

# Strategic Environmental Assessment for the Cullompton Neighbourhood Plan 2015-2033

Environmental Report to accompany the submission  
version of the Neighbourhood Plan

January 2019

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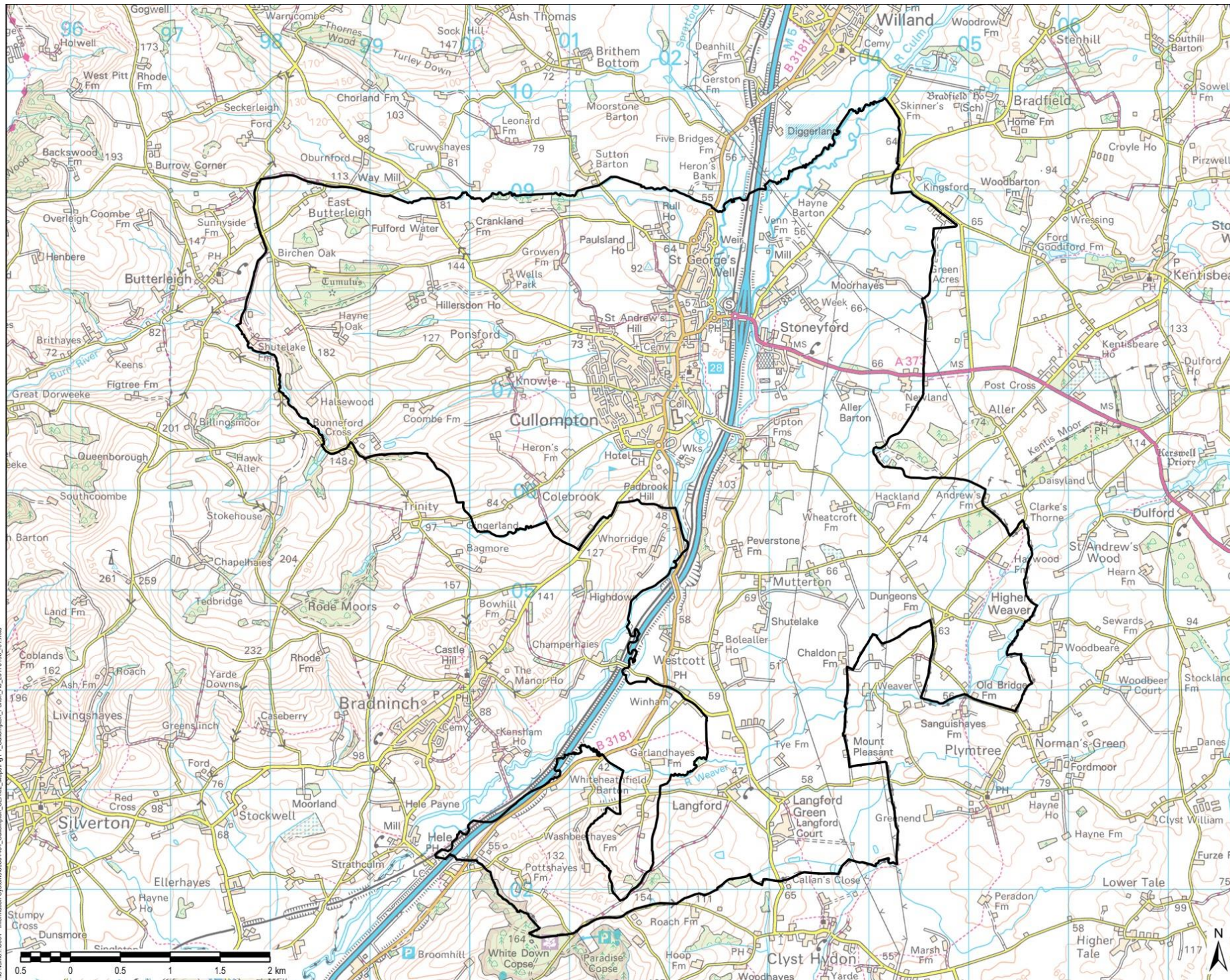
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**LEGEND**  
 [Black outline symbol] Cullompton Parish Boundary

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Purpose of Issue **DRAFT**

Client  
**CULLOMPTON NEIGHBOURHOOD  
 PLAN STEERING GROUP**

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 ASSESSMENT FOR THE  
 CULLOMPTON NEIGHBOURHOOD  
 PLAN**

Drawing Title  
**CULLOMPTON NEIGHBOURHOOD  
 PLAN AREA**

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## Non-Technical Summary

### What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the Cullompton Neighbourhood Plan 2015-2033 (CNP). This process is required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan, and identify opportunities to improve the environmental quality of the area covered by the Neighbourhood Plan and the quality of life of residents.

### What is the Cullompton Neighbourhood Plan?

The Cullompton Neighbourhood Plan (CNP) presents a plan for the administrative area of Cullompton Town Council for the period to 2033. Prepared to be in conformity with the emerging Mid Devon Local Plan, it sets out a vision and a range of policies for the Neighbourhood Plan area. These relate to a range of topics, including, but not limited to, landscape and townscape character, the quality of life of residents, employment opportunities, transport infrastructure and the protection and enhancement of the environment.

It is currently anticipated that the CNP will undergo a referendum in early 2018.

### Purpose of this Environmental Report

This Environmental Report, which accompanies the submission version of the CNP, is the third document to be produced as part of the SEA process. The first document was the SEA Scoping Report (April 2017), which includes information about the Neighbourhood Plan area's environment and community. The second document was the Environmental Report which accompanied the Regulation 14 consultation version of the Neighbourhood Plan.

The purpose of this Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the CNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the CNP and its relationship with other relevant policies, plans and programmes;
- Relevant aspects of the current and future state of the environment and key sustainability issues;
- The SEA Framework of objectives against which the CNP has been assessed;
- The appraisal of alternative approaches for the CNP;
- The likely significant environmental effects of the CNP;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the CNP; and
- The next steps for the CNP and accompanying SEA process.

## Assessment of alternative approaches for the CNP

The Neighbourhood Plan Steering Group is limited in terms of potential alternatives that can be considered for the CNP, which must be in general conformity with and support the strategic development needs set out in the Mid Devon Local Plan and have due regard to the emerging Local Plan Review. Significant effects against SEA objectives are most likely to arise through the consideration of alternatives for the level and location of growth to be delivered in the Neighbourhood Plan, which is often one of the key issues for a Neighbourhood Plan to address. However, alternatives for the level and location of growth in Cullompton up to 2033 have already been developed and subject to assessment at a higher level of plan-making through the Mid Devon Local Plan Review.

The CNP supports in principle a measure of enabling development for new community infrastructure, specifically a new swimming pool complex adjoined to the North West Cullompton development area. In this context the freehold of a one hectare site at Bayne Lane has been offered for a token amount by the landowner, subject to additional land in the vicinity being developed for houses. Whilst the CNP encourages the principle of enabling development for the swimming pool complex, it will only support development if the complex is delivered through the development. In this respect, the location of the swimming pool has been determined by the availability of the land, as well as its deliverability.

Given the unique circumstances surrounding the swimming pool complex, it is therefore considered that there are no reasonable alternatives which can be meaningfully appraised for the Neighbourhood Plan.

## Assessment of the current version of the CNP

The submission version of the CNP presents 40 planning policies for guiding development in the Cullompton area.

Utilising the SEA Framework of objectives and assessment questions developed during the earlier scoping stage of the SEA, the SEA process has assessed the policies put forward through the current version of the CNP. The Environmental Report has presented the findings of the assessment under the following sustainability themes:

- Air quality
- Biodiversity;
- Climate change;
- Historic environment and landscape;
- Land, soil and water resources;
- Population and community;
- Health and wellbeing; and
- Transportation.

The assessment has concluded that the current version of the CNP is likely to lead to **significant positive effects** in relation to the 'population and community' and 'health and wellbeing' SEA themes. These benefits largely relate to the carefully targeted approach to housing provision proposed by the current version of the CNP, the focus on enhancing accessibility to services and employment opportunities in Cullompton by sustainable modes of transport and the CNP's impetus on protecting and enhancing open space and green infrastructure networks. In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing townscape character and the setting of the historic environment in Cullompton, leading to **significant positive effects** in relation to the 'historic environment and landscape' theme.

The current version of the CNP will initiate a number of beneficial approaches regarding the 'air quality' 'transportation', 'land, soil and water resources' and 'climate change' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan, the lack of explicit housing and employment allocations, and the scale of proposals. Similarly, in relation to the 'biodiversity' SEA theme, whilst the scope and scale of the proposed policy approaches relating to the natural environment will help ensure that wide ranging

benefits in relation to this theme are secured through the Neighbourhood Plan, these are not considered to be significant in the context of the SEA process.

## Next steps

The Neighbourhood Plan and this Environmental Report has been submitted to Mid Devon District Council for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Mid Devon Local Plan.

If the Independent Examination is favourable, the Cullompton Neighbourhood Plan will be subject to a referendum, organised by Mid Devon District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Cullompton Neighbourhood Plan will become part of the Development Plan for Cullompton Parish.

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# 1. Introduction

## 1.1 Background

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Cullompton Neighbourhood Plan 2015-2033 (CNP).

The CNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which includes the administrative area of Cullompton Town Council (Figure 1.1), is being prepared in the context of the emerging Mid Devon Local Plan.

The Neighbourhood Plan was submitted to Mid Devon District Council in January 2019.

Key information relating to the CNP is presented in Table 1.1.

**Table 1.1: Key facts relating to the Cullompton Neighbourhood Plan**

Name of Qualifying Body	Cullompton Town Council
Title of Plan	Cullompton Neighbourhood Plan 2015-2033
Subject	Neighbourhood plan
Purpose	The Cullompton Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Neighbourhood Planning (General) Regulations 2012. The plan will be in conformity with the emerging Mid Devon Local Plan Review
Timescale	To 2033
Area covered by the plan	Cullompton Parish. (Figure 1.1)
Summary of content	The Cullompton Neighbourhood Plan will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Lou Maddocks, Cullompton Town Council Email: <a href="mailto:npa@cullomptontowncouncil.gov.uk">npa@cullomptontowncouncil.gov.uk</a> Tel. no. 01884 38249

## 1.2 SEA explained

The CNP has been screened in as requiring an SEA.

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the CNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>1</sup>.

The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.

In line with the SEA Regulations this Environmental Report must essentially answer four questions:

- What is the scope of the SEA?
- What has plan-making/SEA involved up to this point?
  - 'Reasonable alternatives' must have been appraised for the plan.
- What are the appraisal findings at this stage?
  - i.e. in relation to the draft plan.
- What happens next?

These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. **Table 1.2** presents the linkages between the regulatory requirements and the four SEA questions.

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<sup>1</sup> Directive 2001/42/EC

## 1.3 Structure of this Environmental Report

This document is the Environmental Report for the CNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

Each of the four questions is answered in turn within this report, as follows:

**Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory<sup>2</sup> requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>3</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What's the scope of the SEA?	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> </ul>
	<ul style="list-style-type: none"> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What are the key issues & objectives?	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
What has plan-making/SEA involved up to this point?	<ul style="list-style-type: none"> <li>Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with <b>alternatives</b></li> <li>Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
What are the assessment findings at this stage?	<ul style="list-style-type: none"> <li>The likely significant effects associated with <b>the submission version of the CNP</b></li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the submission version of the CNP</b></li> </ul>
What happens next?	<ul style="list-style-type: none"> <li>The next steps for plan making/SEA process.</li> </ul>

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

## 2. Local Plan context and vision for the CNP

### 2.1 Local Plan context for the CNP

The CNP is being prepared in the context of the existing Mid Devon Local Plan, with due regard to the emerging Mid Devon Local Plan Review.

The current Local Plan comprises the Core Strategy (adopted July 2007), the Allocations and Infrastructure Development Plan Document (October 2010) and the Development Management Policies (November 2013).

The Local Plan Review, when adopted, will replace the current Local Plan and will set out a framework for how future development across Mid Devon will be planned and delivered in the period to 2033.

Examination hearings on the Local Plan Review will take place in February 2019. The latest version of the Local Plan Review incorporates an overall housing target of 3,930 dwellings in Cullompton during the period to 2033 and an employment land provision of 73,500 square metres. In this context for the Local Plan Review<sup>4</sup> highlights the following elements for Cullompton:

*Cullompton will develop as a fast growing market town with a strategic role in the hierarchy of settlements in Mid Devon. The town will become the strategic focus of new development reflecting its accessibility, economic potential and environmental capacity. This strategy will improve access to housing through urban extensions and expanded employment opportunities. There will be significant improvements to the town's infrastructure and connectivity, including the reopening of the railway station, and improved services for its population and nearby rural areas. Proposals will provide for approximately 3,930 dwellings, of which 1,100 will be affordable, and 73,500 gross square metres of commercial floor space over the plan period.*

The Local Plan Review seeks to give communities a solid framework within which appropriate community-led planning policy documents, including neighbourhood plans, can be brought forward.

Neighbourhood plans are required to be in general conformity with the strategic policies in the development plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan and Local Plan Review to provide a clear overall strategic direction for development in Cullompton, whilst enabling finer local detail to be determined through the neighbourhood planning process where appropriate.

### 2.2 Vision for the Cullompton Neighbourhood Plan

The vision for the Cullompton Neighbourhood Plan, which was developed during earlier stages of plan development, is as follows:



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*Cullompton is a market town with a distinct character and identity rooted in a rich history that will be conserved as the town grows into the future as a vibrant centre for its residents and the surrounding rural area.*

*To meet the needs of a rapidly expanding population, the town will provide an excellent mix of housing reflecting the distinctive character of the town through varied external finishes and integration of the various styles and types of housing required to meet local needs and encourage families to*

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<sup>4</sup> Mid Devon District Council (January 2017) Local Plan Review 2013 - 2033 Proposed Submission (incorporating proposed modifications) <https://www.middevon.gov.uk/media/343289/web-version.pdf>

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*settle in the town and become part of the community. The housing and amenities will integrate the needs of people and nature, retaining the feel of a country town through abundant use of trees, flowering-trees, hedgerows and imaginative use of water management.*

*The high street will be a pedestrian-friendly economic and social centre for the community, providing a mix of shops, offices, dwellings and places to eat. Further retail will be encouraged in the smaller trading estates bordering the town centre. The leisure pursuits of all age groups will be catered for by excellent sports and activity facilities and easy access to the natural, nearby features of countryside and water.*

*Taking advantage of its location, the town will be a communications hub with good links by rail, road, paths and broadband to the region and beyond.*

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## Vision for the Cullompton Neighbourhood Plan



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To support the Neighbourhood Plan's vision, the CNP sets out a number of Neighbourhood Plan policies. The latest iteration of these policies has been appraised in **Chapter 5** of this Environmental Report.

## 3. The Scope of the SEA

### 3.1 SEA Scoping Report

The SEA Regulations require that: “*When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are Natural England, the Environment Agency and Historic England.<sup>5</sup> These authorities were consulted on the scope of the CNP SEA in April 2017.

