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28th February 2019

Dear Ms Maryan,

RE – Culm Garden Village Draft Vision and Concept document, December 2018

Thank you for providing the opportunity to comment on the above document. The strategic scale of growth proposed as part of the Garden Village 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 Vision and Concept document and look forward to working closely with you as the document evolves.

We note that “*Delivery and Stewardship*” has been identified as a key principle embedded within the Vision and Concept for Culm Garden Village and we support this principle. However, we consider the document could strengthen its focus upon the need to identify new and innovative mechanisms for infrastructure funding and delivery to enable early provision of infrastructure and to maximise community benefit. This has proven to be successful at boosting housing sales in other parts of the county. We welcome the opportunity to work closely with Mid Devon District Council in exploring opportunities associated with this matter further.

Please note we have provided a separate response to the parallel consultation undertaken on the draft Masterplan SPD for the proposed East Cullompton allocation 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, as follows.

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 Cullompton Transport Provision) and CU12 (East Cullompton Phasing). We have also

been engaged on transport matters through the design review process undertaken so far for the whole site and will continue in this role going forward.

The draft Vision and Concept document is a high-level document which sets out key principles to be embedded at the heart of the development. The preparation of a sustainable and holistic transport strategy will be fundamental to ensure development impacts at the Garden Village 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. 4 of the 5 objectives identified for this principle on page 17 of the document specifically relate to transportation. These are supported.

It is necessary to develop a holistic transport strategy for the Garden Village which appropriately considers all modes. Fundamentally it should address the need for strategic junction improvements, provide attractive and integrated public transport links and facilitate high levels of walking and cycling across the site and into the existing town.

Education Provision

Education facilities are widely regarded as forming a fundamental part of any community and can provide a hub for other community activities. As such there is a critical need to ensure appropriate pupil places are planned for as part of the Garden Village. The development of 5,000 homes will require new education facilities including both primary and secondary provision. This scale of development can be expected to yield 1,250 primary aged pupils and 750 secondary aged pupils.

The concept proposals plan on page 32 of the document indicates one “*potential primary school*” within the Mid Devon Local Plan proposed allocation boundary. It is envisaged that this primary school will be a 3-form entry school, offering 630 places. It should be noted however that the final education strategy for the proposed Local Plan Review allocation is yet to be determined and this capacity may be provided through the delivery of two primary schools (one 1 form entry 210 place school and one 2 form entry 420 place school). This is reflected in the draft Masterplan SPD. As such the Vision and Concept document should be updated to reflect this position. All new primary schools should incorporate appropriate early years provision and a children’s centre service delivery base.

The location indicated on the concept plan for this potential primary school is noted. This primary school will need to be delivered in the first phase of development due to a lack of existing school places within the statutory walking distance from the site. We have provided further comments on this matter in response to the draft Masterplan SPD.

The concept proposals plan also indicates two potential locations for an all through school (combined primary and secondary provision) on the site. The primary element of the all through school would need to provide a further 630 places. The secondary element should provide a minimum of 750 places on a site of sufficient size for future expansion if required. We consider the identified “*potential school (combined secondary and primary)*” is appropriately located in a central part of the overall development. It is also in proximity to the boundary of the Local Plan allocation, meaning there is potential for it to be accessed and delivered early as the development grows beyond 1,750 homes. The alternative site for combined secondary primary is located with highway frontage and may be in close proximity to open space and sports facilities. However, locating the all through school here will increase walking distances and reduce the school’s ability to play a central role at the heart of community life.

We are aware there has been discussion regarding the potential for community use of the facilities to be provided as part of the all through school, notably sports facilities and playing pitches. Dual use is supported in principle, but it is necessary to identify the requirements of the community early on in the design process so education and community facilities can be designed to an appropriate specification with appropriate adjacencies. This would enable appropriate governance arrangements to be resolved prior to the appointment of a school sponsor.

In addition to primary and secondary provision, the Vision and Concept document should take into account the need for special educational needs (SEN) provision as part of the garden village. 1.5% of school children require SEN, equating to 30 children from this development, and therefore it would be appropriate to make on site provision in order to meet their needs and the needs of the wider town. There is potential for this to form part of the proposed all through school or alternatively could be provided at a standalone SEN facility. This should be incorporated in future iterations of the document. It is suggested that a large education campus is identified to ensure a wide educational offer can be delivered.

Finally, a key principle envisaged for the garden village is ambitious employment opportunities. One of the objectives associated with this principle (as set out on page 27) is that employment is linked to education and as such schools will be located close to employment areas. We are supportive of this objective and note the concept proposal plan indicates the "*potential school (combined secondary and primary)*" at a location which is close to potential employment development. However, the location of the "*alternative site for potential combined secondary and primary school*" is some distance from the proposed employment site and therefore does not appear to support this objective.

Waste Disposal

We have outlined a number of detailed comments in relation to this topic in response to the draft Masterplan SPD. These are relevant here also.

Waste Planning

As the Waste Planning Authority, the County Council suggests that sustainable waste management should be acknowledged in the draft Vision and Concept document. We feel it would be appropriate for sustainable waste management to be embedded within one or more of the 9 key principles and their associated objectives. 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. We have provided further detailed comments on this matter in response to the draft SPD for the first phase of the Garden Village.

Historic environment

The Vision and Concept document acknowledges that heritage is a theme which is important to a number of the Garden Village principles and their associated objectives. This includes the principle of being locally distinctive with well-designed neighbourhoods and places; being community focused; and providing great homes. The document focuses upon how heritage can influence building design and create a sense of place.

The document could provide more focus upon heritage assets forming part of green infrastructure and informing the site's layout. To achieve this, investigative work is

required which looks more holistically at different types of heritage assets likely to be in the area. In this respect the full extent of constraints/opportunities have not been identified at this stage. Without this work, opportunities may be missed to maximise the potential for heritage assets to form part of green infrastructure and inform the site's layout. More detailed comments relating to this matter have been provided in response to the draft Masterplan SPD.

Surface water flooding

The Vision and Concept document appropriately incorporates the need for sustainable drainage systems and embeds this requirement within two of the objectives (a and c) associated with the "Future proofed – smart and sustainable" principle. The document also recognises the role sustainable drainage systems can play in relation to green infrastructure and open space. This approach is supported.

It is also noted that surface water management will form part of the Masterplan SPD for the first phase of the Garden Village. This is a sensible approach and should ensure that surface water management is considered at an early stage and that areas are allocated for sustainable drainage features. We have provided a number of further detailed comments in response to the draft SPD in relation to this matter.

Health and wellbeing

It is now widely recognised that the built environment plays an important role in influencing people's mental and physical health and the principle of creating a healthy living environment is strongly supported. In addition to the provision of a wide range of services and facilities to support good health, the site layout itself can have an influence upon healthy living and a holistic approach to planning for good health should be taken forward when considering detail through the Masterplan SPD.

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. Section 2 of the document outlines that existing employment areas can be developed further and linked to housing and other facilities with green walking and cycling routes and that new employment areas can take advantage of good access to the motorway and Cullompton. 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.

I hope these comments are useful in progressing the Vision and Concept document. If you have any questions, please do not hesitate in contacting me.

Yours sincerely,

A handwritten signature in black ink that reads "Mike Deaton". The signature is written in a cursive style with a large initial 'M'.

Mike Deaton
Chief Planner