

Development Strategy, Vision and Spatial Strategy

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
Development Strategy, Vision and Spatial Strategy	Development strategy - believe that windfall sites should have safeguards written into policy. If a 'windfall' site is approved Willand could be subjected to three times more houses than the planned number under the proposed local plan.	Willand Parish Council (44)	No change. Applications for windfalls sites will be assessed on their own merits in line with the Local Plan Review policies.
	Development strategy - last line of paragraph 2.15 should refer to 2.12 not 2.13.	Willand Parish Council (44)	For clarity amend paragraph 2.15 to reflect comment.
	Development strategy – allocations for employment land are aspirational.	Harcourt Kerr (1090)	Comment noted.
	Development strategy – paragraph 2.2 disagree with housing figures. Should reflect objectively assessed housing needs in the Exeter HMA SHMA Final Report.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	The housing figures have been updated to reflect the findings of the SHMA Final Report.
	Support Vision.	Willand Parish Council (44); Uffculme Parish Council (54); Harcourt Kerr (1090); Waddeton Park Ltd (3815); Individual (3700)	Support noted.
	Support Spatial Strategy.	Willand Parish Council (44); Individual (5293; 3700)	Support noted.
	Do not support Vision – it is only a wish list.	Individual (5811)	Comment noted.

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	Vision. To be able to promote community well-being there has to be a pledge to underpin existing voluntary aid networks.	Individual (5266)	The vision and spatial strategy describes how sustainable development of Mid Devon will bring positive benefits to local communities and that the Council will use its' planning and related powers to achieve the vision's objectives. Areas outside of the Council's management are recognised with a goal to work in partnership to meet social and economic needs in ways that enhance the environment.
	Vision. To support sustainable success, the Authority has to have a continuous cash flow. Should lobby central government to raise local levels.	Individual (5266)	No change. The vision and spatial strategy describes how sustainable development of Mid Devon will bring positive benefits to local communities and that the Council will use its' planning and related powers to achieve the vision's objectives. Areas outside of the Council's management are recognised with a goal to work in partnership to meet social and economic needs in ways that enhance the environment which include seeking financial support.
	Vision. To conserve and enhance the area, the Authority should acknowledge shops and their streets are 'sales areas'. Should improve pedestrian access to existing streetscapes.	Individual (5266)	No change. The vision and spatial strategy describes how sustainable development of Mid Devon will bring positive benefits to local communities and that the Council will use its' planning and related powers to achieve the vision's objectives. 'Sales areas' are recognised through the objective of 'attractive, lively and successful town centres' as part of supporting sustainable economic success.

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	Vision. To respect environmental limits, should make better use of Authority owned property.	Individual (5266)	No change. The vision and spatial strategy describes how sustainable development of Mid Devon will bring positive benefits to local communities and that the Council will use its' planning and related powers to achieve the vision's objectives. Reusing existing buildings is recognised in 'conserve and enhance the area'.
	The overall strategy requires 'buy-in' from the people who live and work in Mid Devon.	Individual (5266)	Following the options consultation in 2014 and based on the representations received a report was submitted to the Council on 4 th September 2014 which considered the Strategic Options and overall strategy where it was decided that there would be a strategic focus on Cullompton. The vision and spatial strategy describes how sustainable development of Mid Devon will bring positive benefits to local communities and that the Council will use its' planning and related powers to achieve the vision's objectives. Areas outside of the Council's management are recognised with a goal to work in partnership to meet social and economic needs in ways that enhance the environment.
	Support reference to conservation and enhancement of protected landscapes in the Vision Statement.	Blackdown Hills AONB Partnership (1195)	Support noted.
	Believe that vision is admirable but outside of planning powers and roles available to the District Council.	Uffculme Parish Council (54)	No change. Areas outside of the Council's management are recognised with a goal to work in partnership to meet social and economic needs in ways that enhance the environment.

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	Support spatial strategy which incorporates directing housing growth to appropriate rural settlements.	Messrs Persey and Harding c/o Jillings Hutton (4654); Devonshire Homes Ltd c/o Jillings-Hutton (1050); Pemberton Hutton Developments c/o Jillings-Hutton (5786)	Support noted.
	Support Cullompton as the strategic focus in the spatial strategy.	Uffculme Parish Council (54); Pegasus Planning (3678); Individual (4407, 5266, 5293)	Support noted.
	Do not support Cullompton as the strategic focus in the spatial strategy. Artificial bias towards one centre.	Harcourt Kerr (1090)	Following the options consultation in 2014 and based on the representations received a report was submitted to the Council on 4 th September 2014 which considered the Strategic Options and overall strategy where it was decided that there would be a strategic focus on Cullompton. The strategy for long term growth east of Cullompton is central to the plan, and is based on an assessment of the most appropriate strategy to meet the district's housing needs. It reflects the urban focus of the strategy. More detailed responses to comments on the site east of Cullompton are set out elsewhere.
	Particularly support section on community well-being in vision.	Individual (3700)	Support noted.
	Support in vision insertion of green infrastructure under the heading 'promote community well-being'.	Mid Devon CPRE (486)	Support noted.

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	In vision under the heading 'promote community well-being' should include bullet 'increased use of the public rights of way network'.	Mid Devon CPRE (486)	No change. Suggestion refers to use of public rights network, which can be encompassed by 'active, involved, well-educated citizens.'
	In vision under the heading 'support sustainable economic success' should include bullet which recognises long distance walking routes.	Mid Devon CPRE (486)	No change. It is recognised that long distance walking routes can lead to tourism and therefore improve the economy. However it is felt that the vision through reflection in other bullet points encompasses this suggestion e.g. attractive countryside providing for biodiversity and employment.
	Support spatial strategy which seeks to allow/encourage development across the District.	Blue Cedar Homes (3787)	Support noted.
	Vision should reflect the Joint Strategic Needs Assessment and Joint Health and Wellbeing Strategy.	Devon County Council (626)	No change. The vision does not list various assessments and strategies to future proof the vision. The suggestions provided can be considered as part of the vision, it notes partnership working, planning and related powers to achieve the objectives of the vision.
	Vision sets out access to a safe environment under 'promote community well-being' safe, healthy and crime free neighbourhoods. But the Local Plan doesn't have sufficient regard to this.	Devon and Cornwall Police c/o WYG (5762)	S1 and DM1 set the framework for design. Policies refer to safe places with more detailed consideration at the application stage. An amendment is proposed to the supporting text of DM23 to provide clarity and reflect the comment made.

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	<p>Spatial strategy does not reflect a suitable balance of housing and other uses within towns, villages, neighbourhoods and rural areas. Settlement boundaries of some of the larger villages should be extended to allow for rural growth, or policies should allow enough flexibility for development on the edge of settlement boundaries.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>Following the options consultation in 2014 and based on the representations received a report was submitted to the Council on 4th September 2014 which considered the Strategic Options and overall strategy where it was decided that there would be a strategic focus on Cullompton. The strategy for long term growth east of Cullompton is central to the plan, and is based on an assessment of the most appropriate strategy to the meet the district's housing needs. It reflects the urban focus of the strategy. Development is proposed within appropriate towns and villages, and a further redistribution would lead to a less sustainable overall pattern of growth contrary to para 30 of the NPPF.</p>

Development Strategy

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S1 Sustainable Development Priorities	Support objective d) to retain and develop local services and facilities in villages, consider that additional development in villages is necessary to achieve this. Currently the plan concentrates too much development in the towns. The population of villages is ageing. NPPF paragraph 55 states that development should be located where it would enhance/maintain vitality of rural communities and a critical scale of new housing is therefore needed in the villages, not just piecemeal development.	Gladman Developments (5312)	Support noted. Comments on overall distribution not accepted. The Council has considered village potential on an individual basis in accordance with para 55 and the associated guidance. The blanket approach suggested would involve a less sustainable pattern of distribution contrary to para 30 of the NPPF.
	Amend e) to improve the emphasis on walking (in particular) and cycling, de-emphasising car travel, making walking infrastructure a priority of housing development linking to town and village centres.	Crediton Town Council (678); Crediton Neighbourhood Plan Steering Group (1734)	After taking the opportunity to review the policy, the Local Plan Review is considered to provide an appropriate balance.
	Welcome, particularly h), k), l) and m).	Blackdown Hills AONB Partnership (1195)	Noted.
	Support.	Uffculme Parish Council (54); Historic England (1170)	Support noted.
	Recommend addition to j) committing to an 80% reduction in CO2 emissions by 2050, which is an overarching principle of the plan, influencing its spatial strategy and transport and must be taken into account in considering developments including through energy conservation.	Sustainable Crediton (2689)	While the 80% reduction reflects the national requirement (although from a 1990 base) much of the target will be met through non-planning actions, and there is no requirement to state the target within a local plan.

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	Supports the approach of concentrating development at the three main towns as the most practical and logical approach to meeting development needs. Accordingly, a) should be amended to remove reference to long-term growth east of Cullompton, as a new community will undermine this approach, is difficult to secure and will likely be delayed.	Gleeson Strategic Land c/o Bell Cornwell (3775)	The strategy for long term growth east of Cullompton is central to the plan, and is based on an assessment of the most appropriate strategy to meet the district's housing needs. It reflects the urban focus of the strategy. More detailed responses to objections to the site east of Cullompton are set out elsewhere.
	Support the reference to "managing flood risk" however prefer k) to use a measure which relates to the impact scale in the Sustainability Appraisal, as "significant harm" is rather vague and ill defined.	Environment Agency (943)	Not agreed, the term significant harm has provenance in planning and is sufficiently clear for the purpose of this strategic policy, based on the context and facts of any particular case.
	Criterion a) provides an over-reliance on strategic growth east of Cullompton, which is the path of least resistance, over-reliant on cars and too infrastructure-dependent. Delay on this one site could impact meeting housing needs. Uncertain demand at Cullompton. Should be redistribution to the larger villages.	Messrs Persey and Harding c/o Jillings Hutton (4654); Devonshire Homes Ltd c/o Jillings-Hutton (1050); Pemberton Hutton Developments c/o Jillings-Hutton (5786); Waddeton Park Ltd c/o Bell Cornwell (3815)	The strategy for long term growth east of Cullompton is central to the plan, and is based on an assessment of the most appropriate strategy to meet the district's housing needs. It reflects the urban focus of the strategy. More detailed responses to objections to the site east of Cullompton are set out elsewhere.
	Should protect or retain certain agricultural land for production of food and crops for green energy.	Willand Parish Council (1320)	Noted, no change required as this factor is already in the policy.

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	Supports the strategy of development at the towns including long term development to the east of Cullompton since the strategic road network can accommodate the growth or satisfactory mitigation can be provided. Support delivery of infrastructure reducing the need to travel by car, integrating public transport and other sustainable travel.	Highways England (1172)	Support noted.
	Welcome inclusion of Dartmoor and Exmoor National Parks in k).	Exmoor National Park Authority (115)	Noted.
	Generally support, but should also include “accessible land” designated under the CROW Act 2000 in i) and long distance walking and cycling routes in e).	Mid Devon CPRE (486)	Access to public rights of way, promotion of cycling and walking and provision of accessible land are already included, and the proposals add unnecessary detail.
	Amend a) to refer to a range of mid-sized and larger urban extensions at Cullompton able to delivery housing in the early part of the plan period.	Messrs Force and Christian c/o Genesis Planning (3780)	This is unnecessary additional detail for this strategic summary.
	Support, but consider that a policy addressing the NPPF presumption in favour of sustainable development should be included.	Lightwood Land c/o Pegasus Planning (3678)	This is unnecessary as the presumption already forms the “golden thread” within the NPPF and is reflected throughout the policies and proposals of the Local Plan. Its inclusion is no longer specifically recommended by the Planning Inspectorate.
	Support the inclusion of a wide choice of high quality homes including for the elderly.	Blue Cedar Homes (3787)	Support noted.

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	Support i) but this should also include “recreational trails” since previous COR10 is now excluded which referred to the national cycle network and named paths. Improvements to public rights of way should be multi-use. These terms should be included in the glossary.	Devon Countryside Access Forum (1534)	Agreed, add “recreational trails” to criterion (i). Add definition of terms ‘recreational trails’ and ‘public rights of way’ in the glossary.
	This is relevant to caravans.	Caravan Club c/o Savills (5789)	Noted.
	Amend to include the principles of active design.	Sport England (169)	The relevant principles are already generally reflected in the plan policies.
	Support wording, creating “ideal” communities.	Individual (3700)	Support noted.
	Not enough brownfield development and therefore too much greenfield land.	Individual (5278)	Mid Devon is a rural district with a limited supply of deliverable and available previously developed land. The balance of brownfield and greenfield allocations in the Local Plan is considered appropriate.
	Should ensure local communities have a greater say over development.	Individual (5278)	Noted. The consultation processes in the preparation of the local plan and the various masterplans on major sites, the opportunity to prepare Neighbourhood Plans and consultation requirements for planning applications, give significant opportunities for community involvement.
	Support the town centre emphasis.	Individual (4662)	Support noted.

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S2 Amount and Distribution of Development	<p>Over-reliance on large scale urban extensions, 67% of the total housing requirement, is risky given long lead-in times and complex infrastructure, and dubious delivery rates. There needs to be more flexibility than the 10% included in the plan and this needs to be in a mixture of locations and sizes.</p>	<p>Gladman Developments (5312)</p>	<p>Masterplanning work on two of the urban extensions is advanced, and applications on Eastern Urban Extension are subject to resolution to approve, minimising the delivery risk on these two, reflected in the findings of the SHLAA. Urban extensions provide the opportunity for high quality, sustainable, mixed use developments which provide for infrastructure. In addition, a range of smaller sites in urban and rural areas are included to add choice and improve certainty of early delivery. The plan provides very significant flexibility, including 10% “over allocation”, significant windfall potential and contingency sites, and no additional flexibility is required.</p>
	<p>Broadly welcome the growth of Cullompton subject to sufficient mitigation of traffic and environmental issues.</p>	<p>St Andrews Church, Cullompton (1179)</p>	<p>Noted.</p>
	<p>Concern about the overall scale of development proposed, lack of infrastructure, impact on character and sense of community and additional commuting and car use. Loss of agricultural land, landscape impact and biodiversity.</p>	<p>Bradninch Town Council (86)</p>	<p>The level of development is based on objectively assessed need, and the Council has indicated through its work on the SEA that any adverse effects of the development do not outweigh the strong benefits of meeting these development needs.</p>
	<p>Sceptical about job creation likelihood.</p>	<p>Bradninch Town Council (86)</p>	<p>Noted. The proposals are based on evidence of need and demand, and sites are allocated in achievable locations (including within urban extensions). The council actively promotes the development of employment through its economic development function.</p>

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	<p>The reliance on a principal development east of Cullompton to provide development will be risky, given the difficulties in delivering large scale development. The East Tiverton urban extension, which is not particularly complex, was allocated in 2011 and only now is it coming forward. This may lead to dangers arising from a lack of deliverable 5 year supply. The East Cullompton urban extension is too expensive to bring forward and therefore unviable. This goes to fundamental soundness of the plan. The plan should be abandoned and a revised plan prepared based on the “Option 1” previously published, with additional development at Tiverton and Crediton which are more available and viable.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>The provision of development east of Cullompton is relied upon only later in the plan period, allowing significant time to prepare masterplanning and deliver the site, mitigating this risk. It is not accepted this development is too expensive, although the council will continue to examine and look for external funding towards infrastructure (as occurred with the Eastern Urban Extension). With the government “deadline” of 2017 for the preparation of Local Plans abandonment of the local plan is not appropriate or justified..</p>
	<p>The policy should state “at least” 7200 dwellings, reflecting that fact that objectively assessed need is not a ceiling, and decades of under-provision need to be corrected.</p>	<p>Waddeton Park Ltd (3815); MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>The housing target is has been increased to reflect the SHMA Final Report. In any event, this figure is not a ceiling for development, which is reflected in the “overprovision” and other flexibility included in the Local Plan policies and proposals. “Approximately” reflects the existing Core Strategy wording and is appropriately flexible. It is not accepted that there have been “decades of under-provision”.</p>

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	The policy should reduce the Cullompton target to 1,500 dwellings and increase the Rural Areas target to 2,820 dwellings, to improve deliverability.	Waddeton Park Ltd (3815)	This would involve deletion of the East Cullompton site and an extremely unsustainable distribution, contrary to NPPF advice in para 30 and elsewhere. Reasonable alternatives have been assessed within the revised Sustainability Appraisal.
	The policy should increase the overall housing target to 7,800 homes to reflect the most recent DCLG household projections. See analysis by Neil McDonald provided with representations.	Waddeton Park Ltd (3815)	The housing target is has been increased to reflect the SHMA Final Report.
	Development should be focused at the main towns, and not in a new settlement, as this is the most sustainable option, continuing the urban concentration approach of the current Local Plan. A new community would need to be at least 4000 dwellings to be self-sustaining and would impact on economic growth in the towns. Sherford and Cranbrook had lead-in times of more than 15 years. Propose the following distribution: Tiverton – 3510 Cullompton – 2730 Credon – 780 Rural Areas – 780 Total – 7800	Waddeton Park Ltd (3815); NW Cullompton Urban Extension Consortium c/o PCL Planning (5672); Dial Holdings c/o PCL Planning (2315)	See earlier comments on the overall target proposed of 7800. It is noted that this proposed distribution differs from that proposed by Waddeton Park in a different representation. The distribution proposed in this representation is very similar to that previously set out as “town-centric” and has therefore already been considered, including within the SEA. This representation would require the allocation of land at Hartnoll Farm which is not supported by the Council.

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	The overall housing provision is too low, at the bottom of the range within the SHMA and should be reconsidered, to reflect the recent publication of revised household projections. It should not be based on the current Local Plan target.	NW Cullompton Urban Extension Consortium c/o PCL Planning (5672); Dial Holdings c/o PCL Planning (2315); Summerfield Developments (SW) Ltd c/o WYG Planning (3773); Taylor Wimpey UK c/o WYG Planning (1708); Home Builders Federation (149)	The emerging target was not based on the previous Local Plan/Core Strategy target. The housing target has been increased to reflect the SHMA Final Report.
	The distribution should be altered to reduce Cullompton provision to reflect the removal of the East Cullompton proposal and Crediton should be increased to reflect its size. Difficulties of bringing forward sites such as the East Cullompton one are well known. Crediton has scope for additional development.	MJ Gleeson c/o Bell Cornwell LLP (3775)	This implies a target of 1,500 at Cullompton and 2,820 dwellings at Crediton. Arguments for the retention of the East Cullompton development are set out in earlier comments and in more detailed responses on the site specifics. There is no evidence that Crediton has the capacity for such a significant increase in its development rate (about 4 times as high as currently proposed) given heritage, landscape and air quality constraints. Taking the highest capacity of all allocation sites submitted through the SHLAA the maximum capacity of Crediton for this Local Plan Review is 1047 dwellings. A more achievable version of this has been considered within the SEA (the Tiverton and Crediton focussed approach) which indicates this option is a less sustainable strategy and is therefore not preferred.

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	Support use of SHMA figures and spatial strategy. Welcomes the lack of retail/leisure development at Junction 27 due to the likely negative impact on vitality and viability of Exeter.	Exeter City Council (141)	Noted. The Council resolved on the 22 nd September 2016 to include an allocation in the Local Plan Review for retail/tourism/leisure use at junction 27 of the M5 motoway. The potential impacts identified by Exeter City Council raised through this representation and through Duty to Cooperate meetings has led to further retail impact analysis included in the evidence base. The evidence indicates that the proposed Local Plan allocation is reasonable and considers that it would not have a significant adverse impact on Exeter city centre.
	Support the reopening of the Cullompton Railway Station. Local plan should also consider and protect reopening Willand (former Tiverton Junction) and reproviding the track to Tiverton as part of the Devon Metro scheme.	Railfuture Devon and Cornwall (5830)	Support noted. Without significant further work on costings, feasibility and funding, the inclusion of reopening Willand Station and in particular a new line to Tiverton in the Local Plan could not be supported as it would be premature. These proposals do not currently form part of the metro scheme although the Council is commissioning a timetable study which includes consideration of the role of the Willand loop.
	The Local Plan should contain further explanation of how the housing target and distribution have been determined to improve clarity and reflect the latest evidence.	Devon County Council (870)	Agree that improved reference to the SHMA conclusions on objectively assessed housing need should be included and additional paragraphs in the supporting text has been included.

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	<p>The distribution of development should be amended to propose a new settlement with residential development in association with commercial development at Junction 27/Willand which is sustainable and deliverable. This would be instead of the area east of Cullompton. This strategy would overcome the considerable infrastructure and delivery difficulties of the current plan. The plan does not meet the objectively assessed need of the district, and the housing target should be increased, and expressed as a minimum.</p>	<p>Hallam Land Management (4386)</p>	<p>Not agreed. A new settlement would be a less sustainable option than the current approach of development at or close to the existing towns where there are existing town centres, other social and community facilities, public transport networks and employment. The housing target has been increased to reflect the SHMA Final Report.</p>
	<p>Should be amended to reflect the allocation of additional land in Tiverton, see other Lowman objections.</p>	<p>Lowman Manufacturing Company Ltd C/O Heynes Planning (4564)</p>	<p>See specific comments in response to the site proposal.</p>
	<p>Overprovision of housing over too long a period, putting pressure on agricultural land and infrastructure.</p>	<p>CPRE (486)</p>	<p>The level of development is based on objectively assessed need, and the Council has indicated through its work on the SA that any adverse effects of the development do not outweigh the strong benefits of meeting these development needs. It is not agreed the preferred approach is overprovision of housing. Alternatives of overprovision have been considered in the updated SA which does indicate greater negative effects on infrastructure and resources. Infrastructure needs are considered in the plan and its supporting infrastructure delivery plan.</p>

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	<p>The distribution of housing and employment are inappropriate and will be very difficult to deliver. A significant shift towards Cullompton over the plan period is indicated, including little or no development in Tiverton or Crediton later in the plan period, and this does not appear feasible. Previous Local Plan Inspectors have supported the majority of development at Tiverton and there is no reason to change now, particularly as the Tiverton EUE is now coming forward. Cullompton already has a significant urban extension to bring forward. There is insufficient rural growth proposed. Employment development is biased away from rural areas, which is counter to the market's wishes. Even permitted, serviced land in the urban areas has failed to come forward due to poor returns. Development at Cullompton of the scale proposed is unlikely to come forward due to infrastructure costs, with no developer on board.</p>	<p>Harcourt Kerr (1090)</p>	<p>The distribution of development is considered to be appropriate in terms of sustainability and deliverability. Cullompton is an area of significant development in the previous local plan, including significant infrastructure improvements, and this strategy builds on that. Specific issues associated with the Eastern Cullompton development are dealt with separately. However, the evidence base supporting this allocation has now been significantly expanded and updated. Tiverton faces environmental constraints, which are reflected in the reduction in long term development there. The rural proposals are based on settlement-by-settlement assessment, and further development in rural areas would be less sustainable. Rural employment is supported by development management policies and other opportunities existing within the wider planning system as a result of permitted development right changes.</p>
	<p>Placing 50% of district growth in Cullompton has not been demonstrated or justified by the evidence base, or shown to be viable or deliverable and therefore plan is unsound.</p>	<p>G L Hearn (3781); Hallam Land Management (4386)</p>	<p>As set out above, the distribution of development with significant emphasis on Cullompton is supported by the Local Plan evidence base which has been significantly expanded and updated.</p>
	<p>Major development to the east of Cullompton is inappropriate and would impact on our parish. Development should be on a smaller scale at different sites.</p>	<p>Broadhembury Parish Council (1483)</p>	<p>The development east of Cullompton is considered to be appropriate, and will provide a sustainable location for new homes and jobs, with infrastructure provided alongside. A more dispersed pattern would run the risk of failing to provide such significant infrastructure.</p>

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	The housing provision should be 8400 as previously proposed, as set out in the SHMA and previous underdelivery. There is too much emphasis on Cullompton and more growth should be diverted to the rural settlements to improve rural housing affordability.	Devonshire Homes Ltd c/o Jillings-Hutton (1050); Pemberton Hutton Developments c/o Jillings-Hutton (5786); Messrs Persey and Harding c/o Jillings Hutton (4654)	There is no clear basis for the suggestion of a 8400 dwelling target, which was used in previous consultation documents in the absence of an OAN from an up to date SHMA. The housing target has been increased to reflect the SHMA Final Report. The emphasis on Cullompton is considered appropriate and sustainable whereas a significant increase in rural development would lead to unsustainable travel patterns.
	Support the principle of development at the towns, but need to be satisfied that levels can be accommodated without severe impact on the strategic road network, subject to mitigation. A new motorway junction would need Secretary of State approval, considering safety and economic benefit.	Highways England (1172)	Since this representation has been received, MDCC officers have been in regular discussions with DCC and the HE. These discussions have informed work on a refined evidence base.
	The Local Plan provides less housing than the recently published SHMA, however the difference is modest and could pragmatically be taken forward with the need for an early review incorporated to increase the rate of supply in the later part of the plan period. This would increase the need for the council to deliver against the target in the early years of the plan. The commercial requirement for Cullompton set out in the Local Plan is unclear because of differing figures included in the plan (eg S2, S6, S11 and table 15). This should be clarified.	Persimmon Homes SW c/o CLP Planning (3640)	The housing target is proposed to be increased to reflect the SHMA Final Report. The criticism of the commercial figures is not accepted, as these are measuring different things. The difference in figures referred to relate to different aspects of the plan; some references are with regard to need and other supply.

