

## **STATUTORY/OTHER CONSULTEE RESPONSES**

Responses from statutory and other consultees, including Town and Parish Councils, are summarised below. The full responses will be published on the Culm Garden Village website. In most cases, a single response from a consultee includes comment on both the consultation documents.

### **1. Highways England**

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.

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 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.

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.

## **2. Environment Agency**

### *Vision & Concept*

We consider that more should be included in respect of water resources and water quality. 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 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. 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.

The vision should include more about enhancing the environment (i.e. providing net gain) and being resilient to climate change. The emerging 'Connecting the Culm' project will be important. 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.

The floodplain park and connecting green-blue corridors (incorporating SuDS) will play an important part. 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. 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 Masterplan SPD*

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, 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 a 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 as 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').

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.

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.

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.

### **3. Sport England**

Sport England has assessed this consultation in the light of Sport England's Planning for Sport: Forward Planning guidance  
<http://www.sportengland.org/facilities-planning/planning-for-sport/>.

The overall thrust of the statement is that a planned approach to the provision of facilities and opportunities for sport is necessary, new sports facilities should be fit for purpose, and they should be available for community sport. To achieve this, our objectives are to:

PROTECT sports facilities from loss as a result of redevelopment

ENHANCE existing facilities through improving their quality, accessibility and management

PROVIDE new facilities that are fit for purpose to meet demands for participation now and in the future.

The occupiers of new development, especially residential, will generate demand for sporting provision. The existing provision within an area may not be able to accommodate this increased demand without exacerbating existing and/or predicted future deficiencies. Therefore, Sport England considers that new developments should contribute towards meeting the demand that they generate through the provision of on-site facilities and/or providing additional capacity off-site. The level and nature of any provision should be informed by a robust evidence base such as an up to date Sports Facilities Strategy, Playing Pitch Strategy or other relevant needs assessment.

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.

The quantity of playing fields needs to take into account the existing situation and future needs of the existing population and the needs generated from new homes. Sports pitches should be in accessible locations, within easy reach of the community and be a large multifunctional open area for a number of sports, linked into a green grid and create non car journeys. They should be in areas where there is no risk of flooding or detrimental noise or air pollution, or under electricity pylons.

Sport England recommends that a ground conditions assessment is undertaken by a sports turf specialist/agronomist who can recommend a scheme for preparing the playing fields to the required specification. The recommended scheme should then be implemented. Detailed guidance on the issues that require consideration is set out in Sport England's guidance 'Natural Turf for Sport':

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/natural-turf-for-sport>.

The developer(s) will need to ensure that the journey to the pitch sports hub from the site and wider town centre be visible being walking, jogging and cycling friendly. The LTA would want to see tennis involved in the plans going forward. They are currently mapping where their future investment is likely to be directed going forward. Whilst there is a notable amount of club provision around Culm, there is very little community provision.

With regard to the linked proposal for a Cullompton relief road we raise concern over the potential loss of land and/or buildings used for sport and recreation including playing fields. Sport England therefore considers that the road proposal conflicts with our national policy on the loss of sports facilities. Should redevelopment be unavoidable, an equivalent (or better) replacement facility should be provided in a suitable location.

Sport England has no objection in principle to housing growth but recommends that further discussions and amendments are made to the Masterplan and finer detailed designs to take on board the comments above before the final plan is adopted as Council policy. The immediate key missing document is a robust evidence of need for sport and recreation – pitch and non-pitch sports.

Sport England, Active Devon and the NGBs would like to work with the developer to provide exemplar sports facilities and physical activity opportunities for the residents of the Garden Village.

#### **4. Devon & Cornwall Police**

Proposed development of this size will inevitably have an impact on policing and therefore it would be prudent for Devon and Cornwall to explore the possibilities of using Section 106 monies to help fund future infrastructure requirements once these needs are identified.

