

Statutory & Other Consultee Comments

Appendix 2

Cullompton Town Centre Masterplan		
Consultee: Natural England	Consultee Comment	Response
Proposed pedestrian, cycle, leisure & recreational routes	Such routes provide an opportunity for multi-functional green spaces improve air quality, aid flood risk management and reduce noise pollution, as well as enhance biodiversity, ecological resilience and support more joined up habitat networks.	Noted
	We would welcome further detail to show the opportunities for nature and wildlife in the outline for the proposals; these routes may provide opportunities to form green corridors, enhancing local sites and improving connectivity, for instance.	Detail to be provided at planning application stage. Request for involvement noted.
	Include reference to Mid Devon's Green Infrastructure Plan.	Insert at end of para 4.2.21: and the Mid Devon Green Infrastructure Plan.
	Give further consideration to the potential environmental value of brownfield sites including links to habitats beyond the site.	The environmental value of sites proposed for development as key opportunity sites is included. However, their full potential including within the wider network of green links will be fully considered at planning application design stage
Biodiversity Net Gain	Where Masterplan proposals such as CCA Fields and The Bullring identify enhanced biodiversity through their delivery, we recommend reference to Biodiversity Metric. The tool Environmental Benefits from Nature has also been designed for use alongside the Biodiversity Metric.	Reference to biodiversity gain is reference throughout the masterplan document. The 'Biodiversity Matrix' and 'Environmental Benefits from Nature' will be fully applied at planning application stage. Specific mention is not required at this stage.
Landscape	The masterplan should recognise the impact that the 'key opportunities' may have on protected landscapes such as the Blackdown Hills AONB and East Devon AONB. Landscape Character Assessments (LCAs) and Natural Character Area (NCAs) profiles provide a context within which to assess development.	The 8 key opportunity sites are town centre focused and modest in scale. Their impact on protected landscapes such as the AONBs will be fully considered at design stage inc reference to LCAs & NCAs.

		Specific mention is made to the AONBs at paras 4.3.26 – 4.3.27.
Trees & Woodland	Any impact on ancient woodland and ancient and veteran trees should be considered in line with paragraph 175 of the NPPF	The impact of any proposals identified within the masterplan on ancient or veteran trees will be fully considered at design stage inc reference to Natural England's Ancient Woodland Inventory.
Community Engagement	We are pleased to see that local people have been given the opportunity to contribute to the masterplan from the outset	Noted
Habitats Regulations Assessment (HRA) & Strategic Environmental Assessment (SEA) Screening.	We agree with the conclusions set out in section 7.1 of the screening report that concludes that the Cullompton Town Centre Masterplan is not likely to have significant adverse effects on the integrity of European Sites, either alone or in combination with other plans or projects, and therefore advises that further Habitats Regulations Assessment is not required	Noted
Habitats Regulations Assessment (HRA) & Strategic Environmental Assessment (SEA) Screening.	We agree that strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) within the SEA Screening Opinion are unlikely to experience significant environmental effects from the proposed Cullompton Town Centre Masterplan	Noted
Consultee: Historic England	This is a very impressive report. It demonstrates an authoritative understanding of the town, its history and character and the issues which currently affect it, and sets out a comprehensive agenda for its future. We are particularly pleased to see such an extensive and well-informed section on the Heritage Strategy. This helps significantly in setting a spatially and thematically broad framework for the town which provides a useful context for the HSHAZ and other heritage related work which may complement and succeed it.	Noted.
	Liaison in the preparation of this report with the updated Conservation Area Appraisal and Management Plan will ensure complementarity, and contribute to the creation of a holistic agenda for the heritage-led regeneration and sustainable management of the town.	Agreed
	Section 4.2.38 refers to a traffic analysis recently undertaken in association with roadworks in Fore St/High St. It would be useful to know these findings & what further assessment may be necessary to inform the public realm design work for the Bullring.	Available through Devon County Council and have been made available to the project team for the redesign of the Higher Bullring.