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	<p>The housing target should be increased to 370 per annum, the mid-point in the SHMA plus a 10% flexibility allowance. This would accord with the evidence and NPPF requirements, and would in particular help to meet the affordable housing needs. The distribution should be amended to increase the amount at Crediton and in the rural areas, reducing the Cullompton provision. Relying major development sites is risky and may undermine housing provision.</p>	<p>Origin3 (5765)</p>	<p>The housing target is proposed to be increased to reflect the SHMA Final Report. A flexibility allowance is included in the allocations, rather than in the target. The comments on distribution are not entirely clear, but there is no basis for a reduction in the Cullompton target, while provision in Crediton and the villages appropriately reflects the characteristics and sustainability of these settlements.</p>
	<p>The origin of the housing target is unclear. It is assumed that this includes the “10% flexibility” referred to in the plan, and therefore the real Objectively Assessed Need is assumed to be 324 per annum. This does not relate to the recently published SHMA figures. A number of technical objections are made to the SHMA including the use of 30 year migration figures, the economic projections, headship rates, affordable housing calculations. Clarification of the employment targets is required as there are currently inconsistencies.</p>	<p>Lightwood Land c/o Pegasus Planning (3678)</p>	<p>The housing target is has been increased to reflect the SHMA Final Report. A flexibility allowance is included in the allocations, rather than in the target. It is considered that the plan approach to employment is sufficiently flexible.</p>

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	<p>In general the SHMA represents a useful and robust evidence in the context of Practice Guidance, however technical evidence is provided concerning the concluding Objectively Assessed Need range and thence into S2. At the least they should be amended to reflect the upper end shown in the SHMA and referred to as minimum provision. There is a lack of supporting justification for the distribution of development, but consider that the growth should be relocated away from Cullompton and towards the more sustainable villages eg Willand. Cullompton development is of doubtful achievability.</p>	<p>Gallagher Estates c/o Turley (5763)</p>	<p>The housing target has been increased to reflect the SHMA Final Report. The specific proposals made in the representation for a change in distribution are unclear, but in general the Council considers the concentration on Cullompton to be appropriate and deliverable. An alternative approach concentrating development in the villages would be a less sustainable development strategy.</p>

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	Support the proposed distribution emphasising development at the towns.	Sustainable Villages Group (3609); Uffculme Parish Council (54); Willand Parish Council (44); Randell Burton (948); Residents of Hederman Close, Silverton (4927); Individual (2502, 5211, 5266, 5293, 4284, 5317, 5318, 1179, 5348, 5717, 5747, 5716, 711, 5712, 2318, 5713, 5714, 5715, 5660, 5667, 3700, 5636, 5632, 5619, 4446, 643, 5618, 5620, 5610, 4590, 5888, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5889, 5674, 4625, 5371, 5673, 4443, 1252, 4251, 3674, 4219, 5787, 5852, 5853, 5854, 5855, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5418, 5876, 5877, 5878, 5879, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5784, 4407, 5775, 4289, 5408, 5401, 5804, 3614, 5816, 5822, 5007, 4311, 5393, 5392, 5382, 5381)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
S3 Meeting Housing Needs	Support Cullompton growth	Dramatic Improvement (5235)	Support noted.
	The overall housing target should be “at least”.	Waddeton Park Ltd (3815); Growen Estates c/o Rocke Associates Ltd (5748); MJ Gleeson c/o Bell Cornwell (3775); Gallagher Estates c/o Turley (5763)	Not agreed, the use of “approximately” provides sufficient flexibility and reflects previous use in the Core Strategy. In any case, the plan provides significant flexibility including “overprovision”, windfalls and contingency sites.
	Supports the provision of affordable homes.	Uffculme Parish Council (54); Individual (3700)	Support noted.
	The affordable housing target should be 35% reflecting need.	Sustainable Crediton (2689)	This would undermine the viability of housing development to an unacceptable degree, given the need to fund key infrastructure (including via CIL).
	Support the self-build requirements.	Sustainable Crediton (2689); Individual (2075)	Support noted.
	Supports the policy thresholds as being PPG-compliant.	South West HARP Planning Consortium (1581)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	The overall housing provision should be increased to meet the full affordable housing requirements of 124 per year, instead of the 100 – 108 per year currently proposed	Gladman Developments (5312); Origin3 (5765); South West HARP Planning Consortium (1581)	Not agreed. The overall target has been revised to reflect the latest SHMA figure. The SHMA forecasts a need of 124 affordable dwellings per year, which it is accepted should be reflected in the local plan text. It is highly likely that the Council and its housing association partners will be able to provide at least 20 additional affordable dwellings per year through non-planning actions such as investment from the HCA, exceptions sites and delivery on council owned land. Analysis by the Joseph Rowntree Foundation indicates that s106 did not provide 100% of the affordable housing completions in any of the last 10 years.
	The self-build requirements are too prescriptive and should only be required if feasible, viable with a proven need.	Gladman Developments (5312)	Not agreed, this policy is in line with the government policy, and there is no evidence provided that such a requirement will undermine viability. The viability work for the Community Infrastructure Levy confirms no negative impact on viability from self-build requirements.
	Wish to see a commitment to housing diversity.	Bradninch Town Council (86)	Noted. See policy S1 (g).
	Need more guidance on how the off-site contributions will be calculated, particularly with reference to pooling restrictions within the CIL regulations.	Devonshire Homes c/o Jillings Hutton (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Messrs Persey and Harding c/o Jillings Hutton (4654)	There is existing guidance within the Council’s adopted “Meeting Housing Needs” SPD. Pooling issues within the CIL regulations do not apply to affordable housing contributions.
	Support the 30% target and 5 dwelling threshold for affordable housing in Bampton, reflecting needs.	Individual (2075)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	A policy to promote community housing, self-build and affordable housing/shared ownership would be most welcome.	CPRE (486)	Noted. Much of this is already in the policy. It is unclear how planning policy could promote “community housing”.
	There is no quantified need for self-build. It is unclear that self-builders will wish to purchase plots on larger housing estates. There are practical challenges eg times of working associated with self-builders on a larger housing site. The requirement to provide 5% should be removed.	Persimmon Homes SW c/o CLP Planning Ltd (3640); Hallam Land Management (4386)	Not agreed, this policy supports the government initiative to promote self-build as a viable alternative to the existing delivery vehicles. Evidence of demand/need is provided in the local plan. The various detailed issues referred to can be overcome through appropriate site management.
	There should be more bungalows.	Individual (5357)	There is no requirement in the plan to either provide or not provide bungalow developments. Developments will be considered on their merits. Housing proposals come forward according to demand and profitability.
	The overall need should be increased to at least 407 per annum.	Mr Force & Mr Christian c/o Genesis Town Planning (3640)	Not agreed. The housing target has been increased to reflect the SHMA Final Report.
	The affordable housing target of 28% in Cullompton is not supported by the viability evidence which suggests 25%. No assessment of the implication of space standards has been included.	Lightwood Land c/o Pegasus Planning (3678)	Updated viability evidence has confirmed the appropriateness of the percentages detailed in the policy. Policy S3 acknowledges that in certain instances there may be viability constraints. The onus is on the applicant to demonstrate any overriding viability constraints.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Reference to self-build should be amended to self/custom build but consider that the viability evidence is flawed.	Lightwood Land c/o Pegasus Planning (3678)	Self-build is the term used in the CIL regulations and is therefore considered to be appropriate for the Local Plan. Since then, the Housing and Planning Act 2016 has described self-build and custom housebuilding under a single definition, so the Local Plan now reflects this as well. The Council's viability assessment has determined that the delivery of self-build housing will not have a negative impact on viability.
	Retirement housing is challenging to deliver and the requirement for on-site affordable housing will often preclude such developments due to higher build costs and longer selling period. Management regimes are not conducive to affordable housing in Blue Cedar Homes schemes. Affordable housing delivered on site should therefore be separate from the age restricted product, not "peppercotting".	Blue Cedar Homes (3787)	The policy allows for the use of off-site payments to deliver affordable housing in appropriate circumstances.
	The SHMA refers to 124 affordable homes being needed per year, rather than the 96 mentioned in paragraph 2.27.	Devon County Council (626)	Agreed. A change has been included in the Local Plan.
	Care homes may not be on strategic sites so paragraph 2.29 may be too prescriptive.	Devon County Council (626)	Noted. A minor change to refer to "other locations" is proposed.
	The Written Statement on small scale developments requires that on sites of 6-10 dwellings only commuted sums for affordable homes can be sought, which should be deferred until completion of the development.	Home Builders Federation (149)	Local Plan policy reflects the most up-to-date position in national policy and guidance. It is agreed that such payments on sites of this scale are payable on completion.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Provision will not meet the full affordable housing need.	Friends Life c/o GL Hearn (3781)	The Local Plan's affordable housing targets are in line with the identified need. Paragraphs 2.27 as amended of the Local Plan refer to other means of delivering affordable housing, and the balance of meeting need while ensuring development viability.
S4 Ensuring Housing Delivery	Support, add flexibility.	Uffculme Parish Council (54); Summerfield Developments c/o WYG (3773); Gallagher Estates c/o Turley (5736); Individual (3700)	Support noted.
	Will need to be amended if the overall level of development changes.	Home Builders Federation (149)	Agreed. The housing target has been increased to reflect the SHMA Final Report.
	The contingency sites cannot provide housing quickly enough to be of help, since development rates would have to fall very low for them to be provided. The five year supply element of this policy is not in accordance with the NPPF.	Devonshire Homes c/o Jillings Hutton (1050); Messrs Persey and Harding c/o Jillings Hutton (4654); Pemberton Hutton c/o Jillings Hutton (5786)	The use of contingency sites is included in the previously adopted plan and found to be sound. The plan also includes other mechanisms to ensure flexibility.
	The contingency sites could only come forward if necessary infrastructure is in place and the Strategic Road Network can accommodate development or severe impacts can be mitigated.	Highways England (1172)	Noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	<p>The policy is unclear, since the action levels column implies no new homes have been delivered in 2013 – 2015 and the action levels are too low. The policy should be amended to delete the confusing action level column, and state that if delivery falls behind by one years' worth, action will be taken. In any case, the presumption in favour of sustainable development means a proactive approach to housing provision should be taken even before there is a shortage of housing supply.</p>	<p>Persimmon Homes c/o CLP Planning Ltd (3640)</p>	<p>This is not agreed, the action levels do not imply anything about past delivery, they are delivery targets. They reflect a potential situation where 10% underprovision against the plan targets is forecast which is a reasonable action level. The contingency sites allow for a proactive approach to housing supply.</p>
	<p>The contingency sites should be allocated to meet housing need, and therefore this policy is unnecessary and should be deleted.</p>	<p>Messrs Christian and Force c/o Genesis Town Planning (3780)</p>	<p>Not agreed, the local plan already allocates 10% "overprovision" and windfalls provide further flexibility.</p>
	<p>Welcome the attempt to improve flexibility however the proposal to act only when development rates are two years behind target is too late and therefore inflexible, since developments can take a year to come forward after permission is granted. The attempt to control which sites come forward when there is a lack of five year supply is contrary to the NPPF.</p>	<p>Gladman Developments (5312)</p>	<p>The use of contingency sites is included in the previously adopted plan and found to be sound. The plan also includes other mechanisms to ensure flexibility.</p>

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
S5 Public Open Space	Local Plan should make the distinction between types of open space, e.g. allotments, sports pitches.	Individual (5211)	This approach is within the policy at present.
	Open space requirements should be set out specific to Cullompton. New developments in Cullompton should include MUGA, tennis courts and consider allotments/community orchards.	Individual (5211)	Not agreed, the standards are based on the evidence set out in the Open Space and Play Area Strategy 2014. The main sites in Cullompton contain specific open space requirements with more detail at masterplanning stage.
	Cullompton should have a central park.	Individual (5707)	While a central park would be difficult to deliver, the urban extensions will provide very significant open space areas accessible to all Cullompton residents.
	Supports policy.	Individual (3700)	Support noted.
	Evidence base does not include sports facilities following the Sport England Methodology on playing fields.	Sport England (169)	There is no specific requirement to follow Sport England methodology. The Council is content with its own published recent evidence which covers open space provision, and on which this policy is based.
	Should provide good play areas.	Individual (5707)	Noted.
	Should provide larger play areas.	Individual (1681)	Noted, this is referred to within the supporting text.
	Policy should be more flexible, standards should be indicative.	Pegasus Planning (3678)	Flexibility is inherent in the local plan policy as local factors may lead to variations in the precise forms of open space provided. This would be discussed on a case by case basis.
Types of open space should be defined.	Pegasus Planning (3678)	This would reduce the flexibility of the policy and is therefore not supported.	

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Disagree with paragraph 2.35, SUDs provision should be considered as public open space.	Pegasus Planning (3678)	The general position that SUDs should not be included is appropriate, since such areas are often not available or suitable for recreational use, whether in wet or dry conditions. However, in any particular case, an applicant could make the case that a particular well-designed SUDs scheme, integrated into a multi-functional green space and available for multiple uses, could be counted against the open space provision. This would then be assessed by the local planning authority.
	Should third word of first line be 'towns' as opposed to 'parishes'?	Willand Parish Council (44)	This refers to the parish boundaries of these settlements and is therefore an appropriate description. A minor wording change is proposed to clarify this.
	Concern over application of policy and management company.	Willand Parish Council (44)	Noted. The use of management companies continues to ensure that open space is maintained and is therefore appropriate.
	Object as it does not include reference to accessible woodland.	Woodland Trust (3625)	There is no requirement to do so and no evidence that this is required. However, amenity/natural greenspace could include woodland areas.
S6 Employment	Confident that the allocations will easily provide for the necessary job creation, there are many smaller firms in Mid Devon and existing firms will probably expand with the economic recovery. There are significant employment sites in adjoining/nearby local authorities which provide short commutes for Mid Devon residents.	Uffculme Parish Council (54)	Noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	The allocations are in the wrong place (Cullompton especially) and therefore are unlikely to achieve these targets; there should be more small scale rural provision which would be easier to develop. This concern is supported by the lack of employment development in recent years.	Harcourt Kerr (1090)	The strategy seeks to provide for new homes and jobs in close proximity, in support of the creation of sustainable communities in accordance with NPPF advice. Comments on the provision of rural employment agreed, which can be provided through appropriate DM policies. Advice from Economic Development Officers is that the targets and locations of employment sites are reasonable and realistic.
	We would encourage mixed use developments and sites close to existing residential areas to reduce the need to travel by car. Would need to be satisfied that development can be accommodated without severe impact on the SRN, and if there is severe impact then mitigation will need to be put in place.	Highways England (1172)	Noted.
	Support the wide range of employment uses listed.	Persimmon Homes c/o CLP Planning (3640); Lightwood Land c/o Pegasus Planning (3678)	Support noted.
	Supports policy.	Individual (3700)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	<p>The level and nature of employment land falls substantially short of that required to meet future employment and economic needs over the plan period. Scale, location and policy restrictions of the allocations will prevent or limit ability to accommodate major investment requirements, particularly B8 and do not make provision for major leisure and tourism. There is a strong case to allocate up to 60 hectares, to improve the low job density ratio and reduce out-commuting. This would be resolved by allocating the Eden Westwood (Junction 27) proposals for 2266 FTE jobs. The current approach assumes limited change to out-commuting. Past development rates indicate a similar need, not met in the emerging local plan. The employment land trajectory indicates that the majority of development will occur early in the plan period, leaving limited amounts for later. There is market demand for new development in the area, particularly B8.</p>	<p>Friends Life c/o GL Hearn (3781)</p>	<p>The plan proposals are supported by the evidence contained within the Employment Land Review and have been subject to Strategic Commercial Land Availability Assessment (SCLAA). On 22nd September Full Council resolved to allocate land at Junction 27 for retail, tourism and leisure. This increase in employment land has resulted in additional housing sites proposed to be allocated to ensure housing and employment land is in step.</p>
	<p>The policy should be amended to recognise circumstances where the standard rate of provision is not appropriate.</p>	<p>Lowman Manufacturing Co Ltd c/o Heynes Planning (4564)</p>	<p>Flexibility is inherent in the policy where other material considerations may apply. Responses to objections regarding specific non-allocated sites are set out in the appropriate table.</p>
<p>S7 Town Centres</p>	<p>A vital element which is supported.</p>	<p>Uffculme Parish Council (54); Individual (3700, 4662)</p>	<p>Support noted.</p>

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	<p>There needs to be more flexibility (policies DM14, DM15 and DM16 do not indicate sufficient flexibility) to improve the range of town centre uses and not exclude larger retail floorspace. Development can fund town centre enhancements. Town centres need to evolve through the market.</p>	<p>Harcourt Kerr (1090)</p>	<p>DM14 sets out a wide range of permissible uses in town centres, seeking to diversify customer choice while protecting and enhancing the viability of the town centre, its historic character and accessibility. The policy is flexible enough to respond to rapid change. DM16 supports DM14 to help retain the town centre's character and appearance. DM15 applies a sequential approach to retail development in towns in accordance with national policy.</p>
	<p>Support the intention, but unclear how the policy will function alongside retail, leisure and recreation allocations at East Cullompton. Exception to sequential testing should apply to requirements of allocations, to avoid arbitrary requirements.</p>	<p>Lightwood Land c/o Pegasus Planning (3678)</p>	<p>Accept that the policy should reflect the strategic decisions within allocations, however not to the extent of exempting all allocations from the sequential test. A revision to the supporting text is proposed.</p>
	<p>The policy would need amending once the site at Lowman, Tiverton is allocated for town centre uses. Consider the retail assessment underestimates retail need in Tiverton.</p>	<p>Lowman Manufacturing Co, Ltd c/o Heynes Planning (4564)</p>	<p>Noted. The site is not proposed for allocation. Responses to objections on non-allocated sites are addressed in the appropriate table.</p>
<p>S8 Infrastructure</p>	<p>Support, but should emphasise existing infrastructure deficits to be rectified.</p>	<p>Uffculme Parish Council (54)</p>	<p>CIL is to be used to fund infrastructure the need for which arises as a result of development. Similarly s106 can only be sought where needed as a result of a specific development. Resolving existing deficiencies is likely to involve other funding sources outside the remit of planning.</p>

