

Consultee responses

1. Cullompton Town Council (page 1)
2. Kentisbeare Parish Council (page 2)
3. Bradninch Town Council (page 3)
4. Devon County Council (page 3)
5. National Highways (page 10)
6. Environment Agency (page 13)
7. Natural England (page 15)
8. Sport England (page 16)
9. Blackdown Hills AONB (page 19)
10. Network Rail (page 20)
11. National Grid (page 22)

1. Cullompton Town Council

Here is the formal response from Cullompton Town Council regarding the consultation on the East Cullompton SPD Masterplan:

Resolved that the council's formal response to the East Cullompton Urban Extension Supplementary Planning Document consultation is as follows:

- The proposal allocated in the latest revision of the Local Plan, although less than half the aspiration, is broadly supported.
- Detailed observations include:
 - The need, whilst encouraging the use of low carbon transport, not to alienate car users. In addition, bus stops without buses to stop at them are largely useless particularly in light of the recent reduction of services by Stagecoach. Subsidising these services in the short term is acceptable whilst the number of occupied dwellings increases but there needs to be a strategic plan in place to make services in and around this proposal sustainable in the long term.
 - That, whilst there are many thousands of new dwellings in progress or proposed, not just in Mid Devon but across the County and South West region, there is little or no provision made to supply water to these new dwellings in the form of new reservoir capacity.
 - That the lessons of Swallow Way (though Kingfisher Reach) must be learned and not repeated.
 - That, whilst the Garden Village Initiative will create a very significant mixed-use development, it should be seen as part of Cullompton with a Parish Boundary review if necessary.
 - That schools, surgeries and community facilities (including road infrastructure) should be delivered in the early phases.
 - Consideration should be given to providing the provision of convalescent care beds in the vicinity of the proposed care home/GP surgery in order to go some way to alleviating "bed blocking" in the NHS.
 - That modifications to Honiton Road may be necessary to increase capacity along the extent of the East Cullompton Urban Extension/Garden Village Initiative.

- That significant improvements and additions to the M5 J27/J28/J29 corridor infrastructure will be required as the current J28 is at capacity now without several thousands of additional vehicles attempting to access it.
- That it makes the reopening of the railway stations a more urgent requirement.
- The size of industrial units and the type of industry, whilst understanding that there will be some market forces, needs to be carefully considered as there is a shortfall of micro and small units in the district making start-up business difficult. Retail also needs to be considered both in the commercial allocation and within the development as a whole.
- The Cullompton Neighbourhood Plan should be fully complied with in the design of any development proposals.
- The Town Council will actively oppose any proposal for dwellings at East Cullompton before the Eastern Relief Road is delivered and that the issues surrounding the capacity of Junction 28 of the M5 are resolved.
- The absence of waste water treatment facilities is a concern as the existing is at capacity.
- There is concern that there is little or no retail; at the start of the East Cullompton vision process, there was a proposal for a retail park at the south west of the allocated site that appears to be absent from the Masterplan Supplementary Planning Document.
- Small retail units (convenience store type) will be required to provide necessities and to avoid unnecessary car journeys to purchase, for example, milk or bread.

2. Kentisbeare Parish Council

Please see below the response from Kentisbeare Parish Council in respect of the East Cullompton Masterplan SPD consultation.

Kentisbeare Parish Council welcomes the explicit recognition of our village remaining “clearly separate from Cullompton in terms of identity and village setting” (p.51).

We do have a number of concerns that we would like to highlight -

- We believe that the process we were promised was a fully coordinated masterplan for the broader Garden Village. The two-stage nature of the process that is now in train involves detailed approval of the East Cullompton allocation that is part of the existing Local Plan and an outline of thoughts about the longer term possibilities for the wider Garden Village. One consequence of this is that facilities that are only required once a certain number of houses have been built may well be located at the furthest extreme of the Garden Village, whereas a larger scale masterplan would be likely to site them more centrally. Obvious examples are the proposed secondary school and the sports clubs. We would suggest that more detailed planning is undertaken before the East Cullompton Masterplan is signed off.
- Public consultation to date and dialogue between Kentisbeare Parish Council and MDDC have consistently opposed any development to the east of Horn Road. The Cricket Club has been granted planning permission and so that must now be excepted. The references to "relocated sports clubs to the east of Horn Road" (4.10) and the "potential to co-locate the all-through school with proposed sports clubs to the east of Horn Road should be explored" (6.2) seem to ignore this consultation. We would hope that MDDC remains true to its stated desire to develop the Garden Village in conjunction with local communities and their wishes.

- The document refers to the area around Horn Road as potentially being "a new neighbourhood framed around new broadleaf planting, avenues and terraces... to create a strong landscape to the eastern edge of the Garden Village." (6.1). We would hope that only planting would be to the east of Horn Road with any new neighbourhood to the west to be consistent with the above. Topographically the east of Horn Road is high and visible ground on either side of the A373.
- In addition, we are concerned about a number of the impacts of the growth in traffic resulting from East Cullompton and the broader Garden Village. The volume of traffic on the A373 has increased noticeably in the last few years. This seems to have been driven by the considerable development elsewhere in Cullompton and the resultant issues at the motorway junction. We believe that the limit of 500 houses to be built in East Cullompton prior to a strategic motorway intervention now looks too high given the approval of recent development applications elsewhere around Cullompton and that it should be revised downwards.
- We are also concerned about the A373 to the east of the Garden Village. It is extremely narrow at various points before Honiton and significant blockages are occurring on a much more regular basis. Getting out on to the road from the lanes that lead off it has also become significantly more difficult. Post Cross is a prime example. One of the concerns we have is that any significant increase in issues on the A373 is likely to manifest itself as an increase in rat-running through the area to the east of the M5, this will result in more traffic on inappropriate routes through our Parish. We therefore urge a more coordinated approach to address the present and future issues on the A373 to Honiton before development starts.

3. Bradninch Town Council

Resolved to submit the following comments with regards: any further development in Cullompton would require a relief road to be built, along with improvements to the existing motorway junction. Also, consideration should be given to the impact on the river Culm, due to the increased sewerage from new developments, to ensure that further pollution could be avoided.

4. Devon County Council

Thank you for the opportunity to comment on the East Cullompton Masterplan Supplementary Planning Document Consultation. The County Council welcomes this as an insightful consultation and a positive step towards delivering sustainable development at East Cullompton in line with garden village principles. The County Council welcomes the inclusion of the 20-minute place principle and emphasis on net zero.

Appendix A attached provides the County Council's detailed comments. The County Council would be pleased to discuss the comments raised and actions arising in more detail. We look forward to continuing our work with you as the Masterplan progresses.