The purpose of scoping was to outline the ‘scope’ of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability issues for the Neighbourhood Plan; and
- An ‘SEA Framework’ of objectives against which the Neighbourhood Plan can be assessed.

Baseline information (including the context review and baseline data) is presented in **Appendix A**.

Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Table 3.1**.

**Table 3.1: Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<p><b>Natural England</b> <b>Alison Slade, Lead Advisor - Devon, Cornwall and Isles of Scilly Area Team</b></p>	
<p>Natural England notes that the SEA Scoping Report includes a section on Biodiversity. At SEA/Habitats Regulation Assessment (HRA) screening (30<sup>th</sup> October 2015) it was Natural England’s advice that the Neighbourhood Plan should make reference to how the Local Plan will deal with European sites. We have not been able to find this specific information within the Scoping Report or other Neighbourhood Plan documents. Natural England advises that up to date information is sought from Mid Devon Council.</p>	<p>Mid Devon District Council has screened the Neighbourhood Plan for HRA requirements and has determined that the CNP is not likely to lead to effects on the European designated nature conservation sites. This includes relating to potential effects on: The Exe Estuary SPA, which is located 16km south of the Neighbourhood Plan area; and the Culm Grasslands SAC, which is located approximately 18km north west from the Neighbourhood Plan area.</p>

<sup>5</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*’.

Consultation response	How the response was considered and addressed
<p>The South East Devon European Site Mitigation Strategy is relevant to housing development at Cullompton. This strategy to mitigate for impacts from increased recreational demand on European sites applies to the wider Exeter and East Devon area. Provision of open space as part of any new residential development will provide mitigation and we welcome that proposed Policy C/H05 of the Neighbourhood Plan encourages open space on housing sites.</p>	<p>Comment noted. This policy has been updated, but the overall premise of the policy remains.</p>
<p>It is Natural England's view that the Neighbourhood Plan would not have significant environmental effects not already considered by the SEA of the Mid Devon Local Plan Review and the Local Plan Review HRA. However, to demonstrate compliance with the European regulations it is recommended that the Biodiversity section of the SEA Scoping Report (and other relevant documents) make reference to the findings of the Mid Devon Local Plan review SEA and HRA in relation to the Cullompton area.</p>	<p>Comment noted. Text has been updated.</p>
<p>Natural England welcomes the references to the value of green infrastructure in adapting to climate change and reducing flood risk in the SEA Scoping Report.</p>	<p>Comment noted.</p>
<p><b>Historic England</b> <b>David Stuart, Historic Places Adviser South West</b></p>	
<p>Our last involvement with this Plan was in November 2015 when we were happy to concur with the view expressed by Mid Devon District Council in the SEA Screening Report at that time that an SEA would not be required. This was based on Version 1 of the Plan dated June 2015. We note that the Plan has since evolved and that there is now a 1st Consultation Draft dated February 2016. We have not received an amended SEA Screening consultation nor is it entirely clear from that later Draft why it is thought that an SEA might now be required. We note that government approval has recently been obtained for the Cullompton Garden Village but are not sure if this has a bearing on the situation.</p>	<p>The Neighbourhood Plan was screened in by Mid Devon District Council as requiring an SEA process. This was given the uncertainties as to what the Neighbourhood Plan would include, including relating to allocations.</p>
<p>We note too from Section 1.2 (p2) of the SEA Scoping Report that it may contain policies and site allocations additional to those in the Local Plan. Reference is made to four employment sites but it is not clear if this alludes to the Local or Neighbourhood Plan.</p>	<p>The reference to employment delivery in Section 1.2 (p.2) of the SEA Scoping Report is in relation to the Local Plan Review. The Neighbourhood Plan does not seek to allocate additional or alternative employment provision.</p>
<p>Section 5.1 (p19) on Headline Sustainability Issues for the Historic Environment indicates that these two considerations and other forms of new development have the potential to lead to impacts on the historic environment but presumably this isn't the trigger for the SEA in question.</p>	<p>Whilst not the trigger for SEA, specific issues affecting the historic environment have been discussed in the Scoping Report and assessed through the SEA process.</p>
<p>It is recommended that the Historic England SEA Guidance is reviewed.</p>	<p>Comment Noted, the guidance has been reviewed.</p>
<p><b>Environment Agency</b></p>	
<p>No comments received.</p>	<p>N/A</p>

## 3.2 Key sustainability issues

Drawing on the review of the sustainability context and baseline, the SEA Scoping Report was able to identify a range of sustainability issues that should be a particular focus of SEA. These issues are as follows, presented by seven environmental themes:

### 3.2.1 Air quality

- An AQMA has been declared for the most of Cullompton town due to exceedances of NO<sub>2</sub> from transport.

### 3.2.2 Biodiversity

- There are no European or nationally designated sites within Cullompton, however there are a number of locally designated sites.
- Features of biodiversity value such as trees, hedgerows, waterways and meadows should be protected from the impacts of future development and where possible enhanced. Their integrity should also be supported through improved ecological connections in the area, including through the provision of green infrastructure enhancements.

### 3.2.3 Climate Change

- Flood risk in Cullompton has the potential to increase as a result of urban development, land use change and climate change.
- Per capita greenhouse gas emissions for Mid Devon District are slightly higher than England, but have been falling since 2005.
- An increase in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions.
- There is a need to increase the Neighbourhood Plan area's resilience to the effects of climate change through supporting adaptation to the risks associated with climate change in the area.

### 3.2.4 Historic Environment and Landscape

- The Neighbourhood Plan area has a rich historic environment, with many features and areas nationally or locally designated for their cultural heritage interest.
- Part of Cullompton has been designated a conservation area. A Conservation Area Appraisal has been prepared.
- New development associated with the allocations in the Local Plan Review and the proposed Culm Garden Village have the potential to lead to impacts on the historic environment, including through affecting the setting of cultural heritage assets and landscape/townscape quality.
- New development could lead to pressures on non-designated sites and townscapes, including from the loss of key built and natural features.

### 3.2.5 Land, Soil and Water Resources

- Agricultural land in the vicinity of the Neighbourhood Plan area comprises significant areas of land classified as the best and most versatile agricultural land, including Grade 1 and Grade 2 agricultural land.



### 3.2.6 Population and Community

- The population of Cullompton grew by 11.7% between 2001 and 2011. This increase was significantly higher than growth seen regionally and nationally.
- The Neighbourhood Plan area has an ageing population, with future implications for the provision of health services, facilities and amenities.

### 3.2.7 Health and Wellbeing

- The majority of residents in Cullompton consider themselves to be in 'very good health'.
- The proportion of residents in Cullompton whose daily activities are limited a lot or a little is broadly in line with Mid Devon, regional and national averages.

### 3.2.8 Transportation

- The Cullompton Neighbourhood Plan area does not current have a railway station.
- The proportion of people driving a car or van to work is slightly higher in the Neighbourhood Plan area than Mid Devon, regional and national averages.
- Cullompton High Street (incorporating Higher Street, High Street and Fore Street) are part of the diversion when sections of the M5 are closed due to accidents or roadworks.
- Increased housing and employment growth in the Neighbourhood Plan area will place increasing pressures on the town's road network. The impact of growth on congestion depends on the delivery of proposed road schemes in the area, including a proposed Eastern Relief Road, improvements to Junction 28, and/or the inclusion of a new junction on the M5.

## 3.3 SEA Framework

These issues were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework for the CNP is presented below.

**Table 3.2: SEA Framework for the Cullompton Neighbourhood Plan**

SEA Objective	Assessment questions
<b>Air Quality</b>	
<p>Improve air quality in the Cullompton Neighbourhood Plan area and minimise and/or mitigate against all sources of environmental pollution.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support a reduction of the emissions which led to the designation of the Cullompton Air Quality Management Area;</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport? and</li> <li>• Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the Neighbourhood Plan area?</li> </ul>
<b>Biodiversity</b>	
<p>Protect and enhance all biodiversity and geological features</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Protect and enhance semi-natural habitats?</li> <li>• Protect and enhance locally designated sites?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support enhancements to ecological networks, including through improvements to multifunctional green infrastructure networks?</li> <li>• Support access to, interpretation and understanding of biodiversity?</li> </ul>
<b>Climatic change</b>	
<p>Promote climate change mitigation in Cullompton</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Limit the increase in the carbon footprint of the plan area from population growth?</li> <li>• Promote the use of sustainable modes of transport, including walking, cycling and public transport?</li> <li>• Reduce the need to travel?</li> <li>• Increase the number of new developments meeting sustainable design criteria?</li> <li>• Generate energy from low or zero carbon sources?</li> <li>• Reduce energy consumption from non-renewable resources?</li> </ul>
<p>Support the resilience of Cullompton to the potential effects of climate change</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Ensure that no development takes place in areas at higher risk of flooding, taking into account the likely effects of climate change?</li> <li>• Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the plan area?</li> <li>• Increase the resilience of biodiversity in the plan area to the effects of climate change, including enhancements to ecological networks?</li> </ul>

SEA Objective	Assessment questions
<b>Landscape and Historic Environment</b>	
Protect, maintain and enhance Cullompton's cultural heritage resource, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance the Cullompton Conservation Area?</li> <li>• Preserve the historic settlement pattern of outlying hamlets?</li> <li>• Conserve and enhance buildings and structures of architectural or historic interest?</li> <li>• Support the integrity of the historic setting of key buildings of cultural heritage interest?</li> <li>• Conserve and enhance local diversity and distinctiveness?</li> <li>• Support access to, interpretation and understanding of the historic environment?</li> </ul>
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance landscape and townscape features?</li> <li>• Support the integrity of Cullompton Conservation Area?</li> </ul>
<b>Land, Soil and Water Resources</b>	
Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the use of previously developed land?</li> <li>• Avoid the development of the best and most versatile agricultural land, which in the parish may comprise Grade 1, 2 and 3a agricultural land?</li> </ul>
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Reduce the amount of waste produced?</li> <li>• Support the minimisation, reuse and recycling of waste?</li> <li>• Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</li> <li>• Encourage recycling of materials and minimise consumption of resources during construction?</li> </ul>
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support improvements to water quality?</li> <li>• Minimise water consumption?</li> </ul>
<b>Population and Community</b>	
Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote the development of a range of high quality, accessible community facilities?</li> <li>• Encourage and promote social cohesion and encourage active involvement of local people in community activities?</li> <li>• Minimise fuel poverty?</li> <li>• Maintain or enhance the quality of life of existing local residents?</li> <li>• Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</li> <li>• Support the provision of land for allotments and cemeteries?</li> </ul>
Reduce deprivation and promote a more inclusive and self-contained community.	

SEA Objective	Assessment questions
<p>Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Support the provision of a range of house types and sizes?</li> <li>• Support enhancements to the current housing stock?</li> <li>• Meet the needs of all sectors of the community?</li> <li>• Provide quality and flexible homes that meet people's needs?</li> <li>• Promote the use of sustainable building techniques, including use of sustainable building materials in construction?</li> <li>• Provide housing in sustainable locations that allow easy access to a range of local services and facilities?</li> </ul>
<p><b>Health and Wellbeing</b></p>	
<p>Improve the health and wellbeing of Cullompton's residents</p>	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> <li>• Promote accessibility to a range of leisure, health and community facilities, for all age groups?</li> <li>• Facilitate enhancements to the housing stock of the Cullompton Neighbourhood Plan area?</li> <li>• Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards?</li> <li>• Reduce noise pollution?</li> <li>• Promote the use of healthier modes of travel?</li> <li>• Improve access to the countryside for recreation?</li> </ul>
<p><b>Transportation</b></p>	
<p>Promote sustainable transport use and reduce the need to travel.</p>	<p>Will the option/proposal help to...</p> <ul style="list-style-type: none"> <li>• Reduce the need to travel through sustainable patterns of land use and development?</li> <li>• Encourage modal shift to more sustainable forms of travel?</li> <li>• Enable sustainable transport infrastructure enhancements?</li> <li>• Facilitate working from home and remote working?</li> <li>• Improve road safety?</li> <li>• Reduce the impact on residents from the road network?</li> </ul>

## 4. What has plan making / SEA involved to this point?

### 4.1 Introduction

In accordance with the SEA Regulations the Environmental Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, this section explains how preparation of the current version of the CNP has been informed by an assessment of alternative options for non-strategic scale development in the Neighbourhood Plan area.

### 4.2 Overview of plan making / SEA work undertaken since 2013

Plan-making for the CNP has been underway since 2013. Initial work incorporated a number of informal and formal consultation exercises carried out by the Neighbourhood Plan Steering Group, including on the scope of the Neighbourhood Plan.

A significant number of consultation events have since been carried out for the Neighbourhood Plan. This has included a range of exhibitions, public meetings and questions and answer sessions as well as workshops.

The following sections discuss the evolution of the CNP in association with the SEA process.

### 4.3 Assessment of reasonable alternatives for the Neighbourhood Plan

A key element of the SEA process is the appraisal of 'reasonable alternatives' for the CNP. The SEA Regulations<sup>6</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

As discussed in section 2.1, the CNP has been prepared in the context of the Mid Devon Local Plan Review. The latest version of the Local Plan Review incorporates an overall housing target of 3,930 dwellings in Cullompton during the period to 2033 and an employment land provision of 73,500 square metres.

Alongside, and to support the Local Plan, Mid Devon District Council submitted 'East Cullompton' as a potential development area to be advanced as part of the Government's Garden Village initiative. The Government responded in January 2017 that the bid for funding to support the proposal was successful and awarded Mid Devon District Council a package of support to advance the initiative. In this context the money earmarked for the proposal is designed to be used to unlock the full capacity of sites, providing funding for additional resources and expertise to accelerate development and avoid delays.

Given the significant amount of development will is proposed for the area, much of which is strategic in scale, and, in the case of the Garden Village, is supported by national funding, the Neighbourhood Plan does not seek to directly allocate additional or alternative housing or employment provision. Instead it seeks to support the strategic level allocations for the Neighbourhood Plan area with a series of locally

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<sup>6</sup> Environmental Assessment of Plans and Programmes Regulations 2004

specific Neighbourhood Plan policies which will help provide a local context to the strategic level policies of the emerging Mid Devon Local Plan Review and the Culm Garden Village proposals.

The CNP supports in principle a measure of enabling development for new community infrastructure, specifically a new swimming pool complex adjoined to the North West Cullompton development area. In this context the freehold of a one hectare site at Bayne Lane has been offered for a token amount by the landowner, subject to additional land in the vicinity being developed for houses. Whilst the CNP encourages the principle of enabling development for the swimming pool complex, it will only support development if the complex is delivered through the development. In this respect, the location of the swimming pool has been determined by the availability of the land, as well as its deliverability. No reasonable alternatives are therefore appropriate to assess for this issue.

