

Appendix 1 Summary of landowner/promoter representations

General	Section 1 Introduction	Section 2 Vision	Section 3 Influences	Section 4 Understanding the Place	Section 5 Masterplan Framework	Section 6 Growing East Cullompton	Appendix 1 Design Code
					Mixed use community hub at Fordmore Farm supported. SPD not clear whether residential can be included in community hubs - green box on page 87 refers to retirement services but not clear if this means retirement living. Requirement to either add residential to community hubs or remove private housing area of Fordmore Farm from the community hub (preferred approach).		
					Landowner intends to develop area of community hub north of Honiton Road for commercial/employment use. SPD does not reflect the consented development at Fordmore Farm (21/00349/FULL) (Class E development, agricultural style warehouse type buildings) or align completely with landowner aspirations. Some of the green space might need to be used for community/retail uses in order to provide sufficient community uses to meet the needs of the allocation. Further discussion on what can be provided requested.		
Good document overall. More optioneering could have been included, especially as masterplan deviates from the first consultation draft. However, SPD sufficiently flexible.	Page 7 – clearer if ‘profound change’ bullet points retitled as ‘profound change, evolving public policy and guidance’.	‘Village scale’ must cognisant of scale and function and be clear that this is a larger village – functional offering must support growing population.		Section 4.4 Natural capital. Findings from flood modelling can be used when planning the wider concept area – boundaries of built zones have scope to change.	Section 5.1 Page 84 – land outside allocation to east of Fordmore shown on map (and all section 5 plans) – error?	Section 6.1 Useful context but is rightly heavily caveated as being part of a separate statutory process. The text caveats the plans as one way of growing East Cullompton, but the text appears to identify some emerging preferred outcomes.	A core part of the proposed strategic design code is a “site wide framework plan to provide the ‘regulating plan’ to structure the design code”. A site-wide ‘regulating’ status would be valid if the site had already been subject to a suite of outline applications, and where suites of parameter plans were approved.
	SPD should list background reports that it relies on.	20mph requirement goes beyond a principle and should refer to the aim/objective of safer streets. Key roads may need to be higher speeds – to be proven at application stage that principle is met.		Section 4.6 Heritage Grade I listed Wood Barton should be shown as a significant listed building.	Note that accompanies the identification of 72ha for housing in the SPD cross refers to the assumption that 7ha of this is assumed to be released by the grounding of the 132KV transmission lines. 16ha affected by the 440kv powerlines does not have a note to accompany this figure - could usefully explain that this area enables another 16ha of green infrastructure. Reasonable to advise that some commercial could come forward in this space. Constrained land to the south of the powerlines is not as much as has been assumed, and that there are developable areas beyond the 30m buffer and the hedge line. Calculations show that only 160 homes might be released. Flexibility should be retained (viability).	The future of the Horn Road and Dead Lane area should still be an open consideration. There remain 4 fields south of the consented cricket club that could be developed for housing whilst maintaining a more than adequate visual and perceptual buffer for Kentisbeare. It may be the case, as indicated on the plans, that the fields immediately east of Horn Road have secondary school or sports hub potential. However, it is unreasonable to suggest that the only other future of this land is as ‘yet more’ country park land, if it is not needed/selected for a secondary school or sports hub.	It appears that there are two objectives; 1. To ensure that the big picture framework masterplanning exercise for the allocation is suitability shaped and that there will be several outline applications presented over a number of years. 2. To ensure that detailed design (post outline application design) for reserved matters approval achieves a minimum consistent quality standard, with the ‘bar’ at a high level. We think the SPD already achieves the first objective. SPDs can go further and that introduce a strategic level of coding with the SPD (better described as strong/firm guidance).
