

## Appendix 2 Summary of changes

Topic	Comment	Changes made
Infrastructure	<p>Substantial infrastructure needed first.</p> <p>East Cullompton will benefit from a 'Site Wide Phasing and Delivery Plan document'. The document should benefit from sufficient weight in the planning process, clearly outlining requirements and delivery mechanisms, to ensure that the development achieves appropriate phasing in terms of housing, education and employment.</p> <p>SPD text should reflect Local Plan that development will require some external funding.</p>	<p>Infrastructure requirements and delivery triggers set out within policy.</p> <p>The SPD requires a site wide infrastructure delivery plan to be agreed, mechanisms for delivery to be set out within this process.</p> <p>The infrastructure delivery section includes references to the need for external funding and some additional text added for clarity.</p>
Honiton Road	<p>A373 is a major concern; major improvements needed.</p> <p>Outcomes from the Junction 28 mitigation option work need to inform the policy approach for the role and function of Honiton Road. This includes decisions regarding priority and speed limits.</p> <p>Honiton Road is an A road so downgrading this and reducing the speed limit are unlikely to be achievable. Crossings of this road are going to be important given this road passes through the middle of the development but the strategic nature of the road cannot be lost.</p> <p>20mph requirement goes beyond a principle and should refer to the aim/objective of safer streets. Key roads (Honiton Road) may need to be higher speeds – to be proven at application stage that principle is met.</p>	<p>The SPD requires careful consideration of the treatment of Honiton Road to provide a safe environment for people and to continue to function as an A road. Detailed design of Honiton Road to be included in the infrastructure delivery plan requirements.</p> <p>The SPD references the need for further technical design and assessment of the approach to Honiton Road. Reference to a 20mph speed restriction removed but left emphasis on the need for design solutions to slow speeds retained.</p>
J28	<p>Improvements to the motorway junction should be carried out first; the allowance of 500 houses before delivery of junction improvements now seems too high.</p> <p>It should be clarified that the 'required after first 500 homes completed' is subject to the prior delivery of the Town Centre Relief Road.</p> <p>National Highways require confidence that a proposed scheme adequately mitigates the SRN impacts of development at Cullompton and provides safe and suitable facilities to accommodate increased active</p>	<p>The SPD reflects existing policy requirements for improvements to J28.</p> <p>Text added to reflect requirement for TCRR.</p> <p>Further work on J28 improvements and modelling of the capacity of the junction is being carried out through separate workstreams.</p>
Town Centre Relief Road	<p>SPD should make it clear that the TCRR needs to be delivered first. Query whether the 'Delivered by 2023' timetable is realistic</p>	<p>SPD to be updated to reflect delivery timescale.</p>
Street hierarchy	<p>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.</p> <p>A new road is proposed to run south (and then west) from Honiton Road. important to recognise that the masterplan is strategic in nature and does not intend this to define the precise location which will instead be defined through planning outline and detailed applications.</p>	<p>Masterplan amended to show link into Kingsmill.</p> <p>Text added to clarify that streets could take a different alignment subject to preferred junction location.</p>
Sustainable transport	<p>Sustainable transport options should be delivered early to promote step change in behaviour. J28 capacity improvements still required for car borne movements.</p>	<p>Infrastructure requirements and delivery triggers set out within policy. The SPD requires a site wide infrastructure delivery plan to be agreed.</p>
Active travel	<p>Pedestrian and cycle routes should have signage.</p> <p>Active travel improvements are funded by developer contributions/ linked to public funding projects – further thought is required regarding costs and likelihood of funding mechanism achieving delivery.</p> <p>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.</p> <p>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 combined with the need for these junction improvements to facilitate active travel connection across the M5.</p> <p>The footway connection along Honiton Road is not complete and some areas are on private land. The whole length would need upgrading to a pedestrian/cycle footway and it is questionable whether this should be next to the busy A373 or whether a completely segregated route elsewhere should be provided instead.</p>	<p>SPD to refer to the need for signage.</p> <p>Further work being carried out on sustainable travel through separate workstream.</p> <p>The SPD requires a site wide infrastructure delivery plan to be agreed.</p> <p>No change to SPD - mobility plan shows 3 crossings.</p> <p>Approach to delivery of active travel crossings clarified. Infrastructure delivery table amended to include delivery of active travel in early phases and in line with capacity improvements to J28.</p>
Mobility hubs	<p>Not clear on what the mobility hub is; not sure it will be successful in a rural community.</p>	<p>Additional text added to expand information on mobility hubs. Further work being carried out on mobility hubs through separate workstream.</p>

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Primary school	Location not safe due to proximity to Honiton Road; school needs to be at the heart of the development. The primary school is next to the main road. This is a dangerous area for young children. It will also cause more congestion at drop off and pick up times along an already over used road. Whilst this SPD cannot change adopted Local Plan policy, we consider that the SPD should not repeat this requirement from the Local Plan for the school to be delivered in phases 1 and 2.	SPD requires traffic calming and safe crossing points. Text amended to include flexibility on location of primary school to north of Honiton Road and addition of requirement for safe school access and appropriate space for drop off away from primary streets. No change to SPD wording for delivery of school - policy requirement.