	<p>Page 56 includes a section on Broadening Cullompton's Offer. This is a very short and simple section, and somewhat disappointing given the expansive and invigorating conversations regarding this to redefine and enhance the town's specific Unique Selling Point e.g capitalising on Devon tweed for promoting Cullompton's heritage and as an economic offer.</p>	<p>The masterplan seeks to set out physical parameters within which Cullompton's offer can be expanded. The offer e.g Devon tweed is dependent on market opportunities.</p>
	<p>We would encourage key messages highlighted within boxes or as bullet points to ensure that they have impact and are not lost in main bodies of text</p>	<p>Key messages are delivered by means of titles & sub headings, aims & objectives. A re-structured and formatted document is not consider necessary.</p>
	<p>We note in section 6.9.3 (p100) that a Delivery Action Plan will form an addendum to this masterplan. This would set out a time scale for interventions and delivery mechanisms. This is a very welcome and important part of the masterplan, especially if it can also identify priorities and delivery dependencies</p>	<p>Noted including need for time scales.</p>
<p>Consultee: NHS Primary care</p>	<p>The Cullompton masterplan includes proposals for a considerable number of new homes in the area. The increased population will require increased primary care capacity to provide medical services to these patients. NHS Devon CCG will engage with the Council via the Local Authority Engagement Team to negotiate S106 contributions towards the cost of increasing the required primary care infrastructure to meet the needs of the larger population.</p>	<p>Noted including invitation to negotiate at detailed planning application stage</p>
<p>Consultee: DCC (Historic) Environment group</p>	<p>Although the Roman Fort is outside the Town Centre Boundary it is briefly referred to in the Objectives of the Heritage Strategy (Section 5). We feel that there are significant opportunities to further integrate the fort for reason that it is a nationally important heritage asset, fundamental significance to the town's origins, is a dominant landscape feature and a significant open green space (albeit farmed). It has public rights of way running adjacent to it. It is also strategically located between the town centre and the new developments on the north and north-west of the town. This ties in with the Baseline Report (5.1 Emerging themes and objectives) where objectives for heritage/historic landscape - particularly (1) key views, green spaces, amenity roles, and (5) raising the profile of rural walks, support having more ambition for the future of the Roman fort. Include as a key opportunity site.</p>	<p>Whilst briefly referenced, the Roman Fort lies outside the boundary of the town centre masterplan. The Cullompton Conservation Area Appraisal and Management Plan that is being updated alongside the adoption of this masterplan, gives the Roman Fort particular consideration.</p>

	Para 4.3 (Public Realm and Open Space) could mention that the CCA Fields contain historic managed water meadows. These heritage assets could have a role in modern water management and biodiversity enhancement	Insert at para 4.3.2, second sentence: 'open fields, managed water meadows with an opportunity for biodiversity enhancement....'
	Paras 4.3.18-20: We welcome proposals to enhance the courts and lanes.	Noted.
	Paras 4.5.12-13: The management of floods and SUDS could reference Cullompton's long history of water management, including mill ponds, mill leats, water meadows, urban water supply conduits. These could play a role in modern solutions.	Insert at the end of para 4.3.16: ...'whilst acknowledging Cullompton's long history of water management in the form of town centre water channels, mill leats and ponds'.
	Para 4.6(3) There is some reference to heritage of the former Tannery Site but the focus is on the wildlife of the watercourse rather than it also being a significant heritage asset. This, and the importance of the Tanning industry to the town's development needs greater mention	Noted. The impact of development proposals upon the heritage of the tannery site and its relevance to the town's development will be fully considered at planning application design stage.
	Para 4.6.22 (Next Steps) should include a heritage impact and opportunity assessment, looking at the built heritage and below ground archaeological potential	The heritage impact including built heritage and below ground archaeological potential will be fully considered at planning application design stage.
	Chapter 5 (Heritage Strategy) does not mention the Roman fort in the introduction or on the Summary of Significance (though it is on the map, Fig.62). Despite being a nationally designated but at-Risk heritage asset, it is not referred to in 5.4 – Strengths, weaknesses, opportunities, and threats.	The Roman Fort lies outside the boundary of the town centre masterplan. The Cullompton Conservation Area Appraisal and Management Plan that is being updated alongside the adoption of this masterplan, gives the Roman Fort full consideration.
	The fort is specifically referred to in the Heritage Strategy under Strategy for change, Aim 2 (Protect) with 5.8.11 containing the objective to remove the fort from Historic England's Heritage at Risk Register. While we very much support this and the following Objective H, we feel that the key actions are limited in scope, relating principally to Historic England grant aid to the landowner. We feel that the Plan provides significant opportunities to link the objectives for the fort with	Reference included in the CAMP to the Roman origins of the town and how it has influenced the town historically. Additional reference to be included in the masterplan as follows: First sentence of para 5.8.4 to now read as follows:

	<p>the wider aspirations for the town and could be much more ambitious. For example:</p> <p>A) Para 5.8 A Strategy for change, Aim 3 (Perceive), 5.8.4 – 5.8.5 do not mention the significance of the Roman origins of the town and the enduring influence of the fort and Roman road network. There is also, in consequence, a significant Roman archaeological resource in the town centre and on St Andrew's Hill.</p> <p>B) Para 5.8 A Strategy for change, Aim 3 (Promote), Objectives I to L do not mention the Roman fort. The Roman fort should be integrated into promotion of the town's heritage. Promotion and awareness raising will also be beneficial for the long-term protection (Aim 2) of the fort.</p>	<p>Cullompton's heritage has many layers, from the prehistoric settlement through to the Roman occupation in the Fort and associated civilian settlement.</p> <p>Objective I relates specifically to the historic buildings of Fore Street and the Bullring with Objective K making reference to Cullompton's distinct heritage including pop-up museum of archived materials. Specific reference to Cullompton's Roman past is not necessary at Objective I & K. However Objective J to be re worded as follows: increase awareness of heritage, including archaeology, in Cullompton's surrounding streets and spaces.</p>
	<p>Promotion and protection of the fort should be integrated with the Masterplan's Vision and Objectives, including:</p> <p>A) Historic Buildings and Landscapes (3) Protecting, enhancing, key views, green spaces – including seeking to provide more green space.</p> <p>B) Enticing Experience for Visitors (12) Raise profile and make use of attractions ... and open spaces. (20) Link new development through a network of attractive spaces enabling connections to the town centre.</p>	<p>The updated CAMP provides additional protection to the setting of the Roman Fort to the east. However, the Point 1, bullet 3 of the Vision for the Masterplan Vision to read as follows: Protect, enhance and create key views to and from historic assets, green spaces and waterways.....</p>
	<p>The fort is referred to as 'Roman fort and camp' in the document. It would be more accurately referred to as 'fort', 'forts' or 'fort and annexes'. There is no evidence for a 'camp' – which is a specific type of temporary Roman field defence.</p>	<p>Noted. All reference to be to the 'Roman Fort'.</p>
	<p>There are a number of comments relating to the Baseline Report.</p>	<p>The comments received to the baseline report whilst welcomed have not been set out in detail as it is not the intention of the Local Authority to update this document as part of this advanced stage of masterplanning.</p>
<p>Consultee: member of the public</p>	<p>As a new resident of Cullompton with a young family the exciting plans set out in the Masterplan was something that really attracted us</p>	<p>Noted.</p>