				Section 4.7 Utilities Moving power lines is at the landowners’ expense. Suggest wording: “The land over which the lines pass within the site benefits from ‘lift and shift’ clause over the route easement. This enables the landowner (at their cost) to alter the path of the power lines if an alternative route is available”. Aspiration of the SPD to ground the 132KV lines - these may remain in situ. The SPD might consider an easement for this eventuality (a Plan B), based on examples elsewhere.	Page 82 (not 84) 8ha shown for community hubs – should exclude green space which should be greyed out on land budget plan. GI might increase as a consequence. Fordmore north and south would decrease to 2ha in tune with local plan requirement for local centre. Page 82 shows existing residential land excluded from community hubs, page 84 includes. Unless land explicitly identified as being available it should not be included.	Land promoter supports the achievement of country park land. It is a fundamental objective of an expanded Cullompton, but the spatial coverage of park land seems to keep growing. The Council must consider what quantum is actually justifiable in planning policy. The masterplan may benefit from the need to achieve biodiversity net gain credits as a driver to justify greater levels of country park land.	Land promoter is willing to scope out a potential approach with the Council that can be shown to genuinely add meaningful benefit to the preparation and determination of outline applications (beyond what is already in the SPD). If strategic coding is ‘adopted/approved’ before applications are approved, we suggest that the word ‘regulatory or regulating’ is not used for any of the structuring plans within that material. The SPD already moves to drive forward a common approach, but there ‘may’ be room for some further targeted material to guide outline applications.
				Sections 4.9 & 4.10 Listed buildings – should refer to ‘indicative risk of moderate or high harm’ – evidence refers only to a risk.	Section 5.2 Outer hubs not needed to meet local plan target for local centre but could help meet other local plan commercial use targets.	An emerging educational strategy is referenced that refers to an all-through school and two other primary school locations, one of which will be paired with a secondary school. At this stage all reasonable options need to be kept on the table.	Placemaking Framework Plan on page 115 of the SPD. This identifies blueways, blueway crossing points, blueway edges, primary streets, the eastern loop, powerline edges and Honiton Road. Perhaps these present the most useful focus for pre-application strategic coding (or further guidance). The mixed-use hubs need no more than what is already in the SPD is needed to shape the approach in these areas before outline approval. Most of Fordmore Farm is already permitted/ built/under construction.

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				Additional zoomed in plans should be presented to show only the allocation area.	Justification for school site not strong – between road and farmyard. Other options could be included – local plan allows for 2 sites.	Elsewhere in the SPD a northern active travel link across the M5 is caveated as being something that can be considered should there be a northern vehicular junction. The same caveat might usefully appear in this section.	SPD provides flexibility for alternative activity zones. SPD could acknowledge any options presented through consultation phase. Given that the SPD is not a fixed plan, scope for strategic 'coding' and outline application work to run in parallel. Pre-application non regulatory coding 'type' guidance could present options so as not to pre-empt final development management decisions.
					Commercial area in right place, strong east-west cycle route good. Less understood is primary road through commercial area (not attractive gateway). Better to skirt western edge of residential land. Not clear how amount of land to meet 32ksqm employment floorspace has been calculated. Light industrial would yield 22,750-26,000 sqm. 'E' uses may increase the density. Useful for background evidence of the SPD to document the assumptions used to justify the size of the commercial area. Local Plan - 1ha of employment land per 500 occupations (just over 5ha). How is this reconciled with the 6.5ha figure in the SPD?	The character areas plan identifies a water meadows character area. The SFRA Q1000 model results identify that EA flood maps are coarse and challengeable. It may be the case that when new flood risk data is applied to masterplanning the garden village, the build zones in the character areas are capable of expansion, drawing them closer together and generating a tighter character area and more housing. There may be other drivers (ecological) but that is another layer of consideration based on choices of where to create BNG credits and where and how much country park land is delivered.	Would like more detail on the overall process that involves any stepped approach to coding. See a role for any such coding to become formalised once land has achieved outline approval. Some adjustment may be needed to reflect approved parameter plans. We see this taking place as part of further, more detailed coding for those areas that have achieved outline approval.
					Section 5.3 Eastern loop better referred to as outer loop (not all east). Text should reference country park is not a local plan requirement. Green box oversteps in referring to BNG being delivered adjacent to boundary and must achieve landscape enhancement. Section 5.4 Welcome apparent recognition, in the green box, that a northern active travel route across the M5 is likely to only be something that is considered where it could be delivered with a new northern junction. Green box on page 109 references junction '30' rather than '28'.		There are some strategic design issues where coding (strategic or otherwise) will not be the tool that delivers a coherent masterplanning approach. The IDP processes have a role to play and will involve strategic engineering strategies that go beyond what coding can achieve. Specific drainage strategies for application areas have to demonstrate that these can operate within a wider system. The location and capacity of early phase junctions are only likely to be deemed suitable if they are capable of enabling the overall superstructure and later phases of the allocation to come forward. Likewise, the garden village will at least be a material consideration when decisions are made.