In the context of the above, it is clear from the discussion above that the Neighbourhood Plan Steering Group is limited in terms of potential alternatives that can be considered for the CNP, which must be in general conformity with and support the strategic development needs set out in the Local Plan and have due regard to the Local Plan Review. Significant effects against SEA objectives are most likely to arise through the consideration of alternatives for the level and location of growth to be delivered in the Neighbourhood Plan, which is often one of the key issues for a Neighbourhood Plan to address. However, alternatives for the level and location of growth in Cullompton up to 2033 have already been developed and subject to assessment at a higher level of plan-making through the Local Plan Review. Reasonable alternatives for the swimming pool complex are also restricted for the reasons set out above.

For these reasons it is considered that there are no reasonable alternatives which can be meaningfully appraised for the Neighbourhood Plan.

## 4.4 Development of Neighbourhood Plan policies

To support the implementation of the vision for the Neighbourhood Plan discussed in Section 2.2, the current version of the CNP puts forward 40 policies to guide development in the Neighbourhood Plan area. The policies were developed following extensive community consultation and evidence gathering, and earlier versions of these policies were assessed through the SEA process during previous stages of plan making.

The policies are as follows:

**Table 4.1: Cullompton Neighbourhood Plan policies**

### Sustainable Development

Policy SD01	Traffic Impact of Major Development
Policy SD02	Links to the Town Centre
Policy SD03	Flood Attenuation
Policy SD04	Solar Design in Housing Schemes
Policy SD05	Connectivity
Policy SD06	Culm Garden Village
Policy SD07	Timing of Infrastructure

### Highways, Travel and Transport

Policy HT01	Motorway Connection
Policy HT02	Improving our Public Transport Network
Policy HT03	Improving our Cycle Network
Policy HT04	Improving our Footpaths

### Housing

Policy HS01	Housing Mix
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Policy HS02	Social and Affordable Housing
Policy HS03	Creating Smaller Housing Units
Policy HS04	Parking on Housing Schemes
Policy HS05	Open Space on Housing Schemes
Policy HS06	Gypsy and Traveller Sites

### **Natural & Rural Environment**

Policy EN01	Protecting and Enhancing the Natural Environment
Policy EN02	Improving the Public Rights of Way Network
Policy EN03	Local Green Space

### **Town Centre, Heritage and Culture**

Policy TC01	Heritage Assets
Policy TC02	Character of the Built Environment
Policy TC03	Pedestrian Priority in the Town Centre
Policy TC04	Service Arrangements in the Town Centre
Policy TC05	Art in the Public Realm
Policy TC06	Cultural and Leisure Facilities in the Town Centre
Policy TC07	Former Cullompton Cinema
Policy TC08	Extending the Attraction of the Town Centre
Policy TC09	Improving the Offer

### **Local Economy & Jobs**

Policy EJ01	Improving Access to Commercial Areas
Policy EJ02	Development of Small Business Units

### **Community Wellbeing and Leisure**

Policy WL01	Existing Recreation Spaces
Policy WL02	CCA Fields
Policy WL03	Usable Public Open Space
Policy WL04	Outdoor Sports Facilities
Policy WL05	Indoor Sports Facilities
Policy WL06	Cullompton Swimming Pool Complex
Policy WL07	Community Allotments, Orchards and Composting
Policy WL08	Dementia Friendly
Policy WL09	Providing for Young People

## 5. What are the appraisal findings at this current stage?

### 5.1 Introduction

The aim of this chapter is to present appraisal findings and recommendations in relation to the current submission version of the CNP. This chapter is structured as follows:

**Sections 5.4** to 5.10 present an appraisal of the current version of the CNP under the eight SEA theme headings; and

**Section 5.11** subsequently discusses overall conclusions at this current stage and recommendations for the next stage of plan-making.

### 5.2 Approach to the appraisal

The appraisal is structured under the eight SEA themes.

For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.<sup>7</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.

Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### 5.3 Air quality

Air quality is a key issue for the Neighbourhood Plan area. Reflecting existing issues in Cullompton, an AQMA has been designated for most of the town due to emissions from transport. In this context, the degree to which the Neighbourhood Plan supports modal shift from the private car will be a key influence on air quality.

The current version of the CNP has a strong focus on promoting sustainable modes of transport, including walking and cycling and public transport use. Policy SD01 (Traffic Impact of Major Development) sets out how major development should specifically demonstrate how the development's vehicular access/egress and circulation arrangements will mitigate the negative impacts of traffic in Cullompton town centre. It also states that road infrastructure requirements should be in place to accompany new development so as to prevent any unacceptable impacts on the existing road network, and in the town centre in particular. This will help reduce impacts on air quality stimulated through traffic growth resulting from the major development proposals that will take place through the strategic allocations of the Local Plan Review.

A number of the policies of the CNP directly seek to promote walking and cycling in the Neighbourhood Plan area. In this context Policy HT03 (Improving our Cycle Network) supports the development of an accessible cycle routes in and around Cullompton through enhancing such linkages between residential areas, employment areas and public facilities and initiating a Cycle Paths Plan. This will be reinforced by Policy HT04 (Improving our Footpaths), which seeks to enhance pedestrian links in the Neighbourhood Plan area and Policy SD02 (Links to the Town Centre), which states that all major developments should include provision for accessible pedestrian and cycle routes, as well connections that link safely to the wider network of routes leading to and from

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<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations 2004



Cullompton town centre and other essential public facilities. This will be further supported by Policy EJ01 (Improving Access to Commercial Areas), which seeks to enhance pedestrian and cycle linkages to employment areas.

Sustainable transport use will be further facilitated by Policy HT02 (Improving our Public Transport Network), which seeks to facilitate a new sustainable transport interchange in Cullompton. This will be supported by Policy TC03 (Pedestrian Priority in the Town Centre), which supports design and highways proposals which make Fore Street and High Street more attractive to pedestrian use and less attractive to through traffic. The policy for the proposed Garden Village (SD06 Culm Garden Village) will also promote sustainable transport use, including through enhancing pedestrian and cycle links between the Garden Village and Cullompton town centre.

In light of these policies, the current version of the CNP sets out a range of provisions which will help limit emissions from transport in the Neighbourhood Plan area.

Air quality in Cullompton will also be supported by the policies which promote green infrastructure provision in the Neighbourhood Plan area. In this respect Policy EN03 (Local Green Space) protects 17 open spaces as Local Green Spaces, whilst Policy WL03 (Usable Public Open Space) promotes the provision of new open space with new development. Open space provision will also be supported by Policy WL07 (Community Allotments, Orchards and Composting), which seeks to ensure provision for allotments and orchards is included within new development. Other policies which will support green infrastructure enhancements include Policy EN01 (Protecting and Enhancing the Natural Environment), which seeks to protect and enhance green corridors facilitate new planting, Policy WL02 (CCA Fields), which seeks to ensure the long term maintenance of the CCA Fields area as open space is secure, and Policy HS05 (Open Space on Housing Schemes), which seeks to maximise open space on new housing developments. These policies will support air quality through facilitating increased absorption and dissipation of nitrogen dioxide and other pollutants, and support noise quality. Enhancements to green infrastructure will also promote modal shift (and as such help limit the effects of traffic growth on air quality in the Neighbourhood Plan area) through improving opportunities for walking and cycling and enhancing sustainable transport networks.

As such, in light of the above focus of the policies on sustainable transport use and green infrastructure enhancements, the CNP will support air quality in the Neighbourhood Plan area.

## 5.4 Biodiversity and geodiversity

The current version of the Cullompton Neighbourhood Plan sets out a range of provisions to help limit potential effects of new development on features and areas of biodiversity interest in the Neighbourhood Plan area, and support enhancements.

A key policy in this regard is Policy EN01 (Protecting and Enhancing the Natural Environment). This sets out a range of provisions for the safeguarding or protection of designated sites, protected species, priority species and habitats, ancient or species rich hedgerows, grasslands and woodland, and seeks to facilitate the safeguarding and preservation of ecologically sensitive areas and ecological corridors. It also seeks to protect trees and woodland and facilitate the planting of new native trees and hedgerows, which are central elements of the Neighbourhood Plan area's ecological networks. This will support linkages for species between different habitats. In relation to designated sites, the policy aims to facilitate the provision of appropriate buffer zones around designated sites or features and/or the implementation of appropriate mitigation and compensation measures where appropriate, and avoid and reduce potential recreational impacts on sites of ecological value. The policy also seeks to safeguard sites of geological importance in the Neighbourhood Plan area.

Ecological networks in the Neighbourhood Plan area will be further supported by the policies which promote the protection and enhancement of green infrastructure networks. In this context, Policy EN03 (Local Green Space) protects 17 open spaces as Local Green Spaces, whilst Policy WL03 (Usable Public Open Space) promotes the provision of new open space within new development areas. Ecological networks will also be supported by Policy WL07 (Community Allotments, Orchards and

Composting), which seeks to ensure provision for allotments and orchards is included within new development, Policy WL02 (CCA Fields), which aims to avoid and safeguard the most sensitive ecological areas and habitats on the CCA Fields and supports the appropriate management and maintenance of the area, and Policy HS05 (Open Space on Housing Schemes), which seeks to maximise open space on new housing developments.

A further key Neighbourhood Plan policy for promoting ecological networks will also be Policy EN02 (Improving the Public Rights of Way Network), which aims to protect and enhance the biodiversity value of the public rights of way network, including footpaths and bridleways. Other policies which will support biodiversity in the Neighbourhood Plan area include Policy WL04 (Outdoor Sports Facilities), which seeks to ensure that assets of biodiversity value are protected through new and enhanced outdoor sports provision, and Policy WLO6 (Cullompton Swimming Pool Complex), which seeks to ensure that any enabling development for a swimming pool does not affect the biodiversity value of the area. Policy SD03 (Flood Attenuation) will also support ecological networks through promoting flood attenuation proposals through major developments which make use of existing on- or off-site natural water features which contribute to the biodiversity of the area.

In this context the CNP policies offer a proactive approach to protecting and enhancing habitats and species in the Neighbourhood Plan area and ecological networks.

## 5.5 Climate change

In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area.

The current version of the CNP has a strong focus on promoting sustainable modes of transport, including walking and cycling and public transport use. Policy SD01 (Traffic Impact of Major Development) sets out how major development should specifically demonstrate how the development's vehicular access/egress and circulation arrangements will mitigate the negative impacts of traffic in Cullompton town centre. Policy HT03 (Improving our Cycle Network) supports the development of an accessible network of cycle routes in and around Cullompton through enhancing such linkages between residential areas, employment areas and public facilities and Initiating a Cycle Paths Plan. This will be reinforced by Policy HT04 (Improving our Footpaths), which seeks to enhance pedestrian links in the Neighbourhood Plan area and Policy SD02 (Links to the Town Centre), which states that all major developments should include provision for accessible pedestrian and cycle routes, as well connections that link safely to the wider network of routes leading to and from Cullompton town centre and other essential public facilities. This will be further supported by Policy EJ01 (Improving Access to Commercial Areas), which seeks to enhance pedestrian and cycle linkages to employment areas.

Sustainable transport use will be further facilitated by Policy HT02 (Improving our Public Transport Network), which seeks to facilitate a new sustainable transport interchange in Cullompton. This will be supported by Policy TC03 (Pedestrian Priority in the Town Centre), which supports design and highways proposals which make Fore Street and High Street more attractive to pedestrian use and less attractive to through traffic. The policy for the proposed Garden Village (SD06 Culm Garden Village) will also promote sustainable transport use, including through enhancing pedestrian and cycle links between the Garden Village and Cullompton town centre.

As such, these policies, through promoting modal shift from the private car, and helping to reduce the growth of traffic from new strategic-scale development in the area, will support climate change mitigation through helping to limit greenhouse gas emissions from transport in the Neighbourhood Plan area.

In terms of limiting emissions from new development areas in the Neighbourhood Plan area, Policy SD04 (Solar Design in Housing Schemes) seeks to integrate high standards of energy efficiency within new development, facilitate passive solar gain and promote the use of roof mounted solar panels and photovoltaic panels where visual impact is minimised. This will be supported by Policy HS04 (Parking

on Housing Schemes), which seeks to ensure that adequate provision should be made for the charging of electric vehicles.

Whilst the CNP does not seek to set specific energy efficiency standards for new development areas, with regard to residential developments, the scope to set standards for residential building performance was radically curtailed by the Government's Housing Standards Review. The Ministerial Statement published on 25<sup>th</sup> March 2015 outlined the Government's new national planning policy on the setting of technical standards for new dwellings and Local Plan making. The Code for Sustainable Homes was formally withdrawn so targets against this should no longer be set in policy, and local authorities were no longer able to require higher standards as a planning condition for new approvals. The Deregulation Act also brought in a Clause which amended the Planning and Energy Act 2008 to prevent local authorities from requiring higher levels of energy efficiency than existing Building Regulations. As such the lack of such targets within the Neighbourhood Plan sits within the context of national policy on this topic.

The CNP's focus on the protection and enhancement of open spaces and green infrastructure networks will promote climate change mitigation through supporting carbon sequestration and promoting sustainable modes of transport; and climate change adaptation through helping to limit the effects of extreme weather events and regulating surface water run-off. The policies supporting biodiversity in the Neighbourhood Plan area (section 5.4) will further help increase the resilience of ecological networks to the effects of climate change through making provision for improvements to habitats and enhancing such networks.

In terms of climate change adaptation, flood risk is a key issue for the Neighbourhood Plan area. This particularly relates to the risk of fluvial flooding from the River Culm; in 2009 it was estimated that within the Parish there were 499 existing properties located in Flood Zone 2 (at moderate risk of flooding) and 424 in Flood Zone 3 (high risk).

Whilst the provisions of the NPPF, the Mid Devon Local Plan Review/SFRA and the Local Flood Risk Management Strategy will help address potential flood risk issues in the Neighbourhood Plan area, a number of the CNP policies will further help manage flood risk issues in the area. Policy SD03 (Flood Attenuation) seeks to ensure that new flood attenuation proposals which make use of existing on- or off-site natural water features, or new on-site water features in suitable and safe locations are integrated within and accompanying new development areas. Policy WL02 (CCA Fields) also recognises the key role of the CCA Fields for flood attenuation through seeking to ensure any new proposals for the area (including specifically relating to the proposed relief road) reduces long term flood risk in the area.

Given the significant flood risk issues in the Neighbourhood Plan area, the provision of additional flood risk policies in addition to the provisions of the NPPF, Local Plan and Local Flood Risk Management Strategy is appropriate for the CNP.

## 5.6 Historic environment and landscape

Cullompton has a rich historic environment and a townscape and landscape that should be conserved, enhanced and enjoyed. This is reflected by the planning policies proposed for the CNP, which have a strong focus on protecting and enhancing townscape quality in the Neighbourhood Plan area and conserving and enhancing the fabric and setting of the historic environment.