Healthcare	No allocation for doctor or dentist.	Text added to expand on potential uses within community hub and multi-use community building. MDDC in discussions with NHS.
20 minute neighbourhood	The SPD could be clearer in defining the 'twenty-minute place' approach to ensure meaningful achievement of this principle.	Commentary added about application of 20 min neighbourhood at local scale and context
Community hubs: location	Wrong location for community hub: too far east - assumption of further development to the east. Fordmore should not be the principal community hub. Not central to the allocation; does not deliver a 'heart' to the development. Encourages too much development along the Honiton Road. Should be co-located with school and healthcare.	Text clarified to explain why Fordmore will be principal centre, and that it will expand to provide broader range of uses including further retail and community space, that it will be accessible (via primary street and active travel) and that it would have potential to expand further if proposals for the GV proceed. Honiton Road requires active frontages in order to reduce the speed limit. SPD to include flexibility on school location, however, current location provides safe walking to community hub.
Community hubs: uses	Small community hubs do not provide required facilities for the number of houses. Need for an indoor meeting/activity space to cater for a range of activities. Potential for one of the designated 'play areas' to be focussed at teenagers and explore whether there is demand for skate park, free-running/parkour equipment. 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. Community hubs should exclude green space. Fordmore north and south would decrease to 2ha in tune with local plan requirement for local centre.	SPD to provide further explanation on what community hubs should contain. Reference to community buildings to include catering for a range of indoor sports and activities and potential for a health hub. Specific reference to teenage play to be included. SPD changed include allowance for some residential where it does not detract from intended character or limit community hub functions. No change proposed to exclude green space. Some public / open space to be delivered as part of bespoke community hub typology. Larger area also required to allow residential uses and some land covered by existing uses. Requirement added for clear governance to be set out in developer proposals.
Commercial uses	Fordmore Farm will not be able to provide larger retail / supermarket that is needed. Suggest a large supermarket, a new food pub, other retail to make East Cullompton a destination. Size of industrial units and type of industry needs to be carefully considered - shortfall of micro and small units making start-up business difficult. SPD does not reflect the consented development at Fordmore Farm (21/00349/FULL) (Class E development, agricultural style warehouse type buildings). Commercial area in right place, strong east-west cycle route good. Less understood is primary road through commercial area (not attractive gateway). Not clear how amount of land to meet 32ksqm employment floorspace has been calculated. 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.	SPD includes retail within the commercial area as well as within the community hubs, and sets out appropriate uses for commercial areas. Text changed from 'integrating employment' to 'integrating commercial' – text already refers to appropriately scaled retail being provided in this area. SPD updated to reflect consented development. No change to primary route through commercial area which should be designed to be attractive – not industrial area. Further explanation on commercial land calculation provided.
Sports facilities	Not clear where sports facilities are going to be within the allocation. 3G sports pitch needed in Cullompton area. In order to provide a flexible, sustainable site which could accommodate a variety of pitch sizes and sports, a site of four hectares is recommended, which includes provision of a clubhouse/changing facilities.	Text amended to confirm size of space at Fordmore Farm is sufficient to provide a multi-pitch hub rather than individual pitches but final location of sports pitches to be confirmed. SPD to make specific reference to sports being provided in accordance with MDDC's Playing Pitch Strategy. 3G pitch is not a specific policy requirement but is required in the Cullompton area by the Playing Pitch Strategy.

