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Dear Sir/Madam

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 providing Highways England with the opportunity to comment on the 'Draft Vision for the whole Garden Village' and 'Opportunities and Concepts document for the Master Plan SPD for Phase 1 only'. This sets out proposals for the future development of the Garden Village and includes a masterplan that shows the proposed location of differing types of buildings and land uses including homes, shops, community facilities and open spaces.

Highways England has recently made representations to the Mid Devon Local Plan Review, in which the East Cullompton site is included as an allocation, and is proposed to form the first phase of the Garden Village. The views expressed in those representations in terms of the traffic impacts on the SRN remain, and our current response should be read in conjunction with those previous comments. In summary, the key points made from the SRN perspective were that:

- a review of modelling undertaken by Devon County Council has been undertaken in order to determine the transport infrastructure necessary to facilitate the sustainability of the development set out in the plan which includes part of the Garden Village site;
- on the basis of the evidence presented, it is agreed that a transport intervention of significant scale would be necessary, particularly for the higher quantum scenarios (1,750 plus), in order to ensure that road safety would not be impacted to unacceptable degree and the residual cumulative impacts on the road network would not be severe.

Based on the technical modelling reports provided, Highways England concludes that:

- development in Cullompton, including the proposed 500 homes at East Cullompton, requires the delivery of the proposed Town Centre Relief Road;
- more than 500 dwellings at East Cullompton will require a strategic scale intervention to facilitate the remainder of the East Cullompton allocation, which may comprise a new

Junction 28a as assumed in the transport evidence or an alternative scheme as is yet to be identified through further assessment;

Vision and Concept document for the whole Garden Village

The Vision and concept document sets out a number questions seeking views on the following:

- a proposed Vision as a statement of intent to guide development of the envisaged garden village at Culm;
- a set of 9 Key Principles which will form the basis of the delivery of the proposed Vision;
- an emerging Concept Plan for the garden village which sets out spatially how the garden village embodies the Vision, Principles and Objectives.

This response aims to answer those questions put forward within the consultation which we considered relevant to Highways England's interest. Where answers are not provided, these questions are not considered to be matters for us to comment upon.

The purpose of the document is to establish a vision for the Garden Village. The first phase of the Garden Village is included within the Mid Devon Local Plan Review which considers proposals for the period between 2013-2033. Emerging Policy CU7 (East Cullompton) 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 to follow). The additional housing (850) does not form part of an allocation in the plan, and development beyond the current local plan allocation would require further detailed testing through the statutory planning process.

It is noted that the vision and concept document refers to the Government's confirmed Garden Village status for land to the east of the M5 motorway at Cullompton. Reference is made to the long-term plans for the Garden Village, to deliver up to 5,000 new homes as well as employment, shops, schools, healthcare facilities and leisure opportunities, including the potential for new sports facilities and country park. It is proposed that *'The garden village will help to deliver M5 J28 motorway improvements and the long-awaited town centre relief road'*

Through the review of the modelling evidence base for the Mid Devon Local Plan, the nature and scale of improvement required to facilitate access to and from the M5 is understood but the detailed scheme and delivery mechanisms are yet to be defined. Highways England is in agreement that a scheme such as Junction 28a is necessary to accommodate the proposed growth. Highways England will continue to work with the authorities to identify the most appropriate scheme and where required provide support in securing funding for delivery of the scheme.

Understanding the Area

Section Two makes reference to *'New employment areas can take advantage of the good links to the M5 motorway and to Cullompton'*. The purpose of the strategic road network (SRN) is to provide for the safe and reliable long distance movement of people and goods. The promotion of the Garden Village as being well connected to the M5 somewhat contradicts the vision of the Garden Village which will *'focus on providing excellent access to services and jobs within a healthy, well connected and green environment'*. Where possible we would expect large

development allocations and proposals to be well located in order to reduce the need for day to day reliance on the SRN, particularly for commuting. We would not want to encourage the development of a 'commuting village' on the edge of the SRN. Through the masterplanning and application process we will be working closely with the authorities and applicants to ensure that the development is well connected by sustainable travel modes and well phased in terms of housing, education and employment to reduce the need for peak hour private car trips particularly on the SRN.

The document identifies '*Connections to and across the M5 motorway (and river and railway line) and development of the garden village is constrained by the current circumstances at Junction 28 of the motorway. This garden village presents an opportunity to support the resolution of town centre traffic problems and provide a new or improved means of access onto the M5 motorway as well as pedestrian, cycling and public transport across the motorway to the existing town*'. The proposal in its current form is considered to alleviate traffic impact on the local road network, and whilst it is noted that a scheme could be delivered to safely facilitate access to and from the M5, it must be recognised that this will be of significant scale and cost with delivery risks.