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Little integration with other services, particularly impact on Royal Devon and Exeter Hospital. Health needs should be met.	Bradninch Town Council (86)	There is no improvement sought by the NHS in relation to the RD&E hospital. Other health requirements are considered in the Infrastructure Plan published separately.
	There should be a strategy for indoor and outdoor recreation to meet NPPF requirements, at the moment there is not up to date evidence. The Open Space and Play Area strategy does not include sports facilities and land in accordance with Sport England guidance. S8 and various other policies would need to be amended to reflect this evidence.	Sport England (169)	There is no specific requirement within national policy to follow sport England guidance, which is therefore merely advisory. The local plan should not be held up for this relatively minor matter, which can be rectified if necessary after submission or adoption, such additional evidence being used to guide CIL expenditure and other resources. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making.
	Development will be to the detriment of social infrastructure. COR10 strategic transport networks should be included in the Local plan.	CPRE (486)	Not agreed. The plan proposes a balanced approach to meeting the development needs of the area in accordance with NPPF advice. The transport networks are protected by other policies.
	Strategic sites will only include care homes if the need hasn't been met already.	Devon County Council (626)	Noted.
	Support developers contributing to or paying the cost of necessary infrastructure, to reduce flood risk. Supporting text should refer to opportunities to reduce flood risk.	Environment Agency (943)	Noted. Policy S9 already refers to reducing flood risk, so this would be unnecessary duplication.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Infrastructure is vital to deliver employment land. The plan should be more explicit about the main infrastructure needs – motorway junctions, rail station, bus system. The evidence for a zero CIL rate is insufficient.	Harcourt Kerr (1090)	The key infrastructure needs are reflected in the local plan, and set out in more detail in the Infrastructure Delivery Plan. The rate for the Strategic Sites is set at zero as infrastructure provision and/or financial contributions towards infrastructure will be provided/collected by Section 106 Planning Obligations. Experience has shown, both by the work undertaken on Tiverton Eastern Urban Extension Masterplan and the Cullompton North West Masterplan, and the planning permissions agreed on the Tiverton Eastern Urban Extension that the infrastructure provision on these strategic sites is best provided by 106 Agreements. That evidence and experience justifies the zero rate.
	Support.	Highways England (1172); St Andrew’s Church, Cullompton (1179); Diocese of Exeter (6081)	Support noted.
	The infrastructure should be in place before development happens.	Individual (1681)	This is often not possible due to funding arrangements, the policy provides appropriate general guidance on timing of provision.
	Define sustainable transport better, and refer to the Infrastructure Act 2015, particularly cycling and walking strategies.	Sustainable Crediton (2689)	Not necessary, as this is already covered elsewhere (eg policy S1). No need to refer to the Infrastructure Act which is minimal impact on the plan’s strategy and proposals.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	The Infrastructure Delivery Plan should be provided as part of the consultation and justify the East Cullompton infrastructure requirements. Support the decision for strategic allocations to fund infrastructure via s106 obligations rather than CIL, which will enable infrastructure to be delivered in a timely fashion.	Lightwood Land c/o Pegasus Planning (3678)	The IDP was published during the consultation. Further work is being carried out on East Cullompton transport requirements, but the other infrastructure requirements are robustly justified.
	South West Water is damaging Collipriest Road and Lane which is supposed to be a scenic public footpath.	Individual (3747)	Noted, not relevant to the local plan. This is private road.
	The policy is supported but the evidence accompanying the plan does not indicate that the strategic allocations and supporting infrastructure can be viably delivered. It is unclear if analysis of the potential for development east of Cullompton to fund/deliver the listed infrastructure has been undertaken. It is unlikely to be viable.	Friends Life Ltd c/o GL Hearn (3781)	Support noted. The responses regarding East Cullompton comments are considered separately.
	Seeks to ensure financial contributions towards critical police infrastructure, specifically the new Criminal Justice Centre at Middlemoor, Exeter. Population growth and loss of existing cells creates the need for 43 new cells, and the Mid Devon contribution to this should be £1,113,762.	Avon and Somerset Constabulary c/o WYG (5762)	Noted, already reflected in the Infrastructure Delivery Plan therefore no local plan change required.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
S9 Environment	Support.	Uffculme Parish Council (54); Exmoor National Park Authority (115); Sustainable Crediton (2689); Lightwood Land c/o Pegasus Planning (3678); Individual (3700, 5211)	Support noted.
	Amend to include reference to Active Design principles.	Sport England (169)	The policies (eg DM1 High Quality Design, S5 Public Open Space) already include relevant principles in accordance with the Planning Practice Guidance.
	The list of Heritage Assets should include registered parks and gardens.	National Trust (170)	This is unnecessary as the list does not purport to be comprehensive.
	The setting of heritage assets could be included.	Devon County Council (626)	This is unnecessary as setting is necessarily part of the consideration of protecting heritage assets.
	c) should refer to restoring floodplain storage and opening up culverted watercourses. e) should be more strongly worded and clearer. f) should refer to priority species and habitats and strategic nature areas.	Environment Agency (943)	c) is not accepted, these detailed proposals do not require inclusion in the policy. e) is not agreed, the policy provides an appropriate wording reflecting the relevance of this objective to be balanced by other sustainability objectives. f) it is not considered that this additional detail is necessary in this policy. Development management policies provide further detail.
	Include registered parks and gardens and battlefields.	Historic England (1170)	The list does not purport to be comprehensive.
	It is more usual to refer to the "special qualities" of AONBs.	Blackdown Hills AONB Partnership (1195)	Noted. The word "environmental" has been deleted from e).
	Needs more detail on watercourses and flooding.	Individual (5211)	Not agreed, the policy provides an appropriate level of advice.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
S10 Tiverton	Add reference to Tiverton's role serving a large rural area including parts of Exmoor.	Exmoor National Park (115)	Agreed, make minor amendment to first sentence of policy.
	Refer to improving the interchange of sustainable travel modes as bus station improvements are proposed.	Devon County Council (626)	Agreed, make minor amendment to b).
	Support f) measures to reduce flooding and suggest adding working with natural processes wherever possible.	Environment Agency (943)	Agreed, a minor change is proposed.
	Add reference to local wildlife sites and biodiversity networks particularly the river corridors.	Environment Agency (943)	This goes beyond the level of detail necessary within this strategic policy.
	Include reference to the historic environment in a).	Historic England (1170)	The point is already covered in a) which refers to heritage.
	Support strategy in general, however further work is needed on the transport evidence in relation to the SRN. There should be reference to the cumulative impact of development on the M5.	Highways England (1172)	A change is proposed in the supporting text to reflect the comment.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	45% of the plan's growth should be in Tiverton; the reference to constraints affecting the town is nonsense, as the previous stages of plan preparation identified housing sites totalling 3,361 dwellings. Hartnoll Farm and Exeter Hill should be allocated.	Dial Holdings c/o PCL Planning (2315)	The SA considers a higher growth option at Tiverton, equating to about 48% of the plan's growth. This option would not include the East Cullompton allocation, but instead allocating Hartnoll Farm, further allocations in Tiverton and all potential allocations in Crediton. This option would result in greater landscape impacts in both Tiverton and Crediton, the coalescence of Tiverton and Halberton and the loss of almost 70ha of grade I agricultural land at Hartnoll Farm. Whilst 3,361 dwellings was noted as having potential for development in Tiverton in the options consultation, there are site specific reasons why a number of these are not proposed for allocation (see allocations/non-allocations sections of the summary of responses for site by site justification). The options consultation also noted above the 3,361 figure the number of dwellings in the table was likely to be much higher than would be allocated in reality. As such the expansion of Cullompton is the most sustainable and is the Council's preferred option.
	Support	Individual (3700)	Noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	The Plan should be based on “Option 1” of the options consultation, with additional growth at Tiverton. 45% of the plan’s growth should be in Tiverton. Allocation of Hartnoll’s Farm and release of contingency sites would achieve this. Hartnoll’s Farm is deliverable in conjunction with the existing allocation at Eastern Urban Extension. This would improve the value for money of the access and other infrastructure.	Waddeton Park (3815)	The SA considers a higher growth option at Tiverton, equating to about 48% of the plan’s growth. This option would not include the East Cullompton allocation, but instead allocating Hartnoll Farm, further allocations in Tiverton and all potential allocations in Crediton. This option would result in greater landscape impacts in both Tiverton and Crediton, the coalescence of Tiverton and Halberton and the loss of almost 70ha of grade I agricultural land at Hartnoll Farm. Release of contingency sites would remove an element of the flexibility associated with the plan’s proposals. As such the expansion of Cullompton is the most sustainable and is the Council’s preferred option.
	Allocation of land at Lowman in our ownership would require amendments.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	Noted.
	Supports emphasis on town centre developments and its revival.	Individual (4662, 5632)	Support noted.
	Support growth of Tiverton	Individual (5782)	Support noted.
S11 Cullompton	Supports the growth of Cullompton, supporting and regenerating the town and allowing provision of significant additional infrastructure.	Willand Parish Council (44); Uffculme Parish Council (54)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Support Cullompton growth, conditional on Junction 28 improvements, new station, eastern relief road, improvements to infrastructure and other measures to ensure the expenditure from new residents happens in the town centre so it becomes a thriving market town. Reductions in bus provision should not be permitted.	Bradninch Town Council (86)	Noted.
	Cross boundary impacts should be fully assessed, working closely with Mid Devon DC, including evidence arising from the SHMA, likely commuting patterns, infrastructure needs and a detailed assessment of A373 impacts.	East Devon District Council (135)	Noted. Devon County have not expressed any concern at the cross-boundary impacts including in relation to the A373.
	The final transport solution has not yet been determined, and improvements to reduce impact on the M5 will be needed. This could be clearer in the supporting text.	Devon County Council (626)	Since this comment was received, MDDC has been working closely with the Highways Authority to develop a clearer understanding of the transport solutions.
	Support measures to reduce flooding.	Environment Agency (943)	Support noted.
	Update paragraph 2.64 to reflect new requirements from April 2015.	Environment Agency (943)	Agreed, the local plan text has been amended accordingly.
	Include reference to green infrastructure, natural environment and county wildlife sites.	Environment Agency (943)	Reference to green infrastructure has been included in the policy, while more detail on GI, the natural environment and county wildlife sites is contained in development management policies.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	<p>There are too many homes, but provided the design can be improved, with a range of homes provided, in keeping with the town's heritage and the Devon countryside, inclusion of social housing, more car parking, protection of hedges and trees and inclusion of green infrastructure, then we would be happy with the plan. Gypsy and Traveller pitches should be screened. Oppose the Eastern Relief Road through Community Fields.</p>	<p>Individual (4283)</p>	<p>Noted. The detailed comments regarding design and layout will be considered in more detail at planning application stage. The Eastern Relief Road forms a key part of the access proposals for development and is contained within the existing Local Plan.</p>
	<p>Support the level of growth proposed at Cullompton, promoting the town's regeneration and importance.</p>	<p>St Andrews Church (1179); Individual (2318, 2502, 3700, 4042, 4625, 5211, 5235, 5302, 5317, 5392, 5418, 5548, 5619, 5632, 5636, 5638, 5674, 5675, 5677, 5678, 5679, 5680, 5681, 5682, 5683, 5684, 5685, 5686, 5687, 5688, 5689, 5690, 5691, 5692, 5693, 5694, 5695, 5703, 5704, 5706, 5711, 5712, 5713, 5714, 5715, 5716, 5747, 5771, 5782, 5787, 5804, 5816, 5825, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5868, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5881, 5882, 5883, 5884, 5892, 5984, 5949, 5950, 5951, 5952, 5953, 5954, 5955, 5956, 6039, 6040, 6041)</p>	<p>Support noted.</p>

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	The infrastructure and facilities are not there to support development and should be in place before development. Examples include town centre traffic relief, sports, motorway junction, railway station, schools, health, recycling, emergency services.	Individual (1681, 1860, 2021, 3579, 3663, 3748, 4283, 4641, 5630, 5633, 5696, 5754, 5780, 5803, 5805, 5867,5869)	This is often not possible. Policy S8 provides appropriate general guidance on timing of provision.
	Don't build on floodplains.	Individual (1860)	The Council is working closely with the Environment Agency and sequential test guidance in the NPPF has been followed.
	There is too much development in Cullompton; impact on infrastructure, flooding, traffic, agricultural land, local environment, not meeting local needs, better sites elsewhere.	Individual (1775, 2021, 2046, 2978, 3330, 3340, 4522, 5072, 5370, 5546, 5556, 5611, 5612, 5616, 5617, 5621, 5622, 5631, 5637, 5639, 5671, 5749, 5751, 5753, 5758, 5774, 5779, 5790, 5791, 5792, 5793, 5794, 5795, 5796, 5808, 5811, 5814, 5815, 5820, 5829, 5835, 5837, 5838, 5898)	Not agreed, Cullompton is capable of dealing with this level of growth, given the level of infrastructure proposed.
	The development is too far from the town centre to improve it.	Individual (3943)	Not agreed, the distances involved are not untypical of medium sized market towns with well-used town centres. Associated environmental/traffic improvements to the town centre should attract existing and new residents.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Too heavily dependent on infrastructure (junction 28, railway station, highway link) to be relied upon; it will take longer to come forward than envisaged. Further, question the level of market demand for housing at Cullompton.	Devonshire Homes c/o Jillings Hutton (1050); Messrs Persey and Harding c/o Jillings Hutton (4654); Pemberton Hutton c/o Jillings Hutton (5786)	The plan allows for an appropriate lead-in time before development is expected, providing a significant time to allow for the relevant actions to be undertaken, further supported by the inherent flexibility in the local plan. The site promoters have stated that the site could commence earlier. Concerns over market demand are noted, however development rates in Cullompton have been pushed back to the latter part of the plan period, to allow for market adjustments.
	The SRN is sensitive to development at Cullompton, we support the principles within S11; it is imperative that any mitigation works are deliverable. The evidence is not there yet – the text needs to bring out the need for mitigation arising from wider development. More work is needed at this stage. Support the potential reopening of the station.	Highways England (1172)	Support for the policy is noted. Further and ongoing discussions with Highways England are being undertaken.
	The commercial allocations plus existing commitments and completions amount to 89,267 sqm floorspace which considerably exceeds the S11 policy requirement of 77,000 sqm floorspace. This is confusing and should be clarified in the local plan.	Persimmon Homes c/o CLP Planning (3640)	To provide flexibility and allow for growth the Local Plan makes greater provision for commercial floorspace than the target requirement.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Support the overall aim for Cullompton, including the East Cullompton site. The level of detail in the policies on this site do not appear to be based on sufficient evidence and we therefore propose greater flexibility in the allocation policies to allow proposals to respond to further technical assessments and masterplanning. East Cullompton could commence earlier.	Lightwood Land c/o Pegasus Planning (3678)	Noted. The policies within the East Cullompton site are considered to strike an appropriate balance between flexibility and certainty, and to provide a sensible basis for further masterplanning and pre-application discussions. This also takes account of the need to ensure the delivery of appropriate transport improvements. Comment on commencement date noted, but a more cautionary approach is preferred in the local plan to maintain overall deliverability.
	We have grave doubts as the viability of East Cullompton due to the high infrastructure requirements, which do not apply to development at Tiverton. Therefore there should be less development at Cullompton, reduced to 2730 or 1500 homes, and the East Cullompton emphasis being deleted, with additional sites at Tiverton being allocated to replace it.	Waddeton Park (3815)	There does not appear to be scope to provide an additional 2,600 homes in Tiverton (or indeed elsewhere) and it is noted that the site promoted by Waddeton Park has a stated capacity of only 1000 dwellings.
	Development at East Cullompton is unviable, and therefore should not be relied upon as a key proposal in the plan. Funds to improve Junction 28 are not secured, rendering the plan unsound.	Hallam Land Management (4386)	Not agreed, there are deliverable transport solutions to enable this development to come forward.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	A smaller proportion of development should be included at Cullompton due to significant concerns over the substantial infrastructure investment needed. The junction 28 costs are likely to rise above £55m, constraining the development. We have concerns over the sustainability of the proposals in relation to flooding and grade 1 agricultural land. Uncertain realism of reopening the station. Other sites in Cullompton are uncertain, too.	Gallagher Estates c/o Turley (5763)	Not agreed. These issues have been considered through the Sustainability Appraisal to justify the preferred approach. The proposals in the plan are considered to be deliverable during the plan period.
S12 Crediton	Too much development in Crediton, impact on its landscape setting, character, removal of sports facilities, air quality, lack of infrastructure, flooding,	Individual (366, 2534); CPRE (486)	Not agreed, the proposals have been carefully assessed and impact is considered to be acceptable, given the overall need for development and the relative importance of Crediton.
	There is a need for a new 1.1 ha primary school site.	Devon County Council (626); Crediton Town Council (678)	Agreed, amendment proposed to S12 to reflect this.
	Support a new cultural and activity centre which is part of the necessary infrastructure, not just an add-on.	Crediton Town Council (678); Crediton Neighbourhood Plan Steering Group (1734); Individual (5394, 5821)	Reference to community facilities is included in Policy S12 and CRE11.
	The policy should encourage proposals which develop allocated commercial land for small businesses to maximise employment in the town. Current plan proposals may not be sufficient.	Crediton Town Council (678)	The plan allocates land for commercial development in Crediton to provide a significant economic boost to the town. It is considered that the plan includes sufficient flexibility within its policies for small businesses.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Include reference to the natural environment, green infrastructure, local wildlife sites and reduced flood risk.	Environment Agency (943)	While it is accepted that these are general issues which apply to Crediton as much as other areas, they are not key issues central to the town's development which therefore need to be specifically picked out in this policy. They are sufficiently covered in the other strategic and DM policies.
	No objections in principle subject to the usual requirements, collaboration over highways with Exeter City Council and additional explanation of "potential highway improvements" in CRE11.	Highways England (1172)	Noted.
	Support	Individual (3700)	Support noted.
	Refer to "at least 720" dwellings of which affordable housing is "subject to viability". The recent highway investment will have overcome some of the development constraints and more could be done with additional development.	MJ Gleeson c/o Bell Cornwell (3775)	The inclusion of the word "approximately" is considered to provide sufficient flexibility. Affordable housing is subject to viability (see policy S3) and it is unnecessary to repeat this in all allocation policies. However, the Council has prepared viability work for the local plan which supports this level of provision.
	Some doubts about the ability of Crediton to accommodate growth.	Waddeton Park (3815)	Noted. The sites allocated are considered to be suitable and deliverable/achievable. This contradicts other comments from consultants on behalf of the same objector promoting significantly more housing provision in Crediton.
	Amend the settlement limit to include all of the existing planning consents 09/00244/MOUT as the proposal is currently arbitrary and unrealistic.	Tesco Stores c/o Burnett Planning (4323)	Detailed response is provided against Policy CRE10.
S13 Villages	Support, but concerned at implications of off-site affordable housing provision for provision in Willand.	Willand Parish Council (44)	Noted. Off-site affordable housing will be provided to accommodate local affordable housing need.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Support Uffculme’s categorisation as a village, allowing minor infilling within the village only. No further sites are suitable for development, and Uffculme has already expanded beyond its infrastructure.	Uffculme Parish Council (54)	Noted.
	It would be useful to define small scale.	Devon County Council (626)	Not agreed, the phrase provides a flexible approach which allows the consideration of a proposal’s context.
	In paragraph 2.79, the method for calculation of off-site contributions should be set out.	Devonshire Homes c/o Jillings Hutton (1050); Messrs Persey and Harding c/o Jillings Hutton (4654); Pemberton Hutton Developments c/o Jillings Hutton (5786)	This is set out in the SPD “Meeting Housing Needs”. The adopted SPD is still considered to be appropriate basis for calculating off-site contributions.
	Despite this policy it is our experience that there is a presumption against economic development in the rural areas and this results in development by appeal – in practice DM18 prevents development because there are always sites allocated in the towns though they may not be deliverable or in the right location for the occupier. This uncertainty and cost in bringing rural sites forward stops development and diverts jobs to neighbouring districts because the planning environment in Mid Devon is too uncertain.	Harcourt Kerr (1090)	<p>There will usually be sites available in the towns because allocations are focused in towns, but this does not prevent rural employment development. DM18 requires consideration of available and suitable sites in the immediate area of the proposal, which does not necessarily include the towns. Also, monitoring of rural employment development shows significant amounts of employment taking place outside the three main towns.</p> <p>Rural employment is supported by development management policies and other opportunities existing within the wider planning system as a result of permitted development right changes.</p>

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	No objections, but development must be supported by robust transport evidence.	Highways England (1172)	Noted, although the small scale developments which come forward in the countryside are unlikely to be of strategic concern.
	Support identification of Bampton as a village.	Bampton Society (1319); D Stephenson c/o Jillings Hutton (5845); Individual (2075, 2781)	Support noted.
	Should identify edge-of-village potential where there is no five year supply and where there is insufficient housing development in accordance with paragraph 2.11.	Church Commissioners c/o Deloitte (1517)	Not agreed, this is the function of the contingency sites, already indicated on sites adjoining the towns.
	Agree that Cheriton Fitzpaine is a sustainable location for small scale residential development.	Rosebourne Homes c/o White Young Green (1594)	Support noted.
	Cheriton Fitzpaine enjoys many facilities which sustain it as a vibrant village, and development will help their sustainability.	Mr Yeandle c/o Trevor Spurway (1644)	Noted.
	Concern at lack of affordable housing arising from the 5 dwelling threshold.	Individual (1680)	Noted. This reflects national policy.
	Support Sampford Peverell as a village in the policy, suitable for allocations, as it has a much wider range of services than the three minimum and adjoins Tiverton Parkway Station.	Taylor Wimpey c/o WYG Planning (1708)	Support noted.
	Support	Individual (3700)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Object to the reclassification of Bampton as a village, with little justification. Its size and services are significantly greater than the majority of villages in S13.	Summerfield Developments c/o WYG Planning (3773)	The justification for the re-classification is set out in the SA, which scores the alternative options of either retaining Bampton as a town, or including it amongst the list of villages. Bampton meets the essential criteria identified in Policy S13 and has similar characteristics to other settlements identified as villages in the plan, having a population and level of services akin to other villages. It does not have the same significant strategic role of the three markets towns which provide a range of services, retail offer, employment opportunities and connection to the strategic road network. The classification of the settlement as a town is therefore not a preferred option.
	The policy is over-prescriptive by allowing only a limited development in villages, limiting ability to meet housing needs. For example, Hemyock is allocated insufficient development. The policy should not refer to small scale, instead to a scale reflecting the size and facilities of the village.	Waddeton Park (3815)	The policy provides for appropriate levels of development in villages, based on an assessment of their suitability and the overall need to maintain a sustainable pattern of development.
	The identification of villages and their growth levels is inconsistent – Uffculme will have no growth while much less suitable Chawleigh has an allocation. Uffculme has a range of facilities including a secondary school. Allocations appear to be ad hoc.	Messrs Persey and Harding c/o Jillings Hutton (4654)	Noted. The Council has considered potential allocations in various villages and assessed each location on its merits with regard to the individual characteristics of the site that was put forward. The available sites in Uffculme were not preferred, though a previous option site has since been granted at appeal and is now included in the plan.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Taken with S14 these create a “presumption against development” in rural areas outside settlement boundaries, contrary to the NPPF (see para 55). The policy should allow development adjoining settlement limits.	Gladman Developments (5312)	The policies, which reflect standard practice across the country, are not contrary to the NPPF and do not apply a “presumption against development”.
	No distinction is drawn between settlements, whereas some villages (eg Willand) have a greater potential for development. Each settlement should be graded to establish how much development is suitable, and this would lead to Willand allocated the highest proportion of development.	Gallagher Estates c/o Turley (5736)	Not agreed, the allocations have been made considering their general suitability for development and site specific characteristics and are considered to provide a suitable range of provision in rural areas.
	Support the identification of Silverton as a village for limited growth.	Pemberton Hutton c/o Jillings Hutton (5786)	Support noted.
S14 Countryside	Support Bickleigh being defined as part of the countryside. This will retain its special and unique character, supported by residents’ views.	Bickleigh Parish Council (41)	Support noted.
	Support, especially paragraph 2.81, Mid Devon is a rural area of low population density. However, note that overall the rural area is allocated the same amount of development as Crediton.	CPRE (486)	Support noted.
	Additional employment development should be permitted in rural areas.	Harcourt Kerr (1090)	The policy already permits a variety of employment generating development in countryside. Rural employment is supported by development management policies and other opportunities existing within the wider planning system as a result of permitted development right changes.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Include additional bullet point “there is no harm to historic assets and their settings and where appropriate enhancement opportunities are taken” to improve guidance to applicants. Historic England research on the issue could be mentioned.	Historic England (1170)	The policy already refers to character and appearance, and the wording proposed would introduce additional detail outside the overall scope of the policy, necessitating the inclusion of a range of additional such criteria for consistency purposes. The protection of historic assets is already covered in policies S1, S9, DM1, DM25 and DM27.
	Support	Individual (3700)	Support noted.
	This policy will ensure virtually no housing provision of any kind in the rural areas and needs far greater flexibility by allowing housing development abutting settlement boundaries.	Waddeton Park (3815); Gladman Developments (5312)	Not agreed, the policy permits affordable housing, conversion of rural buildings and other specific forms of residential development in addition to the rural allocations at a variety of villages.
	This policy would support expansion of Exebridge Lakeside Caravan Club. However DM22 as currently drafted is particularly restrictive on caravan sites expansion and should be more flexible to allow sites to diversify and support a thriving tourist industry (in line with NPPF and policy S1 of this local plan review).	Caravan Club c/o Savills (5789)	Noted. Comment considered as part of DM22.

