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Dear Ms Maryan,

RE – East Cullompton Masterplan SPD Stage 1: Issues, Opportunities and Concepts Consultation, December 2018

Thank you for providing the opportunity to comment on the above document. The strategic scale of growth proposed as part of the East Cullompton allocation will have a significant impact upon a range of infrastructure and services for which the County Council has responsibility. As such we welcome the early opportunity to be involved in the production of the Masterplan SPD and look forward to working closely with you as the document evolves.

Delivering significant infrastructure projects in a timely manner can present a number of challenges but is vitally important to ensure communities have access to necessary facilities. The draft SPD refers to identifying new mechanisms for funding and delivering infrastructure and we are keen to work with Mid Devon District Council to explore potential opportunities further to help deliver infrastructure earlier.

Please note we have provided a separate response to the parallel consultation undertaken on the draft Vision and Concept document for the wider Garden Village proposal although there is a degree of overlap in our responses given the relationship between the two documents.

Our comments on the draft document are given under specific topic headings below. This letter also provides the response in relation to primary care from the NEW Devon Clinical Commissioning Groups.

Local transport provision

As the Highways Authority, Devon County Council has been engaged throughout the preparation of the Local Plan Review on the transport requirements associated with this site, notably those set out in proposed policies CU7 (East Cullompton), CU8 (East

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Cullompton Transport Provision) and CU12 (East Cullompton Phasing). We have also been engaged on transport matters through the design review process undertaken so far and will continue to support this process going forward.

The development of a sustainable and holistic transport strategy will be fundamental to ensure development impacts at East Cullompton are managed and mitigated in an appropriate manner. As such we welcome the identification of "*A well connected and integrated new place*" as one of the nine key principles for the garden village.

Existing access and movement arrangements at the site are covered on page 22 of the document. This appropriately covers all modes including walking, cycling and public transport. Pedestrian and cycle routes between the Garden Village and the existing town will be vital to overcome issues of severance. Attractive routes will also need to link to the train station.

In relation to buses, there is no mention of the bus route which connects Tiverton, Cullompton and Exeter which is surprising given the reference to the smaller town services and the Falcon service. The bus strategy should be agreed with Stagecoach who have been to initial Garden Village workshops and should be included going forward.

Page 22 outlines that there is a pavement on both sides of Honiton Road. However, this pavement stops on both sides once you get past Mole Valley (albeit there are private shared surface roads to the south which run back into a footway on the south side out to the bridge). The document should be updated accordingly.

Page 28 provides a summary of the key features to be included in the travel and movement strategy for the site. This should set out that a key principle for the East Cullompton allocation and wider Garden Village is for walkable neighbourhoods and permeability for non-car modes. It is stated that "*Segregated pedestrian and cycle paths over the M5 will be explored.*" Consideration should be given to the need for more than one crossing point of the M5, one of which could be an attractive, direct, standalone route. This provision should be explored in the context of the potential to adapt existing crossings or delivering a new bridge. Such discussions will need to take place as part of a wider transport strategy for the allocation and should not preclude the delivery of appropriate strategic junction improvements. The transport strategy should also encourage the use of electric vehicles and the use of shared mobility, i.e. car and cycle clubs.

Honiton Road will play an important role both in terms of transport functionality and place making and as such a holistic strategy will be required. The draft Masterplan identifies Honiton Road as a strategic highway link in the Access and Movement plan (Figure 14) on page 28, with new junctions providing key connections to the wider site's internal layout. The principle of linking roads into Kingsmill Industrial Estate is supported but the contact point suggested in the diagram on page 28 is not consistent with the comments on page 22. There are currently two options for the potential strategic motorway access solution, one as shown in Figure 14 and the second being a major intervention at the existing junction 28. A decision has not been made on the final option at this stage but if the latter option is pursued, a strategic link between junction 28 and Honiton Road through the CU17 proposed allocation and the adjacent land identified for green infrastructure will be required. The document and associated plans should be updated to reflect this position.

In accordance with the Local Plan, the draft Masterplan SPD acknowledges the significant improvements to Junction 28 of the M5 or new access which will be required to facilitate this development. A number of options have been considered at this stage and further

work will be required as the proposal progresses to identify a preferred option. The County Council considers that no more than 500 homes will be able to come forward without this strategic intervention. It should be noted that the location shown of the strategic motorway access in Figure 14 is not in keeping with the preferred town centre relief road option which would place it further towards the south adjacent to Dukes Street.