					The street hierarchy plan on page 108 is indicative but introduces yellow dashed lines to indicate potential secondary streets. Lack of any reference to the use of Saunders Way as part of the vehicular mobility strategy. The road should connect into the main street of East Cullompton and that this should be referenced as an option in the SPD. Active Travel can be provided as part of a strategy that enables vehicular connectivity.		
					SPD is to rely on a modified Honiton Road as the long term primary east-west route. Relying on Honiton Road and a rural community hub as the main centre for 2,500 and up to 5,000 homes is a fundamental big picture urban design strategy. A more northerly diversion of the Honiton Road for east-west movement linked to a more 'street based', urban local centre typology has received little visible exploration. Need to be assured that the junction solutions that are proposed on the key east-west route sufficient to serve more than just the first phases of development.		
					Section 5.5 The requirement for front gardens and bike storage within the green box on page 11 overly prescriptive. Storage can be provided in back gardens and not all houses need a front garden. Reference in the parking section of the green box to street design out of place. Is 'unmistakable' over the top? This should be left to the detailed design stage.		

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					<p>Section 5.6 (page 122) advises that "a strategic design code for the whole allocation site [or strategically important parts of the site] be prepared prior to detailed planning applications. The Planning and Design Process Flow Diagram identifies that detailed design follows the approval of outline applications (OPAs) and that it requires compliance with the SPD, OPA principles design coding. On this basis, the SPD identifies that the 'detailed design' stage is a process that follows the approval of parameter plans at outline stage.</p>		
					<p>A single strategic site could generate several outline applications. An outline approval could generate several reserved matters applications from different applicants. Regulating codes can bridge a gap between approved EIA parameter plans and the detailed design of each sub-area that has achieved outline approval. It is this detailed design which the strategic design code seeks to shape. Such coding would be secured through the use of a planning condition. However, the process diagram places a site-specific strategic coding stage before the approval of outline applications, and their parameter plans. The SPD as a whole is therefore suggestive of a multi-stage coding process. Does the reader rely on the words or the diagram?</p>		
					<p>The Planning and Design Process Diagram presents the achievement of an agreed phasing and delivery plan before planning applications are submitted. Whilst we do not have an issue with such a document, the only valid sign-off process for 'agreement' is determination of the planning application. In circumstances where there is to be a single application, or a suite of applications at the same time, covering the whole allocation, the phasing and delivery strategy would need to be presented in full. However, a phased planning application strategy, across several years, is likely and this will lead to various levels of detail being available/presentable for various parts of the site at different times. It would not be reasonable to refuse an early phase application on the basis that a full IDP has not been presented for later phases. The test should be whether the phase applied for is policy compliant in delivering the infrastructure and place-making that is required, and that it does not prevent or inhibit later phases from doing the same.</p>		
					<p>We envisage an initial strategy that is site-wide but perhaps to various degrees of resolution. Later phases may not be able to completely pin down the approach, and indeed there may be options or implications from the selected solution to Junction 28 of the M5. It may also be the case that agreement on 'who goes first' is not reached between the prospective early phase developers prior to applications being submitted. The commercial reality is that there is limited immediate term junction capacity and there may be a commercial inability for one developer to simply yield that capacity to another.</p>		
					<p>Page 133 refers to a strategic SUDS system. The schedule refers to a high-level drainage strategy having already been developed. It is not known whether spatial aspects of SUDS strategy within the masterplan has any justification behind it, regarding the locations of the basins that are shown, nor to what extent the strategy is based on land control and phasing. The Culm Garden Village website identifies that a strategic flood risk assessment is forthcoming. It will be important to understand the degree of work that has already been undertaken. The schedule refers to the strategic design coding process to explore these matters. This not the right place to consider these matters, and a discrete engineering assessment is needed based on the land use budget of the SPD and emerging planning application processes.</p>		