Tiverton Eastern Urban Extension Comments

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
<p>TIV1 – TIV5 Eastern Urban Extension, Tiverton</p>	<p>Update the policy once the updated strategy for the provision of sport and recreation has been prepared, and bear in mind the limitations on the use of Section 106 including pooling.</p>	<p>Sport England (169)</p>	<p>There is no specific requirement within national policy to follow Sport England guidance, which is therefore advisory. An investment strategy for sport and recreation facilities can be prepared after the plan’s adoption, through the use of additional evidence to guide CIL or S106 expenditure and other resources. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making. A policy on the use of 106 Obligations is published on the Council’s website and makes specific reference to their use in the provision of open space and sports facilities, in addition to Policy S5 of the Local Plan. Furthermore, there is already an adopted masterplan for Tiverton EUE and any significant revision to the Local Plan policies for the site would create an unnecessary conflict between the two policy documents.</p>
	<p>Include reference to the need to meet the Active Design Principles.</p>	<p>Sport England (169)</p>	<p>The relevant principles are already generally reflected in the plan policies.</p>
	<p>Support the eastern boundary of the EUE as Manley Lane, to avoid impact on the Canal at Halberton, maintain separation between settlements and protect this historic boundary.</p>	<p>GW Canal Advisory Committee (194); Individual (5247)</p>	<p>Support noted.</p>

	Support the provision of a green buffer between development and the canal, to avoid further urbanising of the canal. Would like to know future management and ownership of this area, and consider it may be best managed alongside the canal. Do not support its use for tennis courts, allotments and other unnatural uses.	GW Canal Advisory Committee (194)	Support noted. Green Infrastructure in Masterplan can be used for agriculture or recreation. Further details over GI use and management will arise from Are B masterplanning which is yet to be finalised.
	The green infrastructure area between TIV1 and the Canal should remain in agricultural use, and no additional public access provided.	Individual (398)	Designated as Green Infrastructure in Masterplan – can be used for agriculture or recreation. Further details over GI use and management will arise from Are B masterplanning which is yet to be finalised.
	The policy should provide further details on the allocation for an energy from waste plant (included within the adopted Devon Waste Plan) and related District Heating scheme.	Devon County Council (626)	Whilst the site is identified within the adopted Devon Waste Plan as a potential site for a energy and waste facility, to date no such proposals have come forward from a potential operator. The planning applications received deal with this issue by way of Section 106 provisions in order to safeguard the potential to link up with a district heating scheme in the event that an energy from waste proposal comes forward in the future.
	The new junction onto the A361 should be referred to as a “grade separated junction”.	Devon County Council (626)	Agreed. Refer to A361 junction in policy as “a grade separated junction”.

<p>Traffic calming works are no longer considered necessary on Tidcombe Lane.</p>	<p>Devon County Council (626)</p>	<p>The first phase of two phases of traffic calming has now been implemented. DCC as Highway Authority undertook public consultation on the proposed scheme which included gaining public opinion on whether the proposed calming scheme should be extended into Tidcombe Lane and if so, in what form. Tidcombe Lane traffic calming does not form part of the agreed phase 1. DCC advise traffic calming in Tidcombe Lane is not currently necessary.</p>
<p>Contributions to bus services are likely to be required for a fixed period, such as 5 years, rather than until the services are self-supporting.</p>	<p>Devon County Council (626)</p>	<p>Agreed. An amendment has been made to the supporting text.</p>
<p>The policies could refer to the Grand Western Canal as an asset to be protected.</p>	<p>Devon County Council (626)</p>	<p>Grand Western Canal is a designated heritage asset and a county wildlife site and the need to protect it is set out in para 3.23 of the Local Plan Review.</p>
<p>Reference to facilities for recycling and libraries could be included.</p>	<p>Devon County Council (626)</p>	<p>The adopted Tiverton EUE masterplan makes provision for onsite community facilities which could fulfil a range of community uses. Financial contributions towards library provision can be considered as part of application Section 106 negotiation.</p> <p>Policy W5 of the Devon Waste Plan makes reference to additional waste, recycling and materials recovery facilities being required in close proximity to the source of recyclable waste. Tiverton Eastern Urban Extension Area B masterplanning is expected to resolve in more detail potential uses to be accommodated within the green infrastructure area. Such a suitable use might include a community composting facility.</p>

	Amend the education reference to provision of a 420 place primary school with early years and a children centre funded by fair developer contributions.	Devon County Council (626)	Requirement for 420 place primary school and early years provision already required under Policy TIV4.
	All the land between West Manley Lane and the old railway line should be Green infrastructure, to protect the SSSI.	Individual (870, 1691, 2236, 2283)	Provision is made for the protection of the SSSI and the fields immediately adjacent to it are designated as green infrastructure. To further increase the amount of green infrastructure would create an unjustified conflict with the adopted masterplan.
	The development is already too large for traffic reasons and should not be made any larger.	Individual (870)	Comments noted. The Highways authority has no objection to development of this site subject to the necessary highways improvements.
	To avoid conflict with the outline of the allocation, Tidcombe Fen catchment should all be included in the Green Infrastructure area.	Environment Agency (943)	Policy TIV3 requires provision and management of 47 hectares of land for strategic green infrastructure on the western and southern edges of the urban extension, including management and funding arrangements for the protection and enhancement of Tidcombe Fen Site of Special Scientific Interest, its catchment and land west of Pool Anthony Bridge.
	Refer to SUDs as “strategic” and state that the necessary SUDs and linking pipes should be integrated with and provided in step with development.	Environment Agency (943)	The requirement for a strategic approach to Sustainable Urban Drainage is referred to in paragraph 3.25. An amendment to Policy TIV3 has been made to provide further detail on the requirements of SUDs for this site.
	The first paragraph of TIV3 would be improved by inclusion of the more detailed points found in paragraph 3.26.	Historic England (1170)	Adding the list of Heritage Assets to the policy provides unnecessary detail and Heritage Assets are referred to under clause (g). The text in paragraph 3.26 provides further details of the Assets.

	<p>The transport policies are welcomed, but there is no reference to the M5. The cumulative impact of developments will need to be considered.</p>	<p>Highways England (1172)</p>	<p>Devon County Council has advised that modelling shows that the recent signalisation of the off-slips has unlocked sufficient capacity to accommodate the Tiverton EUE development but any additional development in the future is likely to require improvements to this junction. An addition has been made to the supporting text under Policy S10 to reflect this.</p>
	<p>Support the EUE as a sustainable method of meeting housing need, and would support a further extension into Hartnoll Farm, further to the east.</p>	<p>Dial Holdings c/o PCL Planning (2315)</p>	<p>Hartnoll Farm as a non-allocated site is considered elsewhere.</p>
	<p>Oppose development of this scale, which unnecessarily uses high grade agricultural land and impacts biodiversity, whereas brownfield land should be developed first, of which there is much within Mid Devon.</p>	<p>Individual (2575)</p>	<p>Mid Devon District has a limited number of brownfield sites and not sufficient to provide sufficient housing to meet the identified needs. In order to provide the housing numbers required some loss of agricultural land is inevitable. This site has an adopted masterplan and planning permission has already been approved (or with a resolution to approve) for 1030 dwellings.</p>
	<p>Nobody told us there are priority habitats on the Golf Course.</p>	<p>Tiverton Golf Club (2827)</p>	<p>Priority habitat data is surveyed and mapped by Natural England and landowners are not necessarily contacted.</p>
	<p>Waddeton Park owns a substantial proportion of the site and has recently secured permission for 330 dwellings on the site (subject to a s106). The junction to the A361 has planning permission and a further 700 dwellings is subject to a current application. However there is some doubt as to the remainder (Area B) will come forward due to multiple ownerships. Accordingly, the additional land at Hartnoll Farm should be allocated, as a further extension to the EUE. See more detailed summary under alternative development sites.</p>	<p>Waddeton Park (3815)</p>	<p>There is no evidence to suggest Area B will not come forward and representation 5772 indicates that survey work is progressing and the site could in fact deliver more than previously expected. Hartnoll Farm as a non-allocated site is considered elsewhere.</p>

<p>Welcome the reduced target of 1520 dwellings, but concerned at the removal of the second access previously required in the AIDPD which seems based on poor transport evidence. Traffic calming itself will not sufficiently mitigate the development's impact on the school, and the design of the traffic calming is ongoing and may not be achieved, which is a concern.</p>	<p>Blundells School c/o GVA Grimley (4240)</p>	<p>Traffic calming and environmental enhancement is a key policy requirement of TIV2 (b) and TIV5 (c) & (h). Advice from DCC as Highway Authority to the LPA is that the second strategic access serving Tiverton Eastern Urban Extension (to the north of Blundells School) is not required until the figure of 2000 dwellings is reached.</p>
<p>The plan should refer to the need for coordinated approach to masterplanning and delivery.</p>	<p>Blundells School c/o GVA Grimley (4240)</p>	<p>Policy TIV1 (j) requires compliance with the adopted masterplan and completion of a masterplanning exercise for Area B. Delivery timetable is set out in the approved Masterplan for Area A and a similar timetable will be set out in the Area B masterplan when completed.</p>
<p>The transport mitigation should refer to the need to remove impacts on Blundells School.</p>	<p>Blundells School c/o GVA Grimley (4240)</p>	<p>The policy provisions TIV2 and TIV5 require traffic calming and environmental enhancements along Blundells Road and Tidcombe Lane. Both these schemes will help mitigate the impacts of traffic of Blundells School.</p>
<p>Reference to potential development to the east of the EUE should be removed.</p>	<p>Blundells School c/o GVA Grimley (4240)</p>	<p>This is a general statement reflecting what may be required should an allocation ever come forward east of the current allocation. The statement does not promote a further allocation east of the current allocation.</p>
<p>Paragraph 3.12 should be removed and policy TIV5 amended as they are too flexible. The plan should set out much clearer steps to be taken and full consideration of impacts.</p>	<p>Blundells School c/o GVA Grimley (4240)</p>	<p>Paragraph 3.12, while building in flexibility, clearly states any change will be based on evidence and the current policies and requirements will not be overturned lightly or without clear justification. TIV5 requires detailed justification if there is any proposed deviation from the policy requirements.</p>

	Suggest inclusion of reference to tree planting and landscaping to mitigate impacts on neighbours.	Blundells School c/o GVA Grimley (4240)	Policy DM1 requires that new development must not have an unacceptably adverse effect on the privacy and amenity of the proposed or neighbouring properties and uses. Planting and landscaping details are normally considered at the detailed application stage.
	The adopted plan contains provision to ensure employment development comes forward in step with housing, to enable balanced sustainable development, which should be reinstated.	Blundells School c/o GVA Grimley (4240)	TIV5 sets out the requirements for the provision of infrastructure in step with housing or industrial development. This phasing has been refined in the detailed adopted masterplan following work on viability/phasing etc.
	The full A361 junction should be brought forward to 200 dwellings and the traffic calming earlier than this.	Blundells School c/o GVA Grimley (4240)	The adopted Masterplan for the Tiverton Urban Extension sets out the phasing programme for the highways infrastructure in Section 6.4. The adopted Masterplan phasing programme has been agreed and adopted following full public consultation and following the advice of Devon County Council as Highway Authority.
	Include additional policy requirements relating to flood protection at the Ailsa Brook.	Individual (5702)	The Environment Agency has requested amendments to Policy TIV3 which are set out in the suggested changes. The request for a strategic sustainable urban drainage scheme to deal with all surface water from the development and details of the arrangements for future maintenance should address the concerns over flood protection at Ailsa Brook.

	<p>Area B within the EUE is yet to be masterplanned, but survey work indicates that up to 799 dwellings can be accommodated on it, compared with the 553 dwellings referred to within the Local Plan. Together with slightly higher yields from the applications in Area A the total capacity of the site should be up to 1829 dwellings, rather than the 1520 dwellings indicated. This will improve viability and the efficient use of land for development. The policy should be amended to give a range of housing provision.</p>	<p>Westerberg Ltd c/o WYG Planning (5772)</p>	<p>Amend quantum of development to 1580 to 1830 dwellings to provide a range to enable greater flexibility for the remaining masterplanning work. The lower end of the range has been increased to reflect recent permissions granted on Area A.</p>
	<p>There should be better provision for walking and cycling along Blundells Road as the pavement is currently inadequate.</p>	<p>Individual (5784)</p>	<p>Traffic calming and environmental enhancements are planned for Blundells Road (Policy TIV2 (b)(c)(d)).</p>
	<p>Supports Policy DM23 “Community Facilities” particularly with reference to spiritual needs and places of worship and understands that as set out this will include in each case that provision will be made for the spiritual needs of the communities and places of worship. EDBF (Exeter Diocesan Board Of Finance) notes such facilities will be provided through 106 Agreements. In the light of DM23 EDBF support the provisions in TIV1g and TIV4 Needs should be established through the masterplan process and consultation with the EDBF.</p>	<p>Diocese of Exeter (6081)</p>	<p>Support noted. The policy and masterplan provide for community facilities. This would not prevent a place of worship proposal from coming forward.</p>

Cullompton North West UE (allocated)

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
CU1-6	Supports the principle of development.	Mr Emmett c/o PCL Planning (5844); PCL Planning(5672); Persimmon Homes South West c/o CLP Planning Ltd (3640); Growen Estates c/o Rocke Associates (5748); Waddeton Park Ltd (3815); Individual (4317, 5211, 5561)	Support noted.
	Support for the phasing of development and the early delivery of roads and school.	Individual (3588)	Support noted.
	Support Policy CU1 and its commitment to the provision of Community facilities, including provision being made for the spiritual needs of the communities and places of worship.	St Andrew's Church c/o Rev Hobbs (1179)	Support noted.
	Support the enlarged site.	Growen Estates c/o Rocke Associates (5748)	Support noted.
	The proposal will exacerbate existing traffic problems in the town.	Rull Hamlet Association (1796); Individual (5486, 5631, 5621, 5091, 5710, 3993, 5696, 5829, 1681, 2978)	The proposal includes provision for a "through route" from Tiverton Road to Willand Road. This will provide an alternative route for some traffic. The development will also make financial contributions to other highway improvement schemes: junction 28 M5 and the Town Centre Relief Road.

	Agree that the Tiverton Road to Willand Road link road is necessary, but does not consider that this is likely to be an attractive option for motorway bound traffic.	Individual (4052)	Noted.
	All development in the Cullompton area should contribute towards a town centre relief road which should be delivered urgently.	Individual (5211)	Provision is set out in Policy CU20 to allow developments in Cullompton to contribute to necessary infrastructure. Policy CU2 also amended to make requirements clearer.
	No further building should occur immediately north of Tiverton Road owing to existing traffic problems on Tiverton Road.	Individual (5091)	The North West Extension makes provision for a new road linking Willand Road and Tiverton Road. When complete this will remove some traffic from Tiverton Road. Whilst policy CU6 states that no more than 500 dwellings should be occupied before the opening of the road, it is expected that its delivery will be significantly earlier. Policy CU6 has been amended to accord with the adopted masterplan SPD for the site.
	No development should be allowed to begin at the Tiverton Road end of the site until link road completed as this would incur unacceptable levels of construction traffic in residential areas and adding to the issues in the High Street.	Individual (3588; 3993; 2160)	The North West Extension and its highway connection from Tiverton Road to Willand Road will provide an alternative route. Some development must take place prior to the completion of the link as its cost is provided by the development. Policy CU6 (e) restricts development to the occupation of no more than 500 dwellings before the opening of a “through route” linking Willand Road to Tiverton Road. The development will also provide financial contributions towards the Town Centre Relief Road and the M5 junction. The policy has been amended to accord with the adopted masterplan SPD for the site.

	<p>Policy CU6 criterion f does not indicate whether the development will be permitted to commence at Tiverton Road. If not, further traffic issues will be encountered at junction of Tiverton Road and High Street until the 300th dwelling has been occupied.</p>	<p>Individual (4052)</p>	<p>Development is likely to start at both ends of the North West extension. Some early development will be served off Willand Road and some off Tiverton Road. Policy CU6 ensures than no more than 500 dwellings can be occupied before the opening of the through route. This accords with the adopted masterplan SPD for the site and road delivery is expected significantly earlier than this.</p>
	<p>Policy CU2's reference to transport infrastructure being provided at the expense of all new development implies that the council has prioritised transport infrastructure above other components e.g. affordable housing etc.</p>	<p>Persimmon Homes South West c/o CLP Planning Ltd (3640)</p>	<p>Policies CU1 to CU6 are a suite of policies which apply to the development of the Cullompton North West Extension. They are interrelated and all apply to any development proposal on the land identified in Policy CU1. The masterplan expands on Policies CU1 to CU6. The need for affordable housing on the site is clearly set out in Policy CU1 with a requirement for 28% affordable housing, gypsy pitches and extra care provision. In response to the objection regarding the term "at the expense of all new development", the policy is proposed to be amended to include reference to the terms 'and funded by' rather than 'at the expense of'.</p>
	<p>The requirement to design roads for wider agricultural vehicles is too onerous and creates ambiguity, particularly if the link road then connects onto narrower roads.</p>	<p>Persimmon Homes South West c/o CLP Planning Ltd (3640)</p>	<p>Agreed that Policy CU2's reference to "wider agricultural vehicles" is ambiguous and is not defined. If the road is suitable for normal bus services it will be able to accommodate most agricultural vehicles. It is proposed to delete "wider" from Policy CU2.</p>

	The prescriptive nature of Policy CU2 pre-empts the completion of the Transport Assessment.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	Policy CU2 is not prescriptive. It sets out broad requirements for the provision of transport infrastructure on the site and connecting to the site. A Transport Assessment will help define these broad requirements together with the Masterplan and development details.
	The link road from Willand Road to Tiverton Road is essential and should be constructed as a priority.	Devon County Council (626); Individual (3588, 2160)	Policy CU6 (f) requires that no more than 500 dwellings are occupied before the through route is provided. This accords with the adopted masterplan SPD for the site and road delivery is expected significantly earlier than this. The masterplan's approach to highway infrastructure and its timing incorporates input from DCC.
	Support reference in Policy CU2 to need to accommodate agricultural vehicles on the through road system.	Individual (3588)	While the support for the Policy as proposed in the consultation submission plan is noted there is no definition of "wider agricultural vehicles". It is therefore proposed to delete the word "wider" from policy CU2 as a proposed change. The reason for the change is: "wider agricultural vehicles" is ambiguous and is not defined. If the road is suitable for normal bus services it will be able to accommodate most agricultural vehicles.
	Consideration should be given in Policy CU2 to the provision of a car club scheme.	Individual (3588)	Policy CU2 requires the implementation of travel plans and other non-traditional transport measures which could provide for a car club scheme.

NW relief road now appears to connect with Rull Lane not Willand Road.	Individual (5211)	The Local Plan Policy will not define the final detailed route of the road. The plan policy requires provision of a through route linking Tiverton Road to Willand Road. The NW Cullompton Masterplan (Adopted February 2016) clarifies the location of the north east access point of the NW relief road, with it being shown onto Willand Road.
Cycle routes need to be properly integrated and consider potential for commuter routes to Exeter and Tiverton.	Individual (2160)	Policy CU2 requires provision of cycle routes at appropriate locations and links to and from the town centre.
Motorway Junction already at capacity.	Individual (1681)	Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied.
Safe cycle paths and pedestrian walkways needed from Stoneyford into Cullompton.	Individual (1681)	Policy CU2 already requires provision of cycle routes at appropriate locations and links to and from the town centre.
Provision of the mainline railway station essential.	Individual (1681)	Policy CU20 identifies a site for a railway station at Cullompton.

	<p>A relief road through the CCA fields is most important. (This may also lead to more suitable land being found to accommodate existing sports uses elsewhere).</p>	<p>Individual (1681)</p>	<p>Policy CU19 and CU20 set out the policies for the provision of the Town Centre Relief Road.</p>
	<p>No more large scale development should occur west of the M5 in Cullompton until major improvements are made to J28.</p>	<p>Rull Hamlet Association (1796)</p>	<p>Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied.</p>

	<p>Housing development at J27 would be preferable as development in Cullompton will worsen air quality and exacerbate transport issues, without feasible solutions proposed.</p>	<p>Hallam Land Management (4386)</p>	<p>North West Cullompton Extension is allocated in the Allocation and Infrastructure Local Plan (Part 2) 2010. Significant progress has been made towards its delivery since its allocation in 2010. A masterplan for the allocated area was adopted by the Council in February 2016 and planning applications for the site are anticipated in late 2016 / early 2017.</p> <p>Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied.</p> <p>Housing development at J27 would be in addition to North West Cullompton and not a replacement. The Air Quality Management Plan for Cullompton identifies the provision of a Town Centre Relief Road as a significant measure which will improve air quality in Cullompton. Policy CU20 identifies that CIL and 106 contributions and external funding sources will be used to deliver the Town Centre relief road for Cullompton.</p>
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<p>St George's View is unacceptable as a temporary access, especially as there is a large oak tree with a TPO along the route.</p>	<p>Individual (5395, 6058)</p>	<p>A consultation on the Masterplan for North West Cullompton took place in Sept/October 2015. The issue of a temporary access via St George's View was one of the issues for consideration in that consultation. The final masterplan was adopted by the Council in February 2016 and includes provision for a vehicular access via St George's view on a temporary basis.</p>
<p>A road link from the new distributor road to the allotments behind the cemetery is needed to enable community recycling facilities. This may also need some additional green infrastructure land. This road link could provide access to the new St Andrew's football field.</p>	<p>Individual (5211)</p>	<p>The Masterplan identifies an access to the allotments to the north of the cemetery.</p>
<p>Concerns regarding the phasing of buses and highway provision in Policy CU6.</p>	<p>Devon County Council (626)</p>	<p>The provisions in CU6 are set out in recognition of the need to provide essential infrastructure balanced against the viability of delivering development. Amendments to the policy align with the adopted masterplan with the latter providing a greater level of detail on phasing and infrastructure provision triggers.</p>
<p>Point (f) should be amended to state 'opening of a through route linking Willand Road to Tiverton Road prior to occupation of development.'</p>	<p>Devon County Council (626)</p>	<p>As the through route is being funded and provided by the development it would be unrealistic to require its provision before the occupation of any development. This position has been subsequently agreed with DCC as part of the adopted masterplan work.</p>

<p>Point e is ambiguous. Whilst it might not be possible to provide a bus service through the site at an early phase, there are likely to be other improvements required such as providing more attractive waiting facilities on exiting bus routes. In addition the provision of bus stops and waiting facilities should be delivered in phase with development and the through route. This point should therefore read 'implementation of bus infrastructure and service improvements in step with development'.</p>	<p>Devon County Council (626)</p>	<p>Bus service improvements are normally provided by the developer by way of a financial contribution to the County Council who then provide subsidies to the bus operators. Existing bus improvements are matters for DCC and operator to address. Facilities on the development site are matters which can be addressed as part of the public transport improvements sought and the design process when dealing with the reserved matters or detailed planning applications. Bus operators are unlikely to change existing routes until the "through route" is completed and open to traffic. Criterion e has been amended to align with the adopted masterplan.</p>
<p>Goblin Lane should be protected as a wheelchair accessible walking cycling route, upgraded to a tarmac surface.</p>	<p>Individual (5211)</p>	<p>This can be considered through the planning application process.</p>
<p>Concern over flood risk.</p>	<p>Individual (5070, 5341, 5753, 5486, 5631, 5621, 5710, 2160, 5829, 5841, 5395)</p>	<p>Measures are built into the policies and supporting text to address flood risk and surface water drainage.</p>
<p>Welcome paragraph 3.69 that planning should ensure that '....areas at risk of flooding remain undeveloped'.</p>	<p>Environment Agency (943)</p>	<p>Support noted.</p>
<p>Policy CU3, section 3.81, whilst sound, would benefit from recognition that pluvial runoff from parts of the current site affect parts of Willand Road and adjacent property, and that measures should be put in place to reduce this.</p>	<p>Environment Agency (943)</p>	<p>Agreed. A change to Policy CU3, paragraph 3.81 is listed in the proposed minor modifications to reflect this observation.</p>

<p>Policy CU3 should seek to protect existing features (including trees, hedgerows and floodplain meadow), in preference to creating new. This should include protection of local wildlife sites and protection (and enhancement where possible) of wetland habitats within the floodplain.</p>	<p>Environment Agency (943)</p>	<p>Policy CU3 does seek to protect existing features and floodplains as set out in criterion a) and paragraph 3.81 of the supporting text.</p>
<p>Criterion e of Policy CU3 would be more effective if it read as follows: Appropriate provision of a sewerage system to serve the development and a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance.</p>	<p>Environment Agency (943)</p>	<p>Agreed. A change to Policy CU3 (e) is proposed to reflect this suggested amendment.</p>
<p>Welcome the content of CU6 para h which highlights the need for the SUDS, and linking pipework to be integrated and phased appropriately in step with development.</p>	<p>Environment Agency (943)</p>	<p>Support noted.</p>
<p>Policy CU3's reference to environmental protection and enhancement measures being provided at the expense of all new development implies that the council has prioritised such infrastructure above other components e.g. affordable housing etc.</p>	<p>Persimmon Homes South West c/o CLP Planning Ltd (3640)</p>	<p>Policies CU1 to CU6 are a suite of policies which apply to the development of the Cullompton North West Extension. They are interrelated and all apply to any development proposal on the land identified in Policy CU1. The masterplan expands on Policies CU1 to CU6. The need for affordable housing on the site is clearly set out in Policy CU1 with a requirement for 28% affordable housing, gypsy pitches and extra care provision. In response to the objection regarding the term "at the expense of all new development", the policy is proposed to be amended to include reference to the terms 'and funded by' rather than 'at the expense of'.</p>

	Contributions should be sought from new developments to assist in the cost of maintenance and improvement of existing culverts and drainage systems.	Individual (3588)	This cannot be required through planning. It is a matter for South West Water and owners to maintain existing culverts and drainage systems.
	CU6h: temporary measures, if necessary, should be taken during construction to protect downstream areas from additional water run-off.	Individual (3588)	Agreed. It is proposed that Policy CU6 be amended to address this objection.
	SUDS should be built to the highest standards and well-co-ordinated.	Individual (3588)	Policy CU6 (h) refers to 'necessary sustainable urban drainage features' and 'appropriately in step with development'. The scheme would also be subject to scrutiny by DCC as lead local flood authority.