East Cullompton Masterplan Supplementary Planning Document Consultation

Appendix A:

Item	Issue and reference point	Comments
1 Introduction		
1.1	Background	DCC welcomes the priority that the plan has placed on responding to the climate emergency and nature recovery.
2 Vision		
2.2	Overarching principles	<p>The inclusion of 'Use innovative and modern methods of construction to minimise waste and reduce pollution' under 'Planet' is welcomed. However, this could be expanded to ensure waste is minimised and considered during the design and layout of a development, for example, to reduce inert material exported off site.</p> <p>Further emphasis should be put on the phrase 'reduce carbon emissions'. The NPPF uses the phrase 'contribute to radical reductions in greenhouse gas emissions'.</p>
3 Influences		
3.1	Policy context	<p>The Devon Waste Plan also forms part of the Development Plan for the area. This should be included to ensure the principles of sustainable waste management are considered throughout the planning process. The following is recommended:</p> <p>Devon Waste Plan <i>The Devon Waste Plan for the period 2011-2031 was adopted in December 2014 and forms part of the Development Plan for the area. The key policy from this plan is Policy W4: Waste Prevention. This policy looks for sustainable construction, procurement and waste management in Devon to achieve a reduction in the waste generated through all forms of development.</i></p> <p><i>Major development is required to include a Waste Audit Statement demonstrating how the demolition, construction and operational phases of the development will minimise the generation of waste and provide management of waste in accordance with the waste hierarchy (from preventing waste, re-use, recycling through to the final option of disposal of waste).</i></p> <p>Reference could also be made to the Waste Management and Infrastructure SPD adopted in July 2015 which provides guidance to applicants on how to implement Policy W4: Waste Prevention of the Devon Waste Plan.</p> <p>DCC would welcome reference to Devon's Joint Health and Wellbeing Strategy 2020 – 2025 within the masterplan.</p>

3.2	Context & Carbon Emission Assessment Framework	<p>The Devon Carbon Plan is now live.</p> <p>The Carbon Emissions Assessment Framework is ambitious, and it's particularly good to see the inclusion of embodied carbon in the tool.</p>
3.2	Broad Carbon Reduction Approach by Source (Table)	<p>DCC welcomes the carbon reduction principles set out within the Masterplan and the emphasis on achieving net zero. The table is clear on how low-carbon aspects will be incorporated into the Plan.</p> <p>The need for renewable and green energy sources will be key to the long-term sustainability of the new town. District heating could be a major contribution to reducing carbon.</p> <p>Strong digital connectivity should be included in the table as a Substitute Approach to achieve reduced carbon emissions.</p> <p>DCC recommends that mention is made to preventing inert material being exported from site through design. This would avoid emissions.</p>
4 Understanding The Place		
4.4	Natural Flood Management	Natural Flood Management might not entirely prevent flooding, but can reduce flooding.
4.4	Air Quality	Air quality is the largest environmental health risk in the UK. It shortens lives and contributes to chronic illness. Increased traffic is likely to increase vehicular emissions, which may impact on Air Quality. Although air quality assessments have been carried out, they will need to be monitored at regular intervals through the construction phases and afterwards.
4.6	Heritage	Existing Policy CU7 requires further archaeological investigation to inform mitigation, as development progresses. This will need to be used to identify opportunities to positively influence the detail of design/layout as planning applications come forward, as well as to inform mitigation for the loss of any undesignated archaeological assets. The attention given to the importance of water/water management in shaping Cullompton and the new community is welcome.
4.8	Access and Mobility	<p>It should be noted that Honiton Road is an A road so downgrading this and reducing the speed limit are unlikely to be achievable. Crossings of this road are going to be important given this road passes through the middle of the development but the strategic nature of the road cannot be lost.</p> <p>A choice of travel methods integrating with public transport will be required. The station should be equipped with secure safe cycle storage, and provision for charging facilities for electric bikes to encourage active travel. If the aim is to reduce car journeys, this needs to be supported by adequate and reliable bus services.</p>

4.10	Opportunities Plan	DCC endorses the need for travel crossings over the trainline and motorway and would want them to be implemented as early in the phasing as possible. Suicide Prevention should be a priority for a bridge crossing in a location of this nature.
5 Masterplan Framework		
5.2	Mixed Use Community Hubs	Allocation of parking spaces within the new development will need to be carefully managed and prioritised. Consideration will be needed for inclusive parking for those with disabilities and visiting care workers, who should have priority spaces to prevent delays in support being offered to the most vulnerable people. DCC supports the restriction of hot food takeaways, particularly within 400 meters of a school and limiting the number of takeaways in any given location.
5.2	School site	In its role as Local Education Authority, Devon supports the proposals as set out in the consultation. The preference will be for a single primary school site to support a 630 place primary school with early years provision as this will be a more efficient model to manage the growth of the development. The proposed location of the school, adjacent to an existing road network and utilities, will ensure the school can be delivered early in the development as there is insufficient primary capacity to meet the needs of the development. Therefore, delivery of a serviced site and capital funding will be critical prior to commencement of development.
5.2	Integrating employment	<p>Further information is required to understand the evidence in place which underpin the assumptions made for the scale, mix and phasing of commercial industrial and workspace development and what the planned mix of uses will be. Business space demand cannot rely on 2018/19 projections (e.g. office space demand is now a lot lower, often leading to consolidation of office spaces). However, demand for some manufacturing and especially distribution and storage space is higher than for offices.</p> <p>Further information is also required in relation to the economic growth (GVA/GDP increase) assumptions. The Bank of England has recently updated its economic growth forecasts and the OBR will be publishing its findings later in November 2022 that we expect to better reflect a new economic situation.</p> <p>The ability to intelligently phase commercial business and workspace development is key, to reflect both real-world demand and balance this with aspirations for the community. There needs to be the ability to regularly review any mix of employment uses, maintaining the aspirational tenet of the plan, but adapting the mix of uses to reflect changes to demand patterns in what since 2019 has become a very rapidly changing economic situation, globally, regionally and locally.</p> <p>Retail Further information is required to set out the assumptions around retail space in the new community, how this reflects demand and how this will interact with the retail offer in both Cullompton and other nearby communities, including any new planned retail offers within Mid Devon.</p>

