



Planning, Transport and Environment

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**VIA EMAIL**

30 March 2016

Dear Mr Jeffrey,

**Re: Applications 15/0640/01 and 15/0641/01**

**Outline - Residential development including new access onto Chudleigh Road and Dawlish Road and associated infrastructure. (All matters reserved for future consideration except access)**

**And**

**Outline - Residential development including new access onto Shillingford Road and associated infrastructure. (All matters reserved for future consideration except access)**

Thank you for consulting Devon County Council on the above planning applications. This response is provided in the context of the Exeter CIL. This response covers both applications 15/0640/01 and 15/0641/01 given that the impacts of the applications are similar and many of the submitted documents are the same for both applications.

As per the adopted Exeter City Core Strategy, a strategic site allocation is located at South West Exeter for the delivery of around 500 dwellings (policy CP19). This is adjacent to a further area of land which is allocated for the development of 2,000 dwellings within the adopted Teignbridge Local Plan, bringing the overall scale of the proposed urban extension to 2,500 dwellings. These applications together propose 350 dwellings and will form part of what in future will be a larger development area. As such, the applications in question and the associated infrastructure requirements have been considered specifically in the context of this wider development allocation.

Given the significant level of development identified, and the scale of associated infrastructure required, the county council strongly supports the principle of a joined up, comprehensive approach to the delivery of this strategic allocation. This is necessary to ensure that individual development proposals will not preclude the future delivery of critical infrastructure, in addition to ensuring that a high quality, sustainable community is created. The county council will continue to work with the city council, district council and developers to proactively pursue this objective.

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Strategic Director Place Heather Barnes

The county council has worked closely with the city and district councils in the development of the Local Plan, Core Strategy, Development Framework and Development Brief to identify the infrastructure requirements necessary to mitigate the impacts of the development at this strategic allocation.

The infrastructure planning approach adopted seeks to ensure that all development within the proposed Alphington allocation, and 2,000 dwellings in Teignbridge, contributes proportionally to the full package of infrastructure requirements necessary to make the development acceptable in planning terms. This approach and background has informed the comments provided as part of this response and the financial contributions secured from either s106 agreements or CIL which will assist in ensuring that the necessary infrastructure can be delivered effectively.

The remainder of this response is split into a number of sections and provides the formal views of Devon County Council in relation to:

- Local transport provision;
- Local education provision;
- Waste planning;
- Library services;
- Historic environment;
- Surface water flooding and Sustainable Drainage Systems; and
- Health and wellbeing

### **Local transport provision**

Both applications submitted are in outline, with access being determined in detail. Aldens Farm East (15/0640/01) proposes 234 dwellings and Aldens Farm West (15/0641/01) proposes 116 dwellings. The Transport Assessment (TA) submitted with the applications deals with both applications together and assesses the impacts of up to 400 dwellings.

The Highway Authority has worked with the various transport consultants for the wider South West Exeter development to agree a consistent methodology for Transport Assessments submitted with applications. The applicant for this site was made aware of these discussions and encouraged to work with the other applicants for the wider allocation. Whilst there are elements of the assessment which are not consistent with the agreed methodology, the Highway Authority has considered the information submitted with this application alongside its own work and information that is available from the other applications submitted for the wider South West Exeter development area.

The application refers to the SW Exeter Access Strategy. At the time of writing the strategy, it was assumed that the development within Exeter City Council's boundary would come forward first, with the rest of the allocation likely to come forward towards the end of the plan period. Since the production of the strategy, the development has progressed and applications submitted for the majority of the rest of the allocation. It is therefore no longer appropriate to assume that the Exeter part of the development (these applications) will come forward early and the TA should not assume that these applications will be a first phase of development at SW Exeter. It should be considered as part of the wider urban extension for 2,500 dwellings. The Highway Authority has considered these applications, and their impacts, as part of a larger development.

The trip rate for the development has been taken from the Access Strategy, which is considered to be acceptable and has been agreed for the TAs. This trip rate assumes a

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high uptake of sustainable transport modes. The application must ensure that the developments are designed appropriately to achieve the trip rate used. This will require appropriate contributions to bus services (discussed later in the response).

The indicated mode split is taken from census data based on existing conditions and does not account for the anticipated improvements in sustainable travel provision. It should be noted though that sustainable transport modes have not been increased to take account of the low trip rate. Given that the assessment of the highway impacts is based on an acceptable vehicular trip rate this does not undermine the assessment, but it should be noted that the Highway Authority would expect a higher proportion of users of sustainable modes.