	<p>The land immediately north of Tiverton Road should be used for playing fields rather than for housing.</p>	<p>Individual (5091)</p>	<p>A Masterplan was adopted in February 2016 for the site. This masterplan identifies land for playing fields at the top of Rull Hill and also allows for an element of financial contribution towards improving sport and recreation facilities offsite. This site was identified through the masterplanning process due to its accessible location, close proximity to the wider development area, suitable topography and opportunity to mitigate landscape impact.</p> <p>The land to the west of the cemetery is identified as green infrastructure. Further to the west of the NW Cullompton proposal is an area of land abutting Little Toms, which is in the current adopted plan but was proposed to be deleted in the Local Plan Review. The landowner has recently expressed his intention still to pursue development opportunities for the site. This site will also require Masterplanning, although it should be noted that due to Junction 28 constraints it is not envisaged that this site will come forward until the town centre relief road and the J28 capacity improvements are completed.</p>
	<p>Insufficient commercial development allocated in relation to the gross site area.</p>	<p>Individual (3588)</p>	<p>The commercial allocation was reduced following the evidence of the Employment Land Review 2013 which forms part of the evidence base on the Council's web site. Employment allocations are made in Cullompton to the east of the M5.</p>

	<p>Whilst the use of the wider definition of employment is supported, the 21,000sq m of commercial floorspace in policy CU1 should include reference to education.</p>	<p>Persimmon Homes South West c/o CLP Planning Ltd (3640)</p>	<p>The provision of a primary school on the North west Extension site is in addition to the commercial floorspace and has been listed as a separate criterion in CU1. Irrespective of the employment opportunities generated by a new school there will still be a need for other employment generating uses for the area. There is sufficient flexibility in the policy to allow a variety of uses to meet the target.</p>
	<p>The requirement for a community garden in Policy CU3 has not been justified.</p>	<p>Persimmon Homes South West c/o CLP Planning Ltd (3640)</p>	<p>This is requested by the Health Centre and is a small contribution to health services within the town from the development. It has been included to align with the adopted masterplan.</p>
	<p>Emergency service provision could be accommodated on the site, which could include a land swap for the Tiverton Fire Station and provision of an Ambulance base.</p>	<p>Individual (3588)</p>	<p>There is nothing in the policy provisions to preclude this.</p>
	<p>Too much development on the ridge line of Rull Hill and St George Hill. Development needs to be within the contour line and in keeping with the existing Cullompton development.</p>	<p>Rull Hamlet Association (1796); Individual (5662, 5638, 5547, 5550, 5397)</p>	<p>A masterplan setting out development areas and densities for the site was adopted in February 2016.</p>

	<p>Supports the enlarged NW Cullompton site area incorporating part of Growen Farm but objects to the current site configuration. The current configuration is sub-optimal and unlikely to deliver policy requirements. The current allocation includes: land that is not available, land within floodplain, areas that are too steep for residential development, and land that is required for other uses (such as school development).</p>	<p>Growen Estates c/o Roche Associates (5748)</p>	<p>The land identified is a broad allocation. The policies recognise that there are constraints associated with the allocation in certain areas and identifies within the policies the issues of flood plains, educational and community needs, Policies CU3 and CU4 specifically. Comprehensive masterplanning has taken place and sets out in greater detail the proposed development of the site. One field in the northern part of the site has been confirmed as only available for Green Infrastructure, not development. Modifications to the proposals map to show this together with areas of development and green infrastructure within the adopted masterplan.</p>
	<p>Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. Need to allocate more land as housing requirement in plan is a minimum, and likely to increase as a result of new SHMA and need to boost significantly additional housing.</p>	<p>Growen Estates c/o Roche Associates Ltd (5748)</p>	<p>The housing requirement in the Local Plan Review has been updated to reflect the SHMA Final report. As explained in the response to the comment below, the site is not a preferred site for development. The capacity of J28 precludes a larger allocation of development land at Growen Farm.</p>

	<p>Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. The site is within 400m of the proposed local centre, which is not the case for other land in the allocation. Site maximises non-car trips. Development in south also closest to town centre, than north, development on land to south could therefore maximise sustainable modes of transport reducing congestion in town centre.</p>	<p>Growen Estates c/o Roche Associates Ltd (5748)</p>	<p>The Council's Landscape and Visual Appraisal of the strategic site options (2014) indicated that the most easterly part of Growen Farm has a particularly sensitive character and was least suitable for development. It has accordingly been designated as green infrastructure. The field to the west was considered more robustly separated from the landscape to the north and west by strong hedgerows and was more closely related to land to the south which was previously allocated, and was considered a more logical extension to the allocation. The capacity of J28 precludes a larger allocation of development land at Growen Farm. It is also worth noting that the furthest extent of whole Growen Farm site is no further from the town centre boundary as the furthest extent of the added land to the north (the Rull land), being about 1.5km. Whilst Growen Farm might be closer to the proposed local centre, the northern land would also be relatively close to the school and its associated facilities.</p>
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	<p>Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. Full site has minimal visual impact, unlike revised allocation which proposed development on rising land. The plan fails to afford priority to development of land that is of gentle topography with minimal visual impact over that which is more sensitive owing to its slope and prominence. Land is level and well-drained – no physical constraints to development. More appropriate strategy would be to retain Green Infrastructure (GI) in central location and locate development on less sloping sites such as Growen Farm. Site would be accessible to GI as proposed in adopted plan and with community benefits. GI as proposed would preclude local centre in most optimal/viable location.</p>	<p>Growen Estates c/o Roche Associates (5748)</p>	<p>Topographical considerations were taken into account in the allocation of the land. However the land allocated for the most part is adjacent to the existing settlement and the decision as to which areas were most appropriate to be allocated as Green Infrastructure (GI) was informed by the findings of the Council’s Landscape and Visual Appraisal (2014). Whilst level, well-drained land can be equally ideal for sports facilities as it is development land, such as football or rugby pitches. The land identified for the local centre in the recently adopted masterplan was on previously allocated as GI and accordingly a change to the proposals map is proposed to set this out.</p>
	<p>The field immediately bordering the North and East of Rull Lane is included in the plan without the consent of the landowner, who wishes it to be shown as green infrastructure.</p>	<p>Rull Hamlet Association (1796)</p>	<p>The field immediately bordering the North and East of Rull Lane has not been identified for development at the landowners request. The Council has also been made aware of this as part of the masterplanning work. Land near the proposed local centre is proposed instead.</p>
	<p>A green open space should be provided between the town border (behind St George’s View) and the new development.</p>	<p>Individual (5395)</p>	<p>This is not required. The relationship between dwellings in St George`s view and the development site can be addressed at the detailed planning application stage.</p>

	The proposed school must be accessible to existing residents too and needs to be adjacent to Willand Road to allow easy access.	Individual (2160)	The actual siting of the school has now been established through detailed masterplanning which included public consultation. The siting of the school and the layout of the development is designed to ensure easy and safe access meeting the pre-existing needs of the town together with those arising from the development.
	The specific requirements of the elderly need to be provided for.	Blue Cedar Homes (3787)	Extra care housing is a requirement of Policy CU1 (a) Policy DM12 requires dwellings to be adaptable to accommodate changing needs over time.
	Allocate one play area site with a variety of equipment, rather than lots of smaller ones with higher maintenance costs.	Individual (1681)	We agree with the broad approach suggested by the representor and our general policy approach is for a smaller number of larger play areas. However the linear nature of the site requires there will be a need for more than one play area. This issue has been considered in the adopted masterplan.
	Policy CU4 makes reference to the need to construct a 290 place primary school; however the calculated number of pupils likely to be generated by the development is 300 pupils. The new school would need to meet provision for 420 pupils, given the general growth in the town. This should include early years' provision and a children's centre service delivery base supported by developer contributions.	Devon County Council (626)	Policy CU4 is proposed to be amended to reflect the need for a 420 place primary school and also clarify the number of these places required as a result of the development.
	Policy CU4 should include reference to library facility enhancements.	Devon County Council (626)	The adopted North West Cullompton masterplan makes provision for onsite community facilities which could fulfil a range of community uses. Financial contributions towards library provision can be considered as part of application Section 106 negotiation.

St Andrews Primary School need for a new football field in location behind the cemetery and adjacent to the existing allotments needs to be accommodated.	Individual (5211)	The adopted masterplan makes provision for additional sports and recreational facilities.
Policy CU4's reference to community infrastructure being provided at the expense of all new development implies that the council has prioritised community infrastructure above other components e.g. affordable housing etc.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	An amendment is proposed to CU4 to use the words 'funded by' rather than 'at the expense of'.
Health facilities already at capacity.	Individual (5486, 5621, 5829, 1681, 2978)	No requests have been received from the GP fundholding practice for additional facilities.
Insufficient employment opportunities in the town.	Individual (5486, 5631, 5621, 3993, 1681)	Additional employment land is allocated in Cullompton.
The development will exacerbate parking problems in the town.	Individual (5486)	There is currently spare capacity in the town car parks. Policy CU2 encourages the use of alternative modes to the private car including measures such as improved public transport provision.
Education facilities already at capacity.	Individual (5631, 5621, 5829, 1681, 2978)	Provision is made for additional primary school facilities and places. Land is also safeguarded for expansion of the secondary school.
Policing already minimal.	Individual (5621)	Contributions will be sought district wide to support policing as part of the Community Infrastructure Levy and is included in the Infrastructure Delivery Plan.

	The proposal will turn Cullompton into a faceless dormitory for Exeter.	Individual (5621)	The emphasis of this development is to create new communities with local facilities and employment opportunities. This is achieved in part by sizeable development proposals rather than piecemeal development which have little capability to deliver community facilities. The scale of development proposed in the plan will also assist in reinvigorating the vitality of Cullompton town centre.
	The development will bring more crime.	Individual (2978)	There is no evidence to support this.
	The primary school should be built as a priority.	Individual (3588, 1681)	Policy CU6 has been amended to reflect the masterplan requirements. Transfer of land for the primary school is prior to commencement of the development, with school construction commencing in phase 1.
	Policy CU6 b – replace the word ‘after’ with ‘as soon as’.	Individual (3588)	It may not be practical to deliver all serviced self-build plots as soon as the ‘through route’ is operational. 60 self-build plots are to be provided and it is unlikely they could all be delivered as soon as the ‘through route’ is operational.
	The construction of the link road needs to be a higher priority and the threshold for the trigger greatly reduced to as low as possible.	Individual (3588)	The policy threshold of no more than 500 dwellings being occupied prior to the through route being open (Policy CU6 (f)) aligns with the masterplan. Due to proposed funding arrangements for the road it is likely that it will be delivered significantly in advance of this. This has been agreed with DCC as part of Masterplanning work.
	Policy CU6 a to h pre-empts master planning work. A shorter and more flexible policy is suggested.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	The masterplan has now been completed and policy CU6 has been updated to reflect the latest phasing arrangements.

	CU6g: 'Prior to occupation' should be changed to 'prior to commencement' in order to give the local authority time to build the school before there is an influx of children.	Individual (3588)	Policy CU6g has been amended to reflect the masterplan requirements. Transfer of land for the primary school is prior to commencement of the development, with school construction commencing in phase 1.
	Concerns regard the phasing of buses and highway provision in Policy CU6.	Devon County Council (626)	Change proposed to update local plan to reflect the adopted Masterplan agreed with DCC including the phasing of development in line with local bus service improvements.
	Point f should be amended to state 'opening of a through route linking Willand Road to Tiverton Road prior to occupation of development.'	Devon County Council (626)	The policy threshold of no more than 500 dwellings being occupied prior to the through route being open (Policy CU6 (f)) aligns with the masterplan. Due to proposed funding arrangements for the road it is likely that it will be delivered significantly in advance of this. This has been agreed with DCC as part of Masterplanning work.
	Point e is ambiguous. Whilst it might not be possible to provide a bus service through the site at an early phase, there are likely to be other improvements required such as providing more attractive waiting facilities on exiting bus routes. In addition the provision of bus stops and waiting facilities should be delivered in phase with development and the through route. This point should therefore read 'implementation of bus infrastructure and service improvements in step with development'.	Devon County Council (626)	Change proposed to update local plan to reflect the adopted Masterplan agreed with DCC including the phasing of development.

Policy CU6 criterion f does not indicate whether the development will be permitted to commence at Tiverton Road. If not, further traffic issues will be encountered at junction of Tiverton Road and High Street until the 300th dwelling has been occupied.	Individual (4052)	Development is likely to commence both at Willand Road and at Tiverton Road. It is accepted that some additional traffic disruption will occur on Tiverton Road until the “through route” is completed. Permitting limited development at both ends is likely.
There is a Roman fort adjacent to this site and this adds to the heritage of the area and should be dealt with sensitively in Policy CU3f.	Individual (3588)	Policy CU3(f) already makes provision for protecting archaeological interests of the site.
Loss of agricultural land.	Individual (5486, 5631, 5621, 5710, 2978, 6067)	Mid Devon District has a limited number of brownfield sites and not sufficient to provide sufficient housing to meet the identified needs. In order to provide the housing numbers required some loss of agricultural land is inevitable.
Consideration needs to be given to hedgerows and trees, including any resulting TPOs.	Individual (6067)	These issues are considered in the Masterplan and will also be considered at the detailed planning application stage.
Landscape aspects need to be considered.	Individual (2160)	These issues are considered in the Masterplan and will also be considered at the detailed planning application stage.
The impacts on wildlife need to be considered sensitively.	Individual (2160, 6058, 2978)	These issues are considered in the Masterplan and will also be considered at the detailed planning application stage.
Our views and outlook will be compromised and the impact on our house value has not been considered.	Individual (5486)	The amenities of existing properties will be carefully considered at the detailed planning stage. Property value is not a material planning consideration.

	<p>Care needs to be taken in designing the new development to ensure the privacy of existing properties is not compromised and that appropriate type of development are built adjacent to existing properties in terms of use, style and open space.</p>	<p>Individual (2160)</p>	<p>This is acknowledged and will be addressed at the reserved matters or detailed application stage.</p>
	<p>A Historic Environmental Appraisal needs to reassess the likely impact which the development might have upon the Roman Fort on St Andrew's Hill and numerous listed buildings.</p>	<p>Historic England (1170)</p>	<p>The site has been reassessed by an historic environmental appraisal. The site adjoins a roman fort on St Andrew's Hill (a scheduled Ancient Monument). There are a number of grade II listed buildings within the cemetery and farmyards adjoining the site such as Growen Farmhouse and adjacent range of farm buildings, Little Rull and Paulsland Farmhouse. The site also lies in an area of high archaeological potential. This assessment concludes that any planning application for development must be supported by the results an appropriate level of archaeological works to allow the significance of the heritage asset to be understood along with the impact of any development upon it. It also concludes in general because the site includes large areas of green infrastructure and because it contains a number of mature hedges and trees which can be integrated with the layout the impact on the heritage assets and their settings is less than significant apart from perhaps the cemetery where much will depend on how the alignment of the road. Criterion f and g of CU3 address these issues.</p>

	<p>If a Historic Environmental Appraisal concludes that harm will result from this allocation, then the plan needs to set out ways in which this harm might be mitigated.</p>	<p>Historic England (1170)</p>	<p>The Historic Environmental Appraisal (HEA) has been undertaken as set out in the response to the comment above. The plan includes at Policy CU3 “Environmental Protection” the following environmental protection measures to be implemented which will provide the relevant mitigation measures for any harm identified in the HEA.</p>
	<p>If there still will be harm to historic assets following mitigation measures then justification needs to be provided (NPPF paras 133-134).</p>	<p>Historic England (1170)</p>	<p>The site has been assessed by an historic environmental appraisal, which is referred to above. This particular comment is a national policy requirement and is well understood. It is anticipated that mitigation measures will be successful. The local plan includes justification for the proposal as a whole. It is considered that the proposal brings significant benefits to the area which outweighs potential harm.</p>
	<p>The ELR states that there is insufficient demand to support substantial employment land provision as part of the north west urban extension. It advocates only 10,000 sqm.</p>	<p>Persimmon Homes South West c/o CLP Planning Ltd (3640)</p>	<p>The adopted masterplan makes provision for 10,000 sqm of floorspace and policy CU1 has been amended accordingly.</p>

	1,200 dwellings should be a minimum.	Growen Estates c/o Roche Associates (5748)	Policy CU1 has been amended to 1350 dwellings. The adopted masterplan identifies the site as providing 1120 dwellings, but did not include all the land within the allocation area due to uncertainty over the availability of part of the site. This uncertainty has now been addressed and the remaining area will also need to be masterplanned within the context of the overall site. Following the masterplanning of the majority of the allocation site, the updated housing number is considered an appropriate number of dwellings for the site having regard to the topographical challenges, other identified constraints and the provision of infrastructure required.
	Too many dwellings being built on this site which will increase flood risk and traffic problems.	Individual (5710)	It is considered an appropriate number of dwellings for the site having regard to the topographical challenges, other identified constraints and the provision of infrastructure required. Traffic issues are being addressed via the proposed "through route" and proposed further improvements to the M5 junction.. Importantly any development will need to address drainage issues including implementation of sustainable urban drainage systems as set out in CU3.
	Policy CU1 b is unnecessary repetition of Policy S3.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	It does repeat the overriding requirement in S3 to make provision for self-build plots but it is site specific in terms of CU1.

	<p>The need or demand for self-build does not appear to be objectively assessed, either districtwide or in Cullompton. This level of self-build provision presents problems with regard to conflict between hours of construction and the timing of deliveries which are imposed on larger developments. Generally self-builders tend to undertake construction in evenings and weekends. The self-build element is also likely to slow down delivery given the associated marketing period proposed for self-build plots of 12 months per plot.</p>	<p>Persimmon Homes South West c/o CLP Planning Ltd (3640)</p>	<p>Paragraph 2.30 highlights that approximately 2000 people a year search for self-build plots in Mid Devon and the Council's Citizen Panel Survey 2013 showed that 12% of respondents were considering building their own home. The government is committed to providing self-build.</p>
	<p>Low cost and self-build only a vague promise.</p>	<p>Individual (5631)</p>	<p>Policies are set out in the plan to make provision for self-build plots.</p>
	<p>The development should be conditional upon clear and transparent commitment to funding improvements to J28, addition of a new J28a and addition of new local road(s) to improve motorway crossings.</p>	<p>Individual (5867)</p>	<p>Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied.</p>
	<p>The employment land element may not be delivered.</p>	<p>G L Hearn (3781)</p>	<p>Significant progress has been made on the masterplan for the site and there are strong indications that the site will be delivered.</p>

Sport and recreation evidence base should be completed and a strategy devised to be referred to in policies CU3 and CU4.	Sport England (169)	Noted. There is no specific requirement to follow Sport England methodology, which according to their website was only published in July 2014. The Council is content with its own published recent evidence which covers open space provision, and on which this policy is based.
Generally prefer sports contributions to come from planning obligations rather than CIL, unless there is a specific project identified.	Sport England (169)	The published CIL charging schedule excludes the North West Extension and other strategic sites from the charging schedule. Contributions towards sport facilities will therefore come from 106 contributions rather than CIL on this site.
Active Design should be a feature of the master planning work.	Sport England (169)	The relevant principles are already generally reflected in the plan policies.
Sports provision must be found in the new development.	Mr & Mrs Broom (1681)	Provision is made within the policies for sport and leisure provision.
Policy CU5's reference to implementing the Carbon Reductions and Low Emissions Strategy provided at the expense of all new development implies that the council has prioritised the strategy above other components e.g. affordable housing etc.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	The term 'at the expense of' is proposed to be changed to 'funded by'.
The development will worsen air quality in Cullompton.	Individual (2978)	Cullompton has an Air Quality Management Plan in place; part of that plan is the provision of the Town Centre Relief Road, funded in part by development. This development will provide contributions towards the cost of that road. The NW extension also completes a western route around the town centre.