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	<p>Section 1.1 Table 6 of the Local Plan sets out a housing trajectory for the district. The Local Plan relies upon housing completions starting in 2023/2024 (50 homes). It is late 2022, and this SPD has yet to be finalised/adopted, and no planning permissions have been granted, it is evident that first housing completions will not realistically take place in 2023/24. None of the provisions of the SPD should unnecessarily delay development, are proportionate, and have appropriate regard to land ownerships.</p>	<p>Section 2.1 No reference Policy CU11 (East Cullompton Carbon Reduction and Air Quality). It gives the appearance that it is creating new policy by way of an SPD. Should be reference to Policy CU11 in this section.</p>	<p>Section 3.2 Seems to suggest that a 'Carbon Reduction and Low Emission Strategy' for the whole allocation area is required. Not identified in the 'Planning and Design Process Diagram'. Unclear as to the intention / expectations in this regard. Is a site-wide strategy produced by the Council proposed or are individual strategies to be produced by developers to demonstrate compliance with Policy CU11? The former will unnecessarily delay development whereby the latter will ensure compliance with Policy CU11 whilst allowing development to come forward (consistent with the broad phasing identified later in the SPD). The SPD would benefit from clarity in this regard.</p>	<p>Section 4.9 The 'Combined Constraints Plan' on page 76 combines the constraints identified in the SPD. It shows lack of constraints in the south-western part of the allocation. This supports the indication in the SPD that this area should form part of a first phase of development. It also shows that this area can be delivered as a more discrete part of the wider allocation, without impacting upon or being complicated by some of the issues that affect some other parts of the wider allocation.</p>	<p>Section 5.1 Given the numerous land ownerships within the masterplan area, and the fact that development will come forward in phases through separate planning applications, support the requirement for a 'Compliance Statement'. It is important to have regard to the type of application being submitted (outline or detailed), and the scale of development proposed.</p>		
	<p>Section 1.2 Support the approach, which seeks to ensure that the masterplan concept is designed to work with the variety of potential solutions currently being considered. Support the clarity provided to the effect that any references within the SPD to the wider potential 'Culm Garden Village' are commentary only.</p>		<p>Section 3.5 Whilst there is a key role for the Local Plan and this SPD in shaping the development, the need for developers to rely upon one another should be reduced as far as is possible, consistent with delivering high quality development. Such an approach will avoid unnecessary commercial complications that could delay / prevent delivery.</p>	<p>Section 4.10 The 'Opportunities Plan' on page 78 includes a variety of numbered elements which are explained in the text of page 79. However, it also includes various graphical symbols which do not seem to be explained. Suggest a key is added such that the opportunities it identifies can be properly understood.</p>	<p>Section 5.2 We support the 'East Cullompton Activity Framework' plan on page 84. The key for this plan does not identify what is meant specifically by the thicker and thinner black lines. They seem to represent main and potential secondary roads but this is not clear – amending the key would be helpful.</p>		
	<p>Section 1.3 In the 'Planning and Design Process Flow Diagram', both the 'Delivery and Phasing Plan' and the 'Strategic Design Code' are shown as being produced prior to any outline planning applications. We question the extent to which a site-wide Strategic Design Code needs to be in place prior to any outline permissions within the area being granted – given that the majority of any 'coding' will presumably relate to matters more appropriately addressed at reserved matters stage (materials etc...). There are also likely to be parts of the masterplan concept that are more strategic and more sensitive (and therefore more in need of design-coding) whilst other parts will be less so. The delivery of housing in these less sensitive / less strategic parts of the allocation area should not be delayed unnecessarily by the need for a design code for the whole of the allocation area.</p>				<p>School site page 89 Support the provision of a new school consistent with Policy CU10 of the adopted Local Plan. We note the reference (from Policy CU12 of the Local Plan) to seeking to ensure that serviced land for this school is provided prior to the first occupation. A literal application of Policy CU12 would serve only to unnecessarily complicate and delay development. Whilst the land for the school forms part of the identified Phases 1 and 2 of development on the plan at page 124 of the SPD, it is in a different ownership to other elements of Phases 1 and 2. It would not be appropriate, necessary or desirable to delay residential development elsewhere within Phases 1 and 2 pending a transfer of land for a school from another landowner to the Council, and could also create the potential for commercial issues between landowners which may serve only to undermine the early delivery of development. Accordingly, whilst this SPD cannot change adopted Local Plan policy, we consider that the SPD should not repeat this requirement from the Local Plan, and that the application of Policy CU12 in due course should be done carefully as development proposals emerge within the wider allocation area.</p>		

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	<p>An outline application for a limited number of new homes within the area identified as Phase 1 of the East Cullompton development may not require the full 'Phasing and Delivery Plan' to be in place prior to an outline permission being granted. The SPD should clarify that the flow chart identifies the general theoretical / strategic approach, but that the way in which development is delivered will also need to have regard to practical issues and ensure that any strategic matters such as a design code / delivery plan) are proportionate.</p>				<p>Powerlines (p93) We do not object to the reference in the SPD to exploring the potential to underground the overhead pylons. However, such works would also be extremely costly. A final decision in this regard should be made at a later stage when there is greater clarity on the costs and benefits.</p>		