Designing out crime in the built environment is an effective method of improving the safety, security, and wellbeing of those who live, work and visit Mid Devon. Liaison with the police Designing Out Crime Officer (DOCO) regarding crime prevention through environmental design (CPTED) at the earliest stage of the planning process

will help ensure new communities are safe, secure and sustainable. The DOCO will look to ensure the following elements are considered and incorporated into the design of future developments:

Access and movement - places with quality connections and well-defined routes, that provide convenient movement without compromising security

Structure – encouraging ‘active frontages’ and limiting access to private space

Surveillance – encouraging overlooking of public spaces by those who will take action should a crime be committed

Ownership – clearly defining where public space ends and private space begins and encouraging people to take ownership of their environment

Physical protection – ensuring buildings include appropriate physical measures to prevent crime

Activity – ensuring the level of human activity is appropriate to the location to reduce the risk of crime and increase perceptions of public safety

Management and maintenance – discouraging disorder by creating places that are well looked after with minimum cost implications.

Designing out crime also impacts on the sustainability of developments.

Sustainability is not just about energy use but also includes creating developments which are less likely to suffer high levels of crime. Considering design principles at an early stage can help improve feelings of safety and security, not only for new residents but those who already have homes in the area. Therefore, can consideration be given to the principles and practices of Crime Prevention Through Environmental Design (CPTED) in designing out crime, disorder, anti-social behaviour (ASB) and community conflict within the built environment and be incorporated into the future plans for Culm Garden Village. It is also requested that the DOCO be involved in the review of any designs at the earliest possible stage.

As with many new developments in Devon, the good intention of encouraging residents and their visitors to walk, cycle or use public transport is fully supported but in reality it appears that the owning of a private vehicle continues to be the preferred method of transport. But by failing to recognise this at the design and layout stage is now providing ever increasing visual evidence of how a lack of sufficient and practical parking is having an adverse effect on quality of life issues for residents of some new development.

## **5. Devon County Council**

### ***Local transport provision***

As the Highways Authority, Devon County Council has been engaged throughout the preparation of the Local Plan Review on the transport requirements associated with this site. We have also been engaged on transport matters through the design review process undertaken so far for the whole site and will continue in this role going forward.

The preparation of a sustainable and holistic transport strategy will be fundamental to ensure development impacts at the Garden Village are managed and mitigated in an appropriate manner. As such we welcome the identification of “A well connected

and integrated new place” as one of the nine key principles for the garden village. It is necessary to develop a holistic transport strategy for the Garden Village which appropriately considers all modes. Fundamentally it should address the need for strategic junction improvements, provide attractive and integrated public transport links and facilitate high levels of walking and cycling across the site and into the existing town. Attractive routes will also need to link to the train station.

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

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

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

### ***Education Provision***

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

The concept proposals plan on page 32 of the Vision document indicates one “potential primary school” within the Mid Devon Local Plan proposed allocation boundary. It is envisaged that this primary school will be a 3-form entry school,

offering 630 places. It should be noted however that the final education strategy for the proposed Local Plan Review allocation is yet to be determined. All new primary schools should incorporate appropriate early years provision and a children's centre service delivery base.

The education strategy outlined on page 31 of the Masterplan SPD document is consistent with what has been put forward through the Mid Devon Local Plan review. As stated in the document, there are currently two potential scenarios identified for primary provision. The County Council accepts both scenarios, but it should be noted that there are cost implications of delivering the two-school option. All new primary schools should incorporate appropriate early years provision and a children's centre service delivery base. All development will be required to contribute to the delivery of the primary provision on site.

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

With regard to secondary education, the draft masterplan correctly identifies that around 390 secondary aged pupils are expected to be generated as a result of this development (the full 2,600 dwellings). Devon County Council has undertaken design work to establish how Cullompton Community College can be expanded from a 5 form entry to 8 form entry secondary school to accommodate this growth in pupils. Developer contributions will be required to fund the necessary expansion. The draft masterplan indicates that the emerging access and movement concepts for the site can enable safe and convenient walking and cycling routes across Honiton Road and the M5. This is fundamental for the County Council to accept the proposed secondary education strategy.