	to the town. We are particularly keen to see the relief road, the Culm Garden connection and train station to be built.	
Consultee: DCC Planning, Transportation & Environment.		
Local Transport Provision	Paragraph 4.2.8 refers to the Manual for Streets and states that a carriageway width of 5.5m would enable two Heavy Goods Vehicles to pass, with 6.0m for two-way bus movements. However, the Devon County Council Design Guide outlines that a carriageway of this nature needs to be 6.5m wide for two-way bus movements <i>with the possibility of additional widening on bends where required.</i> This approach should be reflected in the masterplan.	Amend para 4.2.8, fourth sentence to read as follows: 'The Devon County Council Design Guide indicates that a carriageway width of 6.5m would generally enable two Heavy Goods Vehicles to pass, with the possibility of additional widening on bends as required.'
	Paragraph 4.2.11 discusses the conversion of narrower lanes to formal shared surfaces. It should note that potential shared spaces would need to be in line with the new Department for Transport guidance on shared space.	Add to the end of para 4.2.11:including the Department of Transport's guidance on shared space.
	Figure 15 should include the same caveat as that included for Figure 16, that being, " <i>Note: the points of access off the Cullompton Relief Road are not finalised and may change</i> ".	Agreed. Insert Note next to the title of Figure 15: <i>the points of access off the Cullompton Relief Road are not finalised and may change.</i>
	Bullet point 32 on Page 31 should remove ' <i>with improved cycle access to Exeter</i> ' as this is not something which Devon County Council are looking to provide at present.	Agreed. Bullet point 32, page 31 to read as follows: 'Establish strategic cycle links between Cullompton and Willand.'
	Figure 25 seems to suggest new bus stops along the Relief Road however the county council does not consider that buses will take this route as people want to access the Town Centre. We will not be providing bus laybys as part of the scheme and it will be difficult to add in later due to the impact on the floodplain. As such the bus stops indicated on the Relief Road should be removed.	Agreed. Delete 2x bus stop on Figure 25.
	Figure 29 shows public parking provision. This includes a car park off the football club car	Agreed. Amend accordingly.

	park; however, it should be noted that there is no agreement for the football car park to be used publicly. Instead the new and existing CCA car parks could be shown.	
	Devon County Council is supportive in principle for a new railway station to serve the town. Further work and discussion with the railway sector and other stakeholders is required to confirm how deliverable this aspiration is. Any new station would need to ensure appropriate access is achieved without generating additional traffic around J28 and also that it would not impact upon the functioning of the faster, long distance trains.	Noted. Working parties towards the delivery of the railway station, that include Devon County Council and other stakeholders, are established. Impact of the station on J28 and long distance train services noted.
Waste Planning	The waste planning authority have no strategic issues to offer.	Noted.
	The final sentence in paragraph 4.5.14 refers to “ <i>storage for recycling and landfill waste</i> ”. It is recommended that ‘ <i>landfill waste</i> ’ is replaced by ‘ <i>residual waste</i> ’.	Agreed. Replace final sentence of para 4.5.14 as follows: New development should include appropriate internal and external storage for residual waste’.
Flood Risk Management	<p>The County Council welcomes the consideration of SuDs within the masterplan. There are a number of ways Mid Devon District Council may wish to add to this:</p> <p>A) SuDS could be constructed within pocket parks, such as swales and rain gardens. These features could manage surface water from surrounding impermeable areas.</p> <p>B) SuDS could be multifunctional. For example, green roofs could be constructed on top of bus shelters and cycle shelters. Kerbed rain gardens could be constructed as traffic calming measures or pedestrian crossings.</p> <p>C) Rainwater could be re-used, for example for use at public toilets or water planted areas.</p> <p>D) SuDS could be designed to replicate historical features or be representative of a local region or area. Rills could be constructed to represent the use of leats and water although these features may require space.</p>	Noted. For consideration in the detailed design of pocket gardens and other development opportunities as planning permission requires.

