



NW Cullompton Urban Extension Masterplan
Supplementary Planning Document

Habitat Regulations Assessment Screening and
Appropriate Assessment Report

April 2022

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1. NW Cullompton Urban Extension Masterplan Supplementary Planning Document (SPD)

Purpose, scope and content

1.1 The NW Cullompton Urban Extension Masterplan bridges the gap between high level policy aspirations and delivery on the ground. This is to ensure that the development achieves high quality design and sense of place in a coordinated manner.

1.2 The Masterplan is set out in 5 Chapters. A brief description of each part is provided below:

1. Introduction

This sets out the relationship between planning policy, the existing adopted Masterplan SPD and the draft revised Masterplan, and set out the purpose the Masterplan.

2. About the site

This introduces the site within the wider context of Cullompton. It provides background and context including land ownerships, constraints and opportunities across the urban extension.

3. Development, vision and concept

This outlines the overarching ambition for the development of the urban extension as an attractive, well designed neighbourhood, that is set out within a number of development concepts and guiding principles.

4. Creating the structure

This provides specific detail for the Masterplan area in terms of character, densities, movement, landscape and open space, drainage and character, whilst providing an illustrative Framework Plan and land use budget.

5. Delivering the place

This section details the infrastructure requirements for the urban extension and delivery including S106 contributions and their triggers as well housing delivery rates and phasing of development, as well as monitoring and review.

Relationship with the National Planning Policy

1.3 The National Planning Policy Framework (2021), in 'Identifying Land for Homes' paragraph 73 sets out the following:

“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:

a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;

b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;

c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;

d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and

e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”

1.4 The NW Cullompton Urban Extension was allocated in the Mid Devon Local Plan (2013-2033) as an urban extension to Cullompton town as it is considered to be well located and supported by the necessary infrastructure and facilities¹. Policies CU1-CU6 are consistent with the National Planning Policy Framework. The NW Cullompton Urban Extension Masterplan SPD provides further detail on the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains. It ensures the community has sufficient access to services and employment opportunities within the development itself as well as setting out clear expectations for the quality of the development to ensure there are a variety of homes to meet the needs of different groups in the community. It also makes a realistic assessment of likely rates of delivery.

Relationship with the Mid Devon Local Plan

1.5 The adopted Mid Devon Local Plan 2013-2033 (“Local Plan”) Policies CU1-CU6 NW Cullompton Urban Extension provide the policy baseline for the more detailed guidance included in the NW Cullompton Urban Extension Masterplan SPD:

Policy CU1 NW Cullompton

A site of 100 hectares to the North West of Cullompton is allocated for mixed use development subject to the following:

- a) 1350 dwellings with 28% affordable housing to include at least five pitches for gypsies and travellers and provision of extra care housing;
- b) 5% of housing to be provided as serviced plots for sale to self-builders;
- c) 10,000 square metres commercial floorspace to include a care home or retirement complex, and other suitable uses such as a hotel or leisure development;
- d) Provision of at least 28 hectares strategic green infrastructure;
- e) Provision of a road linking Tiverton Road to Willand Road, and transport provision to ensure appropriate accessibility for all modes;

¹ The NW Cullompton urban extension was previously allocated through the Mid Devon Allocations & Infrastructure DPD which was superseded by the adopted Mid Devon Local Plan 2013-2033.

- f) Environmental protection and enhancement;
- g) Community facilities and primary school to meet local needs arising;
- h) Carbon reduction and air quality improvements;
- i) An agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development; and
- j) Comprehensive Masterplanning of the development including at least two stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document, before any planning application is determined.