Policy TC01 (Heritage Assets) provides a local context to protecting and enhancing designated heritage assets. Whilst statutory provisions provide protection for the nationally designated listed buildings and scheduled monuments present in the Cullompton Neighbourhood Plan area, locally designated sites included on the Mid Devon local list are not currently offered protection through the planning process. As such Policy TC01 seeks to ensure that development proposals that affect a building or structure on Mid Devon District Council's Register of Heritage Assets must demonstrate how they protect or enhance the heritage asset. It also seeks to ensure that any renovations or alterations of buildings or structures identified on the Register of Heritage Assets requiring planning

permission should be designed sensitively, and with careful regard to the heritage asset's historical and architectural interest and setting. Given the Register of Heritage Assets includes several locations, buildings and structures in the Cullompton area that were identified as being of local importance in the Cullompton Conservation Area Appraisal, the policy offers an appropriate local context to protecting designated sites of historic environment interest in the Neighbourhood Plan area.

In relation to the setting of the historic environment and local distinctiveness, the policies promoting improvements to green infrastructure networks will support enhancements. This includes through Policy EN01 (Protecting and Enhancing the Natural Environment), Policy EN03 (Local Green Space), Policy WL03 (Usable Public Open Space), Policy WL07 (Community Allotments, Orchards and Composting), Policy WL02 (CCA Fields), Policy SD03 (Flood Attenuation) and Policy HS05 (Open Space on Housing Schemes), which will offer improvements to the quality of the public realm and the setting of key features and areas of historic interest. This will be further supported by Policy TC02 (Character of the Built Environment), which will enable enhancements to the public realm through seeking to ensure that development should '*...contribute positively to the character of the built environment in its locality by: (i) demonstrating an understanding of the diverse qualities that contribute to this character; and (ii) reinforcing local distinctiveness and a strong sense of place.*'

The Neighbourhood Plan has a strong focus on enhancing the quality of the public realm in Cullompton town centre. In this context Policy TC03 (Pedestrian Priority in the Town Centre) supports design and highways proposals which make Fore Street and High Street more attractive to pedestrian use and less attractive to through traffic. Policy SD01 (Traffic Impact of Major Development) has a strong focus on minimising the impact of traffic from new development areas on the quality of the public realm in the town centre. This includes through seeking to ensure that new major development proposals specifically demonstrate how vehicular access/egress and circulation arrangements will mitigate the negative impacts of traffic in the town centre and that road infrastructure requirements are in place in good time to prevent an unacceptable impact on the existing road network, particularly in the town centre. The quality of the public realm in the town centre will also be supported by Policy TC06 (Cultural and Leisure Facilities in the Town Centre), which encourages the provision of cultural and leisure facilities in the town centre through the conversion and/or better use of redundant buildings and spaces, Policy TC07 (Former Cullompton Cinema), which supports proposals which enable the re-use of the former Cullompton Cinema building for community leisure and or cultural purposes and Policy TC05 (Art in the Public Realm), which seeks to encourage '*innovative public art which enlivens and add positively to the character of the public realm*'. Policy HS03 (Creating Smaller Housing Units) also seeks to ensure that conversion and/or modification of existing larger dwellings or other redundant buildings within the town respects the character, scale, setting and design of the existing building.

Townscape and landscape quality and the setting of the historic environment will also be supported by the policies which support sustainable transport use. Policy HT03 (Improving our Cycle Network) supports the development of an accessible network of cycle routes in and around Cullompton through enhancing such linkages between residential areas, employment areas and public facilities and initiating a Cycle Paths Plan. This will be reinforced by Policy HT04 (Improving our Footpaths), which seeks to enhance pedestrian links in the Neighbourhood Plan area and Policy SD02 (Links to the Town Centre), which states that all major developments should include provision for accessible pedestrian and cycle routes, as well connections that link safely to the wider network of routes leading to and from Cullompton town centre and other essential public facilities. This will be further supported by Policy EJ01 (Improving Access to Commercial Areas), which seeks to enhance pedestrian and cycle linkages to employment areas. Sustainable transport use will be further facilitated by Policy HT02 (Improving our Public Transport Network), which seeks to facilitate a new sustainable transport interchange in Cullompton. The policy for the proposed Garden Village (SD06 Culm Garden Village) will also promote sustainable transport use, including through enhancing pedestrian and cycle links between the Garden Village and Cullompton town centre. These policies will therefore help limit the impact of traffic and congestion on the quality of the public realm and local distinctiveness in the Neighbourhood Plan area.

The Garden Village policy (SD06, Culm Garden Village) seeks to ensure that the Garden Village comes forward through a comprehensive masterplan which facilitates a '*unique character, within an*

*outstanding natural environment*'. The policy also seeks to ensure integration between the existing settlement areas within the Neighbourhood Plan area and the Garden Village. This will help integrate the new settlement within the existing landscape framework of the area, and support the Garden Village's contribution to local distinctiveness.

In relation to other policies which will support townscape and landscape character, Policy HS02 (Social and Affordable Housing) seeks to ensure that affordable housing is indistinguishable from other types of housing and not located separately, and Policy HS06 (Gypsy and Traveller Sites) seeks to integrate provision with the landscape through appropriate boundary treatments.

## 5.7 Land, soil and water resources

Whilst no specific allocations are presented in the Neighbourhood Plan area, the CNP supports the development of additional land in the North West Cullompton development area in order to facilitate a new swimming pool. Whilst the proposed site of the swimming pool is on land classified as Grade 3b land (and as such is not classified the best and most versatile agricultural land), land surrounding the site is classified as Grade 2 agricultural land. As such, any enabling development in this area may take place on the best and most versatile agricultural land (although this is uncertain).

The policies which support green infrastructure enhancements and new and enhanced open space, including Policy EN01 (Protecting and Enhancing the Natural Environment), Policy EN03 (Local Green Space), Policy WL03 (Usable Public Open Space), Policy WL07 (Community Allotments, Orchards and Composting), Policy WL02 (CCA Fields) and Policy HS05 (Open Space on Housing Schemes), will enhance the quality of land and water resources through promoting the ability of natural processes to support soil and water quality. Policy SD03 (Flood Attenuation) also seeks to ensure that flood attenuation measures taken forward through major developments should make use of existing on- or off-site natural water features. This will support water quality through promoting natural filtration and managing run off.

## 5.8 Population and community

The Local Plan Review has determined Cullompton will become the strategic focus of new development in Mid Devon, "*reflecting its accessibility, economic potential and environmental capacity*" (Local Plan Review Policy S11). The latest version of the Local Plan Review incorporates an overall housing target of 3,814 dwellings in Cullompton during the period to 2033 and an employment land provision of 80,267 square metres. It also includes a 160ha site to the East of Cullompton, which is allocated for mixed use development and will provide 1,750 dwellings within the plan period and at least 850 further dwellings beyond 2033.

In 2016 Mid Devon District Council (MDDC) responded to a government initiative to "*support locally-led garden cities and towns in places where communities once them*", recognising the opportunity to maximise garden village principles at the East Cullompton site. Local leadership and strong community support is a key factor for the delivery of Garden Villages<sup>8</sup>. As such the delivery of the Garden Village has been backed by Cullompton Town Council and the Neighbourhood Plan Steering Group. However, that support is conditional upon establishing a joined-up approach that ensures the planning of a garden village at East Cullompton is connected to the planning framework for the rest of the parish area; and that delivery is genuinely locally led.

MDDC's Garden Village expression of interest submission<sup>9</sup> highlights the following six community principles to underpin the delivery of growth:

- A mix of homes for rent, sale, and shared ownership;
- Well-designed homes in beautiful landscape settings;
- Development which enhances the natural environment;

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<sup>8</sup> Department for Communities and Local Government (2016) Locally-Led Garden Villages, Towns and Cities.

<sup>9</sup> Mid Devon District Council (2016) Locally-led Garden Villages: Expression of Interest from Mid Devon District Council.

- A wide range of local jobs;
- Local leisure, cultural, shopping and community facilities; and
- Mobility for all enabling healthy living from an integrated transport system.

These community principles underpin the relevant policies of CNP, including specifically Policy SD06 (Culm Garden Village), supporting the vitality and economic prosperity of the Neighbourhood Plan area. This policy seeks to influence the creation a new settlement area which embraces the principles of accessibility for all, delivers a mix of housing types, and plans for complementary facilities to serve the whole of the Neighbourhood Plan area.

Policy HS01 (Housing Mix) will further facilitate housing delivery which will help meet local needs. The policy recommends that development includes a proposed housing mix that is based on an up-to-date local housing needs assessment and evidence from Cullompton Town Council. In this context Policy HS02 (Social and Affordable Housing) supports the provision of housing for different groups in the parish, and requires that affordable housing be integrated with development. This will be further supported by Policy HS03 (Creating Smaller Housing Units) which supports the conversion and/or modification of existing larger dwellings or other redundant buildings provided the development results in small dwelling units that meet an identifiable need for smaller properties across all tenures. This will help meet the local housing need of the area, whilst also contributing towards mixed and inclusive communities and neighbourhoods.

In terms of accessibility to services and facilities, a number of policies will support sustainable transport enhancements, and promote access by alternatives modes of transport to the private car (**section 5.10**). This will support the quality of life of residents. The quality of life of those with dementia will also be supported by Policy WL08 (Dementia Friendly Town) and younger people through Policy WL09 (Providing for Young People).

The provision of services and facilities is supported by Policy SD06 (Culm Garden Village) which requires Garden Village development proposals to plan for facilities that serve the needs of the wider Neighbourhood Plan area, including sports, education, health/wellbeing, community, and faith spaces. However, integration between the existing town and new development is highlighted as a challenge, particularly given the physical location of the Garden Village east of the J28 of the M5 motorway and railway line. The CNP states that the Garden Village is not to become a stand-alone settlement. As such the CNP's focus on integration between the new development area and the existing town will promote accessibility to, and the availability of, local services, facilities and amenities. This will contribute towards the satisfaction of residents with their neighbourhood as a place to live, and promote the wider vitality of the town.

The quality of life of residents will be promoted by a number of the CNP policies including EN03 (Local Green Space), WL01 (Existing Recreational Space), and WL03 (Usable Public Open Space), which provide a focus on protecting open space and green infrastructure networks. Policy EN03 (Green Space) and WL01 (Existing Recreational Space) supports the designation and protection of sites which are particularly important to the local community, whilst Policy WL03 (Usable Public Green Space) recognises opportunity for new provision. In this context the draft plan's impetus on the protection and enhancement of green infrastructure networks will support the quality of life of residents by facilitating improvements in levels of physical activity, enhancing social interaction between residents, and promoting psychological well-being. This will be reinforced by the CNP's strong focus on local distinctiveness, and enhancements to the public realm. Policies such as TC08 (Extending the Attraction of the Town Centre), TC02 (Character of the Built Environment) and TC05 (Art in the Public Realm) will therefore contribute towards the maintenance and enhancement of the local townscape, the vitality of the town, and the quality of life of residents.

The CNP places a focus on the economic viability of the area. In this context Policy SD06 (Culm Garden Village) requires the Garden Village proposal to provide appropriate space for businesses to function effectively, encouraging employment extensions and expansions, and supporting residents' livelihoods. Policy EJ02 (Development of Small Business Units) also has strong support for employment opportunities in the Neighbourhood Plan area, focusing on the provision of local

enterprise and jobs, and the diversification of the local economy. This will support the vitality of the neighbourhood plan area through promoting new employment opportunities, economic sectors and uses in the area.

The provision of employment space within the Garden Village is expected to reduce out-commuting for employment purposes to centres such as Exeter and Taunton, if the Garden Village is successfully integrated with the rest of Cullompton town. This is reflected by Policy SD06 (Culm Garden Village), which seeks to foster integration between existing and new settlement areas, and in addition to employment space, also encourages the provision of infrastructure (including transport, community and environment). This will contribute towards the self-sufficiency of Cullompton, and support the growth of the local economy. This will be further supported by Policy SD02 (Links to the Town Centre), which aims to ensure the plan area is safely linked to the network of routes leading to and from the town centre and other public facilities. To ensure a steady growth pattern that is proportionate the constraints of the town, Policy SD06 (Culm Garden Village) and Policy SD07 (Timing of Infrastructure) also considers the delivery of required infrastructure, which will help manage growth in the Neighbourhood Plan area. This will provide residents with good access to employment and services and facilities, and contribute to the quality of life of residents.

## 5.9 Health and wellbeing

The policies of the CNP will bring a range of benefits for the health and wellbeing of residents. The main impacts of the Neighbourhood Plan's policies on health and wellbeing will be through creating healthy, inclusive communities through built design and natural spaces. Policy EN03 (Local Green Space) designates areas of Local Green Space for recreation and relaxation, as well as providing air and water quality benefits. There is now robust evidence that access to nature improves people's health and wellbeing through encouraging healthy outdoor recreation and relaxation. In this context the quality of life of residents will be further promoted by a large proportion of the CNP's Policies, including WL02 (CCA Fields) and WL03 (Usable Public Space), which support the protection of the existing leisure and recreational space in the Neighbourhood Plan area.

Similarly, Policies WL04 (Outdoor Sports Facilities), WL05 (Indoor Sports Facilities) and WL06 (Cullompton Swimming Pool Complex) provide support for the enhancement and improvement of sports facilities and pitches. This includes the provision of a dance studio and a health and fitness suite within the Cullompton Swimming Pool Complex. These policies also provide support for flexible, accessible sports and recreational facilities, that are designed to serve the whole Neighbourhood Plan area, and not only for new development areas. Policy SD06 (Culm Garden Village) also includes the provision of new health and community facilities.

Health and wellbeing will also be promoted by Policies EN01 (Protecting and Enhancing the Natural Environment) and WL07 (Community Allotments, Orchards and Composting). These comprise key elements to the CNP's overall focus on delivering the social and recreational services that residents need for a healthy lifestyle; providing valued contact with nature and enabling stress-relief.

The policies which directly and indirectly promote healthier modes of travel will contribute towards health and wellbeing. In this context Policies TC03 (Pedestrian Priority in the Town Centre), HT02 (Improving our Public Transport Network), HT03 (Improving our Cycle Network), and HT04 (Improving our Footpaths) seek to encourage the use of public transport and aim to make walking and cycling in the CNP area more appealing and accessible. The CNP's encouragement of an uptake of sustainable transport use and move away from the car as the primary mode of transport would also reduce congestion in the town and have positive effects on residents' physical health and quality of life.

The delivery of the Garden Village Initiative will include the provision of infrastructure (including transport, community, and environment) which will serve the needs of the whole community of the neighbourhood area. Policy SD06 (Culm Garden Village) and Policy SD07 (Timing of Infrastructure) consider the required infrastructure and its delivery, to manage sustainable growth which will bring benefits to the whole of the town and parish area. This infrastructure will contribute towards the safety, quality of life, and community cohesion for new and existing residents.

Community vitality is also a key contributor to health and wellbeing. In this context Policies including TC05 (Art in the Public Realm), TC06 (Cultural and Leisure Facilities in the Town Centre) and TR08 (Extending the Attraction of the Town Centre) focus on protecting and enhancing community facilities and supporting local amenities and assets. These policies will therefore promote the vitality of the town and contribute to the satisfaction of residents with Cullompton as a place to live.