Cullompton (allocated)

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
<p>CU7-12 Cullompton Eastern Extension</p>	<p>Supports the allocation.</p>	<p>Pegasus Planning (3678); Mr Bazley c/o LSN Architects (2156); Mr Jenner c/o RHA (1796); St Andrew's Church c/o Rev Hobbs (1179); Individual (5258, 5361, 4022, 5265, 5360, 1680, 5290, 5292, 2314, 4201, 4174, 5313, 5314, 5316, 5318, 5321, 5345, 5347, 5350, 5337, 5351, 5328, 5365, 5367, 5371, 3700, 5632, 5700, 5085, 4357, 5801, 4120, 4042)</p>	<p>Support noted.</p>
	<p>Support acknowledgement of the impact on the AONB and master planning approach welcomed.</p>	<p>Blackdown Hills AONB c/o Mrs Turner (1195)</p>	<p>Support noted.</p>
	<p>Support policy CU8. The details with regard to contributions will be discussed at the Master Planning Stage.</p>	<p>Pegasus Planning (3678)</p>	<p>Support noted.</p>
	<p>Support the reopening of Cullompton Station.</p>	<p>Rail Future (5830)</p>	<p>Support noted.</p>
	<p>Support Policy CU10.</p>	<p>St Andrew's Church c/o Rev Hobbs (1179)</p>	<p>Support noted.</p>
	<p>CU12 criteria a, d and e are supported.</p>	<p>Pegasus Planning (3678)</p>	<p>Support noted.</p>

	New motorway junction would negate the need to build the relief road across the CCA fields.	Individual (5299)	A new motorway junction in itself would not provide adequate traffic relief to Cullompton town centre. The Relief Road proposal is an important element of the air quality management proposals for Cullompton. The alignment of the Relief Road would seek to minimise the impact on existing facilities and flood risk.
	Any new junction should incorporate northern slip roads as well as southern.	Individual (5299)	A number of different highways solutions have been investigated. DCC consider that a southern slip roads option will achieve the necessary additional capacity in the road network to accommodate traffic from the new development proposals and address existing problems on the highway network. Improvement works, as identified by Devon County Council, to accommodate traffic from the development will be set out in the submission evidence.
	J28 has insufficient capacity to accommodate increased traffic flows.	Kentisbeare Parish Council (76); Individual (5338, 5665, 5631, 5629, 5625, 5624, 5615, 5613, 5759, 393, 3209, 5867, 5866, 5561, 5785, 5490, 5783, 5776, 5817, 5836, 5835, 5993, 1681, 5809, 5807, 5810, 5819, 5818, 5823, 5800, 5799, 5798, 5797)	Improvements to the motorway junction by signalisation at the top of the existing south bound slip roads were constructed in summer 2015. Further improvement work, as identified by Devon County Council, to accommodate traffic from the development will be set out in the submission evidence.
	Attention needs to be paid to infrastructure requirements. Including the impacts on the A373 in East Devon. Increased risk of accident on A373. Improvements should be made to the A373 Cullompton to Honiton to improve safety.	East Devon District Council (135); Broadhembury Parish Council (1483); Kentisbeare Parish Council (76); Individual (3588, 4688, 5490, 5705, 5798, 5800, 5805, 5810, 5811, 5820, 5819, 5823, 5835, 5993)	The Transport Assessment, which will accompany a planning application, will need to set out the transport impacts of the development and how these issues will be addressed.

Routes for pedestrians and cyclists need to be included, with extra bridges over the motorway.	Bradninch Town Council (86); Individual (5757, 5631, 5629, 5626, 5705, 5785, 5835, 5993, 5805, 1681, 5811)	Improvement work, as identified by Devon County Council, to accommodate traffic from the development will be set out in the submission evidence.
Additional public transport provision required (inc Railway Station).	Kentisbeare Parish Council (76), Bradninch Town Council (86); Individual (5623, 5613, 5490, 5770, 5766, 5846, 5847, 1681, 5810, 5799)	Policy CU20 identifies a site for a railway station and includes bus service enhancements and bus interchange. Policy CU8 lists more specific public transport requirements as a result of the East Cullompton proposal.
Infrastructure needs to be in place first.	Kentisbeare Parish Council (76); Individual (5352, 5664, 5665, 5625, 5623, 5621, 3993, 5707, 5705, 5867, 5561, 5490, 5777, 5770, 5846, 5776, 5847, 5835, 5842, 1681, 5811, 5800, 5798, 5797)	A phasing strategy will be drawn up as part of the Masterplanning process as more information comes forward on the detailed requirements, viability and phasing deliverability. Examples of this in practice can be seen the adopted Tiverton Eastern Extension Masterplan and the North West Cullompton Extension Masterplan.
The local roads would not be able to cope with this scale of development.	Kentisbeare Parish Council (76); Individual (5343, 5366, 5753, 5664, 5635, 5634, 5631, 5629, 5626, 5625, 5624, 5622, 5621, 5615, 5613, 5759, 3993, 5707, 5705, 3209, 5866, 5648, 2979, 5561, 5552, 2677, 5785, 5490, 3340, 5777, 5776, 5770, 4641, 5768, 5766, 5846, 5847, 5817, 5831, 5837, 5836, 5835, 5993, 5805, 5802, 5809, 5807, 5812, 5811, 5810, 5820, 5819, 5818, 5823, 854, 5800, 5799, 5798, 5797, 4688)	DCC Highways has been fully engaged in the development of this local plan proposal. Improvement works to accommodate traffic from the development will be set out in the submission evidence.

Support development of the allocation subject to improved infrastructure in Cullompton, upgrading J28, re-opening of the train station and provision of the eastern relief road.	Bradinch Town Council (86); Individual (5623)	Support noted.
The relief road, if located to the east, would impact on existing residents. A western alternative should be considered.	Individual (5664)	A western relief road, as an alternative to an eastern relief road, was previously the subject of consultation with respect to the Allocations and Infrastructure DPD. J28 M5 improvement works together with the town centre relief road will be set out in submission evidence and include preliminary design work.
Increased risk of accident on A373. Improvements should be made to the A373 Cullompton to Honiton to improve safety.	Individual (3588, 5705, 5993, 5810, 5819, 5823, 5800, 5798, 4688)	The Transport Assessment, which will accompany a planning application, will need to set out the transport impacts of the development and how any significant impacts on the A373 will be addressed.
A one way system through the town and not increasing the Kingsmill Industrial estate would negate the need for major development.	Individual (5757, 5756)	A one-way system was previously considered but it was not considered practical to implement owing to the location of the fire station, the impact on town bus services and the impact on Tiverton Road junction.
The development would necessitate the provision of a new motorway junction.	Kentisbeare Parish Council (76); Individual (5625)	Comprehensive improvement work, as identified by Devon County Council in liaison with Highways England, to accommodate traffic from the development will be set out in the submission evidence.
The development is likely to cause 'rat running' through Langford, Plymtree and Dulford.	Individual (5352, 5621)	Improved highway access onto the motorway would make rat-running less favourable and more time consuming. These concerns have been raised with DCC and will be considered further at the master planning stage.
Bridge needed over the motorway for local traffic.	Individual (5867)	Improvement works identified by Devon County Council to accommodate traffic from the proposed Eastern Cullompton Extension will be set out in the submission evidence.

	More cycle provision needed.	Individual (5867)	Off-site improvements proposed by DCC to cater for additional transport movements from the site include enhancements for non-motorised users. On-site cycle provision will be an important consideration in the master planning work. It should be noted that Policy CU8 includes requirements for improved cycle provision.
	Government funding needed for transport infrastructure improvements along with DCC plans.	Hallam Land Management (4386); Individual (5867)	It is common for strategic highway schemes which increase capacity on the trunk road network/junctions to involve an element of public funding.
	HGVs should be banned from using the A373 between Honiton and Cullompton unless access required.	Broadhembury Parish Council (1483)	DCC encourage use of the M5/A30. We understand there are no current proposals to ban HGVs from using the A373. It should also be noted that this is not something that would be addressed by the local plan. This issue has been brought to the attention of DCC.
	Unsustainable proposal as people will be reliant on services in Cullompton and will drive to them.	Broadhembury Parish Council (1483)	The proposal will include a range of services and employment opportunities within the development which will enable many of the needs of the new residents to be met. The close proximity of the development to Cullompton town centre will also present opportunities for existing services to be accessed by pedestrians and cyclists. Public transport improvements will provide access to Cullompton and beyond.
	The development will place pressure on parking provision in Cullompton.	Individual (5629, 5634, 5759, 5770, 5766, 5846, 5847, 5823)	There is currently spare capacity in the town car parks. Policy CU2 encourages the use of alternative modes to the private car including measures such as improved public transport provision.

<p>A relief road through the CCA fields is most important. This may also lead to more suitable land being found to accommodate existing sports uses elsewhere.</p>	<p>Kentisbeare Parish Council(76); Individual (1681)</p>	<p>The Relief Road proposal is an important element of traffic and air quality management proposals for Cullompton. The alignment of the Relief Road would seek to minimise the impact on existing facilities and flood risk. It should also be noted that the local community is developing a neighbourhood plan which is investigating opportunities for enhanced sports provision in the area.</p>
<p>Concern regarding the deliverability of M5 access arrangements and the need to effectively relieve the town centre from traffic.</p>	<p>Individual (4052)</p>	<p>Improvement works identified by Devon County Council to accommodate traffic from the proposed Eastern Cullompton Extension will be set out in the submission evidence. These improvements have been carefully considered by the Highway Authority in consultation with other relevant agencies and are considered to be deliverable during the plan period.</p>
<p>Development should include car clubs.</p>	<p>Individual (3588)</p>	<p>Policy CU2 requires the implementation of travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts. This could provide for a car club scheme.</p>
<p>Essential safe pedestrian and cycle routes are provided at early stage of development to facilitate safe crossing of the motorway and safe routes to town and enhancement of existing networks.</p>	<p>Individual (3588)</p>	<p>Agreed. Safe pedestrian and cycle routes will need to be provided at the early stage of development. Such detailed phasing arrangements will be established through masterplanning.</p>
<p>The Highway authority support policy CU8. A new bridge crossing the M5 would be required. DCC will work closely with MDDC to seek appropriate funding.</p>	<p>Devon County Council (626)</p>	<p>Improvement works identified by Devon County Council to accommodate traffic from the proposed Eastern Cullompton Extension will be set out in the submission evidence.</p>

	<p>Concern of increased flood risk as a result of the development and associated highways' improvements. Concerns raised also with regard to increased risk of flooding elsewhere such as at Kentisbeare, Kingsmill, and the area surrounding Upton Lakes. Concerns also raised over use of 2008 data.</p>	<p>Bradninch Town Council (86); Kentisbeare Parish Council (76); Upton Lakes and Lodges Ltd (5242); Harcourt Kerr (1090); Individual (3524, 5070, 5343, 5352, 5366, 5370, 5757, 5756, 5753, 5752, 5750, 5664, 5665, 5631, 5626, 5625, 5624, 5623, 5622, 5621, 5615, 5613, 3993, 5707, 3788, 5866, 5648, 2979, 5561, 5553, 5552, 5545, 5490, 5783, 5777, 5776, 5770, 5768, 5766, 5846, 5847, 5817, 5831, 5837, 5835, 5993, 5802, 5997, 5809, 5807, 5811, 5810, 5820, 5819, 5818, 5799, 5797, 5563, 4688)</p>	<p>All proposed sites in the emerging Local Plan were assessed as part of the 'Mid Devon Strategic Flood Risk Assessment'. This evidence was independently produced in consultation with the Environment Agency, South West Water and Devon County Council to help assess all potential sites within Mid Devon as part of the Local Plan Review and help guide development to areas of lowest flood risk. To ensure surface water run-off is not increased elsewhere from the development of the site, the Mid Devon Proposed Submission Local Plan requires the provision of an appropriate 'Sustainable Urban Drainage Scheme' and sewerage system to responsibly manage all surface water from the development. The initial strategic flood risk assessment work was based on data sources from 2008, which was the most up to date available data at the time. However the area has now been subject to detailed and rigorous flood modelling utilising updated data sets. This work has been done in close liaison with the Environment Agency.</p> <p>A catchment based assessment will be undertaken as part of the masterplan work as agreed with the Environment Agency.</p>
	<p>A road through the CCA fields will increase the flood risks.</p>	<p>Individual (5299)</p>	<p>A relief road solution is being developed in liaison with the Environment Agency and designed in such a manner so as to address flood risk issues and includes mitigation measures.</p>

Concerns regarding foul drainage, soil stabilisation and SUDS. Including comments regarding proximity to Upton Lakes.	Kentisbeare Parish Council (76); Upton Lakes and Lodges Ltd (5242); Individual (5750, 5997, 5811, 5799)	Policy CU9(f) emphasises the importance of these issues. Impacts on surrounding areas will be considered at masterplanning and application stages.
Consideration should be given to Critical Drainage areas and catchment based assessments.	Kentisbeare Parish Council (76); Upton Lakes and Lodges Ltd (5242); Individual (5997)	In addition to the extensive flood modelling work recently completed a catchment based assessment will be undertaken as part of the masterplan work as agreed with the Environment Agency.
Contributions should be sought from developers for maintenance of existing culverts and drainage systems.	Individual (3588)	This cannot be required through planning. It is a matter for South West Water and owners to maintain existing culverts and drainage systems.
SUDS should be built to a high standard.	Individual (3588)	Policy CU9 (f) states 'The necessary sustainable urban drainage features, and linking pipe work is integrated and phased appropriately in step with development.' The scheme would also be subject to scrutiny by DCC.
The 40 hectares of green infrastructure should include the Local Wildlife Sites and floodplains and associated Priority Wetland Habitat.	Environment Agency (943)	Policy CU9 does seek to protect and enhance trees, hedgerows and other environmental features.
CU7 We welcome the content of para 3.97 which highlights the need for careful planning to 'ensure that areas at risk of flooding remain undeveloped'.	Environment Agency (943)	Support noted.

	<p>We welcome recognition within paragraph 3.107 of the numerous small watercourses and requirement to retain them, and their floodplains, within areas of green infrastructure.</p> <p>Paragraph f would be more effective if it read as follows.</p> <p>Appropriate provision of a sewerage system to serve the development and a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance. We welcome the wordage within paragraphs b) and i) making reference to the requirement to retain the areas of floodplain as informal open space free to flood, and phasing of the necessary sustainable urban drainage features.</p>	Environment Agency (943)	A change is proposed to policy CU9 f) in response to the comment made by the Environment Agency.
	The site allocation should be larger to accommodate increased sports' provision.	Individual (5211)	The site includes provision for sports provision which will be considered further at the master planning stage. This would need to consider other sports provision options that are coming forward in the Cullompton area. It should also be noted that the area proposed for extension to the allocation is constrained. The Neighbourhood Plan is currently considering additional sports opportunities for the area.
	The development should incorporate allotments and community orchards.	Individual (5211, 4317)	The proposal incorporates a significant amount of green infrastructure which potentially could be utilised for these uses. There is an opportunity for these to be considered as part of the master planning work.

Housing mix on the site should reflect local circumstances and diversity.	Bradninch Town Council (86); Individual (5211)	Agreed that the housing mix should reflect these factors and this will be considered further at the master planning stage.
The development should incorporate local facilities; a community hall, schools, GP surgery, allotments, local shops, etc.	Kentisbeare Parish Council (76); Individual 4317, 5625, 5615, 5759, 5561, 1681)	Policy CU10 details the community facilities to be provided as part of the development. This will include a new primary school(s), a shopping and community centre, a multi purpose community building, sporting and leisure facilities, etc. No requests have been received from the GP fundholding practice for additional GP surgery facilities.
The site extends over our garden.	Individual (5370, 5818, 5563)	Site boundary to be amended to exclude outline over private garden.
New play areas and parks needed.	Individual (5707)	The proposal will incorporate public open space. The precise nature of which will be established as part of the master planning work.
Duplication of services not necessary and uneconomic.	Individual (5628)	A development of this scale would need a range of services on site to meet the needs of new residents.
More explicit reference to care home provision needed.	Blue Cedar Homes Ltd (3787)	The proposed development will include provision for elderly care as referred to in paragraph 3.100. More detailed proposals will develop through the masterplanning work.
Allocate one play area site with a variety of equipment, rather than lots of smaller ones with higher maintenance costs.	Individual (1681)	In principle, we agree with the broad approach suggested by the representor and our general policy approach is for a smaller number of larger play areas. The detailed siting of play areas will be established through the master planning work.

<p>Overhead power lines cross the proposed site. Overhead power lines should remain in-situ and development should not occur directly underneath them. This area could be used to form open space, nature conservation, landscaping or as a parking court. Guidelines are provided on appropriate ways to create high quality development near overhead power lines.</p>	<p>The National Grid c/o Mr Austin Entec (143)</p>	<p>The master planning process will take these comments on board and further liaison will be undertaken with the National Grid.</p>
<p>Design of new properties need to be considered carefully with the new development to ensure variation of external appearance and to ensure that appropriate bin storage and car parking is provided.</p>	<p>Individual (5211)</p>	<p>The points made are important issues which will be best placed resolving at the Masterplanning stage. The development will be informed by the council's current emerging SPD on waste and bin storage.</p>
<p>Support the principles of this policy and recognise the importance of green infrastructure. However would wish to see more flexibility to the quantum identified in criteria b and c. The level of provision should be agreed as part of the master planning work and removed from the local plan policy.</p>	<p>Pegasus Planning (3678)</p>	<p>Whilst it is agreed that the detailed arrangements with respect to green infrastructure provision will be agreed at the master planning stage, it is considered that the broad quantity and proportion of green infrastructure should remain in the local plan policy. This will then provide a framework for the subsequent master planning work.</p>
<p>Criterion d should be expanded to provide 6th form education to prevent students from Cullompton having to travel out of the area.</p>	<p>Individual (3588)</p>	<p>DCC has confirmed that it has no plans for expanding the school to provide 6th form provision.</p>
<p>Land should be allocated for provision of a GP surgery.</p>	<p>Individual (3588)</p>	<p>No requests have been received from the GP fundholding practice for additional facilities.</p>
<p>The policy could be reworded to set out that the site should deliver 'education facilities providing for a total of not less than 630 pupils plus additional early years provision, including the requisite land to deliver these facilities. The required primary school capacity could be delivered through the provision of either one or two schools'.</p>	<p>Devon County Council (626)</p>	<p>Change is proposed to Policy CU10 to reflect DCC proposed rewording. It is proposed to update the policy to reflect the latest position of DCC with respect to pupil numbers. The detailed location and scale of either one or two schools will be the subject of ongoing discussions with DCC during the master planning stage.</p>

Medical services already at capacity.	Bradninch Town Council (86); Individual (5343, 5370, 5753, 5664, 5665, 5635, 5634, 5628, 5626, 5624, 5621, 5615, 5613, 5759, 5705, 3209, 5866, 5648, 2979, 5561, 5490, 5783, 5777, 5776, 5770, 5768, 3524, 5776, 5846, 5847, 5836, 5993, 5805, 5809, 5807, 5812, 5810, 5820, 5818, 5823, 854, 5799, 5797, 5563)	No requests have been received from the GP fundholding practice for additional facilities. Indeed NHS England has stated that there is currently capacity within the two existing surgeries.
Schools already at capacity.	Individual (5343, 5753, 5664, 5665, 5634, 5631, 5628, 5626, 5624, 5621, 5615, 5707, 3209, 5866, 5648, 2979, 5490, 5783, 3340, 5777, 5776, 5770, 5768, 3524, 5776, 5846, 5847, 5836, 5993, 5805, 5809, 5807, 5812, 5810, 5820, 5818, 5823, 854, 5799, 5797)	The proposal includes a new primary school and contributions towards an expansion of local secondary education facilities.
Policing will be overstretched.	Individual (5664, 5621, 5615, 5613, 2979, 5770, 5766, 5846, 5847, 5805, 5807, 5810, 5797)	Contributions will be sought district wide to support policing as part of the Community Infrastructure Levy and is included in the Infrastructure Delivery Plan.
There is insufficient existing supermarket provision and related car parking to accommodate further growth of the town.	Individual (5819)	The development will incorporate convenience shopping provision.

	Insufficient local employment opportunities.	Individual (5615, 5613, 3993, 5705, 5561, 5552, 5783, 5770, 5766, 5846, 5847, 5835, 5993, 1681, 5802, 5809, 5807, 5811, 5823, 5797)	Additional employment land is allocated in the plan for the Cullompton area.
	“The local community will be fragmented by a concentrated influx of people the south west could do without bringing crime, drugs and anti-social behaviour with them.”	Individual (5705)	The proposals are to meet the objectively assessed needs for the area. Also, do not concur with the assumption that all people from outside the region are anti-social.
	The significance of the town centre relief road should be emphasised in Policy CU12.	Individual (4052)	The phasing of the town centre relief road will be a matter for negotiation at masterplanning stage.
	Highways infrastructure improvements needed prior to development.	Individual (3588)	The infrastructure works will be delivered at the earliest stage of the development that is practicable as it provides an essential part of the transport measures necessary for the site to be developed satisfactorily.
	There is insufficient flexibility in CU12.	Pegasus Planning (3678)	The elements of this policy are crucial for satisfactory and acceptable delivery of this proposal. There will be scope through the master planning work and planning application stage to refine the phasing arrangements.

	<p>Self build element too high and should be referred to as self/custom build in policy CU12.</p>	<p>Pegasus Planning (3678)</p>	<p>Paragraph 2.30 highlights that approximately 2,000 people a year search for self-build plots in Mid Devon and the Council's Citizen Panel Survey 2013 showed that 12% of respondents were considering building their own home. The government is committed to removing the main barriers which hold back many thousands of custom build projects every year. They want to increase the opportunity for more people (to build their own home) and make self/custom build a mainstream option for future home owners, not an exception for a privileged few. Custom build are not always built by self-builders it can be where a builder is contracted by a home owner to create a "custom built home".</p>
	<p>The rate of release of commercial development should be linked to either the rate of 1 hectare per 500 occupied dwellings, or phased to deliver a larger area of commercial at a suitable stage in development.</p>	<p>Pegasus Planning (3678)</p>	<p>The policy as worded is considered appropriate, however the masterplan will provide more detail with regard to commercial phasing.</p>
	<p>The phasing of strategic infrastructure should be based upon detailed technical assessments.</p>	<p>Pegasus Planning (3678)</p>	<p>The elements of this policy are crucial for satisfactory and acceptable delivery of this proposal and are informed by supporting evidence and the advice of statutory partners. There will be scope through the master planning work and planning application stage to refine the phasing arrangements.</p>

The proposals would compromise the beauty and tranquillity of the area.	Bradninch Town Council (86); Upton Lakes and Lodges Ltd (5242); Individual (5343, 5338, 5750, 5629, 5627, 5621, 5615, 5648, 5490, 3340, 5831, 5997, 5809, 5812, 5810, 5820, 854, 5797)	The local planning authority has a responsibility to find land to accommodate objectively assessed need within the district. Given the rural nature of Mid Devon there is only a limited supply of brownfield land available and so inevitably greenfield land has to be made available for development. Issues such as design and the impact of the development on local amenity will be carefully considered at the master planning and detailed planning application stages.
Loss of privacy and light.	Individual (5338)	The amenities of existing properties will be carefully considered at the detailed planning stage.
Loss of Agricultural Land.	Individual (5352, 5635, 5631, 5629, 5626, 5624, 5622, 5621, 5615, 5613, 5707, 2979, 5545, 2677, 5785, 5490, 5783, 5770, 5766, 5846, 5847, 5837, 5835, 5993, 5802, 5809, 5823, 5799, 5797)	The loss of agricultural land is regrettable, but given the rural nature of the district, there is insufficient brownfield land to meet the identified housing and employment needs of the area. The site does include Grade 1/2 agricultural land but is predominantly Grades 3a and 3b and there is a lack of alternative sites in the area which could bring about this level of benefits.
Ecological concerns.	Upton Lakes and Lodges Ltd (5242); Individual (5370, 5750, 5664, 5665, 5622, 5615, 5613, 2979, 5490, 3340, 5817, 5831, 5997, 5818, 5823, 5797)	There are few areas of formal wildlife designations on the site, those that are present will be incorporated within the green infrastructure and left undeveloped. More detailed consideration of mitigation with respect to existing habitats will be addressed at the detailed planning application stage.
Great Crested Newt impact assessment should be undertaken.	Upton Lakes and Lodges Ltd (5242); Individual (5997)	A full ecological assessment will be required at application stage.