		<p>There has in very recent years been a trend towards a need for less retail space overall, however, there has also been a shift whereby smaller towns that have a characterful and distinctive mix of an attractive environment, a variety of things to do, a good mix and number of essential services and homes located close to retail and a good mix smaller units and independent retailers alongside a handful of chain stores have tended to perform much better (e.g. Totnes, Sidmouth, and to some extent Crediton and Okehampton). Cullompton's existing retail core tends to perform less well than might be expected of a town of its size, function and historic character. Regeneration of the existing Cullompton town centre should form a key objective of an urban extension, or new community in East Cullompton.</p> <p>Work locations and commuter patterns</p> <p>Further information is required in relation to the assumptions made about where people who live in the new community might work and where people who work in the new community might live taking into account a new and emerging reality about people's travel to work patterns in the Cullompton and Mid Devon areas. This will vary by sector of employment. There have been shifts, especially in those working in office-based employment, towards more flexible working, but with some days in a central workplace, especially since 2020. This has also meant that for some higher paid employment the area of search for employment has widened from outside of existing Travel to Work Areas (e.g. what are the assumptions around people in Mid Devon now having a nominal workplace location in Bristol, Plymouth, or London as well as Exeter, or Taunton as previously). The location of the existing Tiverton Parkway station and M5 within the District, plus A303 being nearby will likely have some additional impact on the attractiveness of this as an option in Mid Devon.</p> <p>In addition, what assumptions are made about temporary impacts on working patterns from Hinkley Point C, which draws a lot of people from a very wide area? It is likely that Travel to Work patterns vary significantly by sector and rate of pay.</p>
5.2	Residential	<p>The provision of affordable homes within the development is welcome, there should be a mixture of rents and purchase options. DCC would like to see other housing options to be considered such as provision of co-living accommodation blocks for the use of professional single people these are self-contained one-bedroom units with kitchenettes and other shared facilities. Thought should also be given for adaptable homes. We have an ageing population and to reduce burden on expensive care homes having the potential for annexes on private properties or internal ability to reconfigure space needs to be factored in. Wheelchair accessible homes should be included within the housing designs to be fully inclusive and giving options for a range of clients.</p>
5.2	Powerlines	<p>DCC agrees that the powerlines should be moved underground, but if this is not possible the space below them should be used for parkland rather than residential housing.</p>
5.3	Landscape	<p>DCC welcomes the amount of green infrastructure and open space to be provided by this development, which will provide for natural play, active recreation, healthy living, and help to combat climate change. The biodiversity of the area (including hedges and trees) needs to be protected and retained where possible.</p>

5.3	The Blueways	Blueways will be a key feature, time spent outdoors in the natural environment is positive for mental health and wellbeing. Improving the existing river crossings is a way of working with the natural beauty of the area, giving a defined sense of "place".
5.3	Crossing points and fords	Fords should not be prioritised. If fords are proposed, then they will need to be carefully considered (e.g. consideration of design, location, road type, etc.). These features can cause obstructions to flows. Fords will need to be drained effectively so that pollutants are not washed into the watercourse.
5.3	Community Greens	<p>The sports pitches should be open access for use for the whole community and not just the schools/private clubs. Consideration should be given to lighting the pathways and sports areas to make them a safe place at night.</p> <p>Allotments are important for the supply of healthy local food and working on an allotment has been proven to be beneficial for health and wellbeing. It would be welcomed to see the completion of some of the allotments in-line with the phased completion of the first homes.</p> <p>The community orchards will be a resource for the village, but these need to be managed and maintained.</p>
5.4	Junction 28	DCC is aware that any walking / cycling routes over the M5 are linked to the J28 improvement options so a specific route cannot be defined at present. However, this needs to be included in the phasing approach so it is delivered early within the development. This will be especially important before the local centre and facilities on the eastern side are established as initial dwellings will be heavily reliant on the existing town facilities and connections across the M5 to them.
5.4	Active travel & Street Hierarchy	<p>It is good to see that SuDS are referenced within active travel and the street hierarchy. Permeable paving could be used as well as rain gardens, swale, filter trenches. It is great to see SuDS being encouraged along streets.</p> <p>DCC welcomes the promotion of sustainable travel, particularly active travel including walking, cycling and public transport.</p> <p>Walking and cycling routes need to be delivered early in the phasing of the new community. This will help support the aims of increasing sustainable travel modes and reducing the reliance on the private car. Taking this approach as part of the planning applications is supported but assumptions need to be realistic and achievable to satisfy all parties involved.</p> <p>The cycle routes proposed around the town are welcome but these need to be linked to a wider cycling infrastructure for residents to be able to safely move to destinations further afield. The surface of the pedestrian/cycle paths should be fully accessible and suitable for wheelchairs and pushchairs.</p>

5.4	Honiton Road	DCC fully supports the 20-minute neighbourhoods idea but is not sure how this will be achieved without the early delivery of high quality walking and cycling routes between the CGV and existing Cullompton, before there are the resources built at the new community. The footway connection along Honiton Road is not complete and some areas are on private land outside the control of the CGV landowners. The whole length would need upgrading to a pedestrian/cycle footway and it is questionable whether this should be next to the busy A373 or whether a completely segregated route elsewhere should be provided instead (note comments on Honiton Road below). The other routes show the footway/cycle way to be through Honiton Road Industrial Estate which is also 3rd party land and only has a PROW connection to Honiton Road which may not be able to be upgraded.
5.4	Mobility Hubs	DCC welcomes the proposal for mobility hubs and for co-bikes and car share schemes. Further information is required in relation to what these will look like (e.g. cycle parking, direct links to the sustainable travel routes from mobility hubs is essential).
5.5	Placemaking	Access to greenspace is a good way to support good physical and mental health. The design of homes needs to consider the pavement space and access to homes for people with mobility vehicles.
5.5	Parking	The amount of parking provided will have a heavy influence on the reliance on private car for travel. However, sufficient parking should be provided to prevent parking on-street. Consideration of cycle parking and electric vehicle charging needs to be made and included in the Masterplan. Rear parking courts should be avoided unless well-lit and good access is provided and they are overlooked.
5.6	Planning and Design Process Flow Diagram	Does surface water management form part of infrastructure delivery?
5.6	Strategic Design Code	The proposed Strategic Design Code should help to promote good housing design. Poor housing conditions are associated with poorer health outcomes, increased risk of circulatory and respiratory diseases, and mental ill health. Indoor air quality needs consideration with improvements in construction materials used. Good home design, for example adequate storage which include storage for household waste bins is essential to prevent odours from the waste or the potential of rat or vermin infestations.

5. National Highways

Thank you for consulting us on the above document. It is a positive step in providing guidance on the design, development and delivery of site allocation CU7 (East Cullompton) of the Mid Devon Local Plan Review (adopted July 2020). Policy CU7 proposes the allocation of a site of 160 hectares to the east of Junction 28 of the M5 for the development of the initial new settlement (1,750 houses to 2033, with at least a further 850 dwellings to follow). It is also recognised that the site was awarded Garden Village status in 2017, with the potential to deliver up to 5,000 new homes. The Supplementary Planning Document (SPD) is rightly cognisant of this planned future growth of the East Cullompton allocation/Garden Village, which must follow the same principles and policies to ensure sustainable development.