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Green space	<p>Not enough and all at the edges - larger green space needed on Cullompton side. Better dog walking parks.</p> <p>Feather into the edges of the development; more trees and hedges included; include allotments.</p> <p>Keep element of flat multi-use informal space outside pitch layouts to encourage 'free-play' for children &amp; families.</p> <p>Unclear which areas will have the space to function as parkland and nature reserve rather than just as functional travel corridors. It would be useful if the SPD could include a map to show the preferred locations for the 6ha of amenity green space; the public parkland; and the nature reserve.</p> <p>Eastern Loop 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.</p>	<p>Text expanded on green space uses, including allotments and what can be included within the community greens and green corridors. Community growing space such as orchards in community greens and traditional allotment sites provided separately within strategic GI.</p> <p>Changes made to make clearer requirement that detailed proposals demonstrate an appropriate building and landscape treatment to rural edge.</p> <p>Eastern Loop is not a formal road but active travel route</p> <p>Community greens allow for free play.</p>
Fords	Fords should not be prioritised. Implications for flows and water quality.	Text amended but aspiration for fords as crossings to remain to provide place making connections with water.
Climate change	<p>Houses should be net zero with renewable energy.</p> <p>Climate change adaptation could be addressed more explicitly in the sub-section on Natural Capital.</p> <p>Further emphasis should be put on the phrase 'reduce carbon emissions'. The NPPF uses the phrase 'contribute to radical reductions in greenhouse gas emissions'.</p> <p>Strong digital connectivity should be included in the table as a Substitute Approach to achieve reduced carbon emissions.</p>	<p>SPD sets out net zero/renewable energy expectations from developers within existing policy framework.</p> <p>Natural Capital section expanded to add requirements under 'enhancing the landscape structure' for planting to demonstrate climate resilience and biosecurity.</p> <p>Change to carbon emissions and digital connectivity text made.</p>
Air quality	Although air quality assessments are required, they will need to be monitored at regular intervals through the construction phases and afterwards.	Change to text made.
Density	Flexibility should be afforded to residential densities towards the edges of the community.	Density expressed is an average. Text amended to reflect treatment of rural edges.
Drainage	Permeable paving could be used as well as rain gardens, swale, filter trenches.	Permeable paving added to text.
Residential	<p>Affordable homes should be a mixture of rents and purchase options. Other housing options should be considered such as co-living accommodation blocks and adaptable homes. Wheelchair accessible homes should be included within the housing designs to be fully inclusive and giving options for a range of clients.</p> <p>The design of homes needs to consider the pavement space and access to homes for people with mobility vehicles.</p> <p>The requirement for front gardens and bike storage overly prescriptive. Storage can be provided in back gardens and not all houses need a front garden.</p>	<p>No change required. Policy sets housing requirements which will be dealt with at planning application stage.</p> <p>Reference to access added.</p> <p>Change made to separate out requirement for front gardens and storage of bikes.</p>
Self build	Space should be allocated to self build.	This is a policy requirement and is set out in the SPD. Additional text added on custom and self-build added.
Parking	Less emphasis on 'strategic provision' for parking as a preferred strategy to enable flexibility in approach as applications progress and the delivery of electric vehicle charging.	No change. The SPD provides for flexibility.
Waste	Could be expanded to ensure waste is minimised and considered during the design and layout of a development. Include reference to Devon Waste Plan.	Changes made.