<p>Our, adjacent parish, emerging Neighbourhood Plan emphasises its rural and tranquil characteristics along with dark skies. This should be respected.</p>	<p>Broadhembury Parish Council (1483)</p>	<p>The local planning authority has a responsibility to find land to accommodate objectively assessed need. Emerging neighbourhood plan policies in an adjoining district cannot reasonably outweigh proposals to provide for housing need in a neighbouring district. Any impact on neighbouring parishes will be considered very carefully at the master planning and planning application stages to seek to limit the impact on amenity.</p>
<p>New development will not take account of local vernacular and will provide a negative impact on Cullompton as a historic market town.</p>	<p>Individual (5809)</p>	<p>The design elements of the new development will be a crucial part of the master planning work which will include public engagement.</p>
<p>This number of housing not necessary in Cullompton.</p>	<p>Dial Holdings Ltd c/o Mr Seaton PCL Planning (2315); Individual (5624, 5622, 5621, 5613, 5705, 5648, 5807, 5812, 5811)</p>	<p>Cullompton is identified as a strategic location for Mid Devon growth during the plan period and (the opportunity to identify land for residential development) reflects that strategic approach.</p>
<p>Too many houses for Cullompton in one development.</p>	<p>Broadhembury Parish Council (1483); Harcourt Kerr (1090); Hallam Land Management (4386); Kentisbeare Parish Council (76); Dial Holdings Ltd c/o Mr Seaton PCL Planning (2315); Individual (5352, 5366, 5628, 5627, 5626, 5621, 5613, 5759, 5648, 5561, 5552, 5545, 5785, 4641, 5768, 3524, 5836, 5835, 5993, 5802, 5809, 5807, 5811, 5820)</p>	<p>Cullompton is identified as a strategic location for Mid Devon growth during the plan period. The strategic direction of the plan has been informed by the previous 'issues and options' consultation. For a development to function effectively in this location there is a critical mass needed. A smaller scale development would not afford the opportunities to enhance local facilities and provide the necessary infrastructure.</p>
<p>Too much emphasis placed on this development which may be delayed coming forward.</p>	<p>Waddeton Park c/o Mr Baker Bell Cornwell LLP (3815)</p>	<p>It should be noted that this development is scheduled for the later part of the plan period.</p>

	Too many Gypsy and Traveller pitches.	Individual (5811)	The pitches proposed are to meet objectively assessed need.
	If J27 development does not occur, no need to pursue housing development east of Cullompton.	Individual (5756, 5561)	On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. Housing is required to meet the needs of the district. The proposed allocation at Junction 27 has further increased the housing need for the area in addition to those allocated at Cullompton.
	Concern that the amount of commercial floorspace seems low in comparison to housing. It needs to be a community with all necessary facilities and employment opportunities.	Individual (3588)	It is important that commercial development is in step with residential development. The employment land review has indicated that the plan needed to reduce the level of employment land to reach the appropriate balance.
	2,100 dwellings should be a minimum number of dwellings on this site. This would assist phasing arrangements and increase delivery rates.	Pegasus Planning c/o Ms Morrison (3678)	The plan refers to 2,600 dwellings, with 1,750 dwellings being provided during the plan period.

	<p>The site allocation should be reduced to take account of loss of 'excellent quality' agricultural land and to reflect the flood plain.</p>	<p>Gallagher Estates Ltd c/o Ms Griffiths, Turley (5763)</p>	<p>Measures are built into the policies and supporting text to address flood risk and surface water drainage. All proposed sites in the emerging Local Plan were assessed as part of the 'Mid Devon Strategic Flood Risk Assessment'. This evidence was independently produced in consultation with the Environment Agency, South West Water and Devon County Council to help assess all potential sites within Mid Devon as part of the Local Plan Review and help guide development to areas of lowest flood risk. The site layout will ensure that there will be no development within any area of floodplain. To ensure surface water run-off is not increased elsewhere from the development of the site, the Mid Devon Proposed Submission Local Plan requires the provision of an appropriate 'Sustainable Urban Drainage Scheme' and sewerage system to responsibly manage all surface water from the development. The loss of agricultural land is regrettable. The site does include Grade 1/2 agricultural land but is predominantly Grades 3a and 3b and there is a lack of alternative sites in the area which could bring about this level of benefits.</p>
	<p>Further work needed relating to viability and deliverability of the allocation to demonstrate its deliverability during the plan period.</p>	<p>Gallagher Estates Ltd c/o Ms Griffiths, Turley (5763)</p>	<p>Viability work (Dixon Searle August 2016) has been undertaken which demonstrates that the overall assumptions which underpin the plan are sound with regard to viability. The specific viability and deliverability issues relating to this particular development will continue to be refined through the masterplanning work.</p>

	Development not viable.	Harcourt Kerr (1090); Hallam Land Management (4386); Friends Life Ltd c/o GL Hearn (3781); Individual (5820)	The land is being actively pursued by developers who consider that a proposal is viable. MDDC is working closely with partners to consider delivery options and risks. The best available advice from statutory partners is that the proposals are deliverable within the plan period.
	Sceptical that low cost, or self build, elements will be delivered.	Individual (5631)	Paragraph 2.30 highlights that approximately 2,000 people a year search for self-build plots in Mid Devon and the Council's Citizen Panel Survey 2013 showed that 12% of respondents were considering building their own home. The government is committed to removing the main barriers which hold back many thousands of self/custom build projects every year. They want to increase the opportunity for more people to build their own home and make custom build a mainstream option for future home owners, not an exception for a privileged few. Custom build are not always built by self-builders it can be where a builder is contracted by a home owner to create a "custom built home".
	Sceptical that school could be delivered.	Individual (5613, 5759, 5811)	DCC has specified that the school provision is needed and there is no indication that such provision will not come forward. Furthermore provision of the school will be a legal requirement through a s106 agreement.
	Scepticism over the delivery of the train station.	Individual (5802, 5811, 5797, 5621)	Given the increase in population proposed and local support it is reasonable to assume that reopening of the train station could be delivered during the twenty year plan period. The Council is working with partners to deliver a railway station in Cullompton as part of the Devon and Somerset metro project.

	<p>The spatial strategy places too much emphasis on CU7 which is a site with significant risk.</p>	<p>MJ Gleeson C/O Bell Cornwell LLP (3775)</p>	<p>Cullompton is identified as a strategic location for Mid Devon growth during the plan period. The strategic direction of the plan has been informed by the previous 'issues and options' consultation. For a development to function effectively in this location there is a critical mass needed. A smaller scale development would not afford the opportunities to enhance local facilities and provide the necessary infrastructure. MDDC is working closely with partners to consider delivery options and risks. The best available advice from statutory partners is that the proposals are deliverable within the plan period.</p>
	<p>Criteria n should be amended to clarify proposed consultation arrangements and omit reference to two stages of consultation. Proposed change to wording: "alongside the statutory consultation to the SPD, the Master planning exercise will include significant formal consultation with the local community and other stakeholders'.</p>	<p>Pegasus Planning c/o Ms Morrison (3678)</p>	<p>MDDC's Statement of Community Involvement has specified a commitment to two stages of consultation. There is no reason why there should be a departure from this on such an important scheme.</p>
	<p>The reopening of Cullompton station is unlikely to be delivered within the next five years.</p>	<p>Devon County Council (626)</p>	<p>Given the increase in population proposed and local support it is reasonable to assume that reopening of the train station could be delivered during the twenty year plan period, but would agree that completion within the next 5 years less likely.</p>
	<p>Policy CU8 consists of unfunded transport aspirations.</p>	<p>Individual (5811)</p>	<p>Improvement works identified by Devon County Council to accommodate traffic from the proposed Eastern Cullompton Extension will be set out in the submission evidence.</p>

	Sports provision must be found in the new development.	Individual (1681)	Policy CU10 states that contribution towards sports and leisure facilities will be required. The details of such provision will be established through the master planning work.
	New development should be designed in line with Active Design principles and a strategy should be devised for the delivery of sport and recreational land. Devise strategy for delivery of sport and recreational land and update policy CU9 and CU10 to reflect this.	Sport England c/o Mr Parsons (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore advisory. Policy CU9 refers to the proposed sport and recreational land requirements identified as part of this proposal. This will be further refined through masterplanning. The local community is currently considering options for further sports and recreational use in this area as part of the neighbourhood plan.
	Increase in air quality problems.	Individual (5626, 2979, 2677)	The development will facilitate the delivery of the town relief road an AQ mitigation measure which will remove traffic from the town centre AQMA.
	A route for a bypass is essential to remove traffic from the town centre.	Individual (5698)	The development will facilitate the delivery of the town relief road which will remove traffic from the town centre.
	Unsure as to the purpose or intention of e) offsite planting. Request confirmation of the basis for this requirement given that 40 ha of green infrastructure also required.	Pegasus Planning (3678)	Cullompton currently has an Air Quality Management Area. Offsite planting can play a part in capturing carbon and improving air quality. The provision of offsite planting therefore has a different role to the conventional green infrastructure also required.

	Growth at Willand a preferable option.	Hallam Land Management (4386)	Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4 th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan.
	Brownfield sites should be developed instead of this proposal.	Individual (5631, 5545, 5490, 5490, 5993)	Given the rural nature of Mid Devon there is only a limited supply of brownfield land available and so inevitably greenfield land has to be made available for development.
	Hartnoll Farm would be a more sensible location for more development.	Individual (5820)	The Hartnoll Farm proposal is not included in the plan. The Council has carefully considered all the options put forward in the January 2014 Local Plan Review consultation and has determined that the most sustainable option for development is to concentrate the majority of development at Cullompton.
	An enlarged Cranbrook development would be preferable.	Broadhembury Parish Council(1483); Individual (5820)	The proposals set out in the emerging local plan are to accommodate objectively assessed needs for the District, and follows consultation on strategic options for the plan area. Further development of housing sites in other districts would neither assist in meeting Mid Devon's needs effectively nor would it enable the area to harness the benefits of new development. Futhermore, it should be noted that Cranbrook is being expanded in any case to meet East Devon's objectively assessed needs.

	Development should be at J27 instead. Or in the case of Kentisbeare PC's representation J27 development preferable to enable a smaller allocation east of Cullompton.	Kentisbeare Parish Council (76); Hallam Land Management (4386); Individual (5759, 5648, 4641, 5835, 1681)	Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4 th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan.
	The development would be detached from Cullompton and its services, with the motorway as a barrier.	Bradinch Town Council (86); Broadhembury Parish Council (1483); Harcourt Kerr (1090); Individual (4317, 5631, 5629, 5628, 5622, 5613, 5552, 5785, 5490, 5835, 5805, 5802, 5800, 5798 5563)	The development will incorporate a variety of different services and facilities, which will allow an element of self-containment. Improvements to pedestrian/ cycle routes, public transport and provision of a new bridge over the motorway will enable improved access to the town centre.
	Residents will work in towns elsewhere (e.g. Exeter, Taunton, Bridgwater and Bristol).	Individual (5753, 5752, 5631, 5627, 5624, 5621, 5615, 5613, 393, 5561, 5823, 4688)	There is no mechanism in planning terms to restrict where people will work. The development is proposed alongside an increase in employment opportunities for the Cullompton area.
	The proposed development would have a negative impact on tourism.	Upton Lakes and Lodges Ltd (5242); Individual (5343, 5750, 5664, 5665, 5621, 5490, 5835, 5997, 4688)	There is no evidence that the proposals will adversely affect tourism. It is arguable that an increased level of local housing will increase local leisure spend.

Protection and mitigation for the loss of enjoyment and amenity for holiday owners and protection for loss of income from Holiday let, decrease in value of accommodation or impact on tourism and hospitality businesses. Criterion g should include 'protect setting of Upton Lakes holiday lodges'.	Upton Lakes and Lodges Ltd (5242); Individual (3588, 5750, 5553, 5997)	There will be an impact on the area in terms of outlook. Mitigation with respect to the impact on amenity will be considered further as part of the master planning work. Impact upon property value is not a material planning consideration.
Cross boundary issues need to be considered.	East Devon District Council (135); Individual (5811)	Continued liaison is undertaken with adjoining authorities through a range of informal and formal arrangements consistent with the 'duty to cooperate'. This liaison will be ongoing and form an important part of the master planning work.
Insufficient detail to assess the proposal.	Individual (5665, 5552, 5490, 5993, 5811)	The level of information currently available is typical of development proposals included at the strategic local plan stage. More detailed aspects will be discussed as part of the master planning, and subsequent planning application, stages.
Concern about how this will affect the respondent's house price. Also state that they did not move into the area to be told six years later that there might be new housing development occur in the locality.	Individual (5810)	These are not reasons which would carry weight in planning terms. As demonstrated by the respondents' move to the area, housing needs do need to be accommodated.
Commuter patterns should be assessed, particularly to assess impact on employment sites in East Devon.	East Devon District Council (135)	Commuting patterns have been considered by EDGE Analytics. It is unclear what change to the plan is sought.
Certain amount of rented housing could become poorly maintained by uncaring landlords.	Individual (5770, 5766, 5846, 5847)	Poor maintenance can occur irrespective of ownership. There are currently little planning controls that can overcome these concerns.
The Local Plan should detail the specific design requirements relating to sustainability and physical access requirements rather than leave to building regulations.	Individual (5211)	More detailed design aspects will be addressed comprehensively at the master planning and planning application stages. Physical access arrangements are covered by building regulations legislation.

	<p>The development should go up to the parish boundary as land within flood plain could then be used to increase GI leisure land.</p>	<p>Individual (5211)</p>	<p>The land beyond the boundary is countryside, has not been made available, partially in flood plain. The local community is currently considering options for further sports and recreational use as part of the neighbourhood plan.</p>
	<p>Contributions should be sought for off-site community facilities. s106 should be worded flexibly to ensure monies are spent.</p>	<p>Individual (5211)</p>	<p>Contributions for appropriate off site infrastructure will be sought as stated in Policy CU10. Contributions need to be fair and reasonably related to the development; too much flexibility would run the risk of falling foul of these stipulations.</p>
	<p>Respondent proposes that his land would be more suitable for development, than elements south of the A373. Concerns relate primarily to the proximity of residential development to a working farm.</p>	<p>Individual (3788)</p>	<p>The respondent recommends two options One for a smaller landswap, and one for a much larger alteration to include all of the respondent's farm. It is considered that development of this proposed alternative site would be more challenging to develop. If all of this land was included it would be less sustainable primarily due to its unusual shape with access only to the east of the site.</p>

Town allocations

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
TIV6 Farleigh Meadows	Complete evidence base as per Sport England methodology and update policy accordingly;	Sport England (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore advisory. An investment strategy for sport and recreation facilities can be prepared after the plan's adoption, through the use of additional evidence to guide CIL or S106 expenditure and other resources. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making. A policy on the use of 106 Obligations is published on the Council's website and makes specific reference to their use in the provision of open space and sports facilities, in addition to Policy S5 of the Local Plan.
	Amend policy to reflect Active Design principles and implementation	Sport England (169)	The relevant principles are already generally reflected in the plan policies.
	Reserved matters approval is for 255, not 300 – housing numbers in plan should reflect reality	Devonshire Homes Ltd c/o N Jillings (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Messrs Persey and Harding c/o Jillings Hutton (4654)	Agreed. Amendment proposed to update total housing numbers on site to 255.
TIV7 Town Hall / St Andrew Street	Supports policy	Historic England (1170)	Support noted.
	Welcome reference to need to raise floor levels and provision of flood evacuation/access routes	Environment Agency (943)	Noted.

	Question deliverability of site.	Devonshire Homes Ltd c/o N Jillings (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Messrs Persey and Harding c/o Jillings Hutton (4654)	Part of the site has now been completed. Negotiations to deliver the rest of the site are in progress and there is an expectation that the site will come forward.
TIV8 Moorhayes Park	Supports policy.	Historic England (1170)	Support noted.
	Requests amendment to supporting text for flood risk assessment to consider scenario of blockage of local culverts/bridges which convey the leat.	Environment Agency (943)	Agreed. Supporting text amended accordingly.
TIV9 Howden Court	Objection/concern about loss of parking provision, additional parking on roads and negative impact on road safety, loss of turning circle for larger vehicles; right to use parking is contained in covenant; requests car park removed from allocation.	Individual (5214, 5315, 5870, 5404)	The highways authority states that there will not be an impact on the existing highway subject to appropriate design. The housing department at Mid Devon District Council has advised that the site can be delivered with the covenants as laid out.
	Objection/concern re overlooking/loss of privacy/loss of light.	Individual (5315, 5870)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.
	Objection/concern re potential for flooding/poor drainage; sufficient environmental protections should be in place.	Individual (5315, 5870, 5404)	National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.

	Objection/concern re gradient of land proposed for development, which will require significant levelling.	Individual (5315, 5870)	There are many parts of Tiverton where the development of hillsides has been undertaken successfully. A panel of housing experts (the SHLAA panel) considers the site to be deliverable.
	Objection/concern re impact on hedgerow at rear of properties and associated wildlife (including bats, of which the local population should be reviewed).	Individual (5315, 5870, 5404)	Any application will need to consider the impact on biodiversity, typically through the submission of a Habitat Survey. The survey will indicate whether there is likely to be protected species within the site, and how any impact can be mitigated.
	Objection as part of the site identified crosses land owned by objector.	Individual (5870)	A small part of the allocation does overlap with land owned by objector. This is proposed to be removed from the allocation.
	Objection as site has community benefits, i.e. contributes towards attractiveness of area through planting of flowers/shrubs and is used for playing by children.	Individual (5404)	The site is not subject to any formal biodiversity designation. There is the opportunity to incorporate mitigation planting at the design stage to offset any loss.
TIV10 Roundhill	Policy should be deleted as is unsuitable and subject to significant local opposition.	Tiverton Town Council (98)	Not agreed. The site has been assessed as being suitable through the Strategic Housing Land Availability Assessment (SHLAA). Comments in relation to specific objections are set out below.
	Objection as site is former clay pit/landfill and is unstable/would be expensive to redevelop.	Tiverton Town Council (98); Individual (2484, 5259, 5291, 5300, 5262, 5339, 5322, 5500)	The policy requires investigation of ground stability and implementation of appropriate remediation works. A panel of housing industry experts (the SHLAA panel) believe the site to be viable. An application is anticipated to be submitted in time to allow building on site from 2017/18 indicating that the site viable for redevelopment.

	<p>Objection due to capacity of drainage/sewerage network/concern about flooding.</p>	<p>Individual (2484, 5255, 5260, 5419, 5420, 5421, 5422, 5423, 5424, 5291, 5300, 5262, 5303, 5304, 5322, 5323, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572, 5500, 5385, 5399, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449)</p>	<p>South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans. The site is in Flood Zone 1, the area with the least probability of flooding. The application will be accompanied by a drainage strategy setting out the arrangements for the management of surface water. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.</p>
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	<p>Objection due to capacity of parking, loss of parking/loss of garaging, additional congestion on roads, impact on road safety (particularly near play park).</p>	<p>Individual (2484, 5255, 5259, 5260, 5268, 5419, 5420, 5421, 5422, 5423, 5424, 3072, 5291, 5296, 5300, 5262, 5303, 5305, 5339, 5319, 5322, 5323, 5326, 5353, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572, 5500, 2469, 5385, 5399, 5384, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449)</p>	<p>This site is an existing allocation. Concern regarding the loss of the existing garages and the introduction of affordable dwellings which would give rise to an unacceptable increase in both on-street parking and visual impact was considered by the Inspector during the examination of the AIDPD. His conclusion was that development management policies provided sufficient control over such effects and that therefore the policy was sound. Furthermore the parking area is informal, and was only created as a result of demolition of other garages given that they were not used. It was always intended that the site would be redeveloped. In addition, many of the garages fall considerably below the minimum sizes set in the Council's Parking Supplementary Planning Document, and would not be capable of, nor used for, parking a vehicle.</p>
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	<p>Objection as limited/restricted access for emergency vehicles/waste lorries.</p>	<p>Individual (5255, 5259, 5264, 5419, 5420, 5421, 5422, 5423, 5424, 5291, 5300, 5262, 5305, 5319, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572, 5500, 5385, 5399, 5384, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449)</p>	<p>This is a matter which will be addressed at the design stage.</p>
	<p>Objection due to loss of light/privacy.</p>	<p>Individual (5259, 5300)</p>	<p>Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.</p>

	<p>Objection due to loss of rear access to property/ vehicular right of way.</p>	<p>Individual (5264, 5419, 5420, 5421, 5422, 5423, 5424, 3072, 5262, 5305, 2488, 5326, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572, 5500, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449)</p>	<p>The policy states that the right of access to the rear of the properties must be maintained.</p>
	<p>Objection due to loss of property value.</p>	<p>Individual (5264, 5326)</p>	<p>Property value is not a material consideration in planning.</p>
	<p>Request for compensation due to loss of garaging.</p>	<p>Individual (5260)</p>	<p>This is not a planning matter. Though this is not a planning matter, there is no right to compensation in the terms of the rental agreements which can be terminated at a week's notice.</p>
	<p>Objection as nowhere to put electric substation.</p>	<p>Individual (5268)</p>	<p>This will be considered at the design stage – but it is likely that it will be left in situ.</p>

	<p>Objection as would cause unacceptable loss of land to certain residents.</p>	<p>Individual (5419, 5420, 5421, 5422, 5423, 5424, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572)</p>	<p>A small proportion of the allocation overlapped the rear garden of 107 Cotteylands – this area is proposed to be removed from the allocation. The scheme is also required to ensure that the vehicular right of way which those along Lower Cotteylands have to the rear of their properties is maintained.</p>
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	Objection as would cause unacceptable loss of amenity and enjoyment of established rights.	Individual (5419, 5420, 5421, 5422, 5423, 5424, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572)	Approximately 50% of the garages are empty, and are in a poor state of repair. Many of them are too small to be used for the storing of vehicles. Instead, the redevelopment of this site provides the opportunity to improve the quality of the immediate environment through sensitive redesign. Any rights of access to the rear of properties along Lower Cotteylands will be retained.
	Old garages need to be dealt with but those at 1-18 are used and should remain; replacement parking should be provided; or fewer but larger garages should be provided.	Individual (3072, 5296, 5300)	This can be considered at design stage.
	Objection as part of the site shows rear of properties in Lower Cotteylands being taken.	Individual (5262, 5326)	Noted. A small area of the allocation which overlapped a part of the rear garden at 107 Lower Cotteylands is proposed to be removed.
	Alternatively land in front of Cameron Close or at Palmerston Park should be developed instead.	Individual (5319, 5353)	A site at Palmerston Park is included within the plan for development. No land at Cameron Close has been made available for development.
TIV11 Palmerston Park	Criterion b should be extended to cover Priority Species and Habitats.	Environment Agency (943)	Agreed. Policy amended accordingly.
TIV12 Phoenix	Supports policy.	Historic England (1170)	Support noted.