National Highways are responsible for operating, maintaining and improving the Strategic Road Network (SRN), which at Cullompton includes Junction 28 of the M5. The junction can experience congestion during the morning and evening periods and remains a constraint despite previous improvements in 2015. The combination of North West Cullompton strategic allocation (1,350 dwellings and 10,000sqm of commercial floorspace), the East Cullompton allocation and other smaller allocations have been identified to impact on the safe and efficient operation of the SRN. As recognised in the Masterplan, delivery of a transport solution at Junction 28 to enable future growth at Cullompton is necessary, as set out in the most recently adopted Mid Devon Local Plan (July 2020). It is noted that the Masterplan SPD indicates that capacity improvements at Junction 28 are likely to be required after the first 500 homes are completed, to be clear, this is subject to prior delivery of the Town Centre Relief Road¹. We understand that Devon County Council are currently undertaking traffic modelling work to demonstrate the suitability of this development threshold, and National Highways will need to be satisfied that early development ahead of infrastructure provision does not give rise to an unacceptable safety impact for the SRN.

We support the carbon reduction principles of the draft Masterplan, particularly noting the 'in-use transport' measures that are expected to be considered by developers. We would expect Mid Devon District Council to enforce any commitment to deliver carbon reduction generated by private car travel. National Highways, like Mid Devon District Council, has made commitments to reduce our carbon impacts. Wherever possible, we support plans to replace vehicular journeys with active travel modes, both reducing carbon and managing down demand on the SRN. It is important to stress that our license with DfT requires us to focus on the safe and effective operation of the SRN and this cannot be compromised for sustainable travel initiatives.

The ambition of the Masterplan regarding improved sustainable travel modes and appropriate site phasing, to reduce the need to travel by private car, are endorsed. This has the desired potential to reduce the need for network peak hour private car trips on the SRN. Delivery of sustainable transport options early in a development are key in nurturing habits of residents to use sustainable transport modes. However, this may have implications for the existing Junction 28 layout and facilities, particularly through increased demand for active travel to the proposed reopened Cullompton train station, with the motorway overbridge currently forming the principal access route between East Cullompton and the proposed rail station site. We are keen to stress that Cullompton currently generates significant out-commuting with a reliance on the private car. Therefore, a step change in travel behaviour and facilities is required in this development to achieve the sustainability

¹ Agreed by MDDC, DCC and NH within the Mid Devon Local Plan Review 2013-2033 Statement of Common Ground for 'Cullompton Infrastructure Improvement – Highways' on 12/02/2019 - <https://www.middevon.gov.uk/media/346857/scg10-highways-cullompton-policies-s11-cu1-cu21-secure.pdf>

principles aspired to as a Garden Village, and highway capacity improvements will still be required to accommodate residual car-borne travel demands. We anticipate further work/evidence in how the sustainability aspirations of the Masterplan are ensured in site delivery and would welcome a meeting to ensure that this vision is deliverable in terms of transport impacts. We would expect Mid Devon District Council to ensure that they enforce any commitment to reduce private car travel for the life of the development.

One of the core principles in the SPD to achieve sustainability of the development is delivery of a 'twenty-minute place'. It is presumed this means seeking to achieve an 800-metre walkable catchment, or a 10-minute walk to your destination, and 10 minutes back home. The SPD could be clearer in defining the 'twenty-minute place' approach to ensure meaningful achievement of this principle.

We agree with the statement within Section 4.8 that options to improve Junction 28 are under discussion with Mid Devon District Council, Devon County Council and National Highways at the time of writing. Depending on the timetable for the adoption of this document, we anticipate this SPD will be updated to include updates/outcomes of this work. The need for a strategic junction intervention was established as part of the Local Plan Review evidence base (considering 1,750dw at East Cullompton) which demonstrated that transport impacts on the M5 would be severe in the absence of significant improvements to the transport network. Through this work National Highways will require confidence that a proposed scheme adequately mitigates the SRN impacts of development at Cullompton and provides safe and suitable facilities to accommodate increased active travel demands across the motorway. Given proposals for a wider Garden Village of up to 5,000 houses, we anticipate and recommend that this work will consider travel demands associated with the wider development.

Within Section 4.9 we are pleased to see that potential noise and visual intrusion impacts from the M5 are being considered as a constraint within the Masterplan. We have recent examples of residential development experiencing noise issues because of having been located too close to the SRN. We endorse planning policy being proactive in considering and addressing this issue.

The 'East Cullompton Mobility Framework' plan on Page 106 includes three indicative active travel crossing points and two 'potential for future connection to JCT'. It is not clear what the latter entails, however it is presumed that the assumptions in this plan will be updated to align with the work currently being undertaken regarding Junction 28 improvement options. Two active travel crossing points appear facilitated by the existing structures over the M5 (at Old Hill and Junction 28), with one route appearing to require new infrastructure to the north. We would welcome further discussion regarding the establishment of specific active travel routes to serve the East Cullompton site where they interact with the SRN. It is identified on Page 127 that the active travel improvements are funded by "developer contributions/linked to public funding projects" – further thought is required regarding costs and likelihood of funding mechanism achieving delivery.

On Page 109, we assume Junction 28 is being referred to, rather than Junction 30.

As recognised in Section 5.4, "Honiton Road plays a key movement role in the wider highway network". This local road network has an important function for vehicles both exiting and arriving at Junction 28. Outcomes from the Junction 28 mitigation option work need to inform the policy approach for the role and function of Honiton Road. This includes decisions regarding priority and speed limits.

We agree that East Cullompton will benefit from a 'Site Wide Phasing and Delivery Plan document', as identified in Section 5.6 'Infrastructure, Delivery and Phasing'. We recommend this document should benefit from sufficient weight in the planning process, clearly outlining requirements and delivery mechanisms, to ensure that the development achieves appropriate phasing in terms of housing, education and employment. The establishment and agreement of such a phasing and delivery document would provide greater confidence regarding achievement of the site vision and Garden Community principles.

It is noted on Page 122 that there is a suggestion for a 'comprehensive approach' which includes "a consistent approach to the assessment of transport that starts with the vision for the site and then assesses impacts on that basis, offsetting any impact with a range of agreed initiatives". National Highways would welcome a comprehensive approach to site assessment, supporting the identification and delivery of necessary transport improvements. Nevertheless, as highlighted above, further certainty is required regarding the adoption and delivery of sustainability principles at East Cullompton to support any assessments that offset impacts against agreed initiatives.