The document outlines that bus stops *could* be placed at regular intervals to ensure that all residents were within walking distance of planned services. We suggest they *should* be. It would be necessary to ensure appropriate bus stops in relation to the school/s locations

Finally, various plans in the document refer to the “*Potential closure of Old Hill Bridge.*” The approach to Old Hill Bridge will be dependent on the transport strategy. This route could either be retained as a highway, demolished to enable a new junction or left open as a pedestrian/cycle route. An appropriate approach will need to be identified in future as the proposal progresses.

Education Provision

Devon County Council is supportive of the positive approach that has been taken in the draft Masterplan SPD in relation to education provision. The delivery of appropriate education facilities will be critical to ensure the creation of a sustainable community at East Cullompton.

The education strategy outlined on page 31 of the document is consistent with what has been put forward through the Mid Devon Local Plan review. As stated in the document, there are currently two potential scenarios identified for primary provision. The County Council accepts both scenarios, but it should be noted that there are cost implications of delivering the two-school option. This will be more expensive to build and result in a bigger land requirement (a 3 form entry school would require a site of 2.5 hectares and the two school option would require 3 hectares split across a 1.1 hectare and 1.9 hectare site). All new primary schools should incorporate appropriate early years provision and a children’s centre service delivery base. All development will be required to contribute to the delivery of the primary provision on site.

We can confirm that whichever scenario is pursued, primary school provision will need to be available as part of the first phase of development. Due to existing schools within the town forecasted to be at capacity and other primary schools not considered to be within safe statutory walking distance, it will be necessary for the new primary school to be open upon occupation of the first dwelling. In order to achieve this within a timely manner it will be necessary to identify and agree detailed triggers for key stages in the school’s development as part of the legal agreement for the site. We note that it is intended for the next version of the Masterplan SPD to include information about implementation and phasing for infrastructure and we can provide further details to inform this section of the masterplan with regard to primary school delivery. The school/first school should be located accordingly within the development to facilitate early delivery and have road frontage to support this.

With regard to secondary education, the draft masterplan correctly identifies that around 390 secondary aged pupils are expected to be generated as a result of this development (the full 2,600 dwellings). Devon County Council has undertaken design work to establish how Cullompton Community College can be expanded from a 5 form entry to 8 form entry secondary school to accommodate this growth in pupils. Developer contributions will be required to fund the necessary expansion. The draft masterplan indicates that the

emerging access and movement concepts for the site can enable safe and convenient walking and cycling routes across Honiton Road and the M5. This is fundamental to for the County Council to accept the proposed secondary education strategy.

In order to accommodate secondary aged pupils across the wider Garden Village site (5,000 dwellings), a new secondary school is proposed as part of an all through education campus. Consideration should be given to bringing the delivery of the new secondary school campus forward earlier in the development phasing if the development of the Garden Village is accelerated. This will minimise the potential capital outlay of additional provision in the existing town. For the new secondary school to be educationally sustainable it will require all children living in the garden village to attend.

1.5% of school aged children will have special educational needs (SEN). It is envisaged that a new SEN school will be provided as part of the wider garden village proposal. This could be provided alongside primary and secondary provision on site, potentially as part of a wider education campus. Whilst it will not be provided until a later date, this development should contribute towards this facility, and as such the masterplan should indicate financial contributions will be required. Again, we would welcome the opportunity to bring this provision forward at an early phase within the development.

Finally, Figure 4 on page 9 of the document includes a concept plan of the Local Plan Review proposed allocation and the wider area to be covered by the Culm Garden Village. We have a number of comments on this concept plan which have been set out in full in our response to the parallel consultation being undertaken on the Culm Garden Village Vision and Concept document. In addition to these comments, the primary school provision shown in Figure 4 is different to that shown in Figure 15 on page 36 of the document. Figure 4 reflects the single primary school scenario discussed above whereas Figure 15 represents the two primary school scenario. Figure 15 also numbers the two school locations, indicating an order of preference which is at odds with Figure 4. Plans and their supporting text should be consistent about the primary school options to avoid confusion. The location of both sites is noted.

Waste Disposal

In the development of the Local Plan Review, Devon County Council outlined the requirement for a new recycling centre to serve Tiverton, Cullompton and Willand as the existing Ashley site in Tiverton is not sufficient to accommodate the increased demand from an enlarged population. At the Local Plan Review examination hearings in February 2019 it was agreed that relevant policies, including CU10 (East Cullompton Community Facilities) and CU20 (Cullompton Facilities), would be updated to include reference to a new recycling centre and the need for development to contribute financially towards its delivery.