					<p>Community Greens (p102) There is no key for the plan. We assume that the potential Greens are denoted by the dark green shading on the plan but this is not clear (the same applies for the lighter green shading which we assume is showing general green infrastructure). The size of these greens should be considered as part of future planning applications to ensure that they fulfil their identified functions but do not utilise land that may be more efficiently put to other uses.</p>		
					<p>Biodiversity Net Gain (p105) Agree with the requirement for developers to demonstrate a net gain in biodiversity. We note that the SPD identifies that the masterplan framework as a whole may raise questions as to its ability to deliver a biodiversity net gain within its boundaries. It should be noted that some areas of the allocation offer significant potential to secure biodiversity net gain. We are unclear why the SPD requires that such offsite solutions should be 'adjacent to the East Cullompton allocation boundary'. We are not aware that this is a requirement of any national or local level policy approach and we do not consider that it is necessary or appropriate to be so prescriptive.</p>		
					<p>Section 5.4 – Mobility Mobility hubs are not defined on this plan or in this part of the SPD (they are addressed later in the document). Beneficial to clarify and cross-reference as appropriate.</p>		
					<p>Street Hierarchy (p110) The plan does not include a key and accordingly, it is not clear what is meant by the various lines and arrows. A new road is proposed to run south (and then west) from Honiton Road, which would provide access to the proposed land parcels south of Honiton Road and south of the Greenhouse Gardens development. We do not object to this in principle but important to recognise that the masterplan is strategic in nature and that the Council does not intend this to define the precise location and extent of elements of the plan, which will instead be defined through planning outline and detailed applications. For example, it may be that more detailed work demonstrates that this access from Honiton Road is or can be taken from a different location.</p>		
					<p>Question the rationale (from both an urban design and cost perspective) of having this proposed access road running adjacent to the southern edge of these development parcels. Advantageous for this to be a development road. As this is effectively a dead end for vehicles, this change would not undermine any other aspect of the wider masterplan concept in terms of street hierarchy. Furthermore, it will allow the creation of a street running through these development parcels, whilst also reduce the relative infrastructure costs.</p>		

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					<p>Section 5.6 Matters of delivery and phasing are the most crucial considerations. The masterplan must have regard not just to design aspirations but also the reality on the ground given the aspirations / requirements of the various landowners / developers within the masterplan area. Failure to do so will mean that the masterplan is ultimately not delivered (or not delivered in a timely way).</p>		
					<p>The introductory paragraph should stress that phasing and delivery considerations will only seek to bind the various landowners together to the extent that it is necessary do so in order to deliver infrastructure in a fair and timely way. The aspiration should be to ensure the delivery of development on a landowner by landowner basis, with communal elements requiring joint working / funding reduced to a minimum. Clearly, some elements need to be considered holistically but an approach to keep this to a minimum will simplify the development process.</p>		
					<p>We agree that the proposed Phasing and Delivery Plan is going to be a crucial document and should have regard to the need to achieve the build out rates needed to deliver the site allocation in the Local Plan.</p>		
					<p>Within the draft Masterplan document the site identified as a Commercial Area includes an allowance for a Care Home, a Retirement Complex, appropriately scaled retail uses, offices, a Hotel and leisure uses. An overlapping of these uses would provide for circa 32,000 sqm of development floorspace. Such flexibility in respect of land uses is welcomed. Support for the details set out within the draft Masterplan document as they relate to this land ownership. Consideration be given to including an element of residential use within this area which could include an element of live / work units together with specific reference to stand alone employment space.</p>		
						<p>Support the aspirations for a Country Park having the potential to provide an 'outstanding asset' for both existing and future residents. However, it will require collaborative working with developers to ensure its delivery. Ensuring that it is delivered at an early stage so that it is available as occupations progress and the population of the town increases, is an imperative.</p>	
						<p>The realities of delivery and the release of the necessary land necessitate a quantum of accompanying development. An allocation of circa 250 units on part of the land area that is identified as a potential Country Park is likely to be a minimum prerequisite for the delivery. Grown Estates object to the Masterplan Framework in its current iteration since it since fails to reflect the prerequisites for delivery of a substantial community asset. They would be pleased to work with the Council to agree an alternative approach incorporating a quantum of housing that will enable the delivery of the Country Park at an early stage.</p>	