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

1.5% of school aged children will have special educational needs (SEN). It is envisaged that a new SEN school will be provided as part of the wider garden village



proposal. This could be provided alongside primary and secondary provision on site, potentially as part of a wider education campus.

### ***Waste Disposal***

In the development of the Local Plan Review, Devon County Council outlined the requirement for a new recycling centre to serve Tiverton, Cullompton and Willand. At the Local Plan Review examination hearings in February 2019 it was agreed that relevant policies, including CU10 (East Cullompton Community Facilities) and CU20 (Cullompton Facilities), would be updated to include reference to a new recycling centre and the need for development to contribute financially towards its delivery.

A site for the new recycling centre is yet to be identified although the County Council is proactively looking for a potential site. We would welcome the opportunity to discuss the potential for locating this facility within the East Cullompton allocation, or indeed the wider Garden Village, ideally within an appropriate part of the employment area. The site would need to be approximately 1.2 hectares and have good road access. It should be noted that the strategy for the new recycling centre is fluid and we are currently also considering the potential need for a second new facility in the area at Tiverton.

### ***Waste Planning***

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

### ***Historic environment***

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

The document could provide more focus upon heritage assets forming part of green infrastructure and informing the site's layout. To achieve this, investigative work is required which looks more holistically at different types of heritage assets likely to be in the area. Without this work, opportunities may be missed to maximise the potential for heritage assets to form part of green infrastructure and inform the site's layout.

Both the Culm Garden Village and the East of Cullompton Allocation sites occupy large areas within a landscape known to contain evidence of prehistoric and Roman activity, the modern town of Cullompton to the west contains evidence of prehistoric

as well as Roman military and civilian settlement - including a Roman military fort. The surrounding landscape also contains evidence of activity from these periods too, while the current field system and farm landscape here dates to the later medieval and post medieval periods.

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

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

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

The results of this work may influence layout of the development as well as Green Infrastructure within the developments. Finally, it would be helpful to explain how the heritage setting areas associated with the listed buildings have been defined.

### ***Surface Water Flooding***

The Vision and Concept document appropriately incorporates the need for sustainable drainage systems and embeds this requirement within two of the objectives, and recognises the role sustainable drainages systems can play in relation to green infrastructure and open space. This approach is supported.

It is also noted that surface water management will form part of the Masterplan SPD for the first phase of the Garden Village. This is a sensible approach and should ensure that surface water management is considered at an early stage and that areas are allocated for sustainable drainage features. The document generally considers the presence of Flood Zones 2 and 3 and would benefit from a wider consideration of all local flood risk, such as surface water and groundwater flooding.

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

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

Since this scheme is 'landscape led' it would be beneficial to provide 'green/blue corridors' for wildlife and surface water/watercourses within the development to increase the amenity within the area.

In terms of detailed comments, Figure 4 on page 9 of the document does not clearly display the extent of flood zone 2 and 3. The plans should be updated to be clearer. In relation to the Flooding and Drainage section of the document on page 20, the 3rd paragraph which currently refers to "nature based solutions" should be amended to read "Natural Flood Management based solutions".

### ***Health and wellbeing***

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

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

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

### ***Economy and Enterprise***

In order to create a sustainable community at the Garden Village it is necessary to ensure the development of homes is coupled with the provision of jobs and employment space. This requirement has been included within the Vision and

Concept document and this is supported. We welcome the inclusion of “Ambitious employment opportunities,” as a key principle. We strongly support the concept of providing good quality employment in a high-quality environment. Design should be innovative as this will be essential to attract new and business to the area. There needs to be a mix of well-designed premises with good internet connectivity which should include work-hubs.

