

Planning and Affordable Housing Statement

School Close, Bampton, Devon, EX16 9NN

ZED PODS Limited

January 2023

Turley

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1. Introduction

1.1 This Planning and Affordable Housing Statement has been prepared by Turley to accompany an application for full planning permission submitted by ZED PODs Limited [“Zed Pods”] for affordable residential development at School Close, Bampton within the administrative area of Mid-Devon Council [“the Council”].

1.2 This application is submitted in Full and the description of the proposed development is as follows:

“Demolition of existing dwellings to provide 18 affordable dwellings with associated parking, landscaping and associated works”

1.3 This Statement should be read in conjunction with the full details set out in the accompanying documentation. For the Schedule of Documents submitted alongside this application, please see the Covering Letter.

1.4 This Statement is structured in the following order and is to be read in combination with the other submitted planning application documents:

- The Application Site
- Proposed Development
- Affordable Housing Statement
- Planning Policy Context
- Planning Assessment
- Summary/Conclusions

Introduction to Zed Pods

1.5 Zed Pods operate nationally and specialise in the delivery of affordable, modular built homes on underutilised sites across the country, such as above existing car parks, garages, and hardstanding. Zed Pods provide an innovative approach to housing which overcomes and addresses the limitations posed by traditional housing developments including those associated with the provision of permanent homes, revenue and land.

The modular homes are built to a higher standard than conventional homes and have a significant focus on delivering low-carbon, energy efficient units specifically for vulnerable households, key workers and young professionals. Zed Pods specialist design incorporates fabric efficiency and solar panels into each unit to create ultra-low to Net-Zero carbon homes with the lowest possible running costs.

2. Site and Background Context

The Application Site

- 2.1 The site is located within the residential area of School Close, within the defined Settlement Limit of Bampton. The site is approximately 325m from the town centre of Bampton.
- 2.2 The site is of an irregular shape and occupies approximately 0.45ha of land which currently comprises 10 existing dwellings (owned and managed by Mid-Devon District Council) and their associated private garden space and parking. For context an extract of the Site Location Plan (Ref. Z27-ZP-A1-00-DR-A-001-S01-P01) is provide at Figure 1 below:



Figure 1 –Site Location Plan

- 2.3 The development is located within a predominantly residential area and is characterised by a mix of two storey houses and bungalows. The site is bound by Market Close to the north, West Street to the east and School Close to the south.
- 2.4 Vehicular and pedestrian access to the Site is achieved via School Close which connect the site to the wider Bampton area.
- 2.5 The topography of the site is largely flat with a slight slope from the western boundary to the east. With regard to flooding, the site is located within Flood Zone 1 and so is at the lowest risk of flooding.
- 2.6 There are limited trees and hedgerow located on the site and no environmental or ecological designations cover the site. Several priority habitats are within the site's vicinity including Bampton Millennium Green which is approximately 350m to the west of the site. Further details are provided within the Preliminary Ecological Appraisal enclosed with the application.

- 2.7 The site does not contain any heritage assets. It is located outside of but adjacent to the Bampton Conservation Area. Several Grade II listed buildings are located within the sites vicinity the closest lying approximately 100m to the north of the site. Grade I Listed, Church of St Michael and All Angels, is located approximately 250m north-east of the site and Scheduled Ancient Monument, Bampton Castle, is approximately 500m to the north-east of the site. Full assessment of the designated heritage context is provided within the enclosed Heritage Technical Note.

The Surrounding Area

- 2.8 The site is situated in a sustainable location and benefits from being in close walking / cycling distance to local services and facilities. There are several chemists/pharmacies and doctors' surgeries within walking distance of the site. Bampton Primary School, religious facilities, Global Park Community Centre, and a convenience store are all within the site's vicinity.
- 2.9 In terms of proximity to public transport, several Bus Stops are located along Luke Street and Briton Street which accommodate routes 25 and 398 and provide services to the centre of Tiverton; Taunton and Dulverton.
- 2.10 Route 3 of the West Country Way Cycle Network runs through the area of Bampton and connects the site to the wider area of Mid-Devon, including the centre of Tiverton. There are no public rights of way across the site.
- 2.11 Further information regarding the site and the local context and character is provided within the submitted Design and Access Statement and Transport Note.

Relevant Planning History

- 2.12 Based on a review of Mid-Devon Council's online planning history search facility, there are no recent planning application records of relevance to the site. There are historic records of several minor applications relating to extensions approved at No 9 and No 5, and a certificate of lawfulness for a dormer window at No 7.

Pre-Application Consultation

- 2.13 A formal request for pre-application advice was processed under reference number 22/01759/PREAPP and a written response was received from the Council on 7th November 2022.
- 2.14 The advice received has been considered by the Applicant and is addressed in the planning application proposals. The nature of this pre-application process illustrates the collaborative approach taken with the Council on the proposed development.
- 2.15 The pre-application confirmed that the principle of residential development is acceptable in this location.
- 2.16 A summary of the Council's specific pre-application feedback is provided below:

- **Design:** The Council confirmed the use of rendered walls is acceptable. Although the proposed roof material which integrates solar PV panels was noted to differ from materials used on surrounding properties (which consist primarily of slates or tiles), the carbon reduction benefits of the design were recognised by the Council.

The overall layout and pattern of development was noted to be acceptable, however some advice was provided on amenity and separation between existing properties.

In accordance with the Council's advice, the massing of the development is addressed within the DAS.

- **Heritage:** The Council's advice refers to the site's proximity to the Bampton Conservation Area. The Officers' response confirmed a Heritage Statement was considered necessary. Input from a qualified heritage consultant has informed the design proposals and a Heritage Technical Note is submitted with this application demonstrating that the Site has capacity for redevelopment.

In response to the Council's feedback the proposed dwellings on the eastern part of the site have been set back and additional planting is proposed along the frontage along the road to screen the development from the Conservation Area and properties within this along West Street,

- **Open Space:** The Council refer to Policy S5 (Open Space) of the Local Plan which relates to Open Space. The proposal includes community green space and a connection to existing neighbouring allotments. This was welcomed by the Council. Given the proposed on-site provision and noting the development is for a scheme of 100% affordable housing, the proposals demonstrate the case that a financial contribution is not considered necessary, as discussed with the Council Officers.
- **Highway Implications:** School Lane provides the main access into the site and serves the existing housing. Off street parking off of School Lane is considered acceptable in principle by the Council. Their pre-app advice refers to the Parking Standards set out in Policy DM5, which has informed the proposed car and cycle provision.
- **Carbon Reduction:** The Council acknowledged the carbon reduction credentials of the proposed design and build of the proposed development. A Carbon Reduction Statement is submitted alongside this application in accordance with their advice.
- **Waste:** In accordance with the Council's advice, a Waste Audit Statement has been submitted alongside this application.
- **Planning Obligations:** The Council confirmed that the potential for any financial contribution towards education would be considered by the Children's Services Department at a later date.

- **Flooding and Drainage:** The application is supported by a Sustainable Drainage Strategy which demonstrates in accordance with the Council's advice that sustainable drainage systems will be provided on site to prevent increased run off and the development will not increase the risk of flooding on site or to properties elsewhere.
- **Validation Requirements:** We have enclosed within the application a full suite of information that reflects the Council's advice. Please refer to the Covering Letter for details of the application documents.

2.17 Feedback from the planning officers has been considered in detail and has informed the design of the proposed development.

Public Consultation and Engagement

2.18 Zed Pods worked closely with Mid-Devon District Council to consult all residents within a 100m radius on the site area. In November 2022 a mailing list was sent out which explained the overall aims of the scheme and consultation with the local community was undertaken on 9th December 2022. Further information in response to the comments received during the consultation process are provided in the Statement of Community Involvement section of the DAS included within this submission.

3. Proposed Development

3.1 The proposal seeks full planning permission for new affordable homes and associated parking, landscaping, and other minor works. Full details of the proposed design can be found within the enclosed architectural plans and Design and Access Statement prepared by Zed Pods. The description of development is set out below:

“Demolition of existing dwellings to provide 18 affordable dwellings with associated parking, landscaping and associated works”

3.2 In summary, the proposed development will comprise the following components:

- Demolition of existing housing to provide an increased density of new and efficiently designed housing;
- 18 Modular Dwellings - a mix of 1-,2- 3- and 4-bedroom dwellings (Use Class C3) and private rear gardens for each unit;
- Each dwelling will benefit from energy efficient, net-zero design features which include triple glazed low-e windows and doors; stone wool insulation; MVHR Counterflow heat exchanger; Roof Mounted Photovoltaic Solar Panels and Water Saving Facets and Fixtures which use water calculations and specifications from design stages to reduce consumption.
- 38no. off street car parking spaces including and 48 cycle spaces;
- The creation of a pedestrian access from Market Close;
- The widening of the eastern flank of School Close / West street junction from 4.5 metres to 5.5m;
- Provision has been made on site for communal landscaping which includes 730sqm of planted borders with a mix of perennial flowering shrubs and plants; 170 sqm of hedgerow; the planting of 12 trees and 1450sqm of amenity grassland; and,
- The incorporation Sustainable Drainage Features include 590sqm of permeable paving is proposed along with 525sqm of Grasscrete which will be used for paving and vehicle parking.

Modular Design of Affordable Homes

3.3 The scheme comprises of modular homes which are constructed offsite via Modern Methods of Construction (MMC). In this case the type of MMC uses is ‘volumetric’ whereby the modules themselves are built within controlled factory conditions and transported to site via HGV. Offsite construction reduces the timeframe for delivery and reduces the number of operatives on the site along with the noise, dust and highways impacts associated with traditional home construction. This is beneficial in reducing the disruption caused to local residents during the construction phase.

3.4 The proposed development is for 18 new modular dwellings. Please see the summary of schedule accommodation in Table 1 below:

Housetype	Schedule of Accommodation		
	GIFA/Unit (sqm)	Nationally Described Space Standards (sqm)	No. of Units
1 Bed 2 Person (2 Storey)	58	58	10
2 Bed 3 Person (2 Storey)	70	70	2
3 Bed 6 Person (2 Storey)	102	102	4
4 Bed 8 Persons (2 Storey)	124	124	2
Total No. Units			18

Proposed Materials

3.5 Below provides a summary of the materials for the proposed new dwellings and flats:

- External walls will be render (cream colour);
- Triple-glazed windows (in anthracite grey);
- Anthracite grey doors and patio doors;
- Velux roof lights;
- Metal standing seam roof and solar photovoltaic panels mounted to these;
- Security front doors, wooden garden panel fences and external CCTV (as part of a package of secure by design features).

3.6 The full details of the scheme can be found in the pack of illustrative plans and the Design and Access Statement prepared by Zed Pods and submitted with this application. This includes details of the proposed fire strategy and protection systems proposed.

3.7 Further details of the modular scheme can be found in the pack of proposed plans and the Design and Access Statement which have been submitted alongside this application.

4. Affordable Housing Statement

- 4.1 This Section provides an overview of the proposed affordable housing provision, its tenure and proposed management.
- 4.2 There is a clear demand for affordable housing in Mid-Devon which is reflected in the Local Plan and the area of Bampton is considered to be an appropriate and sustainable location to accommodate this need.
- 4.3 Importantly, the proposed development has been directly informed by the local housing needs identified by Mid-Devon's Housing Team and has been designed to accommodate the mix and type of housing local people require.
- 4.4 The proposed residential dwellings will provide a mix of 1, 2 and 3 bed dwellings 100% of which will be affordable. These dwellings will be of energy efficient and sustainable design to achieve the lowest running costs as possible and will be retained by Mid-Devon District Council to provide social rent accommodation to those identified as in need on the local housing register.
- 4.5 The scheme will provide 38 parking spaces which is in excess of the Parking Standards set out in Policy DM5. The additional car parking spaces will be available to other Council tenants within the wider residential area.

The tenancies and maintenance of the homes will be managed by the Council in its function as a registered provider for social housing. The tenants within the existing properties will be both temporarily and permanently re-housed and will be offered the opportunity to relocate into the new units if appropriate, or alternative accommodation options will be otherwise offered.

5. Planning Policy Context

The Statutory Development Plan

- 5.1 The statutory Development Plan for Mid-Devon comprises the '*Mid-Devon Local Plan 2013-2033*', adopted in 2020. This is the primary consideration in the determination of planning applications.
- 5.2 The site has not been allocated for any particular use nor is it covered by any environmental or ecological designations within the adopted development plan.
- 5.3 The key planning policies that are applicable to the proposals are summarised below:
- **Sustainable Development** (Policy S1; Policy S13) - supports the delivery of a diverse mix of housing including affordable; focuses residential development within the defined settlement limits; Bampton has been identified as being a sustainable location for small-scale development.
 - **Housing / Affordable Housing** (Policy S2; Policy S3; Policy S13) - housing developments which contribute towards the defined housing requirement and the affordable housing need are strongly supported by the Council.
 - **High Quality Design / Amenity** (Policy DM1) - seeks to ensure development proposals positively contribute to the surrounding character; schemes are safe and accessible, visually attractive and allow adequate levels of daylight, sunlight and privacy.
 - **Sustainable Design** (Policy S1, Policy S9; Policy DM3; Policy DM4) - promotes sustainably designed, low carbon and energy efficient homes; renewable energy developments; promotes efficient use of natural resources and effective use of land; consideration should be given environmental amenity of nearby properties; avoiding fragmentation of habitats; ensure development will not negatively impact the quality of the environment.
 - **Access / Sustainable Transport** (Policy DM3; Policy DM5) - seeks to ensure that appropriate provision is made for car and cycle parking within new developments; and requires proposals to assess the potential impact on highways and pollution where relevant and mitigate these where required.
 - **Trees / Ecology / Biodiversity** (Policy S5; Policy DM2; DM26) - provision should be made for green infrastructure in major development; schemes should not impact biodiversity and avoid habitat fragmentation; green infrastructure should be incorporated into major development schemes; biodiversity net gain should be achieved. Policy S5 seeks to ensure the provision of suitable open space within residential developments.
 - **Historic Environment** (Policy DM25) - presumption in favour of preserving designated heritage assets and their setting; requires consideration to be given

to their significance, character, setting, appearance, design, layout and local distinctiveness.

- **Sustainable Drainage** (Policy DM26) - promote green infrastructure within the site along with flood and water resource management.
- **Pollution Management** (Policy S9; Policy DM4) - developments will be permitted where pollution is minimised and does not lead to any negative impacts on health, the natural environment and general amenity.

5.4 Full details of the relevant policies in the Mid Devon Local Plan 2013-2033 can be found within the Planning Policy Matrix (**Appendix 1**).

Material Considerations

Supplementary Planning Documents

5.5 The following supplementary planning documents are considered to be of relevance to the proposed development and have all been considered as part of this application:

- Mid Devon Design Guide SPD (adopted October 2022) provides detailed guidance on design issues in Mid-Devon and helps to facilitate better quality design within developments;
- Refuse and Storage for New Residential Properties SPD (adopted February 2017) provides guidance on the design of waste and recycling storage in new residential developments;
- Meeting Housing Needs SPD (adopted June 2012) provides additional advice on the implementation of policies which relate to the provision of affordable housing; and,
- Parking Provision in New Developments SPD (adopted June 2013) provides guidance to ensure that appropriate provision of parking is accommodated in new developments.

National Planning Policy Framework

5.6 The revised NPPF was published in July 2021 and sets out the Government's planning policies for England and how these are expected to be applied.

5.7 At the heart of the NPPF is a presumption in favour of sustainable development which can be achieved through three overarching objectives at paragraph 8:

- An economic objective – help a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and by fostering a well-designed

and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- An environmental objective - to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.
- 5.8 **Paragraph 11** identifies the NPPF's presumption in favour of sustainable development. For decision-taking, this presumption means approving development proposals which accord with the development plan.
- 5.9 **Paragraph 60** sets out the Government's objective of significantly boosting the supply of homes. Placing importance on ensuring a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and land with permission is developed without unnecessary delay.
- 5.10 **Paragraph 92** states planning policies and decisions should aim to achieve healthy, inclusive, safe and accessible places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles and meet well-being needs.
- 5.11 **Paragraph 98** highlights that access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities and can deliver wider benefits for nature and support efforts to address climate change
- 5.12 **Paragraph 100** requires the planning system to protect and enhance public rights of way and access.
- 5.13 **Paragraph 111** states that developments should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 5.14 **Paragraph 119** supports developments which promote an effective use of land to meet the need for homes while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 5.15 **Paragraph 120** promotes and supports the development of under-utilised land and buildings, setting out that policies and decisions should:
- encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;
 - **give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs**, and support appropriate

opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

- **promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing** where land supply is constrained and available sites could be used more effectively.

5.16 **Paragraph 126** confirms the importance of good design as a key aspect of sustainable development. In accordance with **Paragraph 130**, planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience

5.17 **Paragraph 152** requires the planning system to support the transition to a low carbon future in a changing climate, taking full account of food risk and coastal change. It should help to shape places in ways that reduce greenhouse gas emissions, minimise vulnerability and improve resilience, and encourage the reuse of existing resources including the conversion of existing building and support renewal and low carbon energy.

5.18 **Paragraph 169** requires major development proposals to incorporate sustainable drainage systems unless clear evidence this would be inappropriate.

5.19 **Paragraph 174** sets out that planning policies and decisions should contribute to and enhance the natural and local environment including minimising impacts on and providing net gains for biodiversity; recognise the wider benefits of the intrinsic character and beauty of the countryside, and the benefits from natural capital and ecosystems including trees. Policies and decisions should ensure that new and existing

development not be put at unacceptable risk from soil, air, water or noise pollution or land instability.

- 5.20 **Chapter 16** sets out principles to ensure that the historic environment is conserved and enhanced.
- 5.21 **Paragraph 194** states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting.
- 5.22 **Paragraph 195** requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
- 5.23 **Paragraph 199** states when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Emerging Planning Policy

Mid-Devon Local Plan Review

- 5.24 Given the requirement for the adopted Local Plan to be reviewed within the next 5 years, Mid Devon Council have already started work on the Local Plan Review. The first stage of preparation, an Issues Consultation (Regulation 18), took place in January to March 2022. At this stage there are no emerging policies for consideration and the emerging Plan Review holds very limited weight.

6. Planning Assessment

- 6.1 This section provides an assessment of the proposed development with reference to the planning policy context set out at Chapter 3. This section should be read in conjunction with the supporting technical documents enclosed with the application.

Principle of Development

- 6.2 The site comprises existing residential development (previously developed land) and is located within a sustainable location, within the defined settlement limit of Bampton. The adopted Local Plan confirms that Bampton is a suitable location for small scale housing.
- 6.3 The site is under-utilised and the proposals will deliver a net increase in the Council's housing stock for social rent. The proposed redevelopment of the site to provide 18 houses (representing a net increase of 8 new affordable homes) was wholly supported by the Council during pre-application discussions.
- 6.4 The scheme will allow for the replacement of poor-quality housing stock and a more efficient use of land to deliver additional affordable dwellings available for social rent. This is supported by the Adopted Development Plan and the principles within the NPPF. At paragraph 120, the NPPF sets out that the reuse of previously developed land to meet housing needs should be afforded substantial weight.
- 6.5 The principle of development is therefore wholly acceptable and in accordance with local and national planning policy in relation to the provision of new housing and making best use of under-utilised, previously developed land.

Affordable Housing

- 6.6 This proposal seeks to deliver 18 units, 100% of which are affordable for social rent. As such, the scheme is wholly compliant with both the Adopted Development Plan and National Policy which encourages the provision of affordable housing to meet local need, particularly in sustainable locations within defined settlement boundaries.
- 6.7 The proposal is in excess of the local requirements for affordable housing (delivering 100% provision rather than the policy requirement for 30% provision). The development will contribute to the housing requirement specifically identified in the local area by the Council's Housing Team, providing socially rented homes to meet the requirements of local people.
- 6.8 Zed Pods modular design reduces construction time by up to 50% ensuring time effective delivery of much needed affordable homes (with minimal disruption during construction), another significant public benefit of the proposed development.
- 6.9 The scheme complies with Policy S1 (Sustainable Development Priorities) which seeks to ensure the delivery of a diverse housing mix including affordable housing and Policy S2 (Amount and Distribution of Development).

Design, Residential Amenity and Open Space

- 6.10 The proposed development provides a pioneering, high quality and sustainable design which will take full advantage of the currently underutilised residential site and improve the quality and quantum of the affordable housing in Mid-Devon.
- 6.11 The proposals will achieve a high level of amenity for future occupiers and will not cause unacceptable harm on the amenity of the surrounding neighbours. Consideration has been given to the scheme to be in keeping with the neighbouring properties to ensure that it is reflective of local context. To ensure that the scheme will not lead to a negative visual impact, the units have been set back from existing bungalows. Careful consideration has been given to the external materials used such as the silicone thin coat rendered walls which ensure the proposals are sympathetic to the existing building fabric in the locale. Similarly, the layout of the scheme's semi-detached style and the 2-storey height of the dwellings do not significantly exceed the existing ridge height of the bungalows located along School Close and Market Close.
- 6.12 The scheme has carefully balanced the need to make efficient use of land and seeks to increase the density of the existing plot in a sensitive manner. The proposed design has evolved and has taken into account the feedback from the pre-application advice to ensure that the privacy of neighbouring properties is not harmed. The scheme has incorporated both 1200mm and 1800mm high wooden fences and gates and units have been re-orientated to have gardens to the south. Furthermore, acceptable separation distances have been achieved to ensure that the scheme will not have significant impacts on amenity for future residents or existing neighbours.
- 6.13 The scheme has been designed to meet the future needs of occupants through the provision of high-quality internal living space which is in excess of Nationally Prescribed Space Standards. The proposals will deliver at least 20% of units to Level 2 of the Building Regulations Part M accessibility, in accordance with Policy DM1.
- 6.14 In accordance with Policy S5 and the pre-application advice received from the Council, the development will provide a total of 1450sqm of external amenity space through private rear gardens and communal landscape. The development will also provide a connection to the existing residential allotments, reflecting the aspirations identified by Paragraph 100 of the NPPF to enhance access where possible.
- 6.15 The site is located approximately 210m north-east to the amenity green spaces located at Bampton Primary School. Furthermore, the woodland located on the western side of the site will be retained and will provide a direct access to the existing allotments located south of St Molton Road (B3227). This therefore demonstrates that on balance of the benefits of the delivery of additional affordable housing and existing access to open space and on-site provision, a financial contribution towards other forms of public open space is not considered necessary. This approach has been discussed with the Council at the pre-application stage.

Sustainability and Energy

- 6.16 The proposed development will deliver 18 dwellings which will be of high-quality, sustainable design.

- 6.17 Renewable Energy sources including Solar Photovoltaic Panels have been integrated into the design and will be located on southern facing roof elevations. This will produce renewable energy and will provide a minimum of 2kWp per housing unit to meet and exceed the energy demands, with grid feed for any surplus generated. Other sustainable design features include an electric vehicle charging point, triple glazed low-e windows and doors, stone wool insulation and MVHR Counterflow heat exchanger. The site will also incorporate a new electric vehicle charging point to encourage sustainable movements from the site which complies with Policy DM5 (Parking).
- 6.18 The development has also focused on water efficiency. Water saving facets and fixtures including water calculations and specifications have been incorporated into the design stages to reduce consumption.
- 6.19 This Application is accompanied by an Energy and Sustainability Statement prepared by Zed Pods (informed by SAP10 Calculations undertaken by Low Carbon Box). The document outlines the anticipated energy strategy and associated emissions performance of the proposed dwellings.
- 6.20 The Statement-sets out how Zed Pods have reduced energy demands through the incorporation of energy efficient measures including insulation, air tightness, thermal bridging, measures to maximise internal daylighting and winter solar gains and MVHR systems. This demonstrates how Zed Pods have adopted a primarily fabric first approach and used renewable technologies to achieve its key aim to maximise Carbon Reductions. This will establish the development as achieving one of the highest levels of energy performance and an exemplar of sustainable design and construction within the Mid-Devon area.
- 6.21 The Statement confirms the energy demand across the development and energy will be produced by separate PV panels on the units rooftops-and the schemes water-efficient features and water savings every year.
- 6.22 The proposals results in negative Dwelling Emissions Rates for all of the proposed units and evidences that the overall scheme will result in net negative emission and compliance as a Net Zero Operational Carbon Development this results in savings of 17.7 Tonnes of Carbon Emissions for every year that the building is in operation.
- 6.23 It was concluded that the scheme would act as an exemplary example of low carbon development and would help the council to achieve their Net Zero Carbon targets by 2050. Please see enclosed Energy and Sustainability Statement for further details.
- 6.24 In 2019, Mid-Devon Council declared a Climate Emergency. In this context and given full compliance with national and local planning policy aiming to respond to climate change and promoting energy efficiency and low carbon design, significant weight should be afforded to the design of the scheme.
- 6.25 The scheme demonstrates compliance with local policies which promote sustainable development including Policy DM1 (High Quality Design); Policy S9 (Environment) and national policy. Paragraph 152 of the NPPF also further support the sustainable design features of the proposals, seeking to minimise carbon emissions and maximise opportunities to mitigate against climate change.

Access and Transport

- 6.26 In accordance with relevant advice and guidance, a Transport Assessment has been prepared by Via Solutions which confirms that safe and suitable access to the site will be achieved and it demonstrates that the proposals accord with national and local transport policies.
- 6.27 Two accesses are proposed for the development. The first will be gained from Market Close and the second from School Close. Both will provide footways providing pedestrian access into and out of the site. The report considers that the existing junction at School Close / West Street is not adequate to cater for the extra traffic however, the proposed widening along the eastern flank to increase the carriageway width from 4.5m to 5.5m is considered to be an improvement to the existing layout. A Visibility Splay Assessment concluded that 2.4 x 43m visibility splays are required along West Street.
- 6.28 A total of 38 Car Parking spaces are proposed on the site exceeding the requirement of car parking standards, requiring 1.7 spaces per dwelling. Due to the nature of the development being for social housing there is likely to be a lower level of car ownership and therefore at least 1 car parking space will be allocated per dwelling. The remaining spaces will be unallocated and available for wider use, to the benefit of the local community. Whilst car ownership is found to be lower for those living within affordable homes, the development proposals have sought to achieve policy compliance.
- 6.29 Adequate provision has also been made for communal safe and secure cycle storage on the site. In accordance with the requirements sets out in Policy DM5 (Parking) two cycle spaces are proposed for each one and two bedroom unit and four spaces are proposed for each of the three and four bed dwellings.
- 6.30 The development is in a highly sustainable location and is accessible to and promotes use of sustainable transport modes including pedestrians, cyclists and motor vehicles which demonstrates the schemes compliance with Paragraph 110 of the NPPF. The proposals accord with the principles set out at Policy DM3 and the proposed parking provision meets the Council's standards.
- 6.31 In summary, the highway proposals are considered to be safe and traffic impact negligible resulting in no significant impact on the highway network. On this basis, it was considered that there are no highway capacity or safety reasons why this development should not be granted planning permission.

Trees, Ecology and Biodiversity Net Gain

Preliminary Ecological Appraisal and Roost Assessment

- 6.32 The site is not subject to any restrictive environmental or ecological designations. A Preliminary Ecological Appraisal and Roost Assessment has been undertaken by Arbtech in support of the application.

6.33 The habitats on the site have been evaluated as to their likelihood to provide opportunities for relevant species. The key findings of the PEA are set out below:

- No notable impacts are anticipated to habitats.
- One of the buildings on site was identified as having a bat roost and therefore further recommendations are set out and the Applicant will commit to undertaking additional surveys where required.
- The development would result in the loss of low value grassland, hedgerows and shrubs within the existing gardens which is considered to be offset by the proposals flower rich perennial planting, hedgerow and the addition of 12 trees;
- The proposal would result in the loss of the small ornamental ponds and the surrounding stone-faced grass embankment, shrubs and hedgerows however this is considered to be inconsequential to local amphibians or invertebrates.
- The proposed development would not result in removal of any habitats that could be used by foraging or commuting bats.
- No impacts are anticipated on badgers. Hazel dormouse, otters, water vole,

In terms of additional surveys, the PEA makes the following recommendations:

- For buildings where roosting bats could not be ruled out, two bat emergence and re-entry surveys are required during the active bat season to confirm presence or likely absence of a bat roost in the building. A third emergence survey is required for the building where a roost was identified.
- It is recommended that a low impact lighting strategy should be adopted for the site during and post development. We consider this could be secured via planning condition.
- A precautionary working method will be implemented during construction for hedgehogs, amphibians, hedgehogs,
- Provision of a minimum of one bird box per garden area is recommended.
- Recommendations in relation to the presence of cotoneaster should be adopted during construction.
- For the protection of birds, it is recommended that works will be undertaken outside of the period 1st March-31st August and where this timeframe cannot be avoided a close inspection of the vegetation should be undertaken by a qualified ecologist.
- The BNG proposals demonstrate other habitat enhancement features that are proposed including new planting. Other habitat enhancement opportunities that could be explored further including bee bricks, green roofs or retention of deadwood on site.

- 6.34 We consider the PEA recommendations can be secured via suitably worded pre-commencement and/or compliance conditions.

Trees

- 6.35 An Arboricultural Report prepared by Arbtech is submitted in support of this application. The report is provided in the submission pack and includes a tree and hedgerow survey.
- 6.36 The tree survey identified a number of trees and hedgerows in the local area, however not all of these fall within the site boundary. We can confirm the site comprises 10 existing trees, 1 group of trees and 1 hedgerow.
- 6.37 The proposed development seeks to maximise tree retention on site. However, to facilitate the proposed development the removal of the hedgerow (H01), group of trees (G01) and trees T03, T04, T05 and T14 are required. The proposals have minimised tree loss where possible and involve the loss of Category C (low quality trees). In order to mitigate the loss of trees, a total of 12 trees are proposed by the development.
- 6.38 All existing trees that are being retained will be carefully protected during the construction period. We consider a suitably worded planning condition could secure the requirement for Tree Protection.

Biodiversity Net Gain

- 6.39 Biodiversity Net Gain calculations have been prepared by ArbTech and are enclosed with this application. It has been demonstrated that the proposals will achieve biodiversity net gain in accordance with local and national planning policy. Additional information on the landscaping proposals are enclosed within the submitted landscaping plans and Design and Access Statement.

Heritage

- 6.40 A Heritage Technical Note has been prepared by Cotswold Archaeology and is submitted with this application. The Note confirms that the site is not covered by any heritage designations and there are no heritage assets on the site itself.
- 6.41 The dwellings currently located on the site are post-war houses and not found to have historical significance. The Assessment acknowledges the key context relates to the Bampton Conservation Area adjacent to the site.
- 6.42 The Heritage Technical Note includes the assessment of known and potential below-ground archaeological remains. From an initial review of the Historic Environment Records, no archaeological remains have been recorded on the site. Furthermore, the 1889 Ordnance Survey map indicates that the Site lay in an area of enclosed agricultural fields with much of it within orchard. Overall, the current Heritage Note has indicated that the Site has capacity for change and that redevelopment is likely to be attainable.

- 6.43 Significant planting has been provided along the edge bordering the Conservation Area to the south, along West Street, ensuring mitigation of any potential harm on the setting of the Conservation Area. The proposals are considered to improve the appearance and architectural quality.
- 6.44 The proposed development would lead to substantial public benefits that would outweigh any limited harm to the Conservation Area and its setting. This therefore demonstrates the schemes compliance with local Policy DM25 (Development Affecting Heritage Assets) and paragraphs 194, 195 and 199 of the NPPF.

Sustainable Drainage

- 6.45 A comprehensive Flood Risk Assessment and Drainage Report has been undertaken to accompany this application, the conclusions from which are set out in the following paragraphs.
- 6.46 The report has acknowledged the sites location within Flood Zone 1 and is therefore is at the lowest probability of fluvial and tidal flooding.
- 6.47 The proposed development is considered to increase the impermeable drainage areas on site, in the form of buildings and access which will result in an increase in surface water runoff. To ensure that runoff will not increase flood risk elsewhere, flow control and attenuation on-site can be provided to restrict surface water discharge during storm and climate change events.
- 6.48 All methods of surface water discharge were assessed and where soakaways are not possible, discharge of surface water to the public sewer appears most practical subject to agreement with the Lead Local Flood Authority (LLFA) and SWW (South West Water).
- 6.49 It was considered that attenuation storage will be required on site to restrict surface water discharge which can be provided through permeable paving and grasscrete. The indicative surface water drainage strategy is enclosed at Appendix J of the FRA.
- 6.50 A connection to the public combined sewer system via the private foul system is considered feasible.
- 6.51 Several recommendations have been summarised below:
- To reduce flood risk, floor levels should be set to a minimum 300mm above the surrounding ground levels. The architects have confirmed that this is achievable and will be factored into details construction design.
 - A 3m clearance either side of the public sewers within the Site should be provided
 - With regards to the detailed Drainage Strategy design:
 - To determine the suitability of the infiltration techniques a BRE Digest 365 infiltration testing should be undertaken;

- Attenuation volumes should be verified when undertaking detailed drainage design;
- Undertake pre-development enquiry with SWW to confirm capacity within the public sewer network for the development.

6.52 The report has demonstrated that the site will not lead to increased flood risk and an indicative sustainable drainage scheme has been incorporated into the scheme showing compliance with Policy DM1. We consider a suitably planning condition can secure further detailed drainage design to be agreed with the Council and the LLFA prior to the progression of demolition and site clearance works.

Utilities

6.53 A Utilities Overview Assessment has been provided with this application, the report considers the existing and proposed services for the site and assesses the impacts of the proposed development on existing services. This will inform the proposed works and site and relevant parties will be consulted where required in relation to existing and required infrastructure.

Ground Conditions and Other Environmental Considerations

6.54 A Desk-Based, Phase 1 Ground Investigation report was undertaken by Structa and is enclosed with this planning application.

6.55 There is a low potential risk to human health with a low to very low risk to groundwater, surface water, service lines and neighbouring properties. However, the requirement for localised remediation of soils to protect the identified critical receptors cannot be discounted. It is anticipated that the use of contaminant resistant water supply pipes will mitigate the risk to service lines.

6.56 Given the ground conditions, traditional strip of or pad foundations are considered appropriate. It is anticipated that Made Ground and or Topsoil will be present at the surface and beneath hardstanding's across the site. Where Made Ground is of significant thickness consideration to an alternative foundation solution such as ground improvement techniques or piling may be required.

6.57 The completion of an asbestos survey is recommended along with an intrusive ground investigation ahead of the commencement of development works. We consider that these recommendations should be secured by an appropriately worded planning condition.

6.58 On the basis of that the information submitted is in support of this planning application, the proposal would not lead to significant risk to human health and suitable conditions can be attached to the permission there are no reasons why the proposed development should be refused based on ground conditions.

Waste Management

6.59 In accordance with the Pre-Application advice an Access and Waste Management plan have been undertaken by Zed Pods and is included within the accompanying Design and Access Statement. A Proposed Bin Storage Schedule has been detailed and a general waste and recycling store will be accommodated in private bin stores located to the front of each property. This demonstrates that appropriate provision has been for waste and the scheme is compliant with Policy W4 (Waste Prevention) in the Devon Waste Plan 2011-2031.

7. Summary and Conclusion

- 7.1 This Planning Statement has been prepared by Turley on behalf of the Applicant, Zed Pods, in support of a full planning application for affordable, residential development at School Close, Bampton. Full planning permission is sought for 18 new homes, comprising of 1, 2, 3 and 4 bedroom dwellings. One built, these homes will be managed and maintained by Mid-Devon Council in its function as a registered provider of social homes.
- 7.2 The Development Plan for Mid-Devon recognises Bampton as a well-placed location to accommodate additional appropriate scale of residential development which is needed in the District. This is highlighted by the classification of Bampton as a Village in Policy S13 which is suitable for small-scale development. The site is within close proximity to various services and facilities and is well-connected to public transport.
- 7.3 The proposed development will result in the loss of 10 existing homes however provides the opportunity to make best and most efficient use of a previously developed site to provide additional and better quality affordable homes to meet identified local social housing needs. The principle of the proposed development was agreed with the Council during pre-application discussions and is afforded significant weight in the NPPF.
- 7.4 The proposed development is of high-quality and sustainable design and the internal space proposed accords with Nationally Described Space Standards. Energy efficient and carbon reducing features such as photovoltaic solar panels and triple glazed windows ensure the proposals long-term sustainability. Furthermore, off-site construction not only ensures the time-efficient delivery of much needed affordable homes but also reduces the developments contribution to climate change.
- 7.5 The technical assessments and reports that are submitted in support of the planning application demonstrate that this site can accommodate the development and the proposals can come forward with an integrated approach to securing an economically, socially and environmentally sustainable development. There is a clear presumption in favour of sustainable development which is exhibited throughout the NPPF and local planning policy.
- 7.6 When considered against the Development Plan and the NPPF, the benefits of the scheme clearly outweigh any residual negative impacts and there are no policies or technical findings that indicate that development should be resisted in this location. It is therefore respectfully requested that the proposals be approved without delay.

Appendix 1: Planning Policy Matrix

Mid-Devon Local Plan 2013-2033		
Planning Policy Reference	Summary of Policy Requirements	Turley Assessment of Development Proposals at School Close, Bampton
Overview	<p>The Mid-Devon Local Plan sets out the strategic policies to achieve Mid Devon’s vision to achieve sustainable development whilst also benefitting local communities through promoting community well-being, supporting economic success, conserving and enhancing the area and respecting environmental limits.</p> <p>The Government is committed to achieving sustainable development and promotes community well-being through delivering diverse and inclusive communities; sufficient homes which the population can afford; ensures that social and environmental benefits of development are optimised and developments use land, energy and resources effectively.</p>	<p>The proposed development seeks to comply with the strategic policies and objectives set out by Mid-Devon through the provision of high-quality, sustainable homes which will increase the affordable housing stock. The scheme will make a more efficient use of currently underutilised land to provide a development which incorporates energy efficient and low carbon technology.</p>
Policy S1 (Sustainable Development Priorities)	<p>Policy S1 sets out a criterion to ensure that developments create sustainable communities through focusing development in Tiverton, Cullompton and Crediton. The policy seeks to deliver a wide mix of homes including affordable housing. The policy promotes sustainable design to meet the challenges of climate change and minimises the impacts on the historic environment.</p>	<p>The site is within the defined village settlement limits of Bampton where the scale of redevelopment proposed is supported. This is agreed by the Council in the pre-application advice provided. The proposals will meet policy criteria through delivery of affordable homes in a sustainable location, that protect the historic environment and will help to meet challenges of climate change through net zero design. A biodiversity net gain is achieved.</p>
Policy S2 (Amount & Distribution of Development)	<p>Policy S2 sets out the minimum the minimum requirement of 7,860 to be delivered over the plan period to 2033. 786 will be directed to rural areas.</p>	<p>The proposals accord with the policy and will contribute to housing requirement over the plan period in suitable rural areas, including Bampton.</p>

Policy S3 (Meeting Housing Needs)	Policy S3 sets out that Mid Devon’s housing needs will be met through the provision of 7,860 dwellings and 30% affordable dwellings will be delivered on developments of 6 or more dwellings outside of Tiverton, Cullompton and Crediton.	The proposals exceed the policy requirements and will deliver 100% affordable homes, available for social rent and managed by Mid-Devon for those identified as in need on the local housing register.
Policy S5 (Public Open Space)	Policy S13 outlines public open space standards within the area of Tiverton and the village contained within it.	The development will deliver new gardens for the new dwellings and includes community green space and a connection to neighbouring allotments. This was welcomed by the Council during pre-application consultation. The proposals will deliver high quality open space and noting the development is for a scheme of 100% affordable housing, the Council indicated a financial contribution towards other forms of public open space would not be necessary.
Policy S9 (Environment)	Policy S9 ensures that developments will sustain the quality, character and diversity of Mid-Devon’s environmental assets and minimise the impact on climate change through high-quality, sustainable design, the efficient use of land and resources, the provision of measures to reduce flooding, renewable energy development.	The proposed development engages sustainable design principles. The proposals focus on developing zero-carbon and energy efficient homes which utilise renewable energy through solar panels and highly efficient fabric design. The proposed development ensures that all of this proposal is compliant with this policy. The scheme incorporates high-quality sustainable design and promotes the efficient use of the land. In addition to this, the Energy and Sustainability Statement confirms that the scheme would act as an exemplary example of a low carbon development and would help to achieve their Net Zero Carbon targets.
Policy S13 (Villages)	Identifies the area of Bampton as a rural settlement that will be designated as villages suitable for limited development.	The proposed development is supported by this policy and its scale suitable for its location in Bampton was supported by the Council at the pre-application consultation stage.

Policy DM1 (High Quality Design)	<p>Policy DM1 ensures that the design of new developments must be of high quality and demonstrate a clear understanding of the characteristics of the site, its wider context and the surrounding area. The policy promotes the efficient and effective use of sites ensures that developments contribute positively to the local character and are safe and accessible and visually attractive. Developments must allow adequate levels of daylight, sunlight and privacy and make provision for suitably sized rooms and overall floorspace. The policy requires developments of 10 houses or more to provide 20% of dwellings which are build to Level 2 of Building Regulations Part M 'access to and use of dwellings'</p>	<p>The proposal is of high-quality design and is suitable within the local context. The scheme has incorporated sustainable design features including triple glazed windows and solar pv panels. The external materials including the cream silicone render is similar to that of neighbouring properties. The layout of the scheme accords with the surrounding semi-detached style and the height of the scheme has been carefully considered to ensure that it does not exceed the existing ridge height of the bungalows located along School Close and Market Close. The proposal demonstrates an effective and efficient use of land. Please refer to the Design and Access Statement which confirms that the proposal will not lead to harm to the surrounding area. The site will incorporate suitable sustainable drainage proposals and safe and suitable access will be delivered on the site.</p>
Policy DM2 (Renewable and Low Carbon Energy)	<p>Proposals will be permitted where they do not have significant adverse impacts on the character amenity and visual quality of the area. Proposals must demonstrate that impacts are or can be made acceptable in relation to:</p> <ul style="list-style-type: none"> - Landscape character and the character and setting of heritage assets. - Environmental amenity of nearby properties and the wider locality - Quality and productivity of the best and most versatile agricultural land (grades 1,2 and 3a) <p>Biodiversity (avoiding habitat fragmentation)</p>	<p>The proposals align with this policy through engaging sustainable, low carbon design and providing renewable energy proposals through new solar photovoltaic panels. The design of the development and inclusion of low carbon and renewable features will have no unacceptable impacts on surrounding area and environment.</p>
Policy DM3 (Transport and Air Quality)	<p>Policy DM3 outlines that developments must ensure safe access to the transport network and also seeks to ensure developments are accompanied by appropriate information where proposals give rise to significant levels of vehicular movements. The policy also seeks to manage air quality impacts.</p>	<p>The proposal is compliant with this policy and a Transport Statement and Travel Plan accompanies this submission demonstrating safe access and no significant impacts on the highways network. Accordingly, the proposals are unlikely to give rise to any significant levels of pollution.</p>
Policy DM4 (Pollution)	<p>Policy DM4 ensures that developments will not lead any pollution or negatively impact the quality of the environment.</p>	<p>The development will not contribute to any significant impacts on air pollution and will not lead to any detrimental to harm to quality of the surrounding environment. Relevant information to</p>

manage the impacts of the development is provided within the accompanying technical documents including the transport documents, drainage strategy and FRA, and the Energy Statement confirming the low carbon emissions of the sustainable net zero design.

Policy DM5 (Parking)

Policy DM5 outlines the parking requirements. 1.7 car parking spaces are required per dwellings. The minimum cycle parking stand is 2 spaces per 1 or 2 bed dwelling and 4 cycle spaces per

Residential	Description	Location	Minimum car parking standard	Minimum cycle parking standard	EV Infrastructure (Tiverton, Cullompton and Crediton)
C3, C4	Dwellings	General	1.7 per dwelling	1 or 2 bed= 2 per dwelling 3+ beds= 4 per dwelling	1 charging point per 10 units

The development proposes 38 car parking spaces which is excess of this policies requirements. The scheme has allocated 1 car parking space per dwelling and the remaining spaces will be available to existing residents which the Transport Assessment considered to be adequate. In accordance with this policy, provision has been made for 48 cycle spaces which will be located within secure cycle storage.

Policy DM25 (Development affecting heritage assets)

Policy DM25 seeks to protect heritage assets by applying a presumption in favour of preserving (or enhancing) designated heritage assets and their settings. Development proposals likely to affect the significance of heritage assets are required to consider their significance and relevant design matters. In accordance with the test in the NPPF, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

The proposal is compliant with this policy. A Heritage Statement accompanies this submission and describes and assesses the local heritage context (the Bampton Conservation Area and listed buildings in proximity of the site). The Assessment concludes that there are no heritage reasons that would preclude the proposed development.

Policy DM26 (Green Infrastructure in major development)

Policy DM26 requires major development proposals to demonstrate that green infrastructure will be incorporated within the site through biodiversity mitigation, resulting in net gain in biodiversity and new green infrastructure such as the creation of native woodland where possible

The proposal is compliant with this policy. The loss of existing trees has been minimised and is mitigated by proposals for new tree planting and other planting. A Biodiversity Net Gain is achieved.

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