Phases 1 and 2 of the Masterplan identifies delivery of the Honiton Road improvement, including an active travel route, across Junction 28 and into the proposed railway station. This route interacts with numerous access and egress points on the SRN and requires detailed thought regarding feasibility and implication. As per comments on Section 5.4, we await the current work looking at potential Junction 28 improvement options, which should inform understanding regarding this matter and the necessary characteristics of Honiton Road itself for vehicles. In terms of the table of 'Infrastructure Delivery Requirements' on Page 126 onwards, we have the following comments:

- Capacity improvements at M5 Junction 28:
In terms of 'Timing' – it should be clarified that the 'required after first 500 homes completed' is subject to the prior delivery of the Town Centre Relief Road
- Cullompton Town Centre Relief Road:
Query whether the 'Delivered by 2023' timetable is realistic
- Local highway enhancements to ensure any traffic impacts are mitigated:
National Highways agree with the statement that these should be determined through transport assessment work but recommend that this should be led as part of the proposed 'comprehensive approach' and not left to component development sites

It is noted that the final section of the Masterplan considers the potential future extent of East Cullompton – up to approximately 5,000 dwellings. As previously noted, we recommend that this extent should inform the infrastructure choices made for the East Cullompton allocation to ensure that any provision is future proofed and able to accommodate the wider vision for Cullompton. This approach should be kept under review to accord with emerging contents of the next Local Plan, of which we expect a consultation next summer.

It would be much appreciated if reference to 'Highways England' in the document is updated to 'National Highways', noting our named changed in August 2021.

I hope these comments are useful and look forward to continuing to work with you on this project as it progresses.

6. Environment Agency

Thank you for your consultation in respect of this supplementary planning document (SPD).

Environment Agency position

We are supportive of the proposals set out in the Masterplan SPD, which addresses the key environmental risks and opportunities within the East Cullompton allocation and wider Culm Garden Village area beyond. Full implementation of the masterplan's proposals for blue ways, green ways, ecological networks, habitat enhancement and creation, and natural flood management will help contribute to the delivery of a sustainable development which will be resilient to a changing climate.

It will be essential that the masterplan SPD along with the relevant local plan policies are robustly applied to ensure development of the Culm Garden Village (CGV) successfully delivers this vision.

Our comments and recommendations on the parts of the SPD relevant to our remit are set out below.

Section 1 Introduction

The diagram 'Planning for the outcomes we need' in 1.3 (Scope and purpose) clearly sets out climate change, net zero and nature recovery as central cross-cutting themes driving change and influencing the masterplan's proposed outcomes. This is important and we strongly support this approach.

Section 2 Vision

We welcome the vision set out under the heading of Planet, People and Place (2.1). The new vision simplifies the nine original principles from the stage 1 consultation, focussing more holistically on the key challenges and desired outcomes. We support the focus on ensuring East Cullompton/CGV will be sustainable and resilient in the face of climate change, and the commitment to nature recovery and harnessing the Culm for the benefit of nature and flood management.

The overarching principles (2.2) which underpin the vision are intended to deliver some important outcomes. We are pleased to see climate change mitigation and adaptation, flood risk and water management, increasing biodiversity, protecting natural resources, and minimising pollution central to master-planning for East Cullompton. That these principles are shown clearly to cut across each of the broader headings of People, Planet and Place is also welcome.

Section 3 Influences

We are supportive of the Carbon Reduction Principles set out in 3.2. However, the SPD should also identify the principles and influences related to climate change adaptation and resilience. Whilst it is essential that all areas play their part in helping the World move towards achieving net zero carbon emissions, a degree of climate change is now unavoidable. Successfully achieving net zero carbon will require a global response, however, ensuring new settlements are designed and built to adapt to and be resilient to the inevitable impacts of climate change will make a big difference to long-term sustainability locally. Climate change adaptation and resilience is therefore a matter which is much more within the gift of local authorities.

Climate change adaptation could be addressed more explicitly by the SPD in the sub-section on Natural Capital (3.4), which already references the tangible and intangible benefits provided by natural capital such as climate regulation and flood management.

We welcome reference in 3.7 (Parallel work) to the Connecting the Culm project and the work being undertaken on the Strategic Flood Risk Assessment (SFRA) for the CGV.

Section 4 Understand the place

We are pleased to see that the 'constraints and the opportunities map' in 4.3 (Ecology) identifies diverse riparian planting and floodplain habitat opportunities. The supporting text (Habitats) also acknowledges the importance of wet woodland habitats. The map appears to omit some of the smaller watercourses around the site (e.g. the watercourse flowing south towards the A373 from Moorhayes Farm) but this may simply be because they are hidden by other habitat layers such as hedgerows.

We fully support the natural capital approach taken in the SPD. An array of ecosystem services are identified in 4.4 (Natural Capital), many of which overlap and complement each other (e.g. wetlands, natural flood management, water quality).

In respect of natural habitats, it is good that the SPD recognises the important role that fully functioning ecosystems play in providing resilience to climate change. Maintaining and enhancing corridors across the allocation and wider CGV area, particularly along the numerous watercourses will help knit existing habitat areas together as a bigger, better, more joined up ecological network. This is noted in the sub-section on habitat networks which follows.

We welcome the work that has been undertaken in respect of wetland habitat features, and opportunities to enhance and create more of these features. We look forward to seeing further work by your authority or landowners/developers in this area and the multifunctional benefits that could be delivered. This work ties in closely with work on natural flood management, which we are also pleased to see set out in the SPD.

We welcome the acknowledgement of phosphorus run-off from land into watercourses in the discussion under water quality. However, it should also be noted that whilst agricultural land is the source of most nutrients (like phosphorus) entering the waterbodies a significant contribution also originates from treated sewage effluent. Nutrients are an ongoing problem within the Culm Catchment and a key reason why waterbodies in the catchment are failing to achieve good ecological status under the Water Environment Regulations. Improvements in this area to reduce nutrient-laden run-off could help to offset the additional nutrients that will be introduced by the increase in foul flows to South West Water wastewater treatment works.

It is also good that this section on natural capital has identified the cooling potential of trees in the area and the associated benefits for climate mitigation and adaptation, and biodiversity.

We fully support the work undertaken so far in relation to flooding (4.5). Our review of the draft SFRA is ongoing and we will provide detailed comments in due course. We look forward to working with partners to ensure the opportunities offered by development of the East Cullompton allocation and CGV to deliver flood risk management improvements are realised.

The combined constraints plan (4.9) brings the key features together so as to present the foundations for the CGV's green-blue infrastructure network effectively. This is nicely complemented by the opportunities plan (4.10).

Section 5 Masterplan framework

In respect of landscape (5.3) we welcome the landscape framework, including the formalisation of 'The Blueways' and commitment to the use of sustainable urban drainage.

We note the passage regarding crossing points and fords. We would not encourage reliance on fords in light of the associated risks in times of high flow and flood. Any proposals for fords will need to be carefully considered and not result in increases in flood risk.

Section 6 Growing East Cullompton

The masterplan framework for the wider CGV project under 6.1 (Developing a framework for the wider opportunity area) identifies how the green and blue networks could be extended and enhanced beyond those shown in the masterplan for East Cullompton. We would strongly support establishing and enhancing these future corridors as early as possible.

With this in mind we welcome the intention under 6.3 (landscape) that the Blueways could continue to provide a central organising feature of the CGV. The Blueways established with the allocation area could be extended into the expansion area with the creation/formalisation of new ones. The suggestions in respect of flooding and drainage, and natural capital are also welcomed.