## 5.10 Transportation

Traffic and congestion is a key issue for Cullompton, with the town centre a main congestion hotspot. Increased housing and employment growth in the Neighbourhood Plan area facilitated through the strategic allocations of the Local Plan and the proposed Garden Village will place increasing pressures on the town's road network. Whilst the impact of growth on congestion depends on the delivery of proposed road schemes in the area, including a proposed Eastern Relief Road, improvements to Junction 28, and/or the inclusion of a new junction on the M5, which are beyond the scope of the CNP, the Neighbourhood Plan has the potential to implement policies which promote modal shift from the private car, limit a growth in traffic in the Neighbourhood Plan area, and help reduce the impact of traffic on the public realm.

The current version of the CNP has a strong focus on promoting sustainable modes of transport, including walking and cycling and public transport use. Policy SD01 (Traffic Impact of Major Development) sets out how major development should specifically demonstrate how the development's vehicular access/egress and circulation arrangements will mitigate the negative impacts of traffic in Cullompton town centre. It also states that road infrastructure requirements should be in place to accompany new development so as to prevent any unacceptable impacts on the existing road network, and in the town centre in particular. This will help manage traffic growth resulting from the major development proposals that will take place through the strategic allocations of the Local Plan.

A number of the policies of the CNP directly seek to promote walking and cycling in the Neighbourhood Plan area. In this context Policy HT03 (Improving our Cycle Network) supports the development of an accessible network of cycle routes in and around Cullompton through enhancing such linkages between residential areas, employment areas and public facilities and initiating a Cycle Paths Plan for the town. This will be reinforced by Policy HT04 (Improving our Footpaths), which seeks to enhance pedestrian links in the Neighbourhood Plan area, and Policy SD02 (Links to the Town Centre), which states that all major developments should include provision for accessible pedestrian and cycle routes, as well connections that link safely to the wider network of routes leading to and from Cullompton town centre and other essential public facilities. This will be further supported by Policy EJ01 (Improving Access to Commercial Areas), which seeks to enhance pedestrian and cycle linkages to employment areas.

Sustainable transport use will be further facilitated by Policy HT02 (Improving our Public Transport Network), which seeks to facilitate a new sustainable transport interchange in Cullompton. This will be supported by Policy TC03 (Pedestrian Priority in the Town Centre), which supports design and highways proposals which make Fore Street and High Street more attractive to pedestrian use and less attractive to through traffic. The policy for the proposed Garden Village (SD06 Culm Garden Village) will also promote sustainable transport use, including through enhancing pedestrian and cycle links between the Garden Village and Cullompton town centre.

## 5.11 Conclusions at this current stage

### 5.11.1 Potential significant effects

The assessment has concluded that the current version of the CNP is likely to lead to **significant positive effects** in relation to the 'population and community' and 'health and wellbeing' SEA themes. These benefits largely relate to the carefully targeted approach to housing provision proposed by the current version of the CNP, the focus on enhancing accessibility to services and employment



opportunities in Cullompton by sustainable modes of transport and the CNP's impetus on protecting and enhancing open space and green infrastructure networks. In addition, the Neighbourhood Plan has a strong focus on protecting and enhancing townscape character and the setting of the historic environment in Cullompton, leading to **significant positive effects** in relation to the 'historic environment and landscape' theme.

The current version of the CNP will initiate a number of beneficial approaches regarding the 'air quality' 'transportation', 'land, soil and water resources' and 'climate change' sustainability themes. However these are not considered to be significant in the context of the SEA process given the scope of the Neighbourhood Plan, the lack of explicit housing and employment allocations, and the scale of proposals. Similarly, in relation to the 'biodiversity' SEA theme, whilst the scope and scale of the proposed policy approaches relating to the natural environment will help ensure that wide ranging benefits in relation to this theme are secured through the Neighbourhood Plan, these are not considered to be significant in the context of the SEA process.

## 6. What are the next steps?

The Neighbourhood Plan and this Environmental Report has been submitted to Mid Devon District Council for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Mid Devon Local Plan.

If the Independent Examination is favourable, the Cullompton Neighbourhood Plan will be subject to a referendum, organised by Mid Devon District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Cullompton Neighbourhood Plan will become part of the Development Plan for Cullompton Parish.

## Appendix A Context review and baseline

### A.1 Air quality

#### Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- 'Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan'.
- New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

In terms of the local context, Mid Devon District is required to monitor air quality across the borough, report regularly to Defra and take action where nationally set levels are likely to be exceeded. Monitoring is undertaken to assess levels of nitrogen dioxide, Sulphur dioxide, ozone, benzene and particulates. Where exceedances exist, areas are declared as Air Quality Management Areas (AQMA) and local authorities are required to produce an Action Plan to improve air quality in the area.

#### Current Baseline

One Air Quality Management Area (AQMA) has been designated in the Neighbourhood Plan area. Designated in December 2006, this AQMA was declared for an area encompassing most of Cullompton town to the west of the M5. The reason for this designation was for exceedances of NO<sub>2</sub> at Station Road, Higher Street and Fore Street within the town centre. In 2015 Mid Devon District Council undertook non-automatic (passive) monitoring of NO<sub>2</sub> at the following sites:

- Police Station, Station Road
- 49 Station Road
- 15 Higher Street
- 31 Higher Street
- 17 High Street
- Manor Hotel, Fore Street
- 8 Fore Street
- 45 Fore Street

The data collected is presented in Table 2-1 below. The data as presented in Table 2-1 shows that there were no exceedances of the 40µg/m<sup>3</sup> annual mean NO<sub>2</sub> objective; however the results for 8 Fore Street came close at 38.49µg/m.<sup>310</sup>

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<sup>10</sup> Mid Devon District Council, Air Quality Annual Status Report (ASR) (2016) [online] Available at: <https://www.middevon.gov.uk/media/342647/mddc-annual-status-report-2016.pdf>

**Table 2015 Mean NO<sub>2</sub> Monitoring Results**

Location	NO <sub>2</sub> mean concentrations (µg/m <sup>3</sup> )
Police Station, Station Road	24
49 Station Road	24.40
15 Higher Street	24.56
31 Higher Street	18.38
17 High Street	21.59
8 Fore Street	38.49
45 Fore Street	32.53

\*Data was also collected at Manor House Hotel, Fore Street, however due to bad data capture the results were deemed spurious and therefore are not presented here.

### Future baseline

New employment and housing provision within the Neighbourhood Plan area has the potential to have adverse effects on air quality through increasing traffic flows and associated levels of pollutants such as nitrogen dioxide.

Areas of particular sensitivity to increased traffic flows are likely to be routes with the largest existing congestion issues. A potential bypass for the town would help limit air quality issues in the town centre, if taken forward.

## A.2 Biodiversity

### Context Review

At the European level, the EU Biodiversity Strategy<sup>11</sup> was adopted in May 2011 in order to deliver an established new Europe-wide target to '*halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020*'.

Key messages from the National Planning Policy Framework (NPPF) include:

- Contribute to the Government's commitment to halt the overall decline in biodiversity by minimising impacts and achieving net gains in biodiversity wherever possible.
- Promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. Plan for biodiversity at a landscape-scale across local authority boundaries.
- Set criteria based policies for the protection of internationally, nationally and locally designated sites, giving weight to their importance not just individually but as a part of a wider ecological network.
- Take account of the effects of climate change in the long term. Adopt proactive strategies to adaptation and manage risks through adaptation measures including green infrastructure (i.e. 'a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities').
- Plan positively for 'green infrastructure' as part of planning for 'ecological networks'.

<sup>11</sup> European Commission (2011) Our life insurance, our natural capital: an EU biodiversity strategy to 2020 [online] available at: [http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP\\_resolution\\_april2012.pdf](http://ec.europa.eu/environment/nature/biodiversity/comm2006/pdf/EP_resolution_april2012.pdf) last accessed [30/01/17]

- High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

The Natural Environment White Paper (NEWP)<sup>12</sup> sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and personal well-being. It was in part a response to the UK's failure to halt and reverse the decline in biodiversity by 2010 and it signalled a move away from the traditional approach of protecting biodiversity in nature reserves to adopting a landscape approach to protecting and enhancing biodiversity. The NEWP also aims to create a green economy in which economic growth and the health of our natural resources sustain each other and markets, business and Government better reflect the value of nature. It includes commitments to:

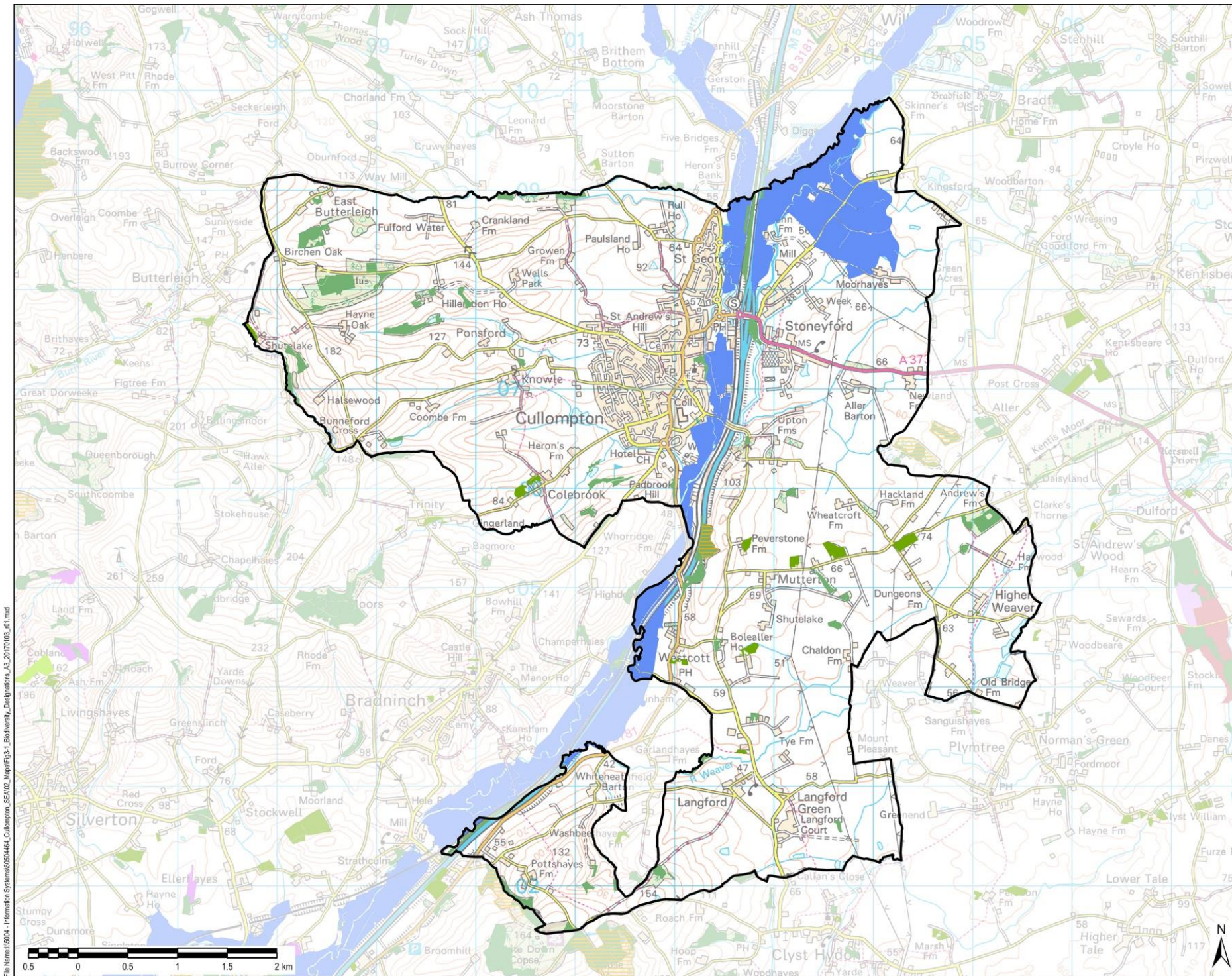
- Halt biodiversity loss, support functioning ecosystems and establish coherent ecological networks by 2020;
- Establish a new voluntary approach to biodiversity offsetting to be tested in pilot areas;
- Enable partnerships of local authorities, local communities and landowners, the private sector and conservation organisations to establish new Nature Improvement Areas; and
- Address barriers to using green infrastructure to promote sustainable growth.

Reflecting the commitments within the Natural Environment White Paper and the EU Biodiversity Strategy, 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services' aims to *'halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people'*<sup>13</sup>.

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<sup>12</sup> Defra (2012) The Natural Choice: securing the value of nature (Natural Environment White Paper) [online] available at: <<http://www.official-documents.gov.uk/document/cm80/8082/8082.pdf>> last accessed [03/02/17]

<sup>13</sup> DEFRA (2011): 'Biodiversity 2020: A strategy for England's wildlife and ecosystem services', [online] Available to download from: <<https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>> last accessed [03/02/17]



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**LEGEND**

- Cullompton Neighbourhood Plan Area
- Ancient Woodland
- Coastal and Floodplain Grazing Marsh
- Deciduous Woodland
- Good Quality Semi-improved Grassland
- Lowland Fens
- Lowland Heathland
- Lowland Meadows
- Traditional Orchard

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Purpose of Issue **DRAFT**

Client **CULLOMPTON NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title **STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE CULLOMPTON NEIGHBOURHOOD PLAN**

Drawing Title **BIODIVERSITY DESIGNATIONS AND PRIORITY HABITATS**

Drawn CN	Checked BB	Approved NBC	Date 04/01/2017
AECOM Internal Project No. 60504464		Scale @ A3 1:35,000	

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Drawing Number **FIGURE 3.1**

Rev **01**

File Name: I:\2016 - Information Systems\60504464 - Cullompton\_SEA\2 - Maps\Fig3.1 - Biodiversity\_Designations\_A3\_20170103\_01.mxd



## Baseline Summary

### Current Baseline

#### *Designated Sites*

There are no nationally designated sites within the Neighbourhood Plan area, however there are a number of locally designated sites. These are listed below:

- Knight's Wood (Status CWS)
- Weekes Farm Orchard (Status CWS)
- Poundapit and Oakham Coppices (Status CWS)
- Knight's Wood (Status ASNW)
- St. Andrew's Hill (Status OSWI)
- Peverstone Embankment (Status OSWI)
- Shepherd's Moor (Status UWS)
- Halsewood Farm Wood (Status UWS)
- Hillersdon Park (Status UWS)
- Aller Wood (West) (Status UWS)
- Owlacombe Farm (Status UWS)
- Langford (Status UWS)
- Langford Mill (Status UWS)
- Hayes Copse (Status UWS)
- Old Bridge Farm (Status UWS)
- East Culm House (Status pCWS)
- Willand-Cullompton Marsh (Status UWS)
- Hele Marsh (Status UWS)
- Colebrooke Court (Status UWS)
- Sherwoods (E) (Status UWS)

\*\* CWS – County Wildlife Site, OSWI – Other sites of Wildlife Interest, UWS – Unconfirmed Wildlife Sites

There are a number of public rights of way (PRoW) within Cullompton; with many rights of way and bridleways being valuable for biodiversity through providing ecological corridors and contributing to local ecological networks. The Cullompton Community Association fields, a 32 acre amenity owned by the people of Cullompton having been purchased by public subscription, are also of value for biodiversity.