### ***GP Provision: Response of the new Devon Clinical Commissioning Group***

In light of the substantial population increase which would arise as a result of these proposals, the CCG is discussing how services will be provided for this area. At the current time, no decision has been made about whether to increase capacity at existing facilities or to seek a new facility to cover the development. An existing provider of primary medical services in Cullompton has also expressed their concern regarding the level of population growth in the area at a time where recruiting GPs poses significant challenge. The CCG will continue to feed in to the development plans and work jointly with its partner organisations. Following the emergence of an appropriate strategy based on robust evidence, it is likely that developer contributions will be sought towards appropriate provision to allow for increased healthcare capacity in the area.

## **6. Natural England**

The vision statement appears to promote high quality and multifunctional green infrastructure. Natural England’s Green Infrastructure Guidance provides an introduction to delivering green infrastructure at the micro and neighbourhood scale through features such as street trees, green facades and green roofs, where consistent with the local character. These features can be extremely important in increasing ecological connectivity between green spaces, particularly when footpaths and green corridors are not feasible.

Natural England also encourages any proposal to incorporate measures to help improve people’s access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

Natural England recognises that climate change is the single biggest threat to the natural environment. Improving energy efficiency is the most efficient mitigation measure to reduce greenhouse emissions and therefore conserve and enhance the natural environment. Natural England welcomes any proposal for sustainable building design which should also give consideration to passive ventilation, solar orientation etc. to reduce demand.

We note from the masterplan maps that the proposed green corridors run mostly along the lines of existing hedgerows. These corridors appear to be a significant width in the masterplan which would provide robust corridors that will provide significant benefits to the garden village community as well as wildlife. We

recommend that you substantiate these proposals in the design of the garden village. There may additionally be significant opportunities to include green infrastructure in urban environments such as green roof systems and roof gardens; green walls to provide insulation or shading and cooling; new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to habitat connectivity, the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".

You may wish to consider providing guidance on strategic net gain to be provided and/or guidance on individual development sites throughout the area, such as the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. There are several examples of good practice where LPAs are making progress with delivering net gain and Natural England would be happy to advise further. We welcome that you first considered what existing environmental features on and around the site can be retained or enhanced before considering what new features could be incorporated into the development proposal.

Biodiversity metrics are available to assist developers and local authorities in calculating and securing biodiversity net gain. Local Authorities can set their own net gain thresholds but Natural England would currently expect a minimum of 5% net gain and LPAs should aim to negotiate upwards of this.

To preserve the wider landscape character of the area, the master plan should recognise and give appropriate consideration to the impact of the village design on the Blackdown Hills Area of Outstanding Natural Beauty (AONB).

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

The Institute of Lighting Professionals has produced practical guidance on considering the impact on bats when designing lighting schemes - Guidance Note 8 Bats and Artificial Lighting. They have partnered with the Bat Conservation Trust and ecological consultants to write this document on avoiding or reducing the harmful effects which artificial lighting may have on bats and their habitats.

An SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. SPDs should be

considered as a plan under the Habitats Regulations in the same way as any other plan or project.

## **7. NHS RD&E**

During 2017/18, the equivalent of 79,644 residents of Exeter and East and Mid Devon attended the Trust's A&E Department and 88,346 of Exeter and East and Mid Devon residents were admitted to Hospital. In addition to this, the equivalent of more than every resident attended an outpatient appointment and 206,744 uses of the Community Health Services were made by Exeter and East and Mid Devon residents. This is equivalent to the average Exeter and East and Mid Devon resident generating 2.1 acute hospital interventions per year at the Royal Devon and Exeter NHS Foundation Trust (see Appendix 2 for 2017/18 Activity % by Local Authority Area).

There is no way to reclaim any additional cost for unanticipated activity within Devon. The only way that the Trust can maintain the "on time" service delivery without delay and comply with NHS quality, constitutional and regulatory requirements is through developer funding the gap directly created by the development population. Without securing such contributions, the Trust will have no funding to meet healthcare demand arising from the development during the first year of occupation. Without the contribution, the health care provided by the Trust would be significantly delayed and compromised, putting the residents and other local people at potential risk.