The distribution is also taken from the Access Strategy and traffic growth has been calculated using TEMPRO. Whilst TEMPRO is a useful tool for growing from the current year, it does not consider the direct impact from neighbouring development. Since the production of the Access Strategy, an updated agreed distribution has been established and used for other applications at SW Exeter. The preferred approach is for the applicant to revise the assessment taking into account the updated information, which the Highway Authority would be happy to provide. This would include assessing the impact of the development at the Chudleigh Road / A379 junction, where the Highway Authority has concerns about the performance and safety. It is noted though that this assessment has been undertaken for other applications and this would involve repeating the assessment. Given that the Highway Authority has the information available from other applications, in this instance, the Highway Authority would not require this further assessment to be undertaken. Based on previous assessments that have been undertaken, the Highway Authority considers that improvements will be required to the A379 / Chudleigh Road junction.

Due to the safety concerns at the A379 / Chudleigh Road junction, it is proposed to realign the road to form a new signal junction on the A379. The land required to deliver this is within the control of Bovis. The Highway Authority does not consider it appropriate to allow this development, or others impacting on this junction, in advance of improvements being made to this junction or the road being realigned. The Highway Authority has offered to deliver improvements for this junction, including the realignment of Chudleigh Road, subject to necessary contributions from the affected developments to cover the full cost of the works. Agreement to fund these works would allow development to come forward. If this cannot be achieved, the Highway Authority would recommend a Grampian condition to restrict occupation of development until the scheme is delivered.

The means of access is a detailed matter for these applications. For both applications for Aldens Farm, priority junctions are proposed at the western and eastern edges. Priority junctions are, in principle, acceptable and the submitted capacity assessments show these junctions to operate comfortably within capacity, with the highest future year RFC of any assessed arm of 0.12. Whilst these junctions also do not consider the full impact of the wider development, it is not considered that including this in the assessment would take them overcapacity. Given that capacity is not a significant design constraint and that the TA refers to Manual for Streets in the relevant policy, it is disappointing that the opportunity has been missed to try to incorporate this approach into the junctions. This would also assist to reinforce the 20mph speed limit on Chudleigh Road.

To allow for local bus services to be extended through the site the provision of routes to the west and east is welcomed. The applicant is advised that a condition is likely to be recommended to provide a through route on the land between Dawlish Road and

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Chudleigh Road. In addition, the bus connection to the southern boundary of the Aldens West site which connects to that shown in the Bovis application should be secured.

As the application is in outline, there is no information on the internal layout. Well-designed residential streets are central to sustainable development and therefore the design of the internal road layout must accord with the principles of Manual for Streets and best practice principles for promoting sustainable transport. To assist in achieving this it is recommended that the applicant liaises with the Highway Authority prior to any application for reserved matters approval. Additional information has been provided which identifies connection points between these applications and adjacent development. These broadly accord with similar points shown on an adjacent application, but there is one point which does not tie up. It is though noted that the plan identifies these locations as indicative. It will need to be ensured that suitable links between the development areas are provided and connect appropriately.

Details of the internal road layout will need to be submitted to and agreed by the Local Planning Authority before occupation of the development. A condition of that effect is recommended as part of any permission. This includes a design that is suitable for a high quality bus link through the site and for pedestrian cycle connections onto adjacent roads. To ensure that appropriate restrictions are implemented across the site a contribution of £10,000 is requested towards off site Traffic Regulation Orders.

The success of development at South West Exeter will be dependent on appropriate mitigation to help alleviate the impacts of the development. This has been identified through ongoing work and is set out in the South West Exeter Access Strategy.

The strategic transport infrastructure required for this development will need to be funded through the Community Infrastructure Levies of both Teignbridge and Exeter as implied through the Authorities' respective Regulation 123 Lists. It has been assumed that the Exeter CIL regime will provide appropriate funding towards Marsh Barton Station and Alphington Park and Ride. It is also assumed that the Teignbridge CIL will provide appropriate funding.

Appropriate payment triggers from the two CIL regimes will need to be discussed and agreed between the county council and Teignbridge District and Exeter City Councils in order to ensure that the transport infrastructure required can be delivered in a timely manner.

In addition to CIL funding, s106 contributions will be required towards some mitigation measures. These are identified in the table below.