7. Natural England

Thank you for your consultation on the above dated 20 September 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Local Plan Policy deliverables

Mid Devon Local Plan Policy CU9 set out a requirement for the site to provide 'an area of 40 hectares for strategic green infrastructure' to include 'an appropriate mix of public parkland, open space, landscaping and local nature reserve'.

Natural England notes that the table on page 95 of the SPD sets out the size of the land areas for the specific types of public open space, in accordance with the Local Plan policy, and most of which are provided within the three community greens as shown on the map on page 102 of the SPD.

However, it is difficult to tell from the maps and descriptions where the amenity greenspace, public parkland and local nature reserve will be located. Additionally, and understandably, much of the strategic green infrastructure, as described in the SPD, is functional (e.g., water courses/SuDS, retained vegetation, and powerlines) and likely to be inaccessible to the public, and so it is unclear which areas will have the space to function as parkland and nature reserve rather than just as functional travel corridors. It would be useful if the SPD could include a map to show the preferred locations for the 6ha of amenity green space; the public parkland; and the nature reserve.

Biodiversity Net Gain (BNG)

Natural England notes, and welcomes, that the SPD sets out the authority's expectations (page 105) for the East Cullompton site to provide measurable net gains in biodiversity. The SPD outlines that there is potential for the site to achieve a 10.77% net gain by enhancing and converting offsite modified grassland and cropland to neutral grassland. Whilst it is welcomed that the initial calculations provided for the SPD confirm that at least 10% net gain is achievable, the detailed planning permission will need to secure an agreed biodiversity gain plan, based on detailed metric calculations.

It is disappointing to note that the SPD is seeking offsite delivery of BNG, as onsite delivery is Natural England's preferred approach. The biodiversity gain plan should set out the reasons for selecting this approach. It will also be necessary to demonstrate that any potential conflict with the recreational (and other) uses of the Country Park can be avoided, i.e., that the recreational use of the park will not affect the success of establishing the net gain site, and vice versa that the presence of the net gain habitats will not restrict the recreational (or other) use of the country park.

The SPD also provides an opportunity for the LPA to outline their priorities and expectations for the wide range of benefits for people and nature that can be delivered through biodiversity net gain, and how this site can contribute towards achieving the opportunities and actions identified in the emerging Devon Local Nature Recovery Strategy, and the Nature Recovery Network.

8. Sport England

Many thanks for consulting Sport England on the above document.

The provision of sport is a material consideration of the Local Planning Authority. This may be on-site within the development or a financial contribution to off-site locations. See Sports Facilities Calculator.

The provision of playing pitches should be guided by the adopted Mid Devon Playing Pitch Strategy (PPS) although we raise concern no stage E implementation/delivery group meeting has been held since adoption. A stage E meeting to discuss needs for East Cullompton would be a worthwhile exercise. We know from experience that what we ask for from developers is challenged as they only want to provide minimal facilities, that don't meet the needs of sport in the local area.

This consultation gives us opportunity to raise the need for a 3G artificial grass pitch (AGP) in the Cullompton area as we do not have a current site identified in the town.

Sports Facilities Calculator

This additional population will generate additional demand for sports facilities. If this demand is not adequately met then it may place additional pressure on existing sports facilities, thereby creating deficiencies in facility provision. You may be aware that Sport England's Sports Facilities Calculator (SFC) can help to provide an indication of the likely demand that will be generated by a development for certain facility types.

Active Design

Sport England has considerable synergy with the NPPF and paragraphs 92 and 93 promoting healthy and safe communities. And achieving well designed places paragraph 130. Active Design complements the latest thinking around 20 minute neighbourhoods.

Sport England, in conjunction with Public Health England, has produced 'Active Design' (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via [this link](#).

Appendix 1 contains a checklist that can demonstrate that the proposal has been / will be designed in line with the Active Design principles.

Cycle and walking networks should be extended to linking the existing urban area with the new development, and access to the surrounding natural environment. To encourage active travel there should be clear signage for cyclists into and out of the development site and to other destinations.

To bridge the gap between the high-level principles of Active Design and delivery in practice, we have worked with the Building Research Establishment (BRE) to link the overarching Active Design Principles with the individual scheme criterion in each of the BRE Environmental Assessment Methodology (BREEAM) family of schemes, including HQM, Communities and CEEQUAL.

We are currently researching and writing Active Design version 3 to be launched in 2023.

Physical Activity Opportunities

The applicant will need to ensure that other physical activity opportunities that should be considered:

* Need for an indoor meeting/activity space for winter activity and when it rains. Huge potential for a 'meet and greet' place for a wide range of informal activity groups, including:

Beginner running
Ride social
Boot camp
Pop-up family games

*An indoor multi-purpose space within the pavilion can cater for a range of activities, including:

Dance
Yoga/Pilates
Circuits
Mums & babies/toddlers activity sessions
Short Mat Bowls
Table Tennis

* Outdoor open access activity trail equipment. Ideally with a walk/jog/cycle trail around the perimeter of the space. This gives scope to a wide range of activity including 'story trails', green gym trail, junior/adult parkrun, circuits & boot camps. All activities that suit the demographic of families, busy working adults.

* Keep element of flat multi-use informal space outside pitch layouts to encourage 'free-play' for children & families, this may include:

'Jumpers for posts'
Frisbee
Rounders
Fitness/Exercise sessions

* Potential for one of the designated 'play areas' to be focussed at teenagers and explore whether there is demand for skate park, free-running/parkour equipment.

Community Use of Education Sites

Making better use of existing resources contributes to sustainable development objectives by reducing the need for additional facilities and the potential loss of scarce resources such as open space. The practice of making school sports facilities available to wider community use is already well established and has been government policy for many years, but there are further opportunities to extend this principle within the education sector through programmes such as Academies and to other privately owned sports facilities, to help meet the growing demand for more and better places for sport in convenient locations.

Sport England promotes the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.

Sports facilities provided at school sites are an important resource, not just for the school through the delivery of the national curriculum and extra-curricular sport, but potentially for the wider community. There are also direct benefits to young people, particularly in strengthening the links between their involvement in sport during school time and continued participation in their own time. Many children will be more willing to continue in sport if opportunities to participate are offered on the school site in familiar surroundings. Many schools are already well located in terms of access on foot or by public transport to the local community and so greater use of the sports facilities outside normal school hours should not add significantly to the number of trips generated by private car.

Use Our School is a resource to support schools in opening their facilities to the community and keeping them open. It provides tried and tested solutions, real life practice, tips from people making it happen, and a range of downloadable resources [link here](#)

National Governing Bodies for sport (NGBs)

The RFU advise that page 102 of the draft masterplan shows the indicative locations and headline purposes of the Community Greens. The RFU notes the draft masterplan states 'sports pitches are to be provided within the Community Greens in accordance with the MDDC Playing Pitch Strategy unless offsite provision in a favourable location is agreed with MDDC'.