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The SPD is overall welcomed as a critical component of delivering the allocation, providing clarity for developers and local communities. Landowner wishes to see the SPD advanced and set out a range of suggestions within these representations as to how the role of the SPD can be further clarified and strengthened to deliver the local plan objectives for the allocation, with a focus on facilitating the phased delivery of the allocation.	The work on low/zero carbon is identified as in parallel, and therefore presents uncertainty on application and given the change in standard tying back to the policy requirements of CU5. Clarification has been sought from the Council on interpretation of this. Request for all background evidence and inputs to be fully listed and published to aid in interpretation of the SPD.	While supported in principle the SPD would benefit from tempering this with an acknowledgment of the site's location adjacent to the M5 and proposals for a new railway station that would inherently be reliant on out-commuting to be viable. It is noted that the fundamentals of junction capacity have been a consideration from inception. The framing of the motorway, railway and river as 'perceived' as an alternative interpretation to clear 'real' barriers is unhelpful.	The balance of priorities within the SPD should reflect that bus provision is a policy requirement.	Within the earlier phases of development this will inherently be linked with the need to address the motorway junction capacity at J28 of the M5 arising from the allocation, with this currently forming the most direct route to Cullompton from the allocation for active travel users. It is therefore likely unfeasible to segregate active travel connectivity from motorway capacity discussions. Requiring delivery of active travel as a 'priority' with respect to phasing release of development across the allocation will imperil early release of phases of the allocation.	The clarity on the flexibility of the masterplan as an image is welcomed. It is agreed that the nature of such allocations/developments require evolution in response to detailed matters that only arise through the course of applications. It is noted that this approach has very limited reproduction elsewhere, which in the context of the wider ambitions being set may lead to competing interpretations/expectations from those involved with the allocation process. The text however goes on to then use this flexibility to seemingly justify the more regulatory role of the 'green box' text as 'requirements'. As set out above these would benefit from either greater flexibility or a two tier structure for broader 'objectives/aims' and more tightly defined 'requirements'.	While this does not have allocated status within the Local Plan, it does have endorsement through the made Neighbourhood Plan. The natural evolution of the SPD to the wider Culm Garden Village extent is therefore a critical component of future proofing the SPD. We would re-emphasise the stated position earlier with regard to sports provision, with the Culm Garden Village expanded masterplan furthering the distribution of such facilities. The extension of this and transition into wider green infrastructure, while logical amongst the established woodland to the south east of the Danescroft parcel, at the extent shown leads to not well resolved development parcels, which will be at risk of isolation with limited ability to connect into the wider development.	It is considered that the approach to the SWDC is not well realised, lacking in clarity and purpose, likely duplicating other actions necessary in realising the delivery of the allocation. There is no policy obligation under the adopted policies for such a document. The request would on its surface not be defensible as part of any planning application process. It is not clear when such a document would be required, with the suggestion that this be before an outline application is made but with no means to refuse to validate and assess an application without such a document, and the flow diagram allowing multiple interpretations. There is no clarity on how such a collaborative document should be prepared. There is no clarity on how such a document would be engaged with by key contributors.
Highlights the need for the SPD to focus on facilitating delivery to ensure one of the core objectives of the local plan to deliver on future housing ambitions is met.	Details for railway station and motorway junction solutions to be resolved, with modelling work to be completed that will clarify road capacity. This presents uncertainty in delivery of the SPD, resulting in a need for flexibility in approaches.	It is considered that the flow from vision through to requirements is not fully realised. The structure would also benefit from either a softening of the framing of the green boxes as 'requirements' to 'objectives/aims' or a two-tier format, setting out broader 'objectives/aims' from the more detailed 'requirements'. It is apparent that much of these 'requirements' will be subject to detailed design work taking account of competing inputs, including from statutory consultees, and it remains unclear how much input these consultees have had at this stage. This is evidenced for example in the commentary above on the desire for fords. The SPD also makes clear in section 3.7 that much work is being run in parallel making some of the 'requirements' lacking in certainty at this stage and emphasising the need for flexibility. The SPD would benefit from a clear mechanism/format to reflect the uncertainties and flexibility needed to respond to such areas.	No objection is held to the principle of encouraging accessibility and the benefits of 20-minute places are well recognised. The 20-Minute Place is supported as an objective. The SPD would benefit from clearly framing the interpretation of the 20-Minute Place. The provision of services within the East Cullompton allocation is to be defined by the infrastructure requirements set by policy and statutory consultees. This will likely limit the ability for true self-containment within the 20-Minute Place approach.		