A site for the new recycling centre is yet to be identified although the County Council is proactively looking for a potential site. We would welcome the opportunity to discuss the potential for locating this facility within the East Cullompton allocation, or indeed the wider Garden Village, ideally within an appropriate part of the employment area. The site would need to be approximately 1.2 hectares and have good road access.

It should be noted that the strategy for the new recycling centre is fluid and we are currently also considering the potential need for a second new facility in the area at Tiverton.

Waste Planning

The need for the development to be masterplanned in a way which enables sustainable waste management is not referred to in the draft SPD and this should be addressed in future iterations of the document. We would expect sustainable waste management to feature within at least one of the 9 key principles set out for the wider Garden Village on pages 10-11. It is important that the layout and design of the site provides adequate space for waste storage and promotes opportunities for waste to be managed as far up the waste hierarchy as possible.

Devon County Council is the Waste Planning Authority for the site and as such, relevant waste policy and guidance produced by the County Council should be signposted in the Masterplan in order to assist the developer looking to deliver the site. Notably this includes the adopted Devon Waste Plan, available at: <https://new.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/devon-waste-plan> and also the Waste Management and Infrastructure SPD available at: <https://new.devon.gov.uk/planning/planning-policies/minerals-and-waste-policy/supplementary-planning-document>.

The SPD provides guidance to local planning authorities and developers to assist in implementation of three of the Waste Plan's policies dealing with waste prevention, waste management infrastructure and the protection of waste management capacity. The SPD is a material consideration when determining planning applications.

We are happy to provide further advice on this matter as necessary in developing the next iteration of the Masterplan.

Historic environment

Both the Culm Garden Village and the East of Cullompton Allocation sites occupy large areas within a landscape known to contain evidence of prehistoric and Roman activity, the modern town of Cullompton to the west contains evidence of prehistoric as well as Roman military and civilian settlement - including a Roman military fort. The surrounding landscape also contains evidence of activity from these periods too, while the current field system and farm landscape here dates to the later medieval and post medieval periods.

To the east there is evidence of Roman iron working as well as place names such as 'Orway' and Stoneyford' that could indicate the presence of a Roman road between the settlement at Cullompton and the iron ore extraction industry operating up on the Blackdown Hills. As such, there is the potential for this landscape to contain evidence of prehistoric and Roman activity in the form of buried archaeological and artefactual deposits. However, the Historic Environment Team is unaware of any formal archaeological investigation being undertaken in this area.

In the absence of information on the archaeological significance of any heritage assets with archaeological interest that may be present and affected by the proposed development, the County Historic Environment Team would advise that future iterations of the Masterplan should be supported and informed by the results of a programme of archaeological work, consisting of:

- (i) geophysical survey of the site followed by
- (ii) field evaluation of the site to understand the significance of any heritage assets identified by the survey and test the efficacy of the survey itself.

The results of this work may influence layout of the development as well as Green Infrastructure within the developments. The County Historic Environment Team can also provide advice of the scope of the works required, as well as contact details for archaeological contractors who would be able to undertake this work.

In addition, enhancement of historic landscape features such as orchards and catch-meadows should be identified within the Masterplan.

Finally, in relation to page 17 of the document, it would be helpful to explain how the heritage setting areas associated with the listed buildings have been defined.

Surface Water Flooding

The document generally considers the presence of Flood Zone 2 and 3 and would benefit from a wider consideration of all local flood risk, such as surface water and groundwater flooding.

Under the Flood and Water Management Act 2010, Devon County Council has been established as the Lead Local Flood Authority (LLFA) responsible for managing local flood risk from surface water and groundwater.

The risk of flooding from surface water map has been developed for Devon to inform where there is surface water flood risk. This dataset indicates the surface water data that best represents local conditions and was reviewed, discussed and agreed between the LLFA, Environment Agency and other local partners. It should be used alongside the existing Environment Agency Flood Zone Maps by Local Planning Authorities in the planning process, assessing flood risk and reducing the potential risk from any new developments.

Sufficient space should be set aside within the masterplan for above ground attenuation features, as part of a wider sustainable urban drainage strategy (SuDS), which should be designed to be sympathetic to the landscape as well as biodiversity. The hydraulic modelling of the existing watercourses and drainage network will be crucial and we look forward to seeing the results of this study. It would be useful for infiltration testing and groundwater monitoring to be considered at an early stage in the design process which will aid the design of the surface water drainage network. We can provide further information and advice on this if necessary.