Power lines	<p>Concerns raised regarding the potential implications of the draft masterplan for National Grid's strategically important 132kV line. National Grid do not support undergrounding. A 10m wide corridor of open ground would be required above the undergrounded cables.</p> <p>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".</p> <p>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 the 440kV powerline corridor.</p>	<p>SPD refers to aspiration for undergrounding but further work needed.</p> <p>SPD to be updated to reflect 10m corridor. Wording added that where powerlines are undergrounded, they do not have to follow the existing overhead line which could allow better accommodation of easements.</p> <p>Wording on lift and shift clause amended.</p> <p>Note regarding the 16ha area and that commercial could be appropriate as mix of uses if included sensitively.</p>

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Heritage	Settings of heritage assets on maps indicate risk of harm but further work needed; no robust evidence base and justification for, or mitigation of, any harm to the heritage assets, or their settings. Archaeological investigation will need to be used to identify opportunities to positively influence the detail of design/layout as planning applications come forward, as well as to inform mitigation for the loss of any undesignated archaeological assets. Grade I listed Wood Barton should be shown as a significant listed building.	Maps to be changed to refer to indicative settings of heritage assets with further assessment required for planning applications. SPD to specify further work required by developers prior to their layouts being set. Text changes made to archaeological assessment. Wood Barton already shown but annotation added.
Biodiversity net gain	It is disappointing to note that the SPD is seeking offsite delivery of BNG, as onsite delivery is Natural England's preferred approach. Text should reference country park is not a local plan requirement. SPD oversteps in referring to BNG being delivered adjacent to boundary and must achieve landscape enhancement.	SPD changed to reflect onsite delivery first. Wording changed so that the off-site BNG can be delivered in suitable areas that provide accessible greenspace for the allocation as well as adjacent to the allocation boundary.
Country Park	Not clear what this is or when it is likely to be delivered; need for a water park not established.	Text changed to expand the explanation of the country park. This is outside the area for the East Cullompton SPD but could start to be delivered through off-site biodiversity net gain and sports facilities.
Proximity to Kentisbeare/need for a green buffer	Wider garden village section shows development encroaching within Kentisbeare Parish.	No change to SPD. SPD is clear that the plans in Section 6 are indicative and the wider garden village is subject to the Local Plan process. Comments on Section 6 to be reported to policy team.
Sports clubs and all-through school	Sports facilities and all-through school shown along Horn Road should be in Cullompton and not in Kentisbeare Parish.	No change to SPD. Cricket club already has planning permission. This area is outside the East Cullompton SPD area and plans in Section 6 are indicative.
Potential wider area for garden village	Area shown for wider garden village includes listed buildings and areas of wildlife importance.	No change to SPD. SPD is clear that the plans in Section 6 are indicative and the wider garden village is subject to the Local Plan process. Comments on Section 6 to be reported to policy team.
Two-stage masterplanning process	The two-stage nature of the process: detailed approval of the allocation and an outline of thoughts about the longer term possibilities. One consequence is that facilities that are only required for a larger garden village may well be located outside the central area. More detailed planning should be undertaken before the East Cullompton Masterplan is signed off.	No change to SPD. The SPD can only focus on allocated land and unless/until further land is allocated, boundaries are not known and the whole area cannot be masterplanned.
Green boxes within SPD	These would benefit from either greater flexibility or a two tier structure for broader 'objectives/aims' and more tightly defined 'requirements'.	Text added to allow appropriate flexibility.
Process	Process diagram not clear on where Design Code and Phasing and Infrastructure Delivery Plan fit within the planning process. Approach to these documents needs further consideration and clarification.	Diagram updated and approach clarified. Both documents will need to be agreed with landowners / developers.
Design code	Further consideration needed on what a strategic design code should contain and how it works through the planning process. Appendix 1 needs further consideration. Design code not the right place to consider site-wide SUDS. Needs further technical work through planning application process.	Further work needed with landowners/developers to scope out strategic design code. Reference in SPD text changed and Appendix 1 removed. Site wide SUDS strategy removed. Strategic drainage requirements are incorporated into SPD, although treatment of SUDS retained within Design Code requirements. Further work needed for planning applications.
Corrections	References should be to National Highways not Highways England. On Page 109, Junction 28 rather than Junction 30. Clearer if 'profound change' bullet points retitled as 'profound change, evolving public policy and guidance'. Land outside allocation to east of Fordmore shown on all section 5 plans should be removed. 'East Cullompton Activity Framework' page 84. The key does not identify what is meant specifically by the thicker and thinner black lines. Key to community greens on plans is not clear.	Changes made
Evidence base	SPD should list background reports that it relies on.	No change. Unnecessary as these are published on the website as available.