Interaction between Commercial Areas and Mixed use Community hub is not clear with reference that these have overlapping uses. It is unclear whether these built forms include curtilage areas, such as parking. The total land budget from these inputs does not meet 160ha.	It is considered that the distribution of development would benefit from further housing close by the principle mixed-use community hub of the allocation that will serve to reinforce the demand and use of these facilities encouraging self-containment through the 20-Minute Place principles.	The interchanging of the framing as a SWDC or Strategic Design Code, with a specific direction to either the whole site or strategically important parts is confused. With regards to the suggested content it is considered that much of this will be addressed in other areas of work associated with applications or the allocation. For example, the SPD presents key principles and a site wide masterplan framework, which the Appendix 1 content effectively reproduces. This inherently infers that the SWDC acts as either an opportunity to evolve the masterplan SPD, in which case this should be made clear, or runs the risk of competing with it. While the SWDC motive may be to encourage settlement of some of these cross-cutting elements to speed application processing, the previous commentary on procedural risks associated with this delaying initial phased release of the allocation and in so doing delaying progression of the allocation as a whole are real and likely risks. Overall, it is felt that the envisaged content should be directed either to that within the SPD, as part of outline application submissions, or to Area Design Codes linked to individual parcels that could evolve from outline permissions that could be secured prior to reserved matters as is common on strategic allocations.
It is considered that the SPD should not set out defined phasing areas given the relative uncertainties surrounding the parallel work and this should be informed by the SPD text and advanced through the PDP process. The PDP should not be predicated on a comprehensive approach before a single outline application to enable phased delivery. The representations set out an alternative approach that addresses the PDP as a process with multiple stages that will evolve to reflect the phased released of the allocation under the parallel work.	The text should acknowledge the close proximity of job opportunities, highway improvements and railway station proposals along with the proposed growth as a response to the existing degree of out-commuting and lack of selfcontainment, as set out in discussion of the 20-Minute Place principles.		The Carbon Neutral 2030 ambitions are recognised. This principle is expanded upon in section 3.2 of the SPD. The policy obligation within the adopted plan Policy CU11 is to "minimise the overall carbon footprint of the development". A carbon neutral scheme is therefore not required by policy and it recognised that the framing is of a requirement to 'minimise carbon' with the processes set out supporting application of this policy requirement.		It is noted that the indicative sketch of community uses omits the consented employment units at Newland Farm. The open space/community hub uses are unclear with play, orchard and woodland/ecology/blue infrastructure areas south east of Newland Farm all within the defined mixed use community hub and arguably duplicating the role of the 'community green' further south-east within the masterplan. While the flexible nature of the masterplan is acknowledged and welcomed the deviation between such imagery and that proposed raises confusion on expectations/ambitions for this space. The image also indicates the segregation of the defined Community Green from the mixed use hub than its integration. Refer to previous commentary on this matter about existing nature of the Newlands Farm complex/consented expansion. Inclusive mobility needs require disabled parking close to facilities. Presume this is allowed for within framing as 'main parking'.		

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Beyond the phasing/delivery implications, the policy rationale and duplication with other considerations/processes are such that the approach to the Site Wide Design Code is challenged. Landowner encourages that the SPD and outline applications can facilitate much of the deliverable ambitions set out for this document, with design codes secured under outline planning permissions.					Further opportunities for incorporating mixed use will be explored. Framing as 'opportunities' reinforces proposal for two tier structure to green box text. These 'opportunities' will be framed by competing interests, such as vegetation retention of hedgerow and woodland adjacent to Honiton Road. Preference for "co-located or close by" to provide flexibility on delivery for retirement, healthcare and aged services cluster.		
					Feedback from the County Education Authority presents no objection to a location north of, but close to, Honiton Road. A preferable alternative for the school location is suggested based on fulfilling the SPD objectives.		
					Flexibility should be afforded to the suggestion of residential densities towards the edges of the community relating to the future Culm Garden Village expansion of the allocation.		
					Inclusion of Blueways within amenity green space would benefit from clarifying if any constraints on this (e.g. flood risk zone) and where overlap with other areas of strategic green infrastructure apply. The sketch of the community hub shows orchards rather than allotments. This infers that allotments could extend to other edible landscapes and clarity is sought in this regard. The scope and format of 'teenage facilities' is not defined. Does this include MUGA, skate park, etc.		