Policy CU2 North West Cullompton Transport Provision

As part of the development of North West Cullompton, the following transport infrastructure will be provided and funded by all new development within the site:

- a) Provision of a network of streets linking to the existing highway network, including a through route linking Tiverton Road to Willand Road suitable for buses and all agricultural vehicles;
- b) Provision of bus, pedestrian and cycle routes at appropriate locations throughout the development, creating an attractive, permeable network for non-car modes travelling within, into and out of the area;
- c) Cycle and pedestrian links to and from the town centre and within the mixed-use urban extension;
- d) Implementation of travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts;
- e) Financial contributions to bus service enhancements within, into and out of, the mixed-use urban extension;
- f) Financial contributions to bus service enhancements between Cullompton, Exeter, Tiverton Parkway and Tiverton;
- g) Financial contributions towards the Town Centre Relief Road and traffic management measures on Willand Road and Tiverton Road; and
- h) Capacity improvements at junction 28 M5, to deliver a strategic highway improvement as demonstrated by capacity studies completed to assess the impact of the traffic generated from the site.

Policy CU3 North West Cullompton Environmental Protection and Green Infrastructure

As part of the development of North West Cullompton, the following environmental protection and enhancement measures will be provided and funded by all new development within the site:

- a) A strategic landscaping and tree planting scheme to protect and enhance trees, hedgerows and other environmental features which contribute to the character and

biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;

b) An area of 28 hectares for strategic green infrastructure, laid out and managed with an appropriate mix of public parkland, open space, landscaping and potential local nature reserve;

c) Areas of equipped and laid out public open space, totalling 0.7 hectares of equipped play, 2.6 hectares amenity open space, 4 hectares for parks, sports and recreation grounds, 0.7 hectares of allotments and 0.1 hectares for a community garden adjoining the health centre;

d) Protection and enhancement where possible of all existing Public Rights of Way;

e) Appropriate provision for sewerage systems serving the development, and provision of a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;

f) Detailed archaeological investigation and measures to record, and where necessary, protect the archaeological interest of the site through appropriate design, layout and mitigation; and

g) Design solutions which respect the settings of listed buildings within and adjoining the site.

Policy CU4 North West Cullompton Community Facilities

As part of the development of North West Cullompton, the following community infrastructure will be provided and funded by all new development within the site:

a) A serviced site of 2.1 hectares for a new primary school at no cost to the Local Education Authority;

b) Provision of a 420-place school with early years provision and a children's centre service delivery base funded by appropriate contributions from developers;

c) A site of 1.0 hectare for community uses including provision of a multi-purpose community building

d) Contribution towards sporting and leisure facilities; and

e) Contributions towards a new recycling centre to serve Cullompton.

Policy CU5 North West Cullompton Carbon Reduction and Air Quality

The development of North West Cullompton will be required to implement a Carbon Reduction and Low Emissions Strategy funded by all new development in the site. This will propose measures to minimise the overall carbon footprint of the development, making provision for sources of decentralised onsite renewable or low-carbon energy and ensure that impact of the site on air quality is acceptable, such as:

a) Renewable and low carbon energy to provide a proportion of the site's energy use;

- b) Measures to ensure that residents, employees and businesses are encouraged to travel in the most sustainable fashion, including travel plans, information, car clubs, lift-sharing and infrastructure for low emission vehicles;
- c) Measures to encourage the sustainable treatment of waste;
- d) Measures to manage the impacts of construction;
- e) Offsite tree planting where sufficient cannot be accommodated onsite;
- f) Energy improvements to existing buildings;
- g) Other measures to capture or mitigate carbon emissions and air quality impacts from development.

Policy CU6 North West Cullompton Phasing

A phasing strategy will be required for the development of North West Cullompton to ensure that the development and infrastructure come forward in step, minimising the impact of development while ensuring that the development remains viable. The strategy should take account of the following requirements, variation of which will have to be carefully justified. Development shall be subject to the following:

- a) Provision of affordable housing will be in broad step with the market housing;
- b) Provision of all serviced self-build plots after the 'through route' linking Tiverton Road to Willand Road is operational;
- c) Provision of commercial development after the delivery of the first 500 houses and prior to the delivery of the first 800 houses, at a rate of at least 0.9 hectare per 150 occupied dwellings thereafter;
- d) Provision of 8.8 hectares of strategic green infrastructure including equipped public open space and one playing pitch prior to the occupation of no more than 500 dwellings;
- e) Implementation of local bus service improvements prior to the occupation of no more than 500 dwellings and strategic bus service enhancements phased with development;
- f) Occupation of no more than 500 dwellings before the opening of a 'through route' linking Willand Road to Tiverton Road and the delivery of traffic management measures on Willand Road;
- g) Transfer of land for a primary school together with right of access to the Local Education Authority prior to the commencement of the development on the site, and transfer of funding for education facilities in instalments;
- h) The necessary sustainable urban drainage features, and linking pipe work is integrated and phased appropriately in step with development and, where required, temporary measures should be taken during construction to protect downstream areas from additional water run-off; and
- i) Occupation of no more than 600 dwellings prior to the completion of the Cullompton Town Centre Relief Road.

Status of the NW Cullompton Urban Extension Masterplan SPD

- 1.6 The NW Cullompton Urban Extension Masterplan SPD will be adopted by the Council as a Supplementary Planning Document. The SPD will not be part of the development plan and does not introduce new planning policies into the development plan. However, it will be capable of being a material consideration in determining planning applications.

2. Habitat Regulations Assessment

- 2.1 A Habitat Regulations Assessment (HRA) refers to the several distinct stages of Assessment. These must be undertaken in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended) and the Conservation of Offshore Marine Habitats and Species Regulations 2017 (as amended) to determine whether a plan or project may affect the protected features of a European site ('habitats site') identified under these regulations before deciding whether to undertake, permit or authorise it.
- 2.2 All plans and projects which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration is typically referred to as the 'Habitats Regulations Assessment screening' and should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.
- 2.3 Where the potential for likely significant effects cannot be excluded, an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives must be undertaken. A plan or project may be agreed to only after having ruled out adverse effects on the integrity of the habitats site. Where an adverse effect on the site's integrity cannot be ruled out, and where there are no alternative solutions, the plan or project can only proceed if there are imperative reasons of over-riding public interest and if the necessary compensatory measures can be secured.
- 2.4 In April 2018, the Court of Justice of the European Union delivered its judgement in Case C-323/17 People Over Wind & Peter Sweetman v Coillte Teoranta ('People over Wind'). The judgment clarified that making screening decisions as part of the HRA and for the purposes of deciding whether an appropriate assessment is required, mitigation measures cannot be taken into account. Mitigation measures intended to avoid or reduce the harmful effects of a plan or project can only be taken into account at the appropriate assessment stage.

3. Habitats site

- 3.1 A Habitats site refers to any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites.

3.2 There are no Habitats sites within Mid Devon although there are 11 such sites within 10km (Table 1), the closest being the Culm Grasslands SAC which lies immediately adjacent to the north western boundary of Mid Devon District.

Table 1: Habitats Sites within 10km of Mid Devon District Council

Special Areas of Conservation (SACs)	Special Protection Areas (SPAs)	Ramsar Sites
<ul style="list-style-type: none"> • East Devon Pebblebed Heaths • Culm Grasslands • South Dartmoor Woods • Holme Moor and Clean Moore • Dartmoor • Exmoor Heaths • Quants • Exmoor and Quantock Oakwoods 	<ul style="list-style-type: none"> • Exe Estuary • East Devon Heaths 	<ul style="list-style-type: none"> • Exe Estuary

3.3 Small parts to the East of the Mid Devon District also fall within the Somerset Levels and Moor Ramsar Tone Catchment area, for which Natural England has set out advice explaining how plans or projects with the potential to have nutrient impacts on Habitats site should be considered when making decisions in relation to planning. The NW Cullompton SPD area falls outside of the catchment area for the Somerset Levels and Moor Ramsar.

Potential Impacts on Habitats Site

3.4 There are a number of categories that can affect Habitats Sites which include:

- Physical Loss
- Physical Damage
- Non-physical disturbance
- Water table/availability
- Toxic contamination
- Non-toxic contamination
- Biological disturbance

4. Mid Devon Local Plan 2013 – 2033 HRA

4.1 As the competent authority under The Conservation of Habitats and Species Regulations (2010) (now 2017 as amended) Mid Devon District Council has been required to assess its Local Plan 2013-2033 as part of the HRA process.

