

## Appendix 1 - Consultee responses

### 1. Devon Archaeological Society

I refer to the above consultation and welcome the opportunity to comment on behalf of the Devon Archaeological Society.

The Devon Archaeological Society was founded in 1928. Our Aims, which we work to achieve through partnership with like-minded groups and national and local authorities and agencies, are to:

- Promote archaeological research and the instigation and execution of fieldwork.
- Seek the preservation of archaeological sites and buildings.
- Publish material relevant to the archaeology of Devon.
- Promote archaeology through meetings, lectures and other forms of instruction and publicity.

We understand that the current consultation relates to a restricted range of matters arising from updated policies in the Mid Devon Local Plan.

Our comments are with regard to the Roman fort Scheduled Monument on St Andrew's Hill, in relation to Local Plan Policy CU3 on community open space, and Policy CU6d on strategic green infrastructure.

We feel that the North West Cullompton Master Plan provides a significant opportunity to implement National Planning Policy Framework (2021) 190, which requires that *'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threat.'*

The St Andrew's Hill Roman fort is on Historic England's 2021 Register of Heritage at Risk. It is described as being in declining condition, having extensive and significant problems due to ongoing agricultural activity. It is therefore a national and local priority to improve the condition of this site, and the Masterplan provides an opportunity to do so. This could be achieved by integrating the site into the access, public open space and green infrastructure aspects of the Masterplan.

The current document refers to the site, but does not provide any particular proposals or solutions. It states (6.10) that the fort's setting is better appreciated through mapping. We disagree. While mapping and other forms of interpretation are useful tools, the fort is also a prominent topographical feature, cultural site and green space, atop the highest hill in the Masterplan area. Its setting can be readily appreciated from all around, as well as from St Andrew's Hill itself.

Sitting between the North West expansion area and the Conservation Area/historic core of Cullompton, the site is crying out for inclusion in the strategies. We therefore request that a 'positive strategy' (NPPF: 190) for the Roman Fort be included in the Masterplan.

### 2. Sport England

Many thanks for seeking Sport England comments on the revised masterplan.

In relation to the needs of sport this is unknown. No evidence base exists apart from playing pitches. However, this additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types. The SFC

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indicates that a population of 3,186 (1300 x 2.36) in this local authority area will generate a demand for:

Artificial Grass Pitch	Sports Halls	Swimming Pools
Pitches – 0.08	0.89 courts / 0.22 halls	0.64 lanes / 0.16 pools
Cost (if 3G) £83,639	Cost £561,013	Cost £618,792
Cost (if sand) £76,074		

Total Cost (if 3G)	<b>£1,263,444</b>
Total Cost (if sand)	<b>£1,255,879</b>

In relation to playing pitches we were part of the group that assisted and contributed to the Council's Playing Pitch Strategy (PPS). This evidence base needs assessment and strategy will help the Council deliver against current and future needs by pitch sport based on consultation with those involved in pitch sport. **We recommend a Stage E delivery meeting of the Playing Pitch Strategy with the Council, NGBs and key stakeholders to ensure the needs of the PPS are helping to shape developments in Cullompton and Mid Devon.**

Generally we are supportive by providing new pitches that could help address established playing pitch deficiencies. But in this economic climate we do not support the provision of a single pitch sites.

On-site provision, Sport England recommends that a ground conditions assessment is undertaken by a sports turf specialist/agronomist who can recommend a scheme for preparing the playing fields to the required specification. The recommended scheme should then be implemented. Detailed guidance on the issues that require consideration is set out in Sport England's guidance 'Natural Turf for Sport' [link](#)

The playing field would also need to be served by quality changing provision to NGB standards and car parking.

However, Sport England is concerned with comments on page 56 that consultation on the masterplan appears to contradict the adopted Council Playing Pitch Strategy. This view is shared by the RFU below.

The RFU advise that the Masterplan SPD states the development will provide a 'Third Sports Pitch (off-site provision)' and the RFU understands this has been provisionally allocated to help address the high overplay of rugby pitches at Cullompton RFC as per the adopted Playing Pitch Strategy (PPS). The PPS states the Cullompton RFC pitches are currently overplayed by 2.8 Match Equivalent (ME) sessions per week and there is no capacity at peak time. The PPS also acknowledges the development of ladies and girls' rugby has increased usage of the pitches, particularly mid-week training.

The RFU is keen to work in partnership with Mid Devon Council to identify how we can utilise this financial contribution to support delivery of the PPS action plan at Stafford Park. To address the over play of the rugby clubs pitches the RFU recommends either:

- Improving the capacity of the main training pitch by installing primary drainage - this would increase the capacity of the training pitch by 2 Match Equivalent Sessions in line with the 'good' pitch maintenance programme the club deliver as per the

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attached GMA report. This is the pitch which takes the vast majority of the peak training demand and thus is most overplayed.