	<b>Per dwelling</b>	<b>Aldens Farm East (234 dws)</b>	<b>Aldens Farm West (116 dws)</b>
Pedestrian / cycle bridge	£1,104	£258,336	£128,064
Alphington Village works	£1,100	£257,400	£127,600
Loram Way cycle link	£375	£87,750	£43,500
Bus services	£1,750	£409,500	£203,000
Car club	£132	£30,800	£15,269
TRO		£10,000	
Travel Planning	£500	£117,000	£58,000
Chudleigh Road	£3,798	£888,732	£440,568

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<b>Total</b>	<b>£8,759</b>	<b>£2,049,518</b>	<b>£1,016,001</b>
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In summary, it is considered that the TA underestimates the full impact of development, as the assessment applies TEMPRO growth rather than considering the direct impact from the whole of the allocation. It is also considered that the impact of the development is not fully considered as the Chudleigh Road / A379 junction is not assessed. The Highway Authority considers that improvements are necessary here and although not supported by the TA due to a lack of information, there is limited benefit in the applicant undertaking a further assessment. In order to mitigate the impact of the development at the Chudleigh Road / A379 junction, a contribution towards the works will be required. The Highway Authority has identified conditions below which would be required if permission is granted.

Conditions:

No part of the western site (15/0641/01) shall be occupied until the access, visibility splays and pedestrian and cycle facilities, as indicated in drawing PHL-01 Revision D have been completed with details that shall have been submitted to, and approved in writing by, the Local Planning Authority.

REASON: To ensure that safe and suitable access is provided for all users in accordance with paragraph 32 of the NPPF.

No part of the eastern site (15/0640/01) shall be occupied until a vehicular access onto either Dawlish Road or Chudleigh Road and the associated visibility splays and pedestrian and cycle facilities with that access, as indicated in drawing PHL-01 Revision D have been completed with details that shall have been submitted to, and approved in writing by, the Local Planning Authority.

REASON: To ensure that safe and suitable access is provided for all users in accordance with paragraph 32 of the NPPF.

No more than 150 dwellings on the Eastern portion shall be occupied until

- a vehicular route from Chudleigh Road to Dawlish Road capable of accommodating two way bus flow through the site
- the pedestrian connections in the Eastern portion as indicated in drawing PHL-01 Revision D

have been provided to a specification agreed in writing with the Local Planning Authority (in consultation with the Highway Authority).

REASON: To ensure the site is served by sustainable transport modes required to meet the agreed residential trip rates.

No more than 75 dwellings on the Western portion shall be occupied until a bus and pedestrian connections are provided as indicated in drawing PHL-01 Revision D have been provided to a specification agreed in writing with the Local Planning Authority (in consultation with the Highway Authority).

REASON: To ensure the site is served by sustainable transport modes required to meet the agreed residential trip rates.

Prior to commencement of any part of the site the Planning Authority shall have received and approved a Construction Management Plan (CMP) including:

(a) the timetable of the works;

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- (b) daily hours of construction;
- (c) any road closure;
- (d) hours during which delivery and construction traffic will travel to and from the site, with such vehicular movements being restricted to between 8:00am and 6pm Mondays to Fridays inclusive: 9.00am to 1.00pm Saturdays, and no such vehicular movements taking place on Sundays and Bank/Public Holidays unless agreed by the planning Authority in advance;
- (e) the number and sizes of vehicles visiting the site in connection with the development and the frequency of their visits;
- (f) the compound/location where all building materials, finished or unfinished products, parts, crates, packing materials and waste will be stored during the demolition and construction phases;
- (g) areas on-site where delivery vehicles and construction traffic will load or unload building materials, finished or unfinished products, parts, crates, packing materials and waste with confirmation that no construction traffic or delivery vehicles will park on the County highway for loading or unloading purposes, unless prior written agreement has been given by the Local Planning Authority;
- (h) hours during which no construction traffic will be present at the site;
- (i) the means of enclosure of the site during construction works; and
- (j) details of proposals to promote car sharing amongst construction staff in order to limit construction staff vehicles parking off-site
- (k) details of wheel washing facilities and obligations
- (l) The proposed route of all construction traffic exceeding 7.5 tonnes.
- (m) Details of the amount and location of construction worker parking.
- (n) Photographic evidence of the condition of adjacent public highway prior to commencement of any work.

REASON: To minimise the environmental impacts of the construction process for local residents and in the interests of amenity.

## **Local education provision**

### Primary school provision

There is no spare capacity at existing primary schools within a reasonable walking distance from the proposed development and therefore the Education Authority stresses that the early delivery of new primary provision, including nursery provision, is critical to mitigate the impacts of development and support the delivery of a sustainable community at South West Exeter.

Two school sites have been identified in planning applications within the South West Exeter allocation. One of these, that which is included in the Bovis application, accords with the SWE Development Framework and is the preferred location for a school site. The county council is actively pursuing a school site in this location. Although this is the preferred strategy, this site has not yet been secured to provide the certainty that additional school places can be provided.

Given that there is no spare capacity in existing primary schools, the county council will require certainty that additional school places can be provided for the development coming forward. This would be outside of the control of this application as it does not propose a school site. Therefore, the acceptability of this application is dependent on the ability to secure a school site to enable a new school to be delivered to provide school places for this application. A Grampian condition is recommended if planning permission

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is granted, to ensure that school places can be provided for pupils generated by this development.

#### Condition:

No occupations shall take place until a primary school site has been secured by the Education Authority, or alternative appropriate primary school and early years provision secured.

REASON: To ensure that appropriate primary school places can be provided to meet the needs of the development.

Applying Devon's adopted Section 106 methodology, a development of 350 new family dwellings is expected to yield 88 primary aged pupils. For each dwelling of two or more bedrooms a financial contribution of £3,332 per dwelling is required from the Exeter CIL. The first phase of the primary school needs to be delivered on occupation of 200 dwellings within the Teignbridge allocation at South West Exeter. Contributions towards land would also be sought from CIL on a pro rata basis

#### Secondary school provision

There is limited spare capacity at existing secondary schools within Exeter to accommodate the development proposed when factoring in current increases in primary pupil numbers, the impact of approved but unimplemented development, existing school infrastructure and strategic housing allocations in the city.

Applying Devon County Council's s106 methodology, a development of 350 new family dwellings is expected to yield 53 secondary aged pupils. Due to some surplus capacity in the city, the equivalent of 42 places required by this development will need to be funded through the Exeter CIL. The cost of this would equate to £2,499 per dwelling of two more or bedrooms. The first phase of the secondary school needs to be delivered on occupation of 1,000 dwellings within the Teignbridge allocation at South West Exeter. In addition to this, it should be noted that the Exeter CIL is expected to deliver additional secondary school places needed through other development within Exeter.

#### Early Years

The county council requires early years provision to be made in the primary school for children that are 2 (disadvantaged), 3 and 4 years of age. In a 210 place primary school there must be a minimum of 26 early years places, whilst in a 420 place school 52 places would be required. The provision will need to be made flexibly at times that meet the needs of local families. This provision is likely to be run by the proposer for the new school. If the proposer chooses not to manage the provision, a partnership with a childcare provider will need to be established. The anticipated cost of a 26 place nursery is £286,000 and therefore a proportional cost for this development is £120,000. This will need to be provided from the Exeter CIL in timely manner to enable early years provision as part of the first phase of the primary school to be delivered on occupation of 200 dwellings within the Teignbridge allocation at South West Exeter.

Families requiring childcare for younger children (i.e. 0-2 year olds) will be able to access childcare places from in existing providers within the city and surrounding areas. Working parents that need longer hours of childcare each day and provision all year round may choose to use a day nursery that is closer to their place of work.

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Childcare for older children (5-14 year olds), such as before and after school provision, can be run from the school. It could be managed either by the proposer for the new school or through a partnership between the proposer and a childcare provider.

### Summary

The Education Authority stresses the importance of securing sufficient CIL funding towards appropriate education infrastructure as included earlier in the response. If such funding is not secured, the education impacts of the development would not be appropriately mitigated and the county council would not be able to support the application. Appropriate payment triggers from the Exeter CIL regime will need to be discussed and agreed between the county council and Teignbridge District Council in order to ensure that the education infrastructure required can be delivered in a timely manner.

As identified above, a condition will be required to manage the delivery of development alongside appropriate education infrastructure.

It should be noted that the financial contributions required through CIL should be adjusted on the date of payment in accordance with any increase in Building Cost Information Service (BCIS) all in tender price index.

### **Waste planning**

The Design and Access Statements' discussion of planning policy (section 5.4) fails to identify the Devon Waste Plan, adopted in December 2014, as part of the statutory development plan. Policy W4 of that Plan requires applications for major development to be accompanied by a waste audit statement that identifies the waste that will be generated during construction and operational phases and explains how it will be managed in accordance with the waste hierarchy. Since adoption of the Waste Plan, Devon County Council has published the Waste Management & Infrastructure SPD that provides guidance to applicants and district councils on preparation and consideration of waste audit statements.

Exeter City Council is recommended to secure submission and implementation of a waste audit statement to ensure compliance with the development plan. Suggested wording for a condition is outline below.

### Condition:

No development shall take place until a Waste Audit Statement for waste arising from the development has been submitted to and agreed in writing by the Local Planning Authority. The statement shall include:

- a) methods to reduce the amount of waste material
- b) methods to re-use the waste within the development
- c) methods for the reprocessing and/or final disposal of excavated materials, including locations (which should hold appropriate planning permission, Environment Agency licences and exemptions) where such activities will take place
- d) estimated quantities of excavated/demolition materials arising from the site
- e) evidence that all alternative methods of waste disposal have been considered
- f) evidence that the distance travelled when transporting waste material to its final disposal point has been kept to a minimum.

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The development shall be carried out in accordance with the approved statement.

## **Library services**

As part of the infrastructure planning work undertaken by the county council, additional local library provision has been identified as an infrastructure requirement which should be provided as part of the wider South West Exeter urban extension. This provision will enhance local residents' access to services, reducing the need to travel and enhancing the wider sustainability credentials of the development.

The county council supports the Museum, Library and Archive Council's (MLA) Standard Charge approach which recommends for libraries a minimum standard space of 25m<sup>2</sup> per 1000 population<sup>1</sup> or 0.025 m<sup>2</sup> per person. The MLA also sets out that there is a standard cost of £3,514 per m<sup>2</sup> of additional library provision.

The Department for Communities and Local Government publishes data about household size and occupancy. In Exeter in 2012 the average housing occupancy was 2.28 persons per dwelling<sup>2</sup>. Applying the occupancy rate for Exeter, the 350 dwellings included within the development are likely to be home to 798 people. This will result in the need for approximately 20m<sup>2</sup> of library floor space. Applying standard library costs, the contribution towards library facilities provision would be £70,000. It is anticipated that this will form part of the multi-purpose community building to be delivered as part of the wider urban extension. As libraries are included on the city council's regulation 123 list, any contribution towards a library provision would be through CIL.

Discussions will need to be held between the county and city council to align the requirements and delivery of suitable provision of the community building to ensure effective use of potential community building and library funds to support the relevant services.

## **Historic Environment**

The Historic Environment Team concurs with paragraphs 16.1 - 16.2 of both Design and Access Statements that states "there are no archaeological constraints which prejudice the principle of development of the site" and that the archaeological mitigation can be secured through a programme of archaeological excavation, investigation and analysis that would be undertaken by the application of an appropriately worded condition on any consent granted. This condition will have to be applied to the outline consent, not upon subsequent reserved matters application consent(s) as stated in para 16.3.

In addition, the site lies to the north and in close proximity to a Scheduled Monument (ref: 1012347) and Historic England must be consulted with regard to any comments they have on the impact of development upon the setting of this nationally important designated heritage asset.

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<sup>1</sup> Public Libraries, Archives and New Development: a Standard Charge approach" 2010.

Available at:

[http://cultureandsportplanningtoolkit.org.uk/fileadmin/user\\_upload/Public\\_libraries\\_archives\\_and\\_new\\_development-a\\_standard\\_charge\\_approachFINAL.pdf](http://cultureandsportplanningtoolkit.org.uk/fileadmin/user_upload/Public_libraries_archives_and_new_development-a_standard_charge_approachFINAL.pdf)

<sup>2</sup> Live table 427 produced as part of the DCLG household projections

Available at:

<https://www.gov.uk/government/statistical-data-sets/live-tables-on-household-projections>

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**Strategic Director Place** Heather Barnes

### Condition:

No development shall take place until the applicant has secured the implementation of a programme of archaeological work in accordance with a written scheme of investigation which has been submitted by the applicant and approved by the Planning Authority.

The development shall be carried out at all times in strict accordance with the approved scheme, or such other details as may be subsequently agreed in writing by the Local Planning Authority.

### REASON

To ensure that an appropriate record is made of archaeological evidence that may be affected by the development

### **Surface water flooding and Sustainable Drainage Systems**

The Flood Risk Assessment has been considered for these applications and the county council has the following comments:

- The site of application 15/0641/01 is proposed to drain into an existing SWW SW sewer. Historic flooding is recorded in this location from sewers surcharging.
- Above ground attenuation features should be utilised unless it can be demonstrated that this is not feasible. The FRA mentions both underground and above ground features. It is not clear how these will be positioned within the development.
- Surface water flood maps show likely ponding in the north east corner of the site of application 15/0641/01.
- A very small localised area of surface water ponding is shown on the surface water mapping close to Lichgate Road (application 15/0640/01). Historic flooding records show a property flooding in this location due to surface runoff from the adjacent field. Surface water flow paths may need to be identified in more detail to ensure that there is no risk or that the development surface water drainage strategy is mitigating this risk.
- The provision and approval of a detailed drainage design should be considered as a condition in any granted planning permission. This detailed drainage design should be in accordance with Devon County Council's draft Sustainable Drainage Design Guidance, which can be found here:  
<https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/>.

The above comments should be addressed by the applicant.

### **Health and wellbeing**

The application proposes affordable housing. Assuming that the population that will take up this offer will come from the Exeter locality, the Joint Strategic Needs Assessment and the locality public health plan shows that the local priorities are: increasing physical activity, reducing alcohol misuse; reducing falls and cold homes and improving the health of the most disadvantaged.

The development should seek to design in measures to meet the local priorities. This may include:

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- Access to safe and easy active travel (i.e. ensuring connectivity, walkability and cyclability throughout the development, particularly routes that separate children from vehicular routes),
- Access to healthy food such as the provision of allotments and the use of edible trees as part of any planting scheme,
- Making provision for the availability of local food outlets that meet local needs, in particular taking opportunities to restrict outlets of unhealthy food close to schools,
- Ensuring the quality and condition of housing, particularly affordable housing, to reduce energy use and make use of low-carbon or carbon neutral technologies to reduce the risks of fuel poverty and increased healthcare costs.

These priorities should be considered at the outline application stage and fed through to reserved matters applications when further detail is known.

### **Summary of the Devon County Council position**

The scale of growth proposed in the South West Exeter urban extension requires a coordinated, comprehensive approach to successfully create a sustainable community and ensure effective and timely mitigation of development impacts. If a comprehensive approach across the site allocation is not taken, there is a risk that the successful provision of infrastructure will be precluded.

The comments provided as part of this response seek to support and enable the delivery of sustainable development to the South West of Exeter, as identified within the adopted Exeter City Core Strategy.

A number of developer contributions have been requested in this response, if the applicant is able to address the issues raised. In addition to the contribution figures quoted above, the county council would wish to recover legal costs incurred as a result of the preparation and completion of any legal agreement such as those prepared under section 106 of the Town and Country Planning Act (1990) or 278 of the Highways Act (1980).

I hope that these comments are useful in determining the planning application. Please do not hesitate to contact me should you have any questions.

Yours sincerely,

Joe Keech  
**Chief Planner**

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**Strategic Director Place** Heather Barnes

## Information required for the approval of drainage schemes:

### Flood Risk Assessment

- Prepared as previously detailed including a clear explanation of the SuDS proposal demonstrating compliance with Devon County Councils SuDS Guidance and recommended documents;

### Plans

- Location plan that includes geographical features, grid reference, street names catchment identification and watercourses or other bodies of water in the vicinity;
- Site plans showing:
  - Existing site;
  - Proposed site boundary and area it encloses;
  - Development proposals clearly identifying all aspects of SuDS, such as ponds, swales and other significant features;
  - Identification of any existing or proposed structures which may influence the flow of water overland or any watercourses present on the site;
  - Exceedance flow paths.

### Surveys/Monitoring

- Existing and proposed site levels;
- Seasonal ground water levels covering a 12 month period where infiltration is proposed.

### Assessments

The applicant should demonstrate:

- Greenfield runoff rate and volume for the site from each of the corresponding 1, 10, 30 and 100 year storms;
- Proposals for surface water management that aims to not increase surface water runoff rate and volumes from the site as a result of the development including any calculations (inclusive of climate change);
- Information in relation to existing surface water systems within the site and their condition;
- Information about other potential sources of flooding that may affect the site;
- Proposed SuDS will not cause any deterioration to water quality or ecological status of any water body and where possible will provide amenity and biodiversity benefits;
- Any environmental impacts as a result of the development and/or provision of SuDS are mitigated.

### Maintenance

- An operation and maintenance plan detailing the maintenance requirements for the SuDS, who will undertake the maintenance and how it will be funded.

### Education

- Details of proposed community engagement, information and interpretative signage.