Health & Wellbeing	It is necessary to ensure that the overall community is equally benefited and there is a strategic overview to ensure social and health disadvantages are mitigated and accounted in view of current and future local policies.	Noted. Health and wellbeing integrated as a 'golden thread' through the document with particular relevance to Vision point 5, bullet 23.
Economic development	There is a need for a strong phased approach to delivery of employment land focusing both on the spatial integrity of any enlarged settlement (i.e. making sure if no more were to be built afterwards, that what is built is in the right place). This phased approach should also focus most on sectors where current demand is, rather than be speculative – current demand is strongly skewed away from office and towards warehousing and some industrial.	Paras 4.4.23 – 4.4.29 are dedicated to employment opportunities within the town centre; with accessibility & the creation of a vibrant town centre in mind. Speculative warehousing and industrial opportunities are limited within the geographic area of the masterplan.
	Office and retail space to be focused towards the re-use of buildings within the town centre.	Noted. See paras 4.4.27.
	Developer contributions need to be realistically accounted for.	Noted.
Other	The fastest possible broadband connectivity at the time of development should go into all new buildings as a matter of course and policy.	Noted.
	The best and most sustainable energy saving and generation at the time of development should be applied to all new buildings as a matter of course and policy. This should be a prerequisite of Devon heading towards Net Zero.	Noted. Details to be addressed at detailed planning application stage.
	Sufficient Electric Vehicle charge points using the best and most up-to-date technology at the time of development should be installed.	Noted. Details to be addressed at detailed planning application stage.
Consultee: Highways England	Draft Masterplan 2021: Consideration given to connectivity to sustainable travel modes, amenities and facilities will be an important aspect in the likely success of modal shift and reducing the reliance on Junction 28 for localised trips across Cullompton.	Noted.
	Strategic Road Network Connections: In order to accommodate more than 500 dwellings at East Cullompton and development at the proposed Culm Garden Village, a strategic scale intervention will be required which may comprise a new Junction 28a as assumed in the transport evidence, or an alternative scheme as is yet to be identified through further assessment.	Noted.

	<p>Masterplan considerations – Movement: The masterplan will need to ensure that the proposed development of Cullompton Town centre is supported by an adequate and sustainable transport network to ensure there is no adverse impact on the existing highway network, including M5 Junction 28. Data published by Government confirms that traffic levels on the strategic road network have now returned to pre-pandemic levels.</p>	<p>Noted. The masterplan gives particular consideration to modes of transport that do not rely on the private car. Recognition is also made to the capacity issues of J28.</p>
	<p>Town centre: Cullompton High Street forms part of an agreed strategic diversion route in the event of disruption on the M5 motorway. Highways England and Devon County Council will need to fully understand the transport implications of any measures proposed for Fore Street or use of the Relief Road to ensure an adequate diversion route is maintained to fulfil its strategic function.</p>	<p>Noted. Devon County Council are working party members to Cullompton's strategic projects including the relief Road, the Railway Station, enhancement of Fore Street and the Higher Bullring.</p>
	<p>Public transport: The masterplan should consider how public transport services can be improved, both through a potential increase in service provision and enhancements to infrastructure to encourage the use of sustainable modes. The principle of investing in the Railway Station is strongly supported by Highways England.</p>	<p>It is not within the remit of the Local Planning Authority to establish means to increase local public transport service. Enhancements are identified including the railway station proposal, enhanced pedestrian, cycle and bus stop provision.</p>
	<p>Commuting: The provision and delivery of the employment sites are key to ensuring that the need to commute to external destinations is minimised & to reduce the need for peak hour private car trips. Commercial development should also be well connected by sustainable travel connections from the outset.</p> <p>Masterplan Themes & Objectives:</p> <ul style="list-style-type: none"> a) Reclaiming Cullompton's spaces to support a vibrant community life: Highways England supports the objective to alleviate traffic through Cullompton High Street. The transport implications of any changes to the local road network on the operation of Junction 28 will need to be fully understood, including how the proposals may impact on the role of the High Street as an agreed strategic diversion route for the M5 motorway. b) Easy to move around on foot, on bicycle, by bus and by train: Highways England welcomes the proposal to create a high-quality pedestrian and cycling link between the town centre and surround areas. Additional emphasis should be placed 	<p>Noted. Paras 4.4.23 – 4.4.29 are dedicated to employment opportunities within the town centre; with accessibility in mind.</p> <p>Noted.</p>

	<p>on the early re-opening of the Culloompton rail station to provide an alternative travel mode, and the masterplan should consider how the rail station could be best integrated into the town and what infrastructure is required to encourage its use.</p>	<p>Noted.</p>
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