A development of up to 5,000 dwellings equates 12,804 new residents (based on the current assumption of 2.56 persons per dwelling as per ONS figures). Using existing 20164 demographic data as detailed in the calculations in Appendix 5 will generate 25,728.72 acute interventions over the period of 12 months.

As a consequence of the above and due to the payment mechanisms and constitutional and regulatory requirements the Trust is subject to, it is necessary that the developer contributes towards the cost of providing capacity for the Trust to maintain service delivery during the first year of occupation of each unit of the accommodation on/in the development. Without securing such contributions, the Trust would be unable to support the proposals and would object to the application because of the direct and adverse impact of it on the delivery of health care in the Trust's area. The contribution required for this proposed development is £7,286,583.

Having considered the cost projections, and phasing of capacity delivery we require for this development it is necessary that the Trust receives 100% of the above figure prior to implementation of the planning permission for the development. This will help us to ensure that the required level of service provision is delivered in a timely manner. Failure to access this additional funding will put significant additional pressure on the current service capacity leading to increased delays for patients and dissatisfaction with NHS services.

## **8. South West Water**

South West Water has no comment at this time other than to confirm initial discussions have been held regarding the provision of public foul drainage and mains water to serve the new village.

## **9. East Devon District Council**

We note that the initial phases of the proposed development align with policy of the emerging Mid Devon Local Plan and we would endorse policy compliant development as the scheme proceeds. In this context we would also highlight the importance of alignment of the overall development with the policies of the Greater Exeter Strategic Plan as it develops and starts to take formal shape.

As you will be aware the proposed development falls in open countryside and at its nearest point suggested built development lies around one kilometre from the East Devon District Council boundary. We are, therefore, specifically interested in cross-boundary issues and relationships across the two local authority areas and the towns and countryside areas that surround and are close to the proposed development area. As you will be aware the main road between Cullompton and Honiton (the A373) is of variable quality and whilst we recognise that Devon County Council, as Highway Authority, will take a particular interest in highway matters we would stress the importance of ensuring that this road, in particular, is fit for purpose to support the development and development you propose not compromise scope for building elsewhere.

A preliminary overview does not reveal designated nature conservation or heritage assets in East Devon in close proximity of the potential area for development but we would stress the importance of careful assessment of potential impacts on designated and non-designated assets as planning work progresses. This consideration, of course, applies to assets on both sides of the District Council boundaries and as you will appreciate we do jointly share an outstanding environment in this part of Devon with, for example, the Blackdown Hills Area of Outstanding Natural Beauty just four kilometres away from the area identified with potential for development.

## **10. Cullompton Town Council**

### ***Vision & Concept***

Name: "Cullompton Garden Village" as the majority of the proposal is located inside Cullompton Parish and Cullompton Town Council and the Neighbourhood Plan have been working for many years for homes in East Cullompton.

Other significant constraints or opportunities: road infrastructure, sewerage, flooding and pylons, business links, sports facilities. The map on Pages 7 and 9 does not include the road bridge at Old Hill and Duke Street and there is concern that there is no alternative crossing of the M5, main line railway and the River Culm.

Objective f (Page 15) should list the countryside park and sports zone as specific topics that should be delivered in Phase 1 of the development.

Cullompton Town Council have been asking for provision of a bus station as a key transport interchange in Cullompton and yet there is no mention of it. There will also be a need for significant parking at a reopened railway station.

No reference to countryside park alongside the River Culm between the river and Kingsmill Industrial Estate, no reference to flooding major works, lakes etc. needed on River Culm to mitigate flooding.

Kingsmill Industrial Estate desperately needs a new LGV suitable road behind Mole Valley Farmers to Honiton Road to remove the log jam of LGV traffic at the junction of Honiton Road and Kingsmill Industrial Estate to Junction 28. The region around Old Hill and Duke Street motorway bridge must be included.