#### *Biodiversity Action Plan Habitats*

The Devon Biodiversity Action Plan (BAP) identifies a number of 'priority habitats' that are characteristic of Devon and for which Devon makes a significant contribution to the UK aims of the BAP. Key areas of BAP Priority Habitat in the Cullompton Neighbourhood Plan area include:

- Areas of Ancient Woodland Priority Habitat;

- Small areas of Traditional Orchard BAP Priority Habitat scattered throughout the Neighbourhood Plan Area
- Coastal and Floodplain Grazing Marsh located around the River Culm; and
- Small areas of Deciduous Woodland.

The figure above shows the location of designated sites and BAP Priority Habitats located within the Neighbourhood Plan area.

### Future Baseline

Although there are no sites within Cullompton that have protection through statutory designations, there are many areas which are important to local biodiversity. As such habitats and species have the potential to come under increasing pressures from housing and employment land provision in the area. This includes through a loss of habitats and impacts on biodiversity networks. This may be exacerbated by the effects of climate change, which has the potential to lead to changes in the distribution and abundance of species and changes to the composition and character of habitats.

## A.3 Climate Change

### Context Review

In its 2007 strategy on climate change, the European Commission assesses the costs and benefits of combating climate change and recommends a package of measures to limit global warming to 2° Celsius.<sup>14</sup> In relation to energy, the Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.

Key messages from the National Planning Policy Framework (NPPF) include:

- Support the transition to a low carbon future in a changing climate as a 'core planning principle'.
- There is a key role for planning in securing radical reductions in greenhouse gases (GhG), including in terms of meeting the targets set out in the Climate Change Act 2008<sup>15</sup>. Specifically, planning policy should support the move to a low carbon future through:
  - Planning for new development in locations and ways which reduce GhG emissions;
  - Actively supporting energy efficiency improvements to existing buildings;
  - Setting local requirements for building's sustainability in a way that is consistent with the Government's zero carbon buildings policy;
  - Positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and
  - Encouraging those transport solutions that support reductions in greenhouse gas emissions and reduce congestion.
- Direct development away from areas highest at risk of flooding, with development 'not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding'. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere.
- Take account of the effects of climate change in the long term, taking into account a range of factors including flooding. Adopt proactive strategies to adaptation and manage risks through adaptation measures including well planned green infrastructure.

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<sup>14</sup> Commission of the European Communities (2007) Limiting Global Climate Change to two degrees Celsius: The way ahead for 2020 and beyond [online] available at: < <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2007:0002:FIN:EN:PDF> > last accessed [27/01/17]

<sup>15</sup> The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO<sub>2</sub> emissions of at least 26% by 2020, against a 1990 baseline.



The Flood and Water Management Act<sup>16</sup> highlights that alternatives to traditional engineering approaches to flood risk management include:

- Incorporating greater resilience measures into the design of new buildings, and retro-fitting properties at risk (including historic buildings);
- Utilising the environment in order to reduce flooding, for example through the management of land to reduce runoff and through harnessing the ability of wetlands to store water;
- Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; and
- Creating sustainable drainage systems (SuDS)<sup>17</sup>

Further guidance is provided in the document 'Planning for SuDS'.<sup>18</sup> This report calls for greater recognition of the multiple benefits that water management can present. It suggests that successful SuDS are capable of 'contributing to local quality of life and green infrastructure'.

## Current baseline

### *Potential effects of climate change*

The outcome of research on the probable effects of climate change in the UK was released in 2009 by the UK Climate Projections (UKCP09) team<sup>19</sup>. UKCP09 gives climate information for the UK up to the end of this century and projections of future changes to the climate are provided, based on simulations from climate models. Projections are broken down to a regional level across the UK and are shown in probabilistic form, which illustrate the potential range of changes and the level of confidence in each prediction.

As highlighted by the research, the effects of climate change for the south west by 2050 for a medium emissions scenario<sup>20</sup> are likely to be as follows:

- The central estimate of increase in winter mean temperature is 2.1°C and an increase in summer mean temperature of 2.7°C; and
- The central estimate of change in winter mean precipitation is 17% and summer mean precipitation is –20%.

Resulting from these changes, a range of risks may exist for the Neighbourhood Plan area. These include:

- Increased incidence of heat related illnesses and deaths during the summer;
- Increased incidence of illnesses and deaths related to exposure to sunlight (e.g. skin cancer, cataracts);
- Increased incidence of pathogen related diseases (e.g. legionella and salmonella);
- Increase in health problems related to rise in local ozone levels during summer;
- Increased risk of injuries and deaths due to increased number of storm events;
- Effects on water resources from climate change;
- Reduction in availability of groundwater for abstraction;
- Adverse effect on water quality from low stream levels and turbulent stream flow after heavy rain;

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<sup>16</sup> Flood and Water Management Act (2010) [online] available at: <http://www.legislation.gov.uk/ukpga/2010/29/contents>

<sup>17</sup> N.B. The provision of Schedule 3 to the Flood and Water Management Act 2010 came into force on the 1st of October 2012 and makes it mandatory for any development in England or Wales to incorporate SuDS.

<sup>18</sup> CIRIA (2010) 'Planning for SuDS – making it happen' [online] available to access via [http://www.ciria.org/Resources/Free\\_publications/Planning\\_for\\_SuDS\\_ma.aspx](http://www.ciria.org/Resources/Free_publications/Planning_for_SuDS_ma.aspx) last accessed [04/02/17]

<sup>19</sup> The data was released on 18th June 2009: See: <http://ukclimateprojections.metoffice.gov.uk/> last accessed [04/02/17]

<sup>20</sup> UK Climate Projections (2009) South West 2050s Medium Emissions Scenario [online] available at: <http://ukclimateprojections.metoffice.gov.uk/23687?emission=medium> last accessed [07/02/17]

- Increased risk of flooding, including increased vulnerability to 1:100 year floods;
- Changes in insurance provisions for flood damage;
- A need to increase the capacity of wastewater treatment plants and sewers;
- A need to upgrade flood defences;
- Soil erosion due to flash flooding;
- Loss of species that are at the edge of their southerly distribution;
- Spread of species at the northern edge of their distribution;
- Deterioration in working conditions due to increased temperatures;
- Changes to global supply chain;
- Increased difficulty of food preparation, handling and storage due to higher temperatures;
- An increased move by the insurance industry towards a more risk-based approach to insurance underwriting, leading to higher cost premiums for business;
- Increased demand for air-conditioning;
- Increased drought and flood related problems such as soil shrinkages and subsidence;
- Risk of road surfaces melting more frequently due to increased temperature; and
- Flooding of roads.

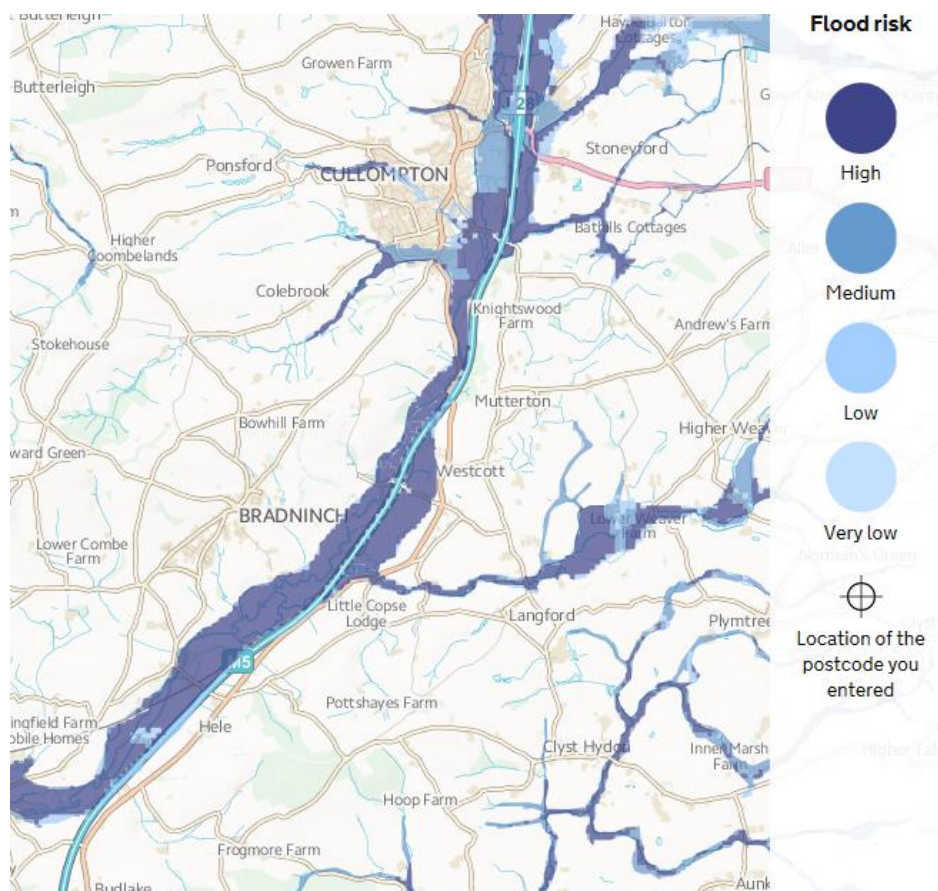
### *Flood Risk*

According to the Mid Devon Strategic Flood Risk Assessment<sup>21</sup> the predominant source of flooding in Cullompton is fluvial flood risk from the River Culm. In this context 424 properties in the town are located within Flood Zone 3 and therefore at the greatest risk of flooding from this source. The most recent severe flooding in the area occurred in autumn 2000, which affected many homes and businesses.

The figure below illustrates the areas of fluvial flood risk present in the Cullompton Neighbourhood Plan area.

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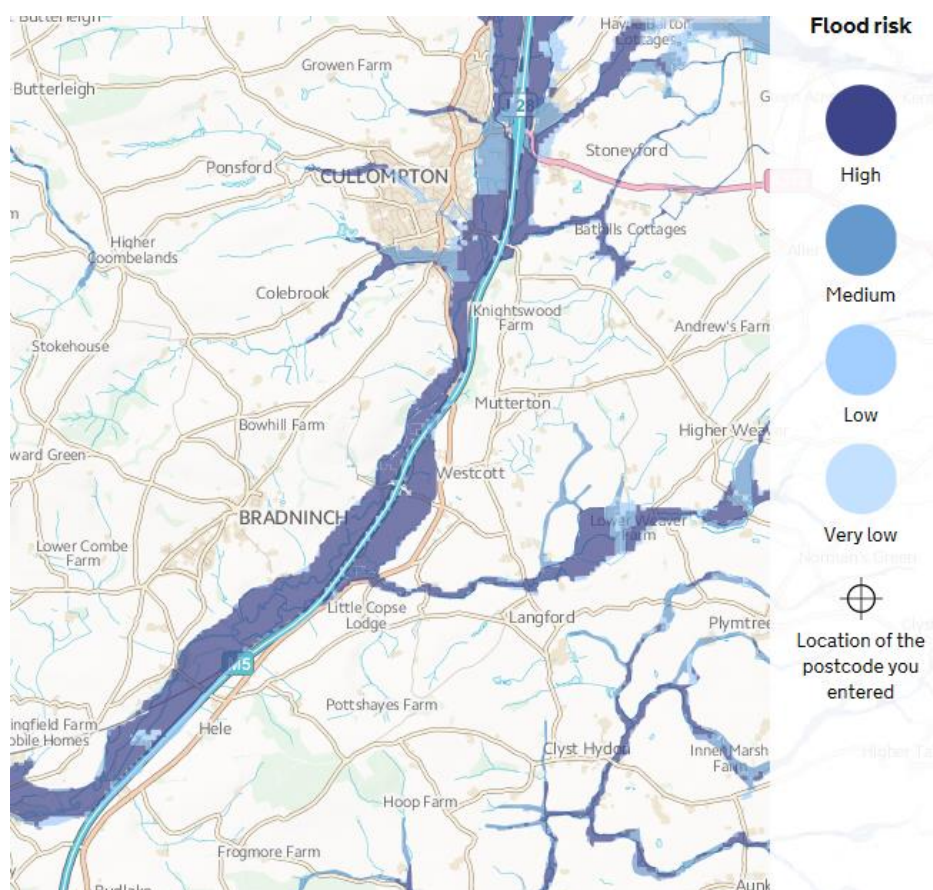
<sup>21</sup> Mid Devon Strategic Flood Risk Assessment (2009) Available online: <https://www.middevon.gov.uk/media/103719/flood-risk-assessment.pdf> Accessed on: 21/12/16



**Figure: Fluvial Flood Risk associated with the River Culm and its tributaries<sup>22</sup>**

Additionally, surface water drainage and sewer flooding is also a risk for some parts of the Neighbourhood Plan area. The figure below highlights the areas at particular risk.

<sup>22</sup> Environment Agency: Long term flood risk maps. Available online: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?map=Reservoirs> Accessed on: 21/12/16



**Figure: Fluvial Flood Risk associated with the River Culm and its tributaries<sup>23</sup>**

### Greenhouse gas emissions

In relation to greenhouse gas emissions, source data from the Department of Energy and Climate Change suggests that Mid Devon has had slightly higher per capita emissions compared to England, the South West, and Devon. Mid Devon has seen a similar reduction in emissions per capita between 2005 and 2015 (20%) compared to the South West (22%) and England (21%).

In relation to CO<sub>2</sub> emissions by end user, between 2005 and 2012 the proportion of emissions originating from industrial and commercial sources in Mid Devon fell from 31% to 29%. In the same period the proportion of total emissions from domestic sources increased slightly from 24% to 25%. Total emissions from road transport increased marginally from 40% to 41%.

### Future Baseline

Climate change has the potential to increase the occurrence of extreme weather events in the Cullompton Neighbourhood Plan area, with increases in mean summer and winter temperatures, increases in mean precipitation in winter and decreases in mean precipitation in summer. This is likely to increase the risks associated with climate change (including fluvial flooding) with an increased need for resilience and adaptation.

In terms of climate change mitigation, per capita emissions are likely to continue to decrease as energy efficiency measures, renewable energy production and new technologies become more widely adopted. However increases in the built footprint of the Neighbourhood Plan area may lead to increases in overall emissions.

<sup>23</sup> Environment Agency: Long term flood risk maps. Available online: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?map=Reservoirs> Accessed on: 21/12/16

## A.4 Historic Environment and Landscape

### Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance valued landscapes, giving particular weight to those identified as being of national importance.
- Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.
- Set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk.
- Develop 'robust and comprehensive policies that set out the quality of development that will be expected for the area. Such policies should be based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics'.
- Consider the effects of climate change in the long term, including in terms of landscape. Adopt 'proactive strategies' to adaptation and manage risks through adaptation measures including well planned green infrastructure.