					The role of the Eastern Loop route to the masterplan vision appears poorly realised. This would act principally as a leisure route providing indirect routes in place of active travel desire lines. The interaction with the countryside would be inherently limited by the predominant definition of the allocation edged by hedgerow boundaries. The Danescroft interest extends just short of the eastern extent of the allocation north of Honiton Road, and excludes the land immediately south of Honiton Road. This will likely imperil delivery with early phases connecting across the northern and southern Danescroft parcel. Future connectivity can be catered for in this circumstance.		
					Biodiversity Net Gain compliance is prescribed by the Environment Act 2021 and subsequent regulations. Compliance with this cannot be prescribed to adjacent land only as a result.		
					Para 3.102 of the Local Plan states "The Council recognises that the high infrastructure costs of this site will not solely be funded by the development. As has been the case on other strategic sized sites, the Council will work with its partners and the development industry to secure external funding to ensure the delivery of the necessary infrastructure." This text should be reflected in the SPD to prevent false expectations of full funding.		
					The approach to the assessment of traffic impact as described in the SPD is subject to agreement from National Highways and the Highway Authority. Unclear whether this text has been agreed to by these key consultees to ensure a safe and functional highway network.		
					Reference to central, southern and northern active travel crossing of the M5, but with only 2 shown and 'potential' future crossing to north part of CGV. Scope of provision of typical active travel sections will be subject to detailed considerations of LTN1/20 and capacity for delivery within adopted highway width and balancing vegetation retention to areas such as Honiton Road. Design of primary street network for first phase as shown in the SPD to M5 improvements is not applicable, given this presumes retained use of Honiton Road.		

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					Annotation shows 'mobility hub' within a building. This does not appear to correlate with wider description of facilities.		
					The approach to build on the Newland Farm complex is endorsed. From project inception this was identified as a logical approach given its range of uses, future consented expansion plans that would further diversify the complex's offer and its location centrally within what would be the logical early phase(s) of the allocation. Comments set out an alternative approach to the community green location as well as concerns about the response to distribute sports provision across the allocation and the focus on fords as part of the emphasis on water.		
					It is highly likely that the combination of the Town Centre Relief Road, Junction 28 improvements, active travel connections and new railway station will require external funding sources in addition to development contributions to ensure a viable development across the allocation, be this with regard to forward funding for phased release or in totality. These are fundamental components to delivery of the scheme and it is not apparent that considerations has been given to how these may come forward with development to ensure a deliverable allocation.		
					Linked to this, and as has been set out earlier, is considered that flexibility in timing of delivery of active travel connections across the M5 corridor is crucial given the opportunity for limited release before M5 junction improvements (with the capacity yet to be defined) combined with the need for these junction improvements to facilitate active travel connection across the M5. While clearly the current arrangement is not ideal for pedestrian and cyclists, given the distances involved opportunities for further emphasis on public transport connectivity, particularly for earlier phases, should be facilitated to enable phased release.		
					There are a number of relevant considerations related to setting out a co-ordinated design scheme is sought for Honiton Road to secure this as a 'street'/'place' and acknowledgement of the variety of inputs is encouraged and proactive working with developers to secure an optimal outcome to these various interests. The focus on a range of car parking solutions is welcomed, but the emphasis should place less emphasis on 'strategic provision' for parking as a preferred strategy to enable flexibility in approach to be informed by the Highway Authority as applications progress and the delivery of electric vehicle charging.		
					While Landowner is broadly supportive of the need for such a document, it is considered that a fully realised Site Wide PDP before any outline applications be advanced is unrealistic and would serve to counter one of its ambitions to "Achieve the build-out rates needed to deliver the site allocation in the Local Plan". Danescroft therefore envisage the PDP as a focused process that will set out a multi-stage approach. This reflects the intention for the PDP to be annually reviewed and have stewardship. This would be based on identifying all infrastructure requirements across the allocation as a whole, before elaborating on these for the initial phases limited by the M5 junction capacity.		
					The M5 junction capacity and associated works to overcome this constraint are likely to prove a key milestone in the delivery of the allocation. So much so that a PDP that determines detailed wider infrastructure delivery before any outline application can be advanced would inherently delay all development within the allocation until this core and complex consideration is essentially fully resolved. It is considered that a detailed phasing proposition at this stage is pre-determinative of key inputs and considerations and is best directed through the surrounding text and the PDP process.		