4.2 A full HRA Report for the Mid Devon Local Plan 2013-2033 was undertaken March 2015 and related to the Publication Draft version of the Local Plan. This concluded that adverse effects on the integrity of European sites (referred to in this report as Habitats sites) around Mid Devon

from policy and site options in the new Local Plan, either alone or in combination with other plans, will not occur.

4.3 Two HRA Addenda were prepared in 2016. The first (dated August 2016) was prepared in order to update the findings of the March 2015 HRA Report in light of changes to the supply of housing and employment land that were made in the Submission version of the Local Plan. The HRA Addendum screened the changes to policies in the Local Plan and concluded that, for each change, the screening conclusions of the March 2015 HRA Report would have been the same and the same Appropriate Assessment work would therefore have been undertaken. The second HRA Addendum (December 2016) presented Appropriate Assessment work that was undertaken in relation to potential air pollution impacts on the Culm Grasslands SAC that could result from development at Junction 27 and the associated additional housing required.

4.4 A third HRA Addendum was prepared in October 2019 which presented an assessment of the proposed Main Modifications raised by the Planning Inspector appointed by the Secretary of State to undertake the independent examination of the Mid Devon Local Plan (2013-2033). This concluded that the HRA for the Mid Devon Local Plan remain that the Local Plan (taking into account the Proposed Main Modifications) is not likely to have adverse effects on the integrity of European sites (referred to in this report as Habitats sites), either alone or in-combination with other plans or projects.

4.5 Subsequent to this conclusion in the Local Plan 2013-2033 HRA, new advice on the potential to have nutrient impacts on Habitats sites was received in 2020 from Natural England in light of a court Judgement (known as Dutch N). Of relevance to Mid Devon District this identified the Somerset Levels and Moors Ramsar Tone Catchment, in which small areas to the East of the District falls within the 'area of risk' Tone Catchment. Development types that require a HRA to determine the impacts on this Habitat Site include:

- New residential units – including tourist accommodation, gypsy sites/pitches
- Commercial developments – where overnight accommodation is provided
- Agricultural Development – additional barns, slurry stores etc. where it is likely to lead to an increase in herd size
- Prior Notifications of agricultural development where, as a result of development, the herd size may increase. Prior notifications for change of use of office to dwellings and agricultural buildings to dwellings
- Anaerobic Digesters
- Some tourism attractions

4.6 No relevant types of development that could affect the Somerset Levels and Moors Ramsar are allocated within the Mid Devon Local Plan and DM28 sets out that where development proposals are likely to have a significant effect on a European site an Appropriate Assessment will be required. In which case, planning permission will be refused unless it has been ascertained that with mitigation measures in place the development will not adversely affect the integrity of the site.

5. NW Cullompton Urban Extension Masterplan SPD HRA Screening

- 5.1 In taking into account the Mid Devon Local Plan 2013-2033 HRA screening, likely significant effects for the NW Cullompton Urban Extension Masterplan on European Sites remain uncertain. The site allocation is located some distance from the nearest European sites and does not fall within the nutrient area of risk catchment area relevant to the Somerset Levels and Moors Ramsar. While the Local Plan includes a number of policies which should mitigate the potential impacts of development at Cullompton these cannot be taken into account at the screening stage in line with *People Over Wind & Peter Sweetman v Coillte Teoranta C-323/17 Case*.
- 5.2 The NW Urban Extension in combination with the other Cullompton allocations identified in the Local Plan would result in fairly large-scale development at the town which could affect European sites through increased pressure for recreation space and increased vehicle traffic in particular. Non-physical disturbance from development (e.g. noise, vibration and light pollution) would not be expected as a result of development at Cullompton, due to the distance from European sites. However for the reason of potential impact identified through recreation pressure and increased vehicle traffic, in line with the Local Plan HRA, it is not possible to rule out the possibility of likely significant effects associated with NW Cullompton Urban Extension Masterplan. Therefore an Appropriate Assessment has been undertaken as set out below.