Cycle paths are essential but there needs to be a safe pedestrian and cycle route over the M5 motorway leading to: Cullompton Community College, town centre, connecting east and west Cullompton, from J28 to Willand alongside River Culm connecting to National Cycle Route in Willand to give national cycle connections.

Active lifestyles do not refer to Sport England's demands that sports facilities are expanded and improved. Who will take on the management and ongoing revenue costs of community buildings?

There is no discussion surrounding additional medical facilities, such as GP Surgeries. The existing facilities do not have the capacity to cater to a town that will be twice the size that it is now.

The addition of suitable accommodation of an ageing population (such as bungalows) and a bus on a circular route to link east and west Cullompton via GP Surgeries, schools and transportation links in order to maximise safety and minimise car usage.

Infrastructure and sporting facilities should be prioritised in the first phase of development. The responsibility for ongoing capital and maintenance costs should be established in advance. Accessibility to community facilities will be a key aspect. How will the community at large be engaged?

There is no mention of bungalows for an ageing population or "homes for life". There is no mention of accessible homes with reference to RNIB and Design Council planning guidance. There is no mention of the weathering of exterior finishes of buildings and damp as reported in other large, modern and local developments.

There needs to be a larger allocation of land for business use and business and employment opportunities should receive more emphasis.

There should be a "green zone" between Horn Road and Dead Lane that contains: a secondary school, the Cricket Club, the Rugby Club and high quality, up market 4-6 bedroomed dwellings.



The Countryside Park and potential for cycle paths along the River Culm are not shown. There is significant concern that the proposed sport and leisure facilities will not be addressed until Phase 2 which may be 10-20 years into the future.

Principles should be increased to ten. Countryside principle should remain but sport and leisure should become principles in their own right.

### ***Masterplan SPD***

The green and blue infrastructure should provide: countryside park of c110 acres along River Culm, lakes for water retention used for a water park, relocate Cullompton Cricket Club and provide a County Cricket ground, site for a secondary school (or “all through” school), Sports Zone – hockey, archery, indoor shooting, outdoor bowls, tennis, Multi Use Games Area, relocate Cullompton Rugby Football Club, larger play areas with 5-a-side football and basketball in place of many small play parks.

A local centre will definitely be required in one of the following locations: with easy access from the M5 on the roadside on Honiton Road between Junction 28 and a new Junction 28A, in the area in the vicinity of the existing Mole Valley Farmers.

Provide lots of large bungalows for the elderly ideally situated in small cul-de-sacs that make walking safe. Pay attention to RNIB Building Guide and the Design Council’s Wheelchair Access housing guide. Do not provide small/starter homes.

Cullompton Town Council for some facilities; sports clubs e.g. cricket and rugby, St Andrew’s Church; YMCA could manage community facilities.

All types of employment should be provided. Smart and sustainable development should provide high speed broadband, solar panels, energy efficient buildings, roofs with wide eaves for shade in summer and rain protection.

Start as quickly as possible. The Road Infrastructure is key, particularly Junction 28/28A and Cullompton Relief Road. Key questions relate to the road infrastructure and time. Questions relate to flooding, sanitation, drains etc.; timing of sport and leisure facilities, parks and amenities for young people that are not sport related; timing of building of schools, doctors’ surgeries, shopping plazas etc.

There is a need for care in locating green infrastructure with such pylons and escarpments that will make the green space less usable. There needs to be better planning for being offices, business and commerce in order that local people can work locally. The proposed secondary school needs to be located within the Cullompton Parish boundary.

## **11. Kentisbeare Parish Council**

### ***Vision & Concept***

The Garden Village should take into account the sensitivities of, and rural nature of the villages in its vicinity. Kentisbeare Parish boundary should be clearly marked in all documents throughout the masterplanning process.

The existing junction 28 is not capable of dealing with the traffic arising from the Garden Village plans. The A373 has become significantly busier in the last couple of years. Also to date, no proper catchment based flood study has been undertaken, although it has been promised. It is not enough to describe issues like this as opportunities. Real infrastructure delivery on all three issues needs to take place before significant quantities of housing are built.

