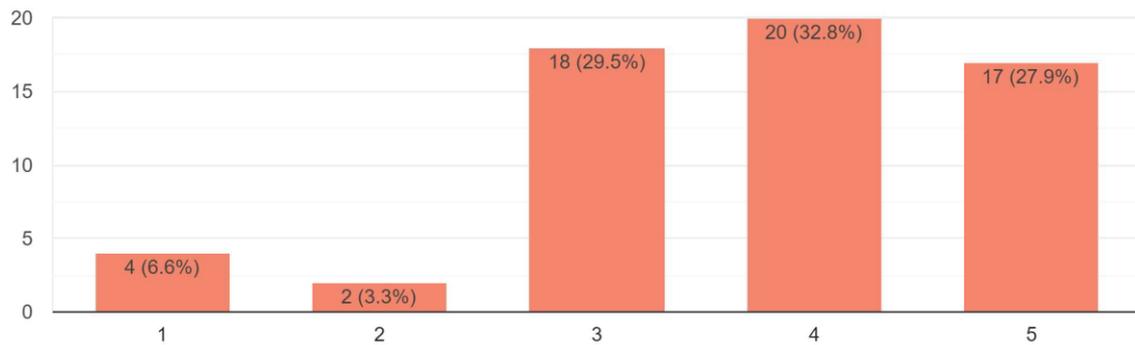
Officer comments: Noted

Appendix 5:

The questions on the proforma prompted either a score from 1 strongly disagree to 5 strongly agree, but also gave room for comment. These are represented below along with the comments made and any comments made:

Q1: Do you agree with the proposed additions and deletions to the conservation area boundary?

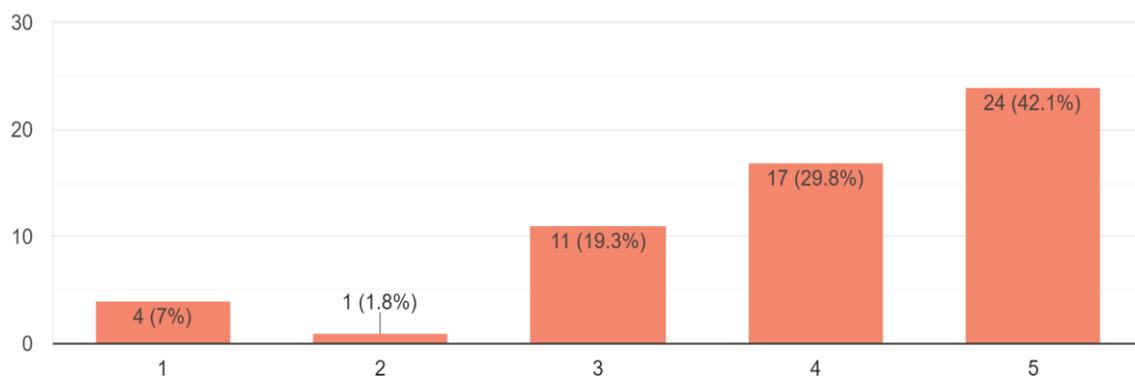
Do you agree with the proposed additions and deletions to the conservation area boundary?
61 responses



Written comments: None

Q2: Do you agree with the proposed additional Important Unlisted Buildings?

Do you agree with the proposed additional Important Unlisted Buildings?
57 responses



Written comments: None

Q3: Are there any other buildings you would like to see included?

Written comments: 6 No.

NOT 19 HIGH STREET Officer Comment: This site is identified as a key negative as the previous property was lost to fire. It is the subject of a management plan principle to

redevelop the site. It should remain in the conservation area, but is clearly not an important unlisted building.