6. Appropriate Assessment

- 6.1 Policies in the Mid Devon Local Plan have already been subject to HRA Appropriate Assessment which concluded that the Mid Devon Local Plan will not have adverse effects on the integrity of European sites (Habitats sites), either alone or in-combination with other plans or projects. Although the Local Plan did not at the time consider the impact on the Somerset Levels and Moors Ramsar site, no allocations fall within the 'area of risk' catchment areas. The Local Plan also includes DM28 which sets out where development proposals are likely to have a significant effect on a European site an Appropriate Assessment will be required. In which case, planning permission will be refused unless it has been ascertained that with mitigation measures in place the development will not adversely affect the integrity of the site.
- 6.2 The NW Cullompton Urban Extension Masterplan SPD does not introduce new policies or proposals outside the scope of the Local Plan. The NW Cullompton Urban Extension Masterplan SPD does not result in development itself but seeks to guide development in the allocated area and falls within the parameters of policies CU1-CU6 of the Mid Devon Local Plan including the proposed number of total dwellings. For the above reasons the findings and results of the HRA for the Local Plan 2013-2033 are applicable for the Appropriate Assessment of the NW Cullompton Urban Extension Masterplan SPD.

Recreation Pressure

- 6.3 In considering the identified possible impact of increased pressure for recreation space, many of the European sites around Mid Devon are vulnerable to the effects of erosion/trampling from recreation (e.g. heathland habitats) and several sites include birds and other qualifying species that could be affected by disturbance, in particular the sites to the south of Mid Devon (Exe Estuary SPA and Ramsar Site, East Devon Pebblebed Heaths SAC and East Devon Heaths SPA).

- 6.4 However, the distance of most European sites around Mid Devon from the District, and in particular the locations that will be the main focus of development (Tiverton, Crediton and Cullompton) means that a significant increase in day-to-day visitor numbers at any of the European sites for activities such as dog walking is not considered likely.
- 6.5 While there may still be some increase in visits to sites such as Dartmoor SAC, South Dartmoor Woods SAC and the East Devon Heaths SAC which are known to be popular visitor destinations, there are a wide range of mitigation measures already in place, for example through the Dartmoor National Park Management Plan and the South East Devon European Site Mitigation Strategy that should help to avoid adverse effects. In addition, policies within the Local Plan will help to ensure that green infrastructure is included within development sites.
- 6.6 In October 2019 a HRA Addendum presented an assessment of the proposed Main Modifications raised by the Planning Inspector appointed by the Secretary of State to undertake the independent examination of the Mid Devon Local Plan (2013-2033). This concluded that the HRA for the Mid Devon Local Plan remain, that the Local Plan (taking into account the Proposed Main Modifications) is not likely to have adverse effects on the integrity of European sites (referred to in this report as Habitats sites), either alone or in-combination with other plans or projects.
- 6.7 Therefore, it is concluded that the NW Cullompton Urban Extension Masterplan SPD proposals, alone or in-combination with other plans and proposals will not have an adverse effect on the integrity of European sites as a result of increased recreation pressure.

Vehicle Traffic

- 6.8 Air pollution from traffic is most likely to affect European sites which have plant, soil and water habitats amongst their qualifying features but some qualifying animal species may also be directly affected, or indirectly affected by deterioration in habitat. Therefore, where European sites do not include species that are vulnerable to these impacts amongst their qualifying features, air pollution-related effects can be ruled out. The qualifying heathland habitats of the Culm Grassland SAC are known to be vulnerable to the effects of air pollution and due to its proximity to a strategic road (A361), it was identified in the HRA for the Mid Devon Local Plan as having the potential to be affected by air pollution as a result of proposals in the Local Plan.
- 6.9 Nitrogen dioxides (NO_x) are considered to be the key pollutants from traffic emissions. Deposition of nitrogen compounds may lead to both soil and freshwater acidification, and NO_x can cause eutrophication of soils and water.
- 6.10 For the Culm Grasslands SAC, in considering the identified possible impact of increased vehicle traffic, the Local Plan Appropriate Assessment included a transport model used to obtain traffic data for assessment year of 2033 i.e. the end of the Local Plan period, when all of the development in the Local Plan are likely to be completed and occupied, and the traffic impacts will be greatest. The Appropriate Assessment of air pollution effects on the Culm Grasslands SAC found that the combination of Local Plan allocations would increase NO_x levels immediately adjacent to the A361, over the plan period. However, the effects would be very localised within the SAC. A negligible increase in nutrient nitrogen and acid nitrogen deposition would occur