Q2: Are there other significant constraints or opportunities that the master planning process at Culm Garden Village needs to take into account?

Highways England expects the masterplan to give detailed consideration to the phasing of the whole development, with particular regard to the delivery of necessary infrastructure, employment and education facilities. This is to ensure that the need to travel to and from external destinations is minimised and that mode choice is available for the residual journeys that are not internal to the garden village.

The development should be well connected from an early phase by public transport and sustainable travel connections. The phasing and delivery of housing, employment, amenities and travel links to the existing settlement and the proposed Garden Village will be crucial to encourage sustainable travel patterns from an early stage of development. Failure to do so is likely to result in a disjointed development which is likely to rely on the private car and commuting for access to employment, education, retail and leisure trips unless the masterplan and planning conditions can provide appropriate mechanisms to prevent housing delivery outpacing the delivery of these other integral elements of the Garden Village proposals.

A well connected & integrated new place

The objectives to create a well connected and integrated new place are considered appropriate however, considering the 'Garden village' aspirations, the key priority should be minimising external vehicular traffic and connecting the development by sustainable travel modes. The potential to re-open Cullompton railway station, which is directly related to the delivery of Culm Garden Village, should be the key priority of the SPD and the development proposal. The timing of providing key infrastructure in line with the phasing of development is likely to influence how people who live in the Garden Village travel.

East Cullompton Masterplan SPD

The Masterplan SPD document only covers the East Cullompton site which is proposed to be allocated for strategic development in the emerging Mid Devon Local Plan (2013- 33) for 1750

dwellings. Any further extension to the Garden village will be required to go through the statutory planning process.

Access and movement

The SPD identifies that strategic infrastructure vehicular access and movement at Cullompton as a whole is constrained by the limited capacity of Junction 28 of the M5, in addition to traffic congestion in the town centre. Junction 28 of the M5 in its current form does not have sufficient capacity to enable all of the East Cullompton allocation to be developed. This is reliant on the delivery of a new strategic solution to motorway access. Whilst it is noted that *'East Cullompton, in combination with the urban extension to the north-west of Cullompton, presents an opportunity to resolve town centre traffic problems and provide an alternative or improved means of access onto the M5'* and that development of the East Cullompton allocation will enable infrastructure to come forward, we do not consider that all traffic problems can be alleviated by providing new highway infrastructure, and that other sustainable travel modes should be promoted in order to reduce private car travel, particularly for non-strategic trips on the SRN.

It is understood that the SPD represents the first stage of a two-part process towards the creation of the final Masterplan SPD for East Cullompton, which is expected in the summer of 2019. Highways England welcomes the opportunity to continue its involvement with the Masterplan process.

It is not the remit of Highways England to provide comment on the detailed internal urban design and master-planning principles of development layouts, unless the intended local road access has the potential for direct impact on the SRN. Whilst the impact of the allocation is understood and intervention to facilitate access and egress to the M5 is considered necessary, the layout of the Garden Village and the consideration that the Masterplan gives in terms of connectivity to sustainable travel modes, amenities and facilities will be an important aspect of the design principles of the Garden Village and the likely success of modal shift and reducing the reliance on the SRN for localised trips.

The re-opening of the Cullompton Train Station has the biggest potential for reducing outbound car-based commuting. The principle of investing in the improvement of the rail line between Cullompton to Exeter is strongly supported.

Overview

Highways England is supportive of the current East Cullompton Masterplan and the objective of creating a sustainable community. However, at this stage the Vision and Concept and Masterplan SPD documents are considered to require further refinement and strengthening in order to reduce the need for external travel, particularly by private car and to identify the scale of necessary transport infrastructure in order to manage viability risk. Measures to encourage modal shift are strongly supported, however further emphasis should be placed on the early re-opening of the Cullompton rail station to provide an alternative travel mode.

The Masterplan aspiration for accommodating further dwellings at East Cullompton is noted by Highways England. It is acknowledged that this will lead to an over-capacity situation at M5 Junction 28 and a major intervention will be required in order to accommodate both planned and further aspirational growth in line with the Garden Village status.

It will be essential that the development strikes the appropriate balance between the provision of significant additional housing, employment opportunities and local facilities to create a sustainable new community, and that delivery is phased to match the provision of the necessary transport infrastructure in order to minimise the traffic impact on the strategic road network.

Yours faithfully

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