Save the Methodist church. *Officer Comment: This is proposed as an important unlisted building, and the area to the front and the building is considered a key negative in need of improvement.*

Most of the old building are not fit for purpose, replace them with modern eco-friendly building, with green roofs and built to modern building codes. *Officer Comments: This is beyond the scope of the CAMP, other than to propose that there is no conservation area. It is also noted that there is a conversation taking place within planning that the carbon cost of demolition and rebuilding is often much higher than adaptive reuse of the existing building stock.*

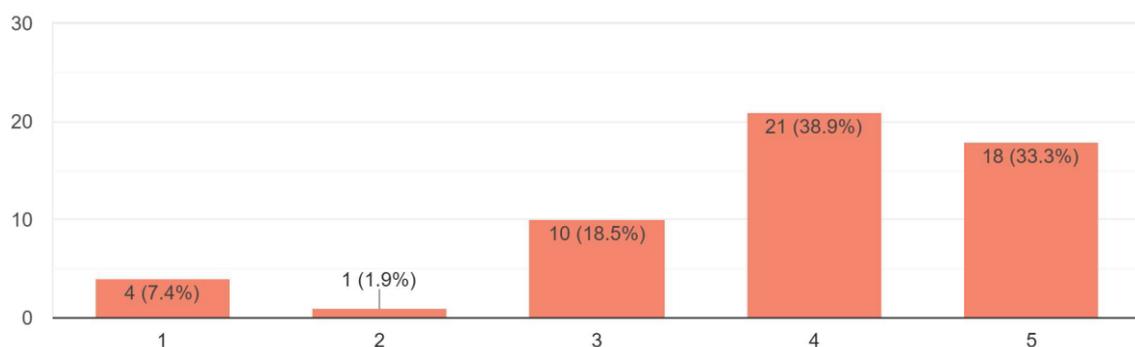
There is a case to include the Roman fort. It is arguably the most significant archaeological/historic feature in the town, in a very dominant position overlooking the town centre and with great potential to link with the Town Centre Masterplan's objectives for green space, attracting visitors and linking the expanding suburbs to the centre. Although it is Scheduled, including it in the CA would integrate it more with the plans for the town and how the centre works with the expansions. *Officer Comment: The Roman Fort is Scheduled which is a similar level of designation as a grade 1 listed building. It would be possible to extend the conservation area to include it, but it was felt that its designation as a SAM meant this was not necessary as it would add no further protection.*

Community House eg Raising Sun Pub, YMCA not 4 more flats. *Officer comment. This is beyond the scope of the CAMP*

Q4: Do you agree with the important features identified in the Conservation Area?

Do you agree with the important features identified in the Conservation Area?

54 responses



Written comments: None

Q5: Are there any other important features in the Conservation Area that you would like to see included?

Four No.

Not within the area on the map, but I assume the two buildings at the Cemetery off Tiverton Road should be included? - *Officer Comment: The buildings referred to are both listed and*

this protection will protect the historic curtilage. The site is too distant and small to add to the conservation area.

Tudor buildings: Officer Comments - Assume this is the Manor Court and No 7 Fore Street. These are in the conservation area and listed.

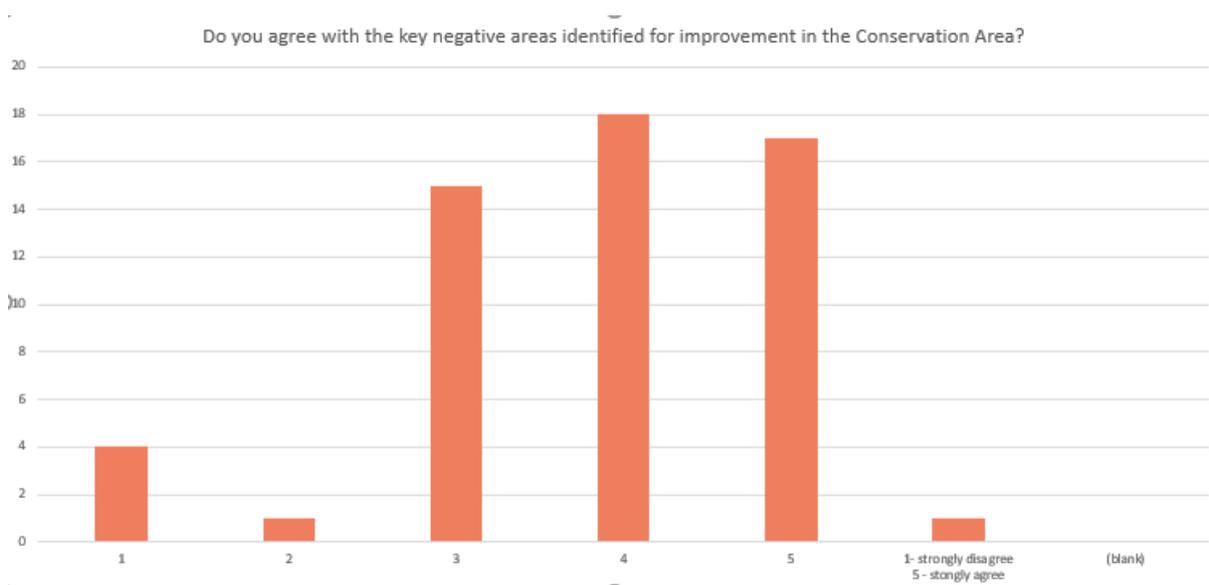
It's another waste of money No comment offered.