The Government's Statement on the Historic Environment for England<sup>24</sup> sets out its vision for the historic environment. It calls for those who have the power to shape the historic environment to recognise its value and to manage it in an intelligent manner in light of the contribution that it can make to social, economic and cultural life.

### Current Baseline

#### Landscape

The Mid Devon Landscape Character Assessment<sup>25</sup> defines land to the west of Cullompton as being within LCT 3B – Lower rolling farmed and settled valley slopes, and land to the east and south along the River Culm is described as being LCT 3E Lowland Plains. The features of each LCT are discussed below:

#### LCT 3B – Lower rolling farmed and settled valley slopes

- This is a gently rolling and strongly undulating landscape with low-lying land adjacent to the rivers in a series of irregular rolling hills
- Characterised by a tightly rolling, medium to small scale landform.
- The drainage patterns are defining characteristics key to both the resultant landform and vegetation patterns.
- Woodlands are mixed with dense scrubby undergrowth, giving a well wooded character.
- Hedgerows are well managed
- Primarily pastoral fertile farmland
- Mainly characterised by Red Devon Sandstone
- There are medium to large scale commercial and intensive farms

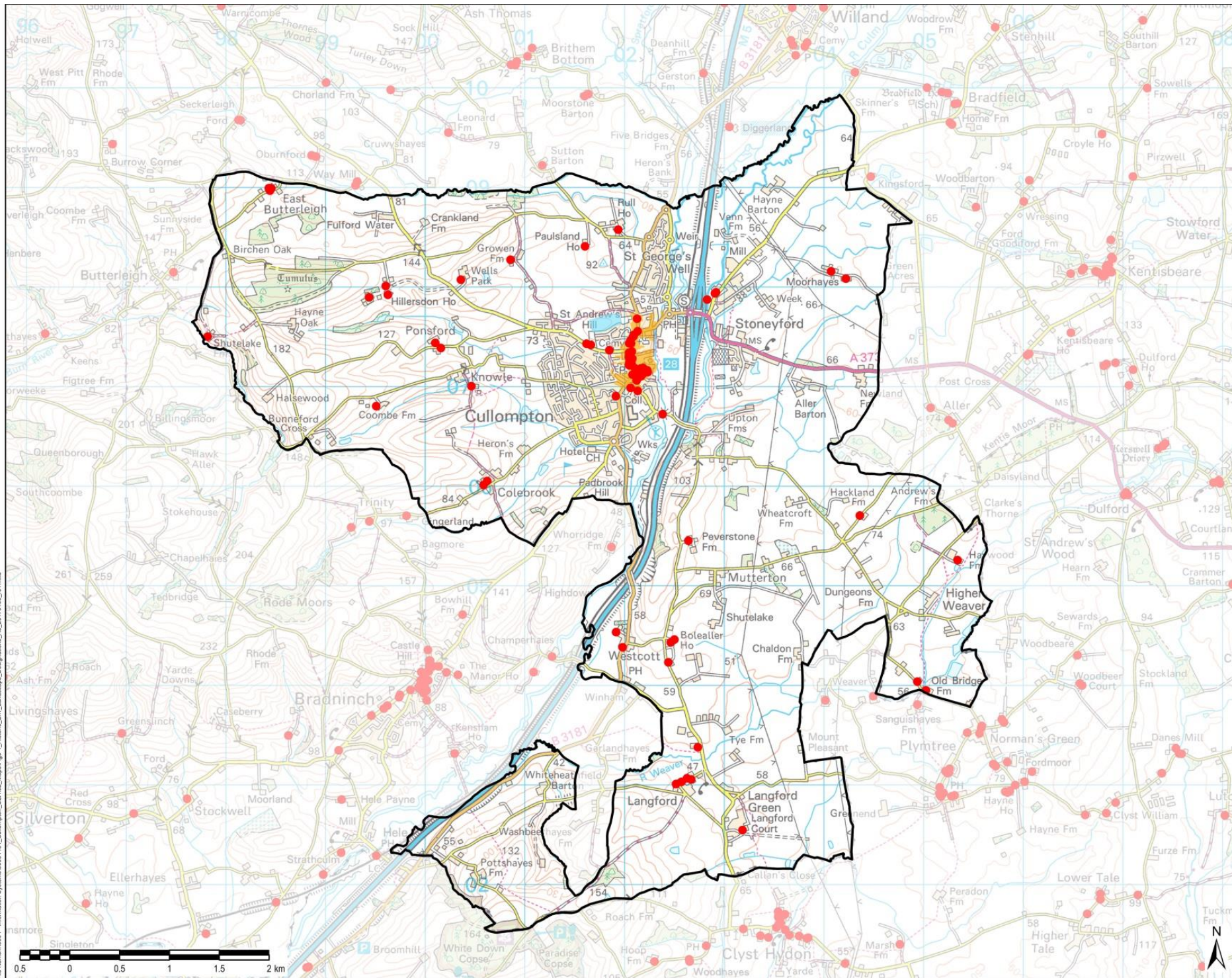
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<sup>24</sup> HM Government (2010) The Government's Statement on the Historic Environment for England [online] available at: <[http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference\\_library/publications/6763.aspx](http://webarchive.nationalarchives.gov.uk/+http://www.culture.gov.uk/reference_library/publications/6763.aspx)> last accessed [30/01/17]

<sup>25</sup> Mid Devon Landscape Character Assessment 2007. Available at: [https://www.middevon.gov.uk/media/103739/chapter\\_4\\_part\\_2\\_landscape\\_character\\_types.pdf](https://www.middevon.gov.uk/media/103739/chapter_4_part_2_landscape_character_types.pdf) Accessed on: 21/12/2016

### LCT 3E – Lowland Plains

- Gently rolling middle ground to lowland with smooth, rounded hilltops
- Primarily managed as arable farmland with some areas of improved grassland
- Fields are divided by hedgerows. Hedgerow trees are infrequent
- Copses and discrete woodlands are characteristic.
- Generally a sparsely populated area
- The landscape is dotted with large scale farm steads
- Roads are straight or winding.



THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

**LEGEND**

- Cullompton Parish Boundary
- Listed Building
- Record of Scheduled Monument
- Conservation Area

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Purpose of Issue **DRAFT**

Client **CULLOMPTON NEIGHBOURHOOD PLAN STEERING GROUP**

Project Title **STRATEGIC ENVIRONMENTAL ASSESSMENT FOR THE CULLOMPTON NEIGHBOURHOOD PLAN**

Drawing Title **HISTORIC ENVIRONMENT AND LANDSCAPE DESIGNATIONS**

Drawn CN	Checked BB	Approved NBC	Date 04/01/2017
AECOM Internal Project No. 60504464		Scale @ A3 1:35,000	

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Drawing Number **FIGURE 5.1** Rev **01**

File Name: I:\5004 - Information Systems\60504464\_Cullompton\_SEA\02\_Maps\Figs-1\_Historic\_Env\_Landscape\_Designations\_A3\_20170103\_r01.mxd

## Historic Environment

The Cullompton Neighbourhood Plan area has a rich historic environment. Numerous features and areas in the area are recognised through historic environment designations. These include statutory listed buildings and scheduled monuments, which are nationally designated, and conservation areas, which are designated at the local level. Historic England is the statutory consultee for certain categories of listed building consent and all applications for scheduled monument consent. The historic environment is protected through the planning system, via conditions imposed on developers and other mechanisms.

The Neighbourhood Plan area contains 89 listed buildings. Of these, two are Grade I listed:

- Parish Church of St Andrew
- The Walronds

The Grade II\* listed structures located in the Neighbourhood Plan area are as follows:

- The Manor House Hotel
- Langford Court
- 6 and 7, Langford
- Hillersdon House
- 8 Fore Street

According to the National Heritage List for England<sup>26</sup> there is one Scheduled Monument within the Neighbourhood Plan area, comprising:

- Two Roman forts and two Roman camps at St Andrew's Hill

There are no registered parks and gardens or historic battlefields located in the Neighbourhood Plan area.

Since 2008, Historic England has released an annual Heritage at Risk Register. The Heritage at Risk Register highlights the Grade I and Grade II\* listed buildings, and scheduled monuments, conservation areas, wreck sites and registered parks and gardens in England deemed to be 'at risk'. The latest Heritage at Risk Register<sup>27</sup> highlights that The Manor House Hotel is deemed to be at risk.

It should be noted that the Grade II listed buildings in the Neighbourhood Plan area have not yet been evaluated as part of the Heritage at Risk programme.

The rich historic environment of Cullompton is reflected by the presence of a conservation area in the town. The Cullompton Conservation Area was designated in 1977 and covers the older core of the town centre and comprises linear development running either side of the B3181. A Conservation Area Appraisal was prepared in 2003<sup>28</sup> which assesses the characteristics of the conservation area. Within this, buildings of special architectural interest and buildings of special historic interest are identified and a discussion of the character and appearance of the conservation area is also presented. In addition to this, the appraisal also identifies 19 unlisted buildings which are thought to make a significant contribution to the character and appearance of the conservation area.

**Figure 5.1** (overleaf) shows the designated landscapes and historical sites located within the Neighbourhood Plan area.

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<sup>26</sup> Historic England: National Heritage List for England: <http://list.historicengland.org.uk> [Accessed 04/01/2017.]

<sup>27</sup> Heritage at Risk Register (2014), <http://risk.historicengland.org.uk/register.aspx> [accessed 04/01/2017.]

<sup>28</sup> Cullompton Conservation Area Appraisal and Management Plan (2003): <https://www.middevon.gov.uk/residents/planning/conservation/conservation-areas/conservation-area-appraisals/cullompton-conservation-area-appraisal-and-management-plan/> [accessed 03/01/2017]



## Future baseline

New proposed development areas associated with the allocations in the Local Plan have the potential to impact on the fabric and setting of cultural heritage assets. This includes through inappropriate design and layout. It should be noted, however, that existing historic environment designations and national and Local Plan policies will offer a degree of protection to cultural heritage assets and their settings. Also new development need not be harmful to the significance of a heritage asset, and in the context of Cullompton there is opportunity for new development to enhance the historic setting of the town and better reveal assets' cultural heritage significance.

New development, including the proposed Culm Garden Village, has the potential to lead to changes in landscape and townscape character and quality in and around the Neighbourhood Plan area. This includes from the loss of landscape features and visual impact.

There are likely to be incremental changes in tranquillity in and around the plan area, affected by changes in the levels of light and noise pollution.

## A.5 Land, Soil and Water Resources

### Context Review

The EU's Soil Thematic Strategy<sup>29</sup> presents a strategy for protecting soils resources in Europe. The main aim of the strategy is to minimise soil degradation and limit associated detrimental effects linked to water quality and quantity, human health, climate change, biodiversity, and food safety.

The Water Framework Directive (WFD) drives a catchment-based approach to water management. In England and Wales there are 100 water catchments and it is Defra's intention to establish a 'framework for integrated catchment management' across England. The Environment Agency is establishing 'Significant Water Management Issues' and recently presented second River Basin Management Plans to ministers. The plans seek to deliver the objectives of the WFD namely:

- Enhance the status and prevent the further deterioration of aquatic ecosystems and associated wetlands which depend on aquatic ecosystems;
- Promote the sustainable use of water;
- Reduce the pollution of water, especially by 'priority' and 'priority hazardous' substances; and
- Ensure the progressive reduction of groundwater pollution.

Key messages from the National Planning Policy Framework (NPPF) include:

- Protect and enhance soils. The value of best and most versatile agricultural land should also be taken into account.
- Prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land, where appropriate'.
- Encourage the effective use of land' through the reuse of land which has been previously developed, 'provided that this is not of high environmental value'. Whilst there is no longer a national requirement to build at a minimum density, the NPPF requires local planning authorities to 'set out their own approach to housing density to reflect local circumstances'.
- Produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply.
- With regards to waste, the NPPF does not contain any specific waste policies as waste planning policy will be published as part of the National Waste Management Plan.

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<sup>29</sup> European Commission (2006) Soil Thematic Policy [online] available at: <[http://ec.europa.eu/environment/soil/index\\_en.htm](http://ec.europa.eu/environment/soil/index_en.htm)> last accessed [30/01/17]

Other key documents at the national level include Safeguarding our Soils: A strategy for England<sup>30</sup>, which sets out a vision for soil use in England, and the Water White Paper<sup>31</sup>, which sets out the Government's vision for a more resilient water sector. It states the measures that will be taken to tackle issues such as poorly performing ecosystems, and the combined impacts of climate change and population growth on stressed water resources. In terms of waste management, the Government Review of Waste Policy in England<sup>32</sup> recognises that environmental benefits and economic growth can be the result of a more sustainable approach to the use of materials.

## Current Baseline

### *Quality of agricultural land*

The Agricultural Land Classification classifies land into six grades (plus 'non-agricultural' and 'urban'), where Grades 1 to 3a is the 'best and most versatile' land and Grades 3b to 5 are of poorer quality.

In terms of the location of the best and most versatile agricultural land, a significant proportion of the Neighbourhood Plan area has undergone recent land classification<sup>33</sup> and comprises land classified as the best and most versatile agricultural land. In this context Figure 6-1 highlights that a small area of land near Stoneyford has been classified as Grade 1, with a large area of land classified as Grade 2 to the north and west of Cullompton town centre. There are also significant areas of land classified as 3a, mainly to the east of the M5.

### *Recycling centres*

There is no Household Waste and Recycling Centre in the Neighbourhood Plan area. The nearest is located in Pinhoe, east Exeter.

### *Watercourses*

The main watercourse in the Neighbourhood Plan area is the River Culm, which is one of the longest tributaries of the River Exe. The River Culm rises in the Blackdown Hills and flows through Culmstock and past Uffculme and Willand, before passing through the east of Cullompton. The river then converges with the River Exe near Stoke Canon to the north of Exeter.

Water supply and waste water provision in the area is provided by South West Water. The East Devon Management Area Abstraction Licensing Strategy<sup>34</sup> highlights that 'Water is Available for Licensing' in the area. This indicates that there is more water than required to meet the needs of the environment and new licences can be considered depending on local and downstream impacts.

Groundwater Source Protection Zones (SPZs) have been defined by the Environment Agency in England and Wales to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water supply. The zones show the risk of contamination from activities that might cause groundwater pollution in the area. The Neighbourhood Plan area falls within a Zone 2 SPZ (Outer Zone).

The Nitrates Directive (91/676/EEC) requires Member States to identify areas where groundwaters have nitrate concentrations of more than 50 mg/l nitrate or are thought to be at risk of nitrate contamination. Areas associated with such groundwaters are designated as Nitrate Vulnerable Zones (NVZs) within which Member States are required to establish Action Programmes in order to reduce

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<sup>30</sup> Defra (2009) Safeguarding our Soils: A strategy for England [online] available to download from:

<<https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england>> last accessed [30/01/17]

<sup>31</sup> Defra (2011) Water for life (The Water White Paper) [online] available at <<http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf>> last accessed [30/01/17]

<sup>32</sup> Defra (2011) Government Review of Waste Policy in England [online] available at:

<<http://www.defra.gov.uk/publications/files/pb13540-waste-policy-review110614.pdf>> last accessed [30/01/17]

<sup>33</sup> Magic (2017) Post 1988 Agricultural Land Classification [online] available at: <http://magic.defra.gov.uk/MagicMap.aspx>

<sup>34</sup> Environment Agency (2012) East Devon WFD Management Area Abstraction Licensing Strategy. Available online:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/292771/LIT\\_7650\\_02c9aa.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/292771/LIT_7650_02c9aa.pdf) Accessed on 21/12/2016.

and prevent further nitrate contamination. Large parts of the Neighbourhood Plan area are underlain by a Groundwater NVZ.