Cullompton RFC is located 1.3miles from the East Cullompton development and the adopted MDDC Playing Pitch Strategy (PPS) states the rugby clubs adult pitch is currently overplayed by 2.8 Match Equivalent sessions per week, with development of the women's and girls game adding additional demand on the current pitches. In addition, five rugby teams (one adult, two youth and two minis teams), requiring a minimum of one rugby pitch, are predicted to be generated through planned housing at East Cullompton to 2033.

With significant constraints at their existing site, the rugby club are proactively seeking viable sites to relocate with the PPS indicating a 4 adult pitch site with appropriate ancillary facilities is the minimum requirement aligned to the predicted team growth. The rugby club strong preference is to relocate to a site within the Culm Garden Village development, with space adjoining the new cricket club site initially identified by the rugby club to explore further.

The Football Foundation (FF) wishes to highlight the need for a single multi-functional and sustainable sporting hub site for East Cullompton. This is as is set out in the Mid Devon Playing Pitch Strategy (September 2021) recommendations.

The FF notes the following extracts from the strategy which support this need:

- The population from the East Cullompton housing growth area to 2033 is expected to generate demand for three adult, two youth and two mini pitches as a minimum, which should be accommodated within a community hub pitch site
- In order to provide a flexible, sustainable site which could accommodate a variety of pitch sizes and sports, a site of four hectares is recommended, which includes provision of a clubhouse/changing facilities.

Furthermore, the FF also wishes to draw attention to the fact that East Cullompton has been highlighted as a possible location for a full size 3G subject to it being delivered either a) in association with identified football pitches as a hub site and/or b) in association with the school.

Conclusion

Whilst supportive of the principle of development we would welcome further information and discussions to ensure the proposal meets the sport and physical activity needs of its proposed community on site and off site in line with the NPPF.

9. Blackdown Hills AONB

This response is made on behalf of the Blackdown Hills AONB Partnership. We welcome the opportunity to contribute to this consultation.

We are pleased that the Connecting the Culm project (which is led by the Blackdown Hills AONB Partnership) is referenced in the consultation documentation. To date, the Connecting the Culm project and team members have played an important role in the Culm Garden Village stakeholder forum, shared information and data including via the Strategic Flood Risk Assessment process and have added value to the Masterplan, through embedding resilience principles on a whole catchment scale into the process, to create an holistic approach to flood and drought management, alongside improvements to water quality, restoring biodiversity and storing carbon. We believe that there are significant opportunities to improve resilience both within and outside of the current allocation boundary, through targeted nature based solutions that could also provide 'blue routes' through the new development as well as create a 'resilience exemplar' country park(s).

We look forward to continued joint working with MDDC and others through the Connecting the Culm project, that is morphing and diversifying as it closes one funding chapter (Interreg 2 Seas) and opens others (Devon Resilience Innovation Project- DRIP and Natural Environment Investment Readiness Fund- NEIRF, plus emerging partnerships with asset managers including Network Rail and National Highways). Through the Connecting the Culm 25 year Blueprint, we have a route-map to a resilience catchment and have set targets up to 2050, with milestones at 2030 and 2040. It is clear that to restore the function of the whole catchment and build resilience is not a quick fix (£12.7 million investment over 25 years) but it will ultimately create 'headroom' and resilience to the East Cullompton/Culm Garden Village development itself, via upstream nature based solution interventions.

We are pleased to see that the Local Plan allocation policies have remained to the fore, noting the element of Policy CU9 regarding protecting the setting of the AONB. We support the guiding principle that the development should very much be seen as an integral part of Cullompton and yet

the eastern extent of the allocation site, and in time a larger development, should present a more natural rural fringe that 'fits' the landscape. We agree that the purpose of planting to the east should not be to screen the new development, but to enhance the natural setting and filter views from the AONB for example. As a key principle, we see the inclusion of green infrastructure as a fundamental element of this development and consequently would wish to ensure that this aspect of the infrastructure delivery plan is not weakened or overlooked.

The proximity to the AONB offers the potential for enhanced opportunities for non-car access, utilising new and enhanced off-road routes and quiet lanes. However it will be important to ensure that there are no unintended consequences for the AONB from such a large development close-by, including visitor pressures at certain sites, increased use of narrow, winding and steep lanes, and car and commercial traffic from the development taking shortcuts across the AONB.

These comments are made on behalf of the Blackdown Hills AONB Partnership in respect of its role to safeguard the distinctive landscape, wildlife, historical and architectural character of the Blackdown Hills whilst fostering the social and economic wellbeing of communities, and recognising the special cultural and geographical relationship between the AONB and the market towns surrounding it, including Cullompton. It is recognised that the AONB Partnership comprises a wide range of interests and organisations and that the comments made will not necessarily always be consistent with the views of individual partnership organisations, or responses made by organisations as statutory consultees.

Trusting that these comments are helpful in progressing the SPD.

10. Network Rail

Thank you for consulting Network Rail on East Cullompton Masterplan SPD. This email forms the basis of our response.

As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated sites it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site allocations and future masterplans.

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.

East Cullompton Masterplan SPD

Policy CU8 acknowledges the reopening of Cullompton Station. The requirement is to support transport needs by working with Network Rail to promote new stations at both Cullompton and Wellington (albeit Wellington is not within your plan area but the development of both stations is coming forward together). As the proposals are developed, Network Rail would request detailed consideration to the quantification of demand for rail travel and should include identification of any

contributions to further improvements that would be merited at Cullompton. It could be that the predicted growth may increase future demands which may, in turn, necessitate the need for enhancements to facilities such as waiting rooms, improved passenger information, toilets and parking.

Transport Assessments and Level Crossings

Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process. This might be an increase in the use of an existing level crossing.

Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any future development impacts on the safety and operation of any of the level crossings within Mid- Devon. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.

Level crossings can be impacted in a variety of ways by planning proposals:

- By a proposal being directly next to a level crossing
- By the cumulative effect of development added over time
- By the type of crossing involved
- By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing
- By developments that might impede pedestrians ability to hear approaching trains
- By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs
- By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing
- By any development or enhancement of the public rights of way

It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.

The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway:-

- (Schedule 4 (j) of the Town & Country Planning (Development Management Procedure) Order, 2015) requires that "...development which is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway" (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both the Secretary of State for Transport and Network Rail for separate approval.

The developer is required to fund any required qualitative improvements to the level crossing as a direct result of the development proposed.

Consultation on pre-application and planning applications

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. With this in mind any planned future development (both residential and employment) should take into account any adverse impact on railway and therefore, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process.