Consultation with officers of St Andrews Church re enhancement of the small car park (Gravel Walk). It is in need of resurfacing and enhancement. Visitors to the historic church are met by a selection of old and broken traffic cones. These cones are used to protect car park spaces which are rented by local residents and often usurped. These cones are considered as necessary but are very unsightly. Here I declare an interest as a resident. *Officer comment: This is interpreted as support of the identification of this area as a key negative and the management plan principle to seek to improve it.*

Parking restrictions in Church Street (including enforcement). *Officer Comment: Enforcement of parking restrictions is beyond the scope of the CAMP*

See above comments regarding the Roman fort. *Officer comment see above*

Q6: Do you agree with the key negative areas identified for improvement in the Conservation Area?



Q7: Are there other areas that detract from the historic character of Cullompton?

Over spilling of bins by welcome to Cullompton sign and graffiti in High street

CTC spending money on [redacted]

No, three times

Damaged cobbles at junction of Fore Street and Queen Square above Hebron Hall.

Don't know

Car park near library *Officer Comment: This is noted and is picked up as a key negative and has a management plan principle which seeks to improve this area.*

I personally do not like the mural at the corner of Station Road but realise that this is only personal taste.

Aldi and Home Bargains. Can we heighten the wall of the car park to cover the ugliness? Or plant trees? Also knockdown the petrol station next to the tannery. The whole area looks awful. Exeter Hill NEEDS to be looked after/cleaned regularly. *Officer comment: This area is beyond the conservation area. The ED team and the HAZ project officer are aware of this comment and will seek to engage on these sites as the opportunity arises.*

Cars

Messy parking in Crow Green. Not enough parking for residents. Unattractive road which could be characterful. *Officer Comment: the majority of Crow Green is modern and beyond the conservation area. The comments are out of scope but noted.*

The conversion of space above shops to flats and the "Alleyways" are mostly all dwellings with their rubbish in the Fore Street *Officer comment: considered in the key negatives and management plan principles.*

The town leat is in dire need of resurrection, particularly the overgrown and unfenced section adjacent to 'millennium way' - health and safety risk to children. If the weir at source was repaired an improved flow could be registered and its side could be enhanced throughout town attractively. *Officer comment: Noted. The condition of the leat is noted as a key negative and there is a management plan principle for the leat.*

Entrances to Cullompton and the caravan sites *Officer Comment: Noted. This is largely a comment for the Masterplan*

Higher Street one hopes is still work in progress. The area needs a complete and thorough overhaul. *Officer Comment: Higher Street suffers partly due to traffic but also poorly maintained property and some public realm. It is hope to encourage people to repair and maintain those properties in need of care and the statutory undertakers.*

Do you have any comments to make on the management plan principles in Part 2 of the Conservation Area Management Plan?

Q8: Do you have any comments to make on the management plan principles in Part 2 of the Conservation Area Management Plan?