Since this scheme is 'landscape led' it would be beneficial to provide 'green/blue corridors' for wildlife and surface water/watercourses within the development to increase the amenity within the area. This would also have the added benefit of helping with ownership/maintenance of the SuDS by integrating them well into the community. The proposed primary school provides an opportunity to showcase exemplary SuDS design which can be used for educational purposes..

In terms of detailed comments, Figure 4 on page 9 of the document does not clearly display the extent of flood zone 2 and 3. The same applies to other figures that have flood zone mapping. The plans should be updated to be clearer.

In relation to the Flooding and Drainage section of the document on page 20, the 3rd paragraph which currently refers to "*nature based solutions*" should be amended to read "*Natural Flood Management based solutions*". This page also refers to much of Cullompton being within a Critical Drainage Area, however the site itself is not within this designation.

Further information and guidance to inform the Masterplan SPD in relation to Sustainable Drainage Systems is available at:

<https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/>.

Health and Wellbeing

We support the key principle of creating a healthy living environment and welcome the Masterplan's inclusion of opportunities for residents and visitors to use green and blue infrastructure. Outdoor usable space is vital for physical, mental and social health and wellbeing. Attractive walking and cycle routes will promote active and recreational travel while open space in general provides opportunities for many groups to enjoy leisure activities for the benefit of wellbeing.

The local centre (s) should be located near to an area of housing and be walkable for the local population. The uses should be based on the needs of the local population. We would request that there is a balanced offer of healthy food provision. We also encourage careful consideration of the proximity of any fast food provision in relation to facilities that are predominantly focused at children, to reduce the risk of contributing towards childhood obesity.

Community facilities that encourage people to interact include spaces such as libraries, cafés, community centres and public spaces for groups to meet in. This will support the establishment of a local community. In relation to question 8, managing facilities will require resources and will provide an opportunity for local people to improve skills. Promoting opportunities for local residents to volunteer their time will also create opportunities for community cohesion and skill development. In terms of funding required to maintain facilities, further thought will be required over the long-term stewardship arrangements of the development.

In terms of health care provision, an assessment of health and care need would be required for the population, involving primary care, secondary care, mental health, public health nursing and pharmacy. Any services should be appropriate to the needs of the population and in should support positive health and wellbeing messages, e.g. active travel, physical activity, healthy food etc.

Finally, there is an inconsistency with how the third principle is currently worded in different parts of the SPD. Page 8 refers to creating, "A healthy living environment" and page 10 refers to "creating a healthy environment and living". This should be revised for consistency.

Economy and Enterprise

In order to create a sustainable community at the Garden Village it is necessary to ensure the development of homes is coupled with the provision of jobs and employment space. This requirement has been included within the Vision and Concept document and this is supported. We welcome the inclusion of "*Ambitious employment opportunities*," as a key principle. We strongly support the concept of providing good quality employment in a high-quality environment. Design should be innovative as this will be essential to attract new and business to the area. There needs to be a mix of well-designed premises with good internet connectivity which should include work-hubs.

General comments

Page 21 of the document considers the impact of the electricity transmission lines which are present at the site. These are considered to be a fixed constraint. This section describes the potential for the lines to be incorporated into green infrastructure. This would need careful consideration as their presence would have a significant impact on green infrastructure functionality and its attractiveness. In addition, there are a series of perched watercourses across the site which lend character to the area. Consideration should be given to how these could be accommodated positively within the development as part of Green Infrastructure.

GP Provision: Response of the NEW Devon Clinical Commissioning Group

NHS Northern, Eastern and Western Devon CCG is the commissioner for primary and secondary care health services in Cullompton and have provided the comments below in relation to the draft Masterplan SPD.

In light of the substantial population increase which would arise as a result of these proposals, the CCG is discussing how services will be provided for this area. At the current time, no decision has been made about whether to increase capacity at existing facilities or to seek a new facility to cover the development. An existing provider of primary medical services in Cullompton has also expressed their concern regarding the level of population growth in the area at a time where recruiting GPs poses significant challenge.

The CCG will continue to feed in to the development plans and work jointly with its partner organisations. Following the emergence of an appropriate strategy based on robust evidence, it is likely that developer contributions will be sought towards appropriate provision to allow for increased healthcare capacity in the area.

I hope these comments are useful in progressing the Masterplan SPD. If you have any questions, please do not hesitate in contacting me.

Yours sincerely,



Mike Deaton
Chief Planner