We feel that there has been no attempt to justify the size of the Garden Village and that the proposal is too big. A green buffer with Kentisbeare should be inside the Cullompton Parish boundary. In addition, we are concerned that affordable housing percentages must not be traded away, and we feel there is insufficient detail or acknowledgement that renewable energy technologies should be a crucial aspect of all housebuilding in the new scheme. As with the Local Plan, there is nowhere near enough detail on the flood risks this scheme will create, and there needs to be particular care and attention to the sizing, placement operation and maintenance of SuDs schemes to mitigate surface water run-off.

We would like to see a good range of skill-based businesses and not just basic service jobs. We would also like to see good links to the surrounding areas – e.g. connecting paths and an upgrade to the A373. We would like the development to reflect local architecture.

The green buffer area between the Garden Village and Kentisbeare should be inside the existing Cullompton Parish boundary. If it is to be an effective buffer zone, it should disguise the scale of the building from the rural areas beyond. That might suggest the planting of new woods or similar, such as coppiced woodlands that would generate an income. We do not believe that sports pitches fulfil that function. Within the buffer zone, property owners should retain their existing rights in terms of development. We would encourage footpaths and cycle/bridleways through the buffer zone. Kentisbeare Parish Council would be looking to secure this area as designated Local Green Space in any Neighbourhood Plan.

The Garden Village seems excessively large, as does the allocation of housing to east Cullompton in the Local Plan. This consultation should be asking for local residents' views as to whether they want a Garden Village at all, not presupposing their approval.

### ***Masterplan SPD***

Plans for east Cullompton continue to ignore all issues to do with the A373 to Honiton. This road needs addressing too. There is also no mention of the flooding issues in the area. There should be no large scale development until this has been

studied thoroughly, and recommendations from a full catchment based study implemented. There is no mention of sustainable drainage systems.

The undergrounding of power lines should take place where it is economically feasible to do so.

The transport network depicts the hoped for reopening of Cullompton railway station, which appears unlikely from comments elsewhere. Infrastructure needs prior delivery. MDDC continue to ignore the resultant transport problems which will be created to the east, notably the inadequate condition of the A373 to Honiton. The map on page 27 shows a “potential formal green infrastructure node” to the east of Dead Lane, representing the relocation of Cullompton Rugby Club. This is not connected to the development of the Garden Village and should be part of a separate process.

Community buildings should be multimodal, particularly churches with reference to acts of worship. We would like to see a good proportion of homes available for local people, together with high quality housing association homes. Priority should be given to local people on the waiting list with reference to social housing.

Offices should be of a high quality design. There are already adequate industrial units within this area, and there should be no further requirement, as it is really important to try and attract high skilled and high salaried jobs, rather than see these jobs being created in Exeter and Taunton. Consideration should be given to flexible co-working spaces (of high quality) to attract high growth and scale-up businesses in the digital economy, new disruptive technologies like artificial intelligence and 3D printing and materials engineering. Agree with SMART and sustainable development.

The allocation is far too big and relies on a considerably overinflated Objective Housing Need, and an ignoring of the regular emergence of windfall sites around Mid Devon. We are greatly concerned that the GESP allocations may override/overtake the Garden Village Plan.

## **12. Bradninch Town Council**

Bradninch Town Council discussed the proposals for the Culm Garden Village in Cullompton at their March Council meeting last week.

Concerns were expressed regarding the capacity of existing hospital facilities and whether these would be able to cope with the additional numbers of patients generated by this large development. Concerns were also expressed about the effects on the existing motorway junction (Jct 28) and its ability to cope with increases in traffic, particularly at busy times and specifically during the morning rush hour.

The Council feel strongly that improvements to Jct 28, health facilities, local roads and public transport provision (as well as other infrastructure and amenities) need to be in place before the garden village is built. The Council also have concerns regarding increased traffic and pollution levels within new and existing residential

areas and the effects on the health of residents, particularly children. The potential increase in run-off and its impact on flooding levels locally were also an issue that was discussed. The Council hope that the developers will be working closely with local groups including 'Connecting the Culm' in this regard.