We would therefore appreciate the Council providing Network Rail with an opportunity to comment on any future pre-application or planning applications should they be submitted for sites adjoining the railway or within close proximity to the railway as we may have more specific comments to make (further to those above).

We trust these comments will be considered in your preparation of the forthcoming policy documents.

11. National Grid

These representations are prepared on behalf of National Grid Electricity Distribution (South West) Plc (NGED), formerly Western Power Distribution (South West) Plc, in response to the East Cullompton Masterplan SPD (July 2022) which is subject to public consultation.

Introduction

NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers to enable the retention of its infrastructure.

In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.

Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) can normally be undergrounded or diverted without significant concern. However, where land allocations affect 132kV lines, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:

- a) whether the lines could be accommodated within the development site; or
- b) the viability and feasibility of diverting and/or undergrounding overhead lines.

This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within policy or guidance.

In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development.

NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation

site's development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan.

In light of the above, NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:

1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy or accompanying guidance to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land;
2. Early engagement with NGED to establish whether NGED's infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above;
4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.

In the context of point 4, NGED welcomes the preparation of a supplementary planning document for the masterplanning of East Cullompton. However, concerns are raised regarding the potential implications of the draft masterplan for National Grid's strategically important 132kV line.

Section 4.7 of the draft SPD deals with utilities and specifically the existing National Grid Electricity Transmission (NGET) 400kV line and NGED's 132kV lines which traverse the site. Although the SPD recognises that the 400kV lines are a fixed constraint to be incorporated into the masterplan, in respect of the 132kV it states:

"There are options available to reduce the effect of the Western Power Distribution (132kV) power lines. The land over which the lines pass within the site benefits from 'lift and shift' clause over the route easement. This enables the landowner to alter the path of the power lines if an alternative route is available. Land north of the allocation is also in the ownership of the landowner over which the WPD cables currently pass."

The East Cullompton Activity Framework on page 84 illustrates an area through the masterplan where it considers that a *"development area [is] enabled by undergrounding powerlines"*.

On page 93, the SPD explains the Council's preference to underground the 132kV line:

"The potential to underground overhead powerlines should be explored, particularly where leaving them in-situ would place a significant obstruction and detraction from the quality and quantity of residential areas. Mid Devon District Council's preference is for the powerlines to be moved underground but a final decision will be subject to further masterplanning, feasibility and viability work."

The SPD Masterplan shows the eastern 132kv line undergrounded as this would cut through and segregate residential areas hindering the creation of a coherent development form. The area of land made available for development by undergrounding the 132kv lines (as shown) equates to around 7ha. or approximately 250 homes within the allocation area."

It goes onto set out how land beneath the powerlines could be used if retained overhead:

“The land beneath the powerlines is not considered suitable for the primary useable areas of public open space, where the presence of the lines would undermine the quality of the spaces beneath. The land beneath may be used for ancillary open space, wildlife corridors, streets and active travel corridors and potentially renewable energy generation.”

NGED does not object to the Council’s expression of a preference to underground the overhead lines as part of this masterplan and it welcomes the acknowledgement within the SPD that a final decision on the treatment of the overhead lines will be taken following further masterplanning, feasibility and viability work. However, NGED would like to take this opportunity to comment upon the Council’s assumptions regarding the diversion and/or undergrounding of the 132kV and the perceived benefits to the masterplan.

The pylon towers on this route were constructed in 1989 and are in excellent condition. They would normally have a further lifespan well in excess of fifty years and there is no practical reason why development could not be built to either side of the lines with clearances maintained. Diversion of the overhead line circuits with underground cables would come at significant cost and operational disruption/risk with no obvious engineering benefit. Extensive additional work would need to be undertaken between National Grid, the local planning authority, landowners and developers to establish the feasibility, cost and viability of diverting or undergrounding the line before such proposals could be relied upon for the purposes of a future planning application.

National Grid has a duty to maintain its infrastructure in an efficient and cost effective manner. Diversion of the route onto land to the north, within the landowner’s control, would increase the length of the overhead line and take a route which is considerably less efficient and direct than the current alignment, incurring additional cost and infrastructure into the National Grid Network for it to maintain.

Contrary to the claims within the SPD, proposals to underground the 132kV line would sterilise a corridor of land along the alignment of the line. Where high voltage electricity lines are undergrounded, National Grid is unable to support any development which could affect the operation of or obstruct the line, including buildings, tree planting, public highway or attenuation features over the cables; a 10m wide corridor of open ground would be required above the undergrounded cables. Conversely, where lines are retained overhead, the land beneath the lines can normally be used for green infrastructure, tree planting, drainage features and attenuation and public highway. Accordingly, the retention of the overhead lines offers greater opportunities to deliver an efficient and effective masterplan than proposals to underground. In addition, it would be necessary to install terminal towers at both ends of the overgrounded line. Land would need to be identified, and secured with willing landowners, to host the terminal towers and such towers are more visually imposing features than the normal pylons which they replace.

Proposals to underground or divert the electricity lines should also be considered in the context of the SPD’s principle for carbon reductions, which is embedded in all disciplines of the planning process. The SPD should explore all opportunities to incorporate the overhead lines into the masterplan to avoid the considerable cost and carbon footprint associated with diverting or underground the lines and the additional infrastructure and construction processes this would involve.

Western Power Distribution issued a letter to Mid Devon District Council on 14 January 2022 requesting that the masterplanners engage with WPD (now National Grid) as soon as possible to agree the design principles associated with the 132kV line. To date, WPD/NGED has received no

response from Mid Devon District Council. The LPA is urged to engage NGED in the refinement of the East Cullompton SPD prior to its adoption, to ensure the implications of moving the overhead lines and the potential to retain the lines within the masterplan are both fully understood and reflected through an updated masterplan.

The SPD acknowledges the potential longer term growth of East Cullompton through further development to the north and east of the allocation. Such proposals, as illustrated within the SPD would have further implications for the 132kV line, with residential development proposed beneath the existing line to the east (as drawn it appears that MDDC assumes this would also be undergrounded). Whilst proposals for further expansion are yet to be confirmed through the emerging Local Plan, a long-term view of the proposals for the 132kV line is needed, taking into account the treatment of the 132kV line through the allocated site and the implications for the development of the wider site.

At the construction stage, any proposals to move the overhead line could have significant implications for the overall project cost, phasing and delivery.

These comments are intended to offer constructive comments on the draft SPD and masterplan. National Grid welcomes the positive steps being taken by Mid Devon District Council to establish a masterplan to inform the future planning of East Cullompton. However, it is concerned that the Council's preference to underground the 132kV line is misinformed and fails to take into account the implications for developable land, phasing and project cost. Officers are also reminded that NGED has statutory powers which it may exercise to retain the overhead line in situ.

National Grid would like to take this opportunity to reiterate its willingness to engage with Officers, prior to adoption of the SPD, to inform the masterplanning process.