from the Mid Devon Local Plan 2013-2033, although critical loads for these are already being exceeded and will continue to do so in 2022, despite expected decreases in background concentrations. The most appropriate mitigation for the effects of air pollution at the Culm Grasslands SAC is to target agricultural sources of nitrogen (which is outside the remit of the Local Plan), although improvements to vehicle emissions nationally, and sustainable transport initiatives, for example those encouraged in the Local Plan, will also contribute to the mitigation of impacts on the SAC's qualifying features. It was concluded that the Local Plan proposals would not have an adverse effect on the integrity of the Culm Grasslands SAC.

6.11 In October 2019 a HRA Addendum presented an assessment of the proposed Main Modifications raised by the Planning Inspector appointed by the Secretary of State to undertake the independent examination of the Mid Devon Local Plan (2013-2033). This concluded that the HRA for the Mid Devon Local Plan remain, that the Local Plan (taking into account the Proposed Main Modifications) is not likely to have adverse effects on the integrity of European sites (referred to in this report as Habitats sites), either alone or in-combination with other plans or projects.

6.12 Therefore, it is concluded that the NW Cullompton Urban Extension SPD proposals, alone or in-combination with other plans and proposals will not have an adverse effect on the integrity of European sites as a result of increased vehicle traffic.

Appropriate Assessment Conclusion

6.13 The Appropriate Assessment considers in detail the potential impact identified at the HRA screening stage i.e. recreation pressure and increased vehicle traffic. From these findings it is concluded that the NW Cullompton Urban Extension Masterplan SPD proposals, alone or in-combination with other plans and proposals will not have an adverse effect on the integrity of European sites.

7. Conclusion

7.1 The NW Cullompton Urban Extension in combination with the other Cullompton allocations identified in the Local Plan would result in fairly large-scale development at the town which could affect European sites through increased pressure for recreation space and increased vehicle traffic in particular. Non-physical disturbance from development (e.g. noise, vibration and light pollution) would not be expected as a result of development at Tiverton, due to the distance from European sites. However for the reason of potential impact identified through recreation pressure and increased vehicle traffic, in-line with the Local Plan HRA, it was not possible to rule out the possibility of likely significant effects associated with NW Cullompton Urban Extension Masterplan.

7.2 An Appropriate Assessment was undertaken in which the findings and results of the HRA for the Local Plan 2013-2033 were applicable for the Appropriate Assessment of the NW Cullompton Urban Extension Masterplan SPD given that the SPD does not introduce new policies or proposals outside the scope of the Local Plan and the SPD does not result in development itself but seeks to guide development in the allocated area and falls within the parameters of policies CU1-CU6 of the Mid Devon Local Plan including the proposed number of total dwellings.

7.3 For the above reasons the findings and results of the HRA for the Local Plan 2013-2033 were applicable for the Appropriate Assessment of the NW Cullompton Urban Extension Masterplan SPD. The Appropriate Assessment considered in detail the potential impact identified at the HRA screening stage i.e. recreation pressure and increased vehicle traffic. It concluded that the NW Cullompton Urban Extension Masterplan SPD proposals, alone or in combination with other plans and proposals will not have an adverse effect on the integrity of European sites as a result of increased recreation pressure or vehicle traffic from the new Local Plan. From these findings it is concluded that the NW Cullompton Urban Extension Masterplan SPD proposals, alone or in combination with other plans and proposals will not have an adverse effect on the integrity of European sites.