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EX16 6PP

**Our ref:** DC/2014/114498/SD-  
04/IS1-L01  
**Your ref:**  
**Date:** 01 March 2019

Dear Ms Maryan

**Culm Garden Village, Cullompton Public Consultation on:**

- **A draft Vision and Concept document for the whole garden village; and**
- **An Issues, Opportunities and Concepts document relating to Issues, Opportunities and Concepts for a proposed Masterplan Supplementary Planning Document for the East Cullompton allocation only (Phase 1 Culm Garden Village).**

Thank you for your consultation of 16 January 2019 in respect of the above documents that will help guide the development of the Culm Garden Village (CGV), to the east of Cullompton.

**Vision & Concept document**

Question 1 (Ideas for the name of the new settlement)

We have no specific ideas for the name of the new town. However, we would be supportive of the name including 'Culm' to help relate the new garden village to its setting.

Question 2 (Constraints and Opportunities)

We consider that more should be included in respect of water resources and water quality. Watercourses should be not just constraints but also present opportunities. We recommend that a Water Cycle Study is undertaken to better understand the impact of the development on water resource for the catchment taking into account the impacts of climate change. A Water Cycle Study would also inform how the development can help improve the water environment and determine the most sustainable way for foul effluent from the Garden Village to be managed. We have concerns regarding the sustainability of the proposal to pump sewage to the Willand sewage treatment works.

Flood risk is clearly a constraint in terms of the areas that are not sustainable for built development (except access roads). For the purpose of applying the Sequential and Exception tests, and informing master-planning, the flood zones should include the

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effects of climate change for the lifetime of the development (i.e. 100 years for residential development). Our Flood Map for Planning does not demonstrate future flood zones so the proposed modelling work would be the best mechanism to determine the effects of climate change.

The impacts of climate change also need to be considered with regard to habitats and species. This should include consideration of whether there is a need for a greater variety of habitats to ensure the habitats and species in and around the new settlement are sufficiently resilient to future climatic conditions. There should be a diverse mosaic of habitat and connections for wildlife.

Green infrastructure needs to be multi-functional. The various green corridors will provide important stepping stones for nature and places for water to be sustainably managed, as well as recreation and amenity for residents. We are pleased that at this early stage many of the potential green corridors follow watercourses although we have some concerns about green infrastructure being located beneath the electricity pylons.

### Question 3 (Emerging vision)

We feel that the vision for the CGV could be more ambitious. For example, the vision should include more about enhancing the environment (i.e. providing net gain) and being resilient to climate change. The current environment within and around the East Cullompton allocation is not considered outstanding. It needs improvement and to be able to adapt to climate change.

### Questions 4 & 5 (I. Embed the Countryside within the Garden Village)

Whilst we are supportive of this key principle we consider that this needs to be as ambitious as possible in terms of the delivery of Net Gain.

It will be important to define what type of countryside will be embedded in the Garden Village bearing in mind that the existing countryside is degraded through current uses such as maize production. The emerging 'Connecting the Culm' project will be important. The project will deliver improvements in the Kenn catchment upstream of the Garden Village which could help address flood risk and high nutrient levels in the watercourse. Principles from 'Connecting the Culm' should help inform the nature of the 'countryside' within the CGV.

It will be essential that there is a robust and comprehensive evidence base in place to inform delivery of green infrastructure under this principle. For example, hydrological modelling may show that more of the area will be at risk of flooding in 100 years' time.

### Questions 6 & 7 (II. A Well Connected & Integrated New Place)

It is important that all new connections are made to be flood resilient. For example, all new roads, footpaths and cycle-ways should, wherever practicable, be designed to be operational in times of flood. Especially careful consideration will be required where routes through the functional floodplain are necessary.

It is noted that the proposed transport hub (including the new railway station) is located in the floodplain and will also need to be flood resilient. Network Rail will need early involvement in this proposal because a new station in Cullompton is not presently included in their investment plan.

### Questions 8 & 9 (III. Creating a Healthy Living Environment)

Support acknowledgement in objective 'c' of the links between health and wellbeing, and access to the natural environment/green infrastructure. Delivery of wide green-blue

corridors will to allow people to enjoy these areas more. However, it will be important that any ancillary development (i.e. benches) does not have an adverse impact on flood flow routes.

Questions 10 & 11 (IV. Locally Distinctive with well-designed neighbourhoods and places)

Homes and neighbourhoods need to be adaptable to ensure they are future-proofed to take account of climate change. With this in mind we support objective 'e' regarding low carbon buildings.

The floodplain park and connecting green-blue corridors (incorporating SuDS) will play an important part in delivering on this principle. The parks will be of benefit to residents of Cullompton and the CGV but may also draw people from elsewhere into the area. It will be important that environmental infrastructure such as SuDS is in place early.

Questions 12 & 13 (V. Community Focused)

We support objective 'a'. It is important to consider mechanisms for delivering environmental infrastructure at appropriate time. The sequencing of delivery of GI is important (see objective a). Need to ensure that the park areas are delivered up front – not much green space is proposed in the first phase. This will relieve the pressure on existing assets. GI needs to be integrated throughout the development.

Maintenance of infrastructure is also an important consideration. It should be considered whether or not this could be the responsibility of Community Land Trust which could link to objective 'f' in helping to foster a sense of community pride and ownership.

Questions 14 & 15 (VI. Great Homes)

We are supportive in principle of objective 'e' in respect of sustainable and resilient in construction and use. However, we would welcome clarification on what standard new homes in the CGV will be built. The new homes need to be resilient and adapted to climate change.

In achieving sustainable and resilient construction there will be a need to consider water resources/efficiency as well as water quality from run-off from the development during and post-construction. SuDS should be incorporated in the right place to deliver multiple benefits including for water quality.