### Future baseline

A significant proportion of land allocated through the Local Plan review will take place on greenfield land, much of which has been classified as the best and most versatile.

Due to increasing legislative and regulatory requirements, there are increasing pressures to improve recycling and composting rates.

In terms of water quality, the requirements of the Water Framework Directive are likely to lead to continued improvements to water quality in watercourses in the wider area. Water quality is also likely to continue to be affected by pollution incidents in the area, the presence of non-native species and physical modifications to water bodies.

Water availability in the wider area may be affected by regional increases in population and an increased occurrence of drought exacerbated by the effects of climate change.

## A.6 Population and Community

### Context Review

Key messages from the National Planning Policy Framework (NPPF) include:

- To 'boost significantly the supply of housing', local planning authorities should meet the 'full, objectively assessed need for market and affordable housing' in their area. They should prepare a Strategic Housing Market Assessment to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries. The Strategic Housing Market Assessment should identify the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period.
- With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified.
- In rural areas, when exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Authorities should consider whether allowing some market housing would facilitate the provision of affordable housing to meet local needs.
- The NPPF attaches great importance to the design of the built environment. It explains how good design is a key aspect in sustainable development, and how development should improve the quality of the area over its lifetime, not just in the short term. Good architecture and landscaping are important, with the use of design codes contributing to the delivery of high quality outcomes. Design should reinforce local distinctiveness, raise the standard more generally in the area and address the connections between people and places.
- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Ensure that developments create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion. Places should contain clear and legible pedestrian routes, and high quality public spaces, which encourage the active and continual use of public areas.

- Ensuring that there is a 'sufficient choice of school places' is of 'great importance' and there is a need to take a 'proactive, positive and collaborative approach' to bringing forward 'development that will widen choice in education'.

The 'Ready for Ageing?' report, published by the Select Committee on Public Service and Demographic Change<sup>35</sup> warns that society is underprepared for an ageing population. The report states that *'longer lives can be a great benefit, but there has been a collective failure to address the implications and without urgent action this great boon could turn into a series of miserable crises'*. The report recognises that the supply of specialist housing for the older generation is insufficient for the demand. There is a need for central and local Government, housing associations, and house builders to ensure that these housing needs are better addressed, giving as much priority to promoting an adequate market of social housing for the older generation as is given to the younger generation.

## Current baseline

### Population

According to the most recent census data available, in 2011 the total population in Cullompton was 8,499. The increase of 11.70% between 2001 and 2011 is similar to Mid Devon (11.43%), but significantly higher than regional (7.31%) and national (7.88%) trends.

### Age structure

Cullompton has a broadly similar age make up as Mid Devon averages, with some minor differences. Cullompton has a lower proportion of residents within the 45-59 and 60+ age groups (45%) than the regional (49%) average, but a higher proportion than the national (41.7%) average.

Cullompton has a slightly lower proportion of residents within the 16-24 age group, and a slightly higher proportion within the 25-44 age groups (26%) than the regional (24.6%) average and national (27.5%) averages. A similar trend is observed in Mid Devon, with the higher percentages of older age groups being indicative of an ageing population.

The proportion of residents within the 0-15 age group is the same as the Mid Devon average (19%), and higher than the regional (17.6%) and national (18.9%) average. However, the lower than average proportion of residents within the 16-24 group potentially suggests an out migration of younger age groups once they reach adulthood for educational or employment opportunities.

### Household deprivation

Census statistics measure deprivation across four 'dimensions' of deprivation, summarized below:

- **Employment:** Any person in the household (not a full-time student) that is either unemployed or long-term sick.
- **Education:** No person in the household has at least a level 2 qualification and no person aged 16-18 is a full-time student.
- **Health and Disability:** Any person in the household that has generally 'bad' or 'very bad' health, or has a long term health problem.
- **Housing:** The household accommodation is either overcrowded (with an occupancy rating of -1 or less), in a shared dwelling or has no central heating.

Broadly speaking, based on these dimensions Mid Devon District is less deprived than England, although deprivation dimensions are broadly in line with the south-west. Within Mid Devon, 45.1% of households are not deprived, which is favourable when compared to regional and national averages. Furthermore, the percentage of households deprived in two dimensions (17.2%) and three dimensions

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<sup>35</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> last accessed [03/02/17]

(3.7%) is also slightly higher than the South West and England averages. Cullompton contains just 0.3% of households deprived in all four dimensions, almost half the national average.

### *Index of Multiple Deprivation*

The Index of Multiple Deprivation 2015 (IMD) is an overall relative measure of deprivation constructed by combining seven domains of deprivation according to their respective weights, as described below. The seven deprivation domains are as follows:

- **Income:** The proportion of the population experiencing deprivation relating to low income, including those individuals that are out-of-work and those that are in work but who have low earnings (satisfying the respective means tests).
- **Employment:** The proportion of the working-age population in an area involuntarily excluded from the labour market, including those individuals who would like to work but are unable to do so due to unemployment, sickness or disability, or caring responsibilities.
- **Education, Skills and Training:** The lack of attainment and skills in the local population.
- **Health Deprivation and Disability:** The risk of premature death and the impairment of quality of life through poor physical or mental health. Morbidity, disability and premature mortality are also considered, excluding the aspects of behaviour or environment that may be predictive of future health deprivation.
- **Crime:** The risk of personal and material victimisation at local level.
- **Barriers to Housing and Services:** The physical and financial accessibility of housing and local services, with indicators categorised in two sub-domains.
  1. 'Geographical Barriers': relating to the physical proximity of local services
  2. 'Wider Barriers': relating to access to housing, such as affordability.
- **Living Environment:** The quality of the local environment, with indicators falling categorised in two sub-domains.
  3. 'Indoors Living Environment' measures the quality of housing.
  4. 'Outdoors Living Environment' measures air quality and road traffic accidents.

Two supplementary indices (subsets of the Income deprivation domains), are also included:

- **Income Deprivation Affecting Children Index:** The proportion of all children aged 0 to 15 living in income deprived families.
- **Income Deprivation Affecting Older People Index:** The proportion of all those aged 60 or over who experience income deprivation.

Lower Super Output Areas (LSOAs) are a geographic hierarchy designed to improve the reporting of small area statistics in England and Wales. They are standardized geographies designed to be as consistent in population as possible, with each LSOA containing approximately 1,000 to 1,500 people. In relation to the IMD 2015, LSOAs are ranked out of the 32,844 in England and Wales, with 1 being the most deprived. Ranks are normalized into deciles, with a value of 1 reflecting the top 10% most deprived LSOAs in England and Wales.

According to a statistical overview of Cullompton<sup>36</sup> Cullompton North ward is identified as being the most deprived ward in the town. This is in terms of Income Deprivation, Employment Deprivation, Health Deprivation and Disability, Education, Skills and Training as well as Crime. Overall, the least deprived area is identified as the Lower Culm ward.

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<sup>36</sup> Devon County Council Statistical Update(2011) [online] Available at: <http://www.devon.gov.uk/cullomptonupdate.pdf>

### *Housing tenure*

The proportion of people owning a home outright or with a mortgage in Cullompton (69.3%) in 2011 was slightly lower than the averages for Mid Devon (69.1%) and the South West (67.4%), but higher than the national average (63.3%).

The proportion of socially rented houses in Cullompton (13.3%) is higher than the averages for Mid Devon (12.6%), South West (13.3%) and the national average of 17.7%. As already highlighted above, the barriers to/quality of housing in several Cullompton LSOAs is a significant issue.

### *Education*

Cullompton has a significantly lower proportion of all usual residents (16+) with Level 4 qualifications or above (19.6%), compared to the average for Mid Devon (26.4%), the South West (27.4%) and England (27.4%). Some 25.6% of residents within Cullompton have no qualifications, with this value broadly aligning with the average for Mid Devon (22.7%), the South West (20.7%) and England (22.5%).

### *Employment*

The predominant occupations in the parish are highlighted below:

- Skilled Trades Occupations (15.4%)
- Elementary occupations (13%)
- Administrative and Secretarial Occupations (10.9%)
- Professional Occupations (10.9%)

Within Cullompton there are a notably higher proportion of residents (aged 16-74) working in skilled trades occupations, in elementary occupations, and in administrative and secretarial occupations compared to the regional and national averages.

### *Future Baseline*

The population of Cullompton parish grew significantly between 2001 and 2011. Given recent development and future allocations in the Local Plan Review, this trend is likely to continue. In common with many other areas, the population has the potential to age.

The suitability of housing for local requirements depends in part on the successful implementation of appropriate housing policies taken forward through the Mid Devon Local Plan Review. However, without interventions, the suitability and quality of housing in the parish may continue to be undermined.

## **A.7 Health and Wellbeing**

### *Context Review*

Key messages from the NPPF include:

- The social role of the planning system involves 'supporting vibrant and healthy communities'.
- A core planning principle is to 'take account of and support local strategies to improve health, social and cultural wellbeing for all'.
- The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities'
- Promote the retention and development of local services and community facilities such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- Set out the strategic policies to deliver the provision of health facilities.

- Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities.

In relation to other key national messages in relation to health, Fair Society, Healthy Lives<sup>37</sup> ('The Marmot Review') investigated health inequalities in England and the actions needed in order to tackle them. Subsequently, a supplementary report was prepared providing additional evidence relating to spatial planning and health on the basis that there is: "overwhelming evidence that health and environmental inequalities are inexorably linked and that poor environments contribute significantly to poor health and health inequalities".

The increasing role that local level authorities are expected to play in providing health outcomes is demonstrated by recent government legislation. The Health and Social Care Act 2012 transferred responsibility for public health from the NHS to local government, giving local authorities a duty to improve the health of the people who live in their areas. This will require a more holistic approach to health across all local government functions.

## Current Baseline

### *Health indicators and deprivation*

Deprivation is a significant contributor to poor health and can have adverse effects on wellbeing. General health is favourable in Cullompton; although levels of very good health are slightly lower than the Mid Devon, regional and national averages.

At the time of the 2011 census 80.9% of Cullompton's residents considered themselves to be in 'very good health' or 'good health', which is slightly higher than the national average (81.4%), but slightly lower than the proportion in Mid Devon (82.1%), the South West (81.4%). Cullompton has a slightly higher proportion of residents reporting that they are in 'fair health' (14.2%) than in Mid Devon (13.4%), South West (13.4%) and England (4.2%). Levels for 'very bad health' are broadly similar across all comparators (1%).

A lower proportion of residents in Cullompton consider themselves to be in 'bad health' (3.9%) compared to the regional (4%) and the national average (4.2%). However, the proportion of residents in 'bad health' compares unfavourably to the Mid Devon average of 3.6% average. Levels for 'very bad health' are broadly similar across all comparators, although slightly less favourable in Cullompton (1.1%) than in Mid Devon (1%).

The lower levels of 'very good health' in Cullompton is reflected in the disability data presented in Table 8.1, with 18.3% of residents reporting that their daily activities were limited in some way. This is higher than the averages for Mid Devon (17.4%) and England (17.6%), however marginally lower than the average for the South West (18.4%).

## Future baseline

Broadly speaking, health and wellbeing in Cullompton is favourable in comparison to the Mid Devon, regional and national averages.

An ageing population has the potential to increase pressures on healthcare services.<sup>38</sup>

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<sup>37</sup> The Marmot Review (2011) The Marmot Review: Implications for Spatial Planning [online] available to download from: <http://www.apho.org.uk/resource/item.aspx?RID=106106> > last accessed [27/01/17]

<sup>38</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/>

## A.8 Transportation

### Context Review

European and UK transport policies and plans place emphasis on the modernisation and sustainability of the transport network. Specific objectives include reducing pollution and road congestion through improvements to public transport, walking and cycling networks and reducing the need to travel. National policy also focuses on the need for the transport network to support sustainable economic growth.

The Devon and Torbay Local Transport Plan 2011-2026 was adopted in April 2011.

### Current Baseline

#### *Rail network*

Cullompton railway station was closed in 1964. However, Network Rail is assessing the case for a new Cullompton Railway Station based on future housing predictions which are expected to put additional pressure on the transport network.

#### *Bus network*

There are regular bus services operated by Stagecoach which provide a service from Cullompton town centre to Exeter, Tiverton, Taunton and Honiton.

#### *Road network and congestion*

The M5 is the key strategic transport link for the town, and provides excellent road access to destinations such as Exeter, Taunton and Bristol. Access to the M5 is via Junction 28.

The A373 runs east from Cullompton and links the town to Honiton.

Cullompton is also served by a number of minor roads. The B3181, which runs through the town centre, links the town with Willand and the A38 to the north west.

There are existing community concerns about congestion and parking in the Neighbourhood Plan area and the ability of the capacity of Junction 28 to meet growth in the town. Cullompton High Street (incorporating Higher Street, High Street and Fore Street) are part of the diversion when sections of the M5 are closed due to accidents or roadworks.

#### *Availability of cars and vans*

In regards to access to vehicles within the Neighbourhood Plan area, the proportion of households with no access to a car or van is lower than regional and national averages, but marginally higher than Mid Devon averages. The proportion of the population with one car or van is higher than the Mid Devon, regional and national averages. The proportion of the population with two or more cars/vans is lower than the Mid Devon average but higher than the regional and national averages. The proportion of households with three or more vehicles is higher than national averages but similar to the regional average, and lower than the Mid Devon average. The proportion of households with four or more vehicles is marginally higher than the national average, and similar to the regional average; however this is slightly less than the Mid Devon average.

#### *Travel to work*

The proportion of people who travel to work driving a car is higher than Mid Devon, regional and national averages. The proportion of people who cycle to work is broadly in line with the Mid Devon average, but less than the regional and national average. In contrast the proportion of Cullompton's residents who walk to work is in line with the Mid Devon average and regional average and much higher than the national average.



## Future Baseline

Increased housing and employment growth in the Neighbourhood Plan area resulting from Local Plan Review allocations (and potentially the Culm Garden Village) will place increasing pressures on the town's road network. The impact of growth depends on the delivery of proposed road schemes in the area, including a proposed Eastern Relief Road, improvements to Junction 28, and/or the inclusion of a new junction on the M5.

5% of Cullompton residents work from home. This level is likely to increase as enhanced provision of high speed broadband internet and changing working practices will support running a business or working from home.

The viability of additional bus and rail services may be supported by future population growth. However, bus service viability may be undermined by potential cuts to funding.