### **13. Willand Parish Council**

#### ***Vision & Concept***

The adjoining roads around the site need to be considered and included in any Masterplanning and not just restrict it to the immediate area of the Garden Village.

The whole of the A373 through to Honiton needs to be looked at with a view to improving it and widening it in places as more traffic will go that way. The minor roads in the area need to be considered to prevent 'rat runs' particularly through Kingsmill Industrial site through to Stag Corner and then on to Willand as an alternative way to get onto the M5 to go North until J28 is fully functional.

The B3181 needs improvements or 'off road' footpaths/cycleways provided to link Cullompton with Willand and then the cycleway to Tiverton Parkway Station.

Willand Parish Council agrees with the Vision, however, would look to have houses of sufficient size and spatiality so that it does not end up with back to back development like some of Cranbrook.

Willand Parish Council agrees with the Principles. Sports pitches need to be located on good land and not on low lying land likely to hold water or flood as appears to be the case on some of the information available.

"Well designed" must include 'spatiality' and roads wide enough to allow safe on road parking for visitors etc. Employment opportunities need to be diverse containing scope for lesser skilled jobs. Proportion of housing must be designed to accommodate disabled or full life term of occupants.

The objectives are correct on the information available at this stage with the provisos in the comments under Question 4 taken into consideration. The main thing is to ensure that the community facilities are built alongside, or even before in some cases, the housing and the occupation of same.

Concept Plan: the only comment is a question as to who will make and when the decision will be made as to the locally distinctive and well-designed neighbourhood places?

Green buffer: Willand Parish Council feel that this is a matter between Cullompton Town Council and, more importantly, Kentisbeare Parish Council. Ideally it should be agricultural land or woodland to make a clear distinction between the two communities. It is felt that Kentisbeare Parish Council should have the lead voice on this matter.

Other comments: There are a lot of fine words and jargon which will need looking at further in the future when the detail starts to appear from the vision.

### ***Masterplan SPD***

The adjoining roads around the site need to be considered and included in any Masterplanning and not just restrict it to the immediate area of the Garden Village.

The whole of the A373 through to Honiton needs to be looked at with a view to improving it and widening it in places as more traffic will go that way. The minor roads in the area need to be considered to prevent 'rat runs' particularly through Kingsmill Industrial site through to Stag Corner and then on to Willand as an alternative way to get onto the M5 to go North until J28 is fully functional.

The B3181 needs improvements or 'off road' footpaths/cycleways provided to link Cullompton with Willand and then the cycleway to Tiverton Parkway Station.

As well as avoiding housing under the power lines schools, employment and community facilities should also be avoided from placement under them.

Sport, health and leisure: The examples given are supported. BMX bike track/skate park. There also needs to be walks with space for dog owners to exercise their pets, preferably off the lead in some areas. At an early stage land identified for sports pitches needs to be a good quality with good drainage. It must not be land tucked away in some inconvenient corner where building houses would not be easy or viable. It must not be in a position where it will flood.

Local centre: Ideally it should be fairly central to the development or at least central to the final village development area. There needs to be good access from the main road. The examples given appear appropriate. Possible site for a swimming pool?

Agrees with provision of all the house types and tenures listed, but "did not know" about live/work units. There should be a high proportion of affordable homes for rent bearing in mind that 'affordable houses' are not that affordable on the average wage for the area.

Agrees with the provision of: industrial units, high tech/digital/low carbon companies, small/flexible workspaces and retail and leisure.

SMART and sustainable: As a general concept this focus is sound but there will be a need for a practical mix of development particularly in relation to business units.

The SPD: This is a starting point and as time progresses much more detail will be sought for scrutiny.

Scope and content: Basically 'yes' but a lot more detail needed to form a complete view.