- Continue to investigate viable land, local to Stafford Park site, to install and construct an additional natural turf pitch.

The Football Foundation is concerned that the proposals for 1 no. pitch in community use is not sufficient. However, this should be determined by the PPS and the TGRs and evidenced as such. The PPS predicts a growth in the urban extension up to 2033 of 5730 people which could lead to 10 new teams being formed which would require at least six new pitches. This represents half of the development, so the longer term needs should be doubled.

The FF is concerned about the quality and carrying capacity of the proposed dual-use pitch (within the primary school grounds) for community and education use. It would be preferred to provide dedicated pitches for community use. For any pitch based on an education site, it could be assumed that a capacity of 1 match could be accommodated each week, so could be used by two teams on a home and away basis. This is contrary to the public comments supporting dual-use, which the FF does not endorse. For any pitch located on a school site the FF would insist a community use agreement (CUA) is agreed with Sport England and Devon County FA in line with the intended usage levels of the facility. The CUA should detail an affordable pricing policy for the local area and should distinguish the difference from training to match play by having a dedicated match play pricing and detailed access to parking and ancillary facilities.

*“Location of sports pitches Policy AL/CU/3 of the AIDPD requires the provision of equipped and laid out public open space as part of the green infrastructure including 2.8 ha of sports pitches. Pitches require relatively level land which is in short supply on this site. Initial proposals related to provision of some of these facilities on land to the far west of the allocation, adjacent to Tiverton Road. However, there were concerns about the deliverability of this in that the land is outside the control of the development promoters and the current landowner has not contributed to the master planning process or acted to release this land for development. As a result, the masterplan identifies that these facilities should, in the main, be centrally located and well related to the primary school as well as linking it with other formal and informal green infrastructure provision. It is also intended that part of the sport pitch provision is to be located off site to meet local demand”.*

The above statement from Part 1 notes that any land provided for sport should be relatively flat, the FF would wish to see any pitches provided meet the Grounds Management Association (GMA) Performance Quality Standard (PQS) of ‘Good’ for football with a sufficient maintenance programme in place to maintain this standard that should be funded initially by a commuted sum to whoever assumes the management responsibility.

The FF wish to understand more regarding the proposed off-site provision and whether this will benefit football?

The FF concludes that there is insufficient evidence provided to justify the proposal which is not in-line with the PPS and thus the proposal is not needs led.

### Active Design

Sport England has considerable synergy with the NPPF and paragraphs 92 and 93 promoting healthy and safe communities. And achieving well designed places paragraph 130.

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Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via [this link](#).

Appendix 1 of Active Design contains a checklist that can demonstrate that the NW Masterplan has been / will be designed in line with the Active Design principles.

Cycle and walking networks should be extended to linking the existing urban area with the new development, and access to the surrounding natural environment. To encourage active travel there should be clear signage for cyclists into and out of the development site and to other destinations.

To bridge the gap between the high-level principles of Active Design and delivery in practice, we have worked with the Building Research Establishment (BRE) to link the overarching Active Design Principles with the individual scheme criterion in each of the BRE Environmental Assessment Methodology (BREEAM) family of schemes, including HQM, Communities and CEEQUAL.

### Physical Activity Opportunities

The applicant will need to ensure that other physical activity opportunities that should be considered:

\* Need for an indoor meeting/activity space for winter activity and when it rains. Huge potential for a 'meet and greet' place for a wide range of informal activity groups, including:

- Beginner running
- Ride social
- Boot camp
- Pop-up family games

\*An indoor multi-purpose space within the pavilion can cater for a range of activities, including:

- Dance
- Yoga/Pilates
- Circuits
- Mums & babies/toddlers activity sessions
- Short Mat Bowls
- Table Tennis

\* Outdoor open access activity trail equipment. Ideally with a walk/jog/cycle trail around the perimeter of the space. This gives scope to a wide range of activity including 'story trails', green gym trail, junior/adult parkrun, circuits & boot camps. All activities that suit the demographic of families, busy working adults.

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\* Keep element of flat multi-use informal space outside pitch layouts to encourage 'free-play' for children & families, this may include:

- 'Jumpers for posts'
- Frisbee
- Rounders
- Fitness/Exercise sessions

\* Potential for one of the designated 'play areas' to be focussed at teenagers and explore whether there is demand for skate park, free-running/parkour equipment.

### Community Use of Education Sites

Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.

Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

***Use Our School*** is a resource to support schools in opening their facilities to the community and keeping them open. It provides tried and tested solutions, real life practice, tips from people making it happen, and a range of downloadable resources [link here](#)

### Summary

We recommend a Stage E delivery meeting of the Playing Pitch Strategy with the Council, NGBs and key stakeholders to ensure the needs of the PPS are helping to shape developments in Cullompton and Mid Devon.