More clarification about any potential a community energy scheme will be essential. We would discourage the use of anaerobic digestion and hydro-power but consider that solar and wind power might be suitable options.

We would also advise that there is an objective to restore soils included in the strategy. Healthy soils play an important role in the sustainable management of waters. Agricultural activities may already have degraded soils at the site and it will be important that new development helps to restore these soils rather than causing further compaction and erosion.

Questions 16 & 17 (VII. Ambitious employment opportunities)

We support the principle of objective 'e' regarding 'quality buildings and environment' and objective 'f' regarding the 'green economy'. It would be good if the subsequent document identifies the types of 'green' jobs envisaged.

Questions 18 & 19 (VIII. Future Proofed – Smart and Sustainable)

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This is an important principle which underpins everything that needs to be delivered as part of the CGV.

We support objective 'c' (environmentally sensitive). We are pleased to see reference to climate change resilience and biodiversity gains included prominently in this section. It will be important that sufficient space is created within the CGV so it can adapt to change in the future. We would recommend a mix of different types of habitat and green infrastructure to ensure resilience far into the future. This objective should be amended to state that SuDS 'will' be incorporated rather than just 'can' be.

We are supportive of objective 'd' in respect of innovation and technology so that the CGV could be an example of innovation for the rest of the country to follow.

#### Questions 20 & 21 (IX. Delivery & Stewardship)

We support objective 'b' regarding a long term management and stewardship strategy. The benefits from the development will only be as good as the delivery and long term management of them. For example, the management and ownership of SuDS features is important. The establishment of a Community Land Trust should be considered.

#### Question 22 (Concept Proposals)

We are generally supportive of the Concept Plan. Overall it shows a good mix of corridors which respect the landscape setting put the environment first. Nonetheless, it will be essential that the evidence base is comprehensive to ensure the concepts can become a high quality reality. This should include, amongst other things, water resources planning and flood risk assessment, as well as any off-site improvements that might be necessary.

#### **East Cullompton Supplementary Planning Document (SPD): Stage 1**

We note that **Section 2** (Culm Garden Village Vision, Key Principles and Concept Proposals) summarises the content of the Vision and Concept document. Our comments above are therefore applicable here too.

Under **Section 3** (Understanding the East of Cullompton Site) there are a number of important issues to consider.

**Figure 6** shows the Localised Landform. However, it also indicates key green infrastructure both inside and outside of the red line boundary of the allocation. It will be important to build in links from the formal green infrastructure that will be delivered in this first phase within the red line to the wider CGV area.

**Figure 7** sets out the Habitat Plan for the area which includes potential floodplain grazing marsh (an important priority habitat for which we are the lead partner). This potential area of grazing marsh needs further clarification. We would want to see protection, enhancement and creation of a variety of habitats to make the area more resilient to pressures such as climate change.

We are aware that there is an area of wet woodland (another important wet priority habitat) at the northwest boundary of the allocation. This is not shown on figure 7. We consider that there is scope to create further wet woodland (i.e. along River Kenn near Week Farm) which would provide both flood risk and habitat enhancement benefits. Wet woodland could provide shade for species, especially fish.

Passage of fish species through the area's watercourses will need to be considered as part of the evidence base as will the potential for in-channel improvements. A robust evidence base will be necessary to show how net gain has been achieved.

We have a number of observations with regard to the section on **Flooding and Drainage**.

In respect of flood risk there is a sizable area of land within the south west area of the area of interest near East Culme House which is at risk of flooding which is not referred to in the document, and should be. In addition, as highlighted with regard to the vision and concept document there is land that, whilst not at risk now, may become at risk of flooding as a consequence of climate change.

We note that the intention is for foul drainage to be directed to the Willand Sewage Treatment Works via a pumping station. We will need to understand the reasons why South West Water have stated that this is their preference for sewage disposal from the CGV. Pumping is not sustainable solution to the long-term management of sewage from a new town, accordingly we have concerns regarding this proposal.

In general we consider that this section should also consider the wider water environment such water quality and water resources and the impacts of climate change on those matters. We would encourage the SPD to pursue a holistic solution to the challenges faced in the water environment, considering flooding, drainage and water quality together. Getting things right upstream will help to reduce impacts at Cullompton where there are existing issues (i.e. 'Catchment Based Solutions').

We note that the route of the high voltage **Electricity Transmission Lines** is proposed to be unchanged. We would encourage relocation if at all possible. Whilst it is acknowledged that the areas below (and above) power lines will be designated as green infrastructure it is not clear what for this green space would take or how useable it will be.

With regard to **Access and Movement** we note that new roads and connections are proposed in the floodplain. These elements of 'essential infrastructure' will need to be resilient, remain operational in times of flood and not result in increases in flood risk elsewhere.

Question 1 (Summary of Constraints) asks whether there are any other constraints/opportunities to be taken into account. We would recommend that the wider water environment and an integrated catchment based approach for the whole area is considered. This should include waste water treatment and supply.

Question 2 under **Section 4 (Masterplanning Opportunities and Concepts for East of Cullompton)** asks about the approach to identifying green/blue infrastructure. Whilst we are supportive in general of the approach we advise that it should also refer to the need to achieve Net Gain. As highlighted above in our comments on figure 7 a range of habitat types should be considered (e.g. wet woodland) and the green infrastructure links need to extend beyond the allocation boundary.

We consider that the **Potential Scope and Content of Final SPD** is broadly acceptable. Nonetheless we recommend that Section 2 (Understanding the Site) is supported by a comprehensive evidence base which includes a Level 2 Strategic Flood Risk Assessment, a Water Cycle Study and a Water Framework Directive Assessment.

In addition Section 4 (Making the Strategy Work) should refer to Net Gain in the context of the wider water environment.

Yours sincerely

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