No comment

It's a waste of money

No four times

On Page 3 the Leat is included in the list of "Negatives". It is in fact a fundamental part of the town and a significant asset, all be it that it needs management and repair. The negative listing is unfortunate yet the recommendation, (Management Plan Principle 29 on Page 90) for the establishment of a management plan is correct. *Officer Comment: The condition of the leat is considered to be a key negative and an area for improvement. There is no intention that the leat of itself is a key negative. Indeed it is recognised as a key component of the character of the conservation area.*

The high street doesn't work at the moment. Inevitably cars, vans and lorries need to pull over on Fore St and it causes chaos. There's not enough parking to accommodate more visitors to the centre, not helped by The Hayridge Centre car park being run by a horrible private company. *Officer Comment: Parking and use of High Street and Fore Street are being considered as part of the public realm enhancement works which we have undertaken and initial consultation on.*

There's a lot of shops doing the same thing - beauty, barbers, hair dressers. Not a lot of diversity nor independent retailers for food and other goods. The swimming pool charity shop, premier, laundrette and copious barbers are eye sores. The hardware store is run down. Porter's signage looks unsightly. The White Hart has huge big branded coffee pavement signs that are not in keeping with this plan. There are some random shops Inc. a henna shop and an Indian tea shop...it seems there is minimal management of what is allowed to open and the quality of the offer/signage not considered. *Officer comment: Under the use classes order, shop and commercial premises are able to be used for a variety of uses without the need for planning permission. The market ultimately decides on the mix and success of businesses. The HAZ is looking to work with landowners and tenants to improve properties in Fore Street and High Street. Signage is also permitted to be changed without consent certain to restrictions. We have prepared shop front and advert guidance for use where consent is required and this can be applied voluntarily when consent is not required.*

No, other than to agree with them.

Q9 Is there anything else you would like to tell us in relation to the Conservation Area Appraisal and Management Plan?

Just seems pointless the buildings are in a terrible state in most of the central area and how much of that is due to the cost of conforming to the conservation area rules. *Officer Comment: The reason the conservation area is 'at risk' is due to the volume and nature of the traffic through it. This in part has led to a lack of investment. Otherwise we are not aware that conforming to conservation rules have resulted in the run down nature of the area, which largely relates to lack of care and maintenance of properties by owners.*

No five times

Do your jobs

With the proposed expansion of Cullompton it is vital to preserve some green firewalls such as including Higher Orchard in the conservation area. I firmly support addition of area 7 in the conservation plan. *Officer comment: Noted. It is proposed to include this area.*

I don't understand the inclusion of a photograph on page 40 under the title "View of St Andrews Parish Church....." Which depicts a garden being used as an ongoing storage area for plastic refuse and soil waste, when the related text says that the gardens "do not erode the character" of this section of the area. I can only hope that inclusion of this area as a visually important open space will lead to the ground being reinstated to its natural level in the flood plain. *Officer comment: The photo referred to is on page 42. The garden referred to as untidy was part of the ongoing building works at the house to extend it. It is anticipated that it will be returned to a domestic garden once the works are completed.*

I have submitted a separate comment upon the proposed railway station.

Is the tannery on there? I cannot see the map properly. *Officer Comment: The remaining historic buildings on the tannery site are proposed to be important unlisted buildings. One is to be included in the conservation area.*

Leave the land alone - it's good well managed Agri land

Be careful not to make rules so stringent that householders can't afford to maintain their home. *Officer Comment: Lack of maintenance of properties is an issue in the conservation area, but none of it appears relate to being in a conservation area itself. In this case money is being made available to help with maintenance and repair of buildings in the HAZ.*

The historical outline at the start implies that the Roman fort was in use throughout the Roman period. This is not the case. It was only occupied from the mid to late 1st Century AD. A civil settlement, established outside the fort, continued until at least the later 4th Century. *Officer Comment: This was sent as a separate letter also and the CAMP has been amended.*

I do not think the food and drink or hairdressing facilities in the town need increasing. *Officer comment: Under the use classes order, shop and commercial premises are able to be used for a variety of uses without the need for planning permission. The market ultimately decides on the mix and success of businesses.*