### 3. Natural England

Thank you for your consultation on the above dated 27 June 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

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We welcome the opportunity to comment on the updated North-West Cullompton Masterplan SPD.

### Biodiversity Net Gain

The Masterplan identifies the expectation for enhanced biodiversity (Section 4.5 C) to be provided within the North-West Cullompton allocation site area, which is welcomed. We note, however, that there is no requirement to provide net gains in biodiversity as set out in Local Plan policies S1(l) and DM26(a).

The SPD might also be an opportunity to set out the authorities' expectations for the allocation site to provide measurable net gains in biodiversity, as will be mandatory for most planning applications from November 2023.

Natural England recently published a brochure on Biodiversity Net Gain; and advice to local planning authorities, developers, and landowners on how they can prepare for net gain, both of which can be found here.

Biodiversity metrics are available to provide certainty and assist developers and local authorities in quantifying and securing net gain and we advise that a metric is used to measure potential biodiversity losses and gains at the masterplanning stage. Biodiversity Metric 3.1 can be used for this purpose.

For any queries relating to the specific advice in this letter only please contact Stephanie Parker-Stephenson at [stephanie.parker-stephenson@naturalengland.org.uk](mailto:stephanie.parker-stephenson@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondence to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

## 4. National Highways

Thank you for providing National Highways the opportunity to comment on the updates being proposed for the NW Cullompton Masterplan SPD which was adopted in 2016. We understand the amendments proposed are to align the document with the Mid Devon Local Plan Review 2013-2033, adopted July 2020.

We endorse the update, to ensure the NW Cullompton Masterplan SPD delivers development in accordance with the latest Local Plan policy approach, for which National Highways provided advice and input.

National Highways are responsible for operating, maintain and improving the Strategic Road Network (SRN), which at Cullompton includes Junction 28 of the M5. The North West Cullompton urban extension is one of a number of strategic development sites at Cullompton that have potential impacts on the SRN. Implementation of the Local Plan policies through a detailed Masterplan is welcomed, as well as recognition in the document that transport infrastructure is key to reduce the impact of the development and early provision is being sought. In addition to road infrastructure, delivery of sustainable transport options early in a development are key in nurturing residents' habits to use sustainable transport modes.

The Masterplan, particularly Section 5, expands on the infrastructure phasing approach identified in Local Plan policy CU6. Section 5.4 'Construction of Road Infrastructure' could be more clearly titled 'Construction of Road Infrastructure within the site'. We would then welcome in Section 5.5 'Infrastructure Requirements' greater emphasis that policy CU6 requires completion of Cullompton Town Centre Relief Road prior to the occupation of 600 dwellings. It is required in Local Plan policy CU2 that this

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development will provide a financial contribution towards this scheme, so clearer acknowledgement is recommended. Delivery of the relief road has been identified to mitigate impacts on Junction 28 on the M5.

Local Plan Policy CU2 also requires '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'. This point could be better emphasised in the Masterplan, including in Section 5.7 'Requirements for Future Planning Applications', part 4 'Traffic & Transport'.

I hope these comments are helpful in taking this document forward and welcome discussion if you have any queries.

### **5. Lead Local Flood Authority**

It's good to see that swales are requested where possible. You might want to request that two Sustainable Drainage features are required where possible, and perhaps suggest that swales and ponds are used.

The designs of SuDS could aim to mimic historical industry and land-uses. For example, the swales could be designed to mimic the existing leats flowing through the town (although they wouldn't have permanent water levels within them). Perhaps dummy water wheels and sluice gates could be included in certain locations of the swales.

You could suggest that side slopes are varied to help integrate Sustainable Drainage features within the landscape. You could also suggest planting if you wish.

Do Mid-Devon want to request re-use of rainfall and green roofs for certain parts of the development (e.g. school, community centre)? Green roofs could be used on top of bus stops.

### **6. Kentisbeare Parish Council**

Kentisbeare Parish Council would like to make two comments on the North West Cullompton Masterplan, both relating to traffic and road infrastructure. The traffic on both sides of junction 28 has been backing up badly on a regular basis for some years now.

We believe that the Willand Road - Tiverton Road link road should be built prior to work commencing on the Persimmon and Barratt David Wilson sites. We also believe it would cause extreme inconvenience to the broad community of Cullompton and its surrounding areas, if anything like a further 500 houses were allowed to be occupied in North West Cullompton prior to delivery of the link road.

We also note the reference under Policy CU2 requiring "additional 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 delivered from the site." We would like it to be made clear that any improvement to J28 should also factor in the very large traffic increases likely to result from the substantial development planned east of the M5 for the proposed "Garden Village".