Lane	When planning this site, the setting of listed Gotham House and Raymond Perry House, along with fine views from Fore Street should be preserved.	Tiverton Civic Society (1410)	This is addressed by the policy.
	Burma Star and memorial garden should be preserved in current location.	Tiverton Civic Society (1410)	Not agreed. Discussions are already underway with the British Legion regarding alternative locations, with agreement dependent on agreeing an acceptable design.
	Market Walk purchased by Council but not within allocation.	Individual (5239)	It is not currently known whether Market Walk will be redeveloped hence it does not form part of the allocation. However, a town centre masterplanning exercise, including an area wider than the Phoenix Lane allocation, and incorporating Market Walk, is being undertaken to identify the best ways to enhance the town centre's attractiveness.
	Policy TIV12 should be deleted. Proposed allocation is incapable of accommodating convenience floor space requirement identified by GVA by 2026 [in their Retail Study] (assuming a discount food store sales density) or even the wider combined convenience and comparison floor space target. Even if discount food store could be accommodated on the site this would result in the displacement of office occupiers that could not be accommodated elsewhere on the site.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	The Retail Study indicates very little need within Tiverton for additional convenience floorspace growth. Instead, it estimates a need for some comparison goods floorspace within the town. The Phoenix Lane allocation would seek to provide some of this comparison goods floorspace through the delivery of a mixed use town centre regeneration scheme. Moreover, the Retail Study also recommended that the principle of including a small proportion of convenience space through opportunities to improve the town centre convenience offer, but noted that there was not the available expenditure to accommodate another large food store. This need is proposed to be met through this single town centre allocation.

	<p>Seems highly unlikely that the site would be developed as the types of occupiers that might accommodate units along Phoenix would be small unit shops that will not provide rental returns that might enable a developer to secure pre-lets to justify the costs of constructing new accommodation. Therefore the prospect of securing the development of a new shopping street on one or both sides of Phoenix Lane appears very limited.</p>	<p>Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)</p>	<p>As one of the principal landowners of this allocation, the Council is taking a leading role in delivering the proposed regeneration. Initial town centre masterplanning concepts by Max Lyons were commissioned by the Council, and which are now to be followed by more in depth masterplanning and consultation exercises. A number of units at the top of Phoenix Lane were recently purchased by a private investor, whilst Premier Inn is looking to develop a hotel at the southern end of Phoenix Lane. These indicate an appetite for investment within the immediate location.</p>
	<p>The site of the Job Centre and Coggan's Well House will not attract operator interest for a discount food store or large format comparison retail uses due to the complexity and cost of land assembly and also appears commercially non viable.</p>	<p>Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)</p>	<p>There is no need for convenience floorspace in Tiverton, so it is unnecessary to consider whether site could accommodate a food store. It is acknowledged that there are complexities associated with delivering town centre schemes, with multiple constraints and landownerships. However, the masterplanning exercise will analyse these constraints in detail and will set out what opportunities exist for delivering the uses proposed in the policy. The size of any comparison goods units would be established during this detailed analysis. Most land within the allocation is either held by Mid Devon or Devon County Council, and one other landowner – reducing the risks over land assembly stipulated by the objector.</p>
	<p>Deliverability questioned / shops at Old Hospital allocation have not been developed.</p>	<p>Devonshire Homes Ltd c/o N Jillings (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Messrs Persey and Harding c/o Jillings Hutton (4654); Individual (5239)</p>	<p>As above the Council is a principal landowner and is funding masterplanning work. The development mentioned at the District Hospital site have been built and are now occupied.</p>

TIV13 Tidcombe Hall	Supports policy.	Historic England (1170)	Support noted.
	Objects to policy as eastern parts negatively impacts on canal conservation area.	Individual (398)	Historic environment appraisal of the site notes that any impact arising from developing part of this site is acceptable subject to design. Accordingly the policy contains a requirement for the protection of the setting of the canal conservation area and Tidcombe Hall.
	Objects to policy due to inadequate capacity of local road network, impact on road safety and potential for disruption to adjoining properties during improvement works.	Individual (398)	The site is supported by the Highway Authority as a contingency. The impact of construction traffic can be conditioned, typically through the use of a Construction Management Plan.
	Objection as Tidcombe Lane is good boundary for development south of the canal.	Individual (398)	Not agreed. Sites have been selected on the basis of the sustainability of their location and that the benefits of developing them for housing outweigh any impacts.
	Objection as contingency site not needed – sufficient housing being built in Tiverton and more promised in future.	Individual (398)	Not agreed. The plan allocates sufficient housing to meet the objectively assessed need, along with a buffer to ensure adequate flexibility. The contingency sites form part of this flexibility as explained in Policy S4.
TIV14 Wynnards Mead	Supports policy.	Historic England (1170)	Support noted.
	Policy currently unsound, advises reference to Cottey Brook be given, and requests unobstructed public open space buffer, at least 7m wide to allow for future maintenance of watercourse.	Environment Agency (943)	Insufficient developable land remaining following Historic Environment Appraisal. Allocation is proposed for deletion from the plan.

	<p>Objects to inclusion of site.</p>	<p>Tiverton Civic Society (1410); Individual (5363, 5364, 5325, 5324, 5349, 5333, 5332, 5329, 5327, 5354, 5355, 5372, 5373, 5374, 5375, 5376, 5746, 5669, 5668, 5670, 5668, 5567, 5566, 5565, 5554, 1235, 5583, 5585, 5584, 5890, 5745, 5744, 5743, 5742, 5741, 5740, 5739, 5730, 5731, 5732, 5733, 5734, 5735, 5736, 5737, 5738, 5721, 5722, 5723, 5210, 5894, 5725, 5726, 5727, 5728, 5729, 5718, 5720, 5719, 5851, 5560, 5558, 5551, 5971, 5970, 5969, 5968, 5967, 5966, 5965, 5964, 5963, 5962, 5961, 5960, 5959, 5958, 5957, 5996, 5995, 5994, 5992, 5991, 5989, 5988, 5987, 5986, 5985, 5984, 5983, 5982, 5981, 5980, 5977, 5976, 5975, 5974, 5973, 5972, 5978, 5944, 5943, 5942, 5941, 5940, 5939, 5938, 5937, 5936, 5935, 5934, 5933, 5932, 5931, 5930, 5929, 5928, 5927, 5926, 5925, 5924, 5923, 5922, 5921, 5920, 5919, 5918, 5917, 5916, 5915, 5914, 5913, 5912, 5911, 5910, 5909, 5908, 5907, 5906, 5905, 5904, 5903, 5902, 6045, 5901, 5900, 5899, 5897, 5896, 6038, 6037, 6036, 6035, 6034, 6033, 6032, 6031, 6030, 6029, 6028, 6027, 6026, 6025, 6024, 6023, 6022, 6021, 6020, 6019, 6018, 6017, 6015, 6014, 6013, 6012, 6011, 6010, 6009,</p>	<p>The planning merits of objections are the important factor which would affect any planning proposal. Comments in relation to specific objections are set out below.</p>
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	<p>Objects due to inadequacy of local road network to accommodate development (including during construction period and for emergency vehicles), poor access and/or negative impact on road safety/lack of footpath.</p>	<p>Tiverton Civic Society (1410); Individual (5349, 5333, 5329, 5327, 5374, 5376, 5221, 5670, 5566, 1235, 5583, 5585, 5738, 5718, 5720, 5719, 5560, 5558, 5551, 5220, 5969, 5965, 5961, 5959, 5936, 5896, 6012, 6000, 5541, 5540, 5357, 5398, 5396)</p>	<p>The highway authority has indicated that in principle the site can be developed, but the final numbers would be informed by detailed Transport Assessment. However, for other reasons stated above the allocation is proposed for deletion.</p>
	<p>Objects due to elevated position and adverse impact on landscape character/conflicts with the plan and underpinning Landscape Character Assessment.</p>	<p>Tiverton Civic Society (1410); Individual (5551, 5987)</p>	<p>Though on an elevated position, the site sites within a relatively enclosed fold in the landscape. Landscape and visual impact would have been considered during the design stage. However, for other reasons stated above the allocation is proposed for deletion.</p>
	<p>Objects due to negative impact on environment/wildlife/ecological importance of area or proposal takes no account of loss of biodiversity.</p>	<p>Tiverton Civic Society (1410); Individual (5364, 5325, 5332, 5327, 5372, 5373, 5746, 5221, 5564, 5614, 5583, 5890, 5744, 5740, 5558, 5551, 5220, 5971, 5969, 5965, 5958, 5957, 5996, 5995, 5994, 5992, 5991, 5990, 5989, 5988, 5987, 5985, 5982, 5972, 5940, 5939, 5938, 5936, 5934, 5932, 5929, 5928, 5922, 5920, 5919, 5917, 5916, 5915, 5914, 5913, 5910, 5909, 5907, 5903, 5896, 6038, 6036, 6030, 6029, 6028, 6027, 6024, 6018, 6013, 6012, 6007, 6006, 6005, 6004, 6002, 5999, 6016, 5450, 5788)</p>	<p>The site is not subject to any designation for the value of its biodiversity and/or effects to protect it. Nevertheless any planning application would need to be accompanied by a Phase I and potentially Phase 2 Habitat Survey and Tree Survey. These would identify whether the site is used by protected species and if so make recommendations for appropriate mitigation measures. Where a site would result in an unacceptable impact on protected species, planning permission would not be granted. However, for other reasons stated above the allocation is proposed for deletion.</p>

<p>Objects due to negative impact on heritage assets/impact on setting of Gotham Farmhouse.</p>	<p>Tiverton Civic Society (1410); Individual (5364, 5329, 5327, 5746, 5221, 5745, 5743, 5742, 5741, 5740, 5739, 5738, 5721, 5723, 5210, 5220, 5964, 5959, 5958, 5957, 5976, 5944, 5940, 5939, 5938, 5937, 5936, 5934, 5933, 5932, 5929, 5928, 5927, 5923, 5922, 5921, 5920, 5919, 5917, 5915, 5914, 5913, 5910, 5909, 5907, 5906, 5903, 6045, 5901, 5900, 5897, 6036, 6032, 6024, 6017, 6013, 6012, 6005, 6004, 5398, 5396)</p>	<p>Following preparation of a Historic Environment Appraisal, as requested by Historic England, this has indicated that the developable area is much reduced once full consideration is given to the setting of various heritage assets and the significance of the re-rating of Gotham Farmhouse to grade II*. The site can no longer support the quantum of development required to be effective as a contingency allocation. It is therefore proposed for deletion.</p>
<p>Objects as the surrounding fields are critical to the special interest of the listed building – much of what is important about the listed building depends on its setting, and development of these fields would cause substantial harm to significance of the heritage asset.</p>	<p>Individual (5221, 5936, 6012)</p>	<p>See above comment regarding assessment of setting.</p>
<p>Objects as harm to listed building is contrary to Local Plan Review vision and environmental protection for heritage assets set out in policies S1, S9, S10, DM1, DM2 and especially DM25/contrary to NPPF.</p>	<p>Individual (5221, 5551, 5220, 5959, 5936, 6012)</p>	<p>See above comment regarding assessment of setting.</p>
<p>Objects as Gotham with its thatched roof would be vulnerable to fire from bonfire/fireworks – or thatched property would be in danger from building so close.</p>	<p>Individual (5614, 5979)</p>	<p>Fear of damage to property is not a material planning consideration.</p>

	Fields boundaries are minimum 200 years old and banks lining track are likely 500 years old – indicating ancient hedges.	Individual (5221, 5936, 6012)	Comments noted.
	Objects as area/valley very special and should be protected from development/is area of environmental importance.	Individual (5364, 5324, 5333, 5332, 5327, 5354, 5355, 5372, 5373, 5964, 5220, 5963, 5986, 5942, 5933, 5925, 6035, 6033)	The area is not part of any designation for its value or special qualities. However, for other reasons stated above the allocation is proposed for deletion.
	Objects due to overlooking/visual impact on adjacent properties/impact on privacy or is too close to adjacent properties.	Individual (5329, 5327, 5670, 5722, 5931, 6027)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. However, for other reasons stated above the allocation is proposed for deletion.
	Objects due to inadequate capacity of sewerage/drainage.	Individual (5329)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage. However, for other reasons stated above the allocation is proposed for deletion.
	Object due to flood risk/concern about surface water run-off.	Individual (5738, 5965, 5989, 5896, 5539)	The site is in Flood Zone 1, the area with the least probability of flooding. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage. However, for other reasons stated above the allocation is proposed for deletion.

	<p>Objection as site contains former landfill and no proper plan to assess associated risks - contrary to NPPF.</p>	<p>Individual (5551)</p>	<p>Assessment of contamination and appropriate remediation is already covered by the policy. However, for other reasons stated above the allocation is proposed for deletion.</p>
	<p>Objects as site is steep and therefore expensive to develop (and/or subsequently developers will try to reduce affordable housing content).</p>	<p>Individual (5558, 5964, 5923)</p>	<p>The Historic Environment Appraisal has indicated that many areas of the site form the setting of heritage assets and should not be developed. However, some of the remaining areas are some of the steepest parts of the site. These could be difficult to develop. These considerations, along with other factors mentioned above have resulted in the proposal to delete the allocation.</p>
	<p>Objects to scoring of the site in the Sustainability Appraisal, original scores and rescoring too high; disputes scores for impact on heritage assets, loss of agricultural land, risk of contamination, surface water run-off, economic benefits, retail benefits, meeting housing needs, proximity to bus services/lack of footpath, school capacity.</p>	<p>Individual (5551)</p>	<p>This representation has been addressed in the Sustainability Appraisal update.</p>
	<p>Objects as housing not needed/already over-provision within the plan/sufficient building going on elsewhere.</p>	<p>Individual (5375, 5551, 5971, 5967, 5966, 5989, 5982, 5974)</p>	<p>Not agreed. The plan allocates sufficient housing to meet the objectively assessed need, along with a buffer to ensure adequate flexibility. The site is now proposed for deletion. However, sufficient flexibility is retained through a degree of over-allocation, windfall provision and the retention of the other two contingency sites.</p>
	<p>Objects to loss of green fields/loss of agricultural land (grade 3)/use brownfield first; encroachment on countryside/outside settlement limit.</p>	<p>Individual (5669, 5667, 1235, 5614, 5584, 5743, 5551, 5971, 5989, 5944, 5926, 5911, 5998, 5543)</p>	<p>These factors are considered when selecting sites, and along with other issues are weighed against the requirement to meet the objectively assessed housing need. However, for other reasons stated above the allocation is proposed for deletion.</p>

Objects as spoils/destroys views/area/valley/Tiverton/Devon.	Individual (5668, 5566, 5985, 5974, 5973, 5943, 5941, 5921, 5907, 5902, 6045, 5901, 5897, 6034, 6031, 6028, 6018, 6015, 6014, 6003, 6000, 5998, 1331, 5538, 5398, 5396)	Not agreed. The area is not subject to any designation for the special qualities of the landscape. Such issues would be considered at design stage. However, for other reasons stated above the allocation is proposed for deletion.
Questions whether fire station in Wellbrook Street will be moved.	Individual (5719)	There are no proposals within the Local Plan Review for relocation of the fire station.
Objects as house purchased based on beautiful/peaceful surroundings.	Individual (5960)	Loss of property value and loss of view are not a material planning considerations.
Objects due to likely negative impact on tourism.	Individual (5996)	No evidence is put forward stating why there would be a negative impact. However, for other reasons stated above the allocation is proposed for deletion.
Objects as not a suitable site for housing (no reasons given).	Individual (5935)	Following the additional work undertaken within the Historic Environment Appraisal, it has indicated that a large part of the site is unsuitable for development. Accordingly the site is proposed to be deleted.
Objects as site is too large for location/too large an area for number of houses.	Individual (5930, 5899, 6007)	The capacity of the site was assessed through the SHLAA process. A lower capacity was assumed given the need to protect the settings of a number of heritage assets. However, following further work as set out above the site is now proposed for deletion.
Other land should be developed instead (suggests by Link Road or M5 corridor).	Individual (5924, 5897, 6011)	Land north of the Link Road in Tiverton is not available for development. Land east of the M5 at Cullompton has been included within the Local Plan Review for mixed development.
Objects as site is in contempt of Green Belt ideals.	Individual (5907)	Mid Devon does not have any Green Belt designations.
Objects as development is for short-term financial gain of landowner.	Individual (5897)	This is not a material planning consideration.

	No capacity within the local schools.	Individual (5357)	Devon County Council has confirmed that there will need to be an expansion of primary and secondary school provision for Tiverton in order to accommodate the development proposed. For primary provision, a new school is being delivered on the Eastern Urban Extension. Land is also safeguarded in the plan for secondary expansion.
	Under-used local hospital.	Individual (5357)	Housing growth provides wider population base which could benefit under-used facility.
TIV15 Tiverton Infrastructure	Policy should be amended to include enhanced library service provision, enhanced recycling centre provision and reference to the Energy from Waste Facility allocated in the Devon Waste Plan and associated district heating network.	Devon County Council (626)	A proposed amendment to the policy is proposed to include enhanced library service provision (consistent with Infrastructure Plan). Reference to Energy from Waste facility is already included in supporting text, so no change is proposed. The recycling centre provision is not specific to Tiverton, as it is intended to cover a much wider area including Cullompton and Willand. It is already specified as a strategic item in the Infrastructure Plan for the district, and would be misleading to include it here given the specific 'town' focus of this policy.
	Blundells School will continue to liaise with the Council, County Highways and developers to agree a traffic calming solution on Blundell's Road – but no evidence to suggest this can mitigate impact of EUE.	Blundell's School c/o GVA Grimley (4240)	Continued close working welcomed.
	Requests completion of sport and recreation evidence base and devise strategy for delivery of sport and recreation land and buildings; amend policy accordingly.	Sport England (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore merely advisory.

	Infrastructure is poor - lack of parking in and around the town, poor access for emergency vehicles in some locations, dying high street, school oversubscribed, hospital undersubscribed.	Individual (5357)	Surveying of Council-owned car parks in Tiverton indicates significant capacity exists. Access for emergency vehicles is considered at the planning application stage. The plan has a town centre first policy and includes a proposal for town centre regeneration. Measures to increase the capacity of schools are provided whilst the additional population base could have benefits to under-used facilities.
CU1-CU6 North West Cullompton	See separate table.		
CU7-CU12 East Cullompton	See separate table.		
CU13 Knowle Lane	Welcomes reference to the requirement to retain areas of floodplain as informal open space and the phasing of the necessary sustainable urban drainage features.	Environment Agency (943)	Support noted.
	Supports commitments in NW Cullompton allocation (and geographically related CU13 site) for the provision of community facilities.	Diocese of Exeter (6081)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	No reference is made to the sports fields used by the rugby club within the policy/review does not protect this land.	Individual (5232, 5238)	Whilst land used by the rugby club has been put forward for development, national and local policy seek to protect playing pitches, and will only justify their loss in limited circumstances. As a result the Council has not allocated this land for development.
	Given total size of Knowle Lane allocations, a Multi-Use Games Area (MUGA) and tennis court should now be provided near to community centre and allotments within the Green Infrastructure.	Individual (5211)	These requests can be handled at design stage, as it would be too prescriptive to include in policy. Reserved matters permission has now been granted on this site which includes a locally equipped area of play.

	Policy needs to include requirement for a link road with no frontage development between Knowle Lane and Tiverton Road to reduce impact on Langlands Road.	Individual (4052)	The highway authority states that this would not be in accordance with Manual for Streets.
CU14 Ware Park & Footlands	Supports commitments in NW Cullompton allocation (and geographically related CU14 site) for the provision of community facilities.	Diocese of Exeter (6081)	Support noted.
	Given total size of Knowle Lane allocations, a MUGA and tennis court should now be provided near to community centre and allotments within the Green Infrastructure.	Individual (5211)	These requests can be handled at design stage, as it would be too prescriptive to include in policy. Such discussions are already underway as part of the reserved matters application currently pending consideration.
	Further land is for sale which could be Knowle Lane phase 4; therefore important to substantially improve sports provision and local road network.	Individual (5211)	The policy requires access to the site to come via the adjoining CU13 allocation. However, the supporting text acknowledges that if this is not possible then Knowle Lane, providing it is widened, could be used as the access point. The site will provide contributions towards public open space in accordance with Policy S5. Some of the contribution could be used to fund additional sports provision.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	No reference is made to the sports fields used by the rugby club within the policy/review does not protect this land.	Individual (5238)	Whilst land used by the rugby club has been put forward for development, national and local policy seek to protect playing pitches, and will only justify their loss in limited circumstances. As a result the Council has not allocated this land for development.

	<p>Developments contributing towards motorway improvements and local road network, but not in themselves being adequate to bring about the changes should not be permitted until all contributions have been secured.</p>	<p>Individual (5867)</p>	<p>The highway authority is satisfied with the proposed policy which stipulates that no development should come forward until improvements to the M5 and the forthcoming road through the NW Cullompton allocation are complete.</p>
	<p>Objection to allocation as sustainability appraisal scoring for site is less than CU21 Colebrook and therefore this site should be contingency instead, with CU21 as full allocation.</p>	<p>Mr Christian & Mr Force c/o Genesis Town Planning (3780)</p>	<p>The scoring of this site is not dissimilar to that for CU21. CU21 scores marginally higher in terms of economic and housing benefits solely because of its larger size. There is also a marginally higher score in category C 'mitigating impact of climate change' because part of that site contains floodplain and is within the Critical Drainage Area where more stringent measures to mitigate flood risk would be required compared with other sites. However, CU14 is almost exclusively Flood Zone 1 and therefore is sequentially preferable. Furthermore, this is a relatively small site providing for 38 dwellings. Being of this size it would unlikely provide the required boost to land supply needed should commitments or completions fall below a level at which the provisions in Policy S4 be enacted.</p>
	<p>Objection to allocation as there is uncertainty of delivery given access is via adjacent (yet to be built out) allocation with potential for ransoming, potential for archaeological remains; can only deliver after road improvements carried out elsewhere – should therefore be deleted.</p>	<p>Gallagher Estates Ltd c/o Turley (5763)</p>	<p>This site