



Vistry Homes Ltd  
Cleeve Hall  
Bishops Cleeve  
Cheltenham  
GL52 8GD

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Sent by email to: [Fiona.Milden@vistrygroup.co.uk](mailto:Fiona.Milden@vistrygroup.co.uk)

Dear Fiona

**Design West Review Panel**  
**DWSW312**                      **17 November 2021**  
**Vistry Housing, Fremington, North Devon**

Thank you for inviting the Panel to review your scheme and for your presentation. As you know, we first reviewed this scheme on 23 March 2021. This letter supercedes our letter of 7 April 2021. As there is now a planning application, this letter (unlike the first) will be a public document.

Before the first review a member of the Panel undertook a **site visit** and the whole Panel had the benefit of their report and the drone footage you showed us.

We acknowledge the way you have constructively engaged with the comments arising from the **first review** and a better scheme has resulted. Important reservations persist, however.

The **principle of development** is at issue here since this is not an allocated site, and it is outside the defined development boundary for Fremington & Yelland. The Panel wishes to be clear therefore that it is not our role to give a view on the merits of this site compared to other unallocated sites that have been, or might be, put forward for possible development. Our role is to help you and North Devon Council (the LPA) bring about the best possible scheme – but only if development of this site is considered acceptable.

The Panel had two fundamental and related **reservations** about the scheme at the first review: access and how it relates to the form of the village. We take these in turn.

First, the **vehicular access**. This remains at the same location and has not changed significantly since March. The Panel thus repeats the comments from the first letter as these still apply:

*St. Andrews Road is a quiet, narrow, residential cul-de-sac that is not well suited to accommodate the traffic that would flow from a scheme of this size – perhaps 1000 person trips a day. Even this unsatisfactory access can be realised only by demolition of*

Design West  
16 Narrow Quay  
Bristol BS1 4QA

[www.designwest.org.uk](http://www.designwest.org.uk)

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VAT no: 664 3455 24

*one bungalow with a new road replacing it between two other bungalows. The adverse reaction of residents can be imagined - that would mean an unhappy situation not only at planning stage but perhaps later too. There appears to be no alternative feasible access arrangement to that envisaged.*

Second, how it relates to the **form of the village**. The comment we gave last time is only partially allayed by the changes to the scheme. We wrote:

*The form of Fremington, as villages generally, is to have a core with buildings close together and a lower density beyond, typically with the greatest informality and lowest density where the village meets the countryside. This scheme, however, bids to leapfrog the low-density, established and intended edge and then place a higher density beyond it. It would therefore present an anomaly in village form that would jar against the prevailing form and grain and make the village less legible.*

The layout now is an improvement on the one we saw eight months ago. It is more relaxed and village-like and is less dominated by vehicular routes. We welcome these revisions. But the fundamental anomaly remains.

Taking the two reservations together, the scheme would still be a cell or pod added to the village, a development with a single point of vehicle access, a cul-de-sac on a cul-de-sac, not integrated well with the village, and not enhancing the character or permeability of Fremington.

As we said before:

*That the site to the east has been developed is not a precedent, in our view, since that had been a brownfield site. Development of land to the west may be unlikely but it is never wise to close off options, and the LPA might advise on this point.*

*It would be preferable to establish the **needs of Fremington** and then to assess what sites, if any, might be brought forward before a decision was made as to the relative merits of your site. In fact, a neighbourhood development plan is being prepared and we would encourage you to engage with this process. Possibly, were the principle of development here to be accepted in the emerging plan, there could be a co-design exercise on the scheme.*

It could help to an extent if the **number of homes** in the scheme was reduced. A less dense scheme would be less anomalous on the village edge. It could more easily relax into the landscape and offer a softer edge to the sensitive ecological areas to the north – and the full site is edge, not just the unbuilt portion. It would generate fewer vehicle movements and so somewhat ease the impact of the single access. At the same time, **tightening the layout** to release more land for green landscape and less for hard surfaces would be similarly beneficial. We hope you might do both. Quite possibly, fewer houses and more green infrastructure would lead to higher property values.

The Panel would couple with this density and layout suggestion a reiteration of our point before about proclaiming the scheme in and contributing to the **North Devon UNESCO Biosphere Reserve**. We said:

*The array of designations can be viewed as a constraint but could also be celebrated – making a virtue of the ecological and natural richness of the wider area. The site is in the centre of the North Devon UNESCO Biosphere Reserve, an international designation that is not merely protective but is there ‘to inspire a positive future by connecting people and nature today’. Your scheme could exemplify how connections can be made by a sensitive scheme between people and nature. The scheme’s identify or ‘tag line’ could pick up its place amid the Biosphere. It may well be that these special rural and natural characteristics would be a factor in drawing people to relocate to this area in the first place and they need to be maximised.*

The Biosphere Reserve did not feature in your presentation to us. The Panel considers that it should be *a key*, and perhaps *the*, driver of the whole scheme. The entirety of your proposals should be geared to people and nature *together* – and we have more detailed ideas below. This should be the story you tell about the scheme. Study of other Biosphere Reserves and successful developments within them would be useful.

Linked to this, we would encourage you to rethink the **northern field** so that the scheme is a clearer and more positive proposition for the Biosphere Reserve. Given the importance for nature conservation of the estuary and its fringes, we urge you to consider formally making the northern field a Suitable Alternative Natural Green Space (SANG). It would then primarily be a buffer zone in which development is constrained, indeed best if there is a binding commitment to secure it in perpetuity as undeveloped land with its advantages fully maintained. Such would give reassurance that development is not creeping towards the estuary (see also below our comments relating to the Tarka Trail).

It would be beneficial in our view if the **sports pitch** could be taken out of the proposals, so that the northern field can become wholly natural, and the overall development concept clearer and stronger. Tempting though it might be to meet a village need for football, the pitch would be an urbanising influence, possibly once conceded leading on to changing and storage huts, parking, lights and so forth.

Also, we do not see the rectilinear **area of marsh** marked off in the northeast for biodiversity gain as being viable long-term, surrounded as it is by unsupervised active agriculture. With the Biosphere Reserve as a driver, the complete field would serve nature before anything else and there would be no need to set aside a patch in this way.

Maintaining access for the farmer to the larger fields to the east would not be an issue in our view. Indeed, having agricultural access through the village extension would add to rather than detract from its rural character.



A skilfully designed scheme could even provide supplementary inland habitat for some of the key species of the nearby SSSI, whilst also reducing recreational pressure in even more vulnerable sites nearby.

Last time we saw the connection to the **Tarka Trail** as the major benefit to the community and we recommended that you make the most of the opportunity. The route is clearer than before. The Panel continues to back the link and it chimes with the emphasis in the ethos of the North Devon UNESCO Biosphere Reserve on people and nature together. However, the stricture of Natural England that ideally there would be no connection, due to concerns about increasing disturbance pressure to waterfowl of the SSSI /SAC, will make it harder for the LPA to embrace this as a key benefit. Offering a convincing and sizeable SANG that is also highly biodiverse and carefully designed (see above) could be key in reducing Natural England's level of concern.

The climate emergency, biodiversity crisis and the Biosphere Reserve context ought to cue a scheme with high ambition in **environmental sustainability**. Yet such an aim did not come through in the presentation – though particular items are welcome such as food growing, EV charging, homes for working, and responsible sourcing. The statement about 'more work' on sustainability strategies disappointed us since such thinking ought to be undertaken early in the design process and should inform the emerging proposals.

It is encouraging to see the thought being given to habitat creation and enhancement and to hear that you envisage a significant net gain. We note that Biodiversity Net Gain is now a legal requirement due to the Environment Bill recently obtaining royal assent. Nonetheless, we repeat this from the first letter that:

*We hope you will regard the overall 10% net gain not as a target but as a minimum to be exceeded. There are many ways not only the public green spaces but also the streetscape and private plot planting can have high value to native fauna and heightened biophilic appeal.*

As we added before:

*Both formal and informal landscape can work for nature... the ecological character of the surrounding countryside could be brought into the heart of the scheme and to the new residents' very doorsteps. ...Residents could take pride in seeing wildlife near their homes and in their role in safeguarding species.*

*It might well be fruitful to consult the following new guidance in this regard:*

[https://www.researchgate.net/publication/332230725\\_Nature\\_Based\\_Solutions\\_-\\_Technical\\_Handbook](https://www.researchgate.net/publication/332230725_Nature_Based_Solutions_-_Technical_Handbook)

*And,*

[https://platform.think-nature.eu/system/files/thinknature\\_handbook\\_final\\_print\\_0.pdf](https://platform.think-nature.eu/system/files/thinknature_handbook_final_print_0.pdf)

In relation to the above, the Panel welcomed the new inclusion in the plan of the **green/blue corridor**, and we particularly commend the way this is not open to vehicles. In fact, we would

like to see it full length, reaching southeast to meet the green link to the informal southeast-corner access. This route would then be more significant than the vehicular routes, so establishing the forward-looking credentials of the scheme in promoting active travel. This would also strengthen the landscape in the scheme – throughout the scheme that is, not mainly on the edges.

This green corridor, if extended, would have greater value in your biodiversity strategy. It could be described, if unlit, or lit in a highly bat-sensitive fashion, as an attractive bat foraging and commuting route connecting to the Fremington Local Nature Reserve. Your ‘welcome’ for bats could then be an exciting strand in the nature narrative for the scheme. Reptiles could potentially use the corridor too and we would envisage linear rockeries (that ensure mowing does not wreck their value) forming an important wildlife refuge right in the heart of the scheme.

The **swale** in the corridor is welcome. Water is always a draw for people and is core to the biophilic design canon. Could there be water in the heart of the scheme that is an amenity feature as well as serving a drainage role? Might the basin in the northern field be smaller but with its attenuation function partly met by a two-stage detention pond with freeboard to take flood volumes, amid the housing? To reach its full potential in drainage and biodiversity terms it should be codesigned by a wetland ecologist and engineer and landscape architect working closely together.

We understand that you plan greater landscape design development of the northern **field** (as shown to us it seemed more contrived than natural in feel). It would help to use level changes and planting to create reveals, so one does not see all as one enters. We hope trees put in will be native species and the diagram suggests they would be clumped which should aid biodiversity value. However, noting that scrub is typically a much more important bird nesting habitat, we strongly suggest that there be a mosaic of copse and thorny scrub patches large enough to attract some of the less common countryside songbirds.

We were unclear what the **visual impact** of the scheme would be and ask that this be made clear. This should cover near views such as from the Tarka Trail and distant ones (the site is overlooked by an AONB).

The **street typologies** are clear and the hierarchy legible. There might be discussion of the **parking** standards as some easing of the requirements may be possible in Fremington with its bus routes and the nearby Tarka Trail connecting well with Barnstaple train station. A car club would be worth considering for a scheme of this size, especially if parking was reduced. We suggest making bike storage as handy as possible so that it is easier to get on a bike than in a car. Beyond the site, the right turn from St Peter’s Road into St Andrew’s Road appears tight and you might discuss this with the Highway Authority. It is in your favour that your location is sustainable with the right connections.



While we welcome an informal **layout** in general, we think there might be more formality in a few places to give variety and interest and to aid legibility. Houses could frame say the allotments and larger spaces. We suggest a different typology on the blue/green route. The layout is a little complex and could be simplified (drives as well as roads). The layout could also do more to accentuate desired routes and discourage undesired ones such as northeast to a dead end. The examples in the National Design Guide might be instructive.

The Panel would encourage a conscious effort to form **interactive spaces** to deliver social value, from the allotments to pocket green spaces. You might engage with local residents about how they might wish to use spaces in the scheme, and what destinations they would like, including their interaction with nature.

It is early to comment on architecture at outline stage, but we felt the indications shown were unpromising if the aspiration is a special scheme for a special site. Study of exemplary schemes elsewhere and bringing in architectural advice would be good. Examples in [The National Design Guide](#) and in the [RIBA Award Winning Homes](#) are a good starting point. Natural materials would support local cohesion and sustainability.

To repeat:

*There are examples worth examination of landscape-led housing schemes where a multidisciplinary team have worked closely together to develop an integrated approach. For example, Uplands, Nailsea that addresses the transition into rural landscape and supports and enhances wildlife, <http://www.mikhailriches.com/project/the-uplands-nailsea/#text>*

You start with a significant site in a sensitive location, and it will undoubtedly be a challenge to obtain a consent and to win local support. The Panel would say that setting a new development boundary encroaching on the countryside and its special estuarial character would require a justification greater than a contribution to housing supply. You should set out the benefits to the village and beyond.

At the same time, we see potential for a scheme that has a sense of place and offers its community the experience of being in nature and having close links with nature. It could be a unique scheme that offers something new and exciting to Fremington and becomes an exemplar in its own right.

Yours sincerely

**Timothy Cantell, Panel Secretary**

**Design West**

Panel Members for this review:

Design West  
16 Narrow Quay  
Bristol BS1 4QA

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Registered Charity no: 290575  
VAT no: 664 3455 24



Juliet Bidgood	Architect (Chair)
Justine Leach	Landscape Architect/Urban Design
Jackie Gillespie	Architect
Mike Wells	Ecologist/Ecourbanist
Jon Tricker	Transport, Engineering and Placemaking

cc Darren Beer, Focus on Design  
North Devon Council  
Devon County Council  
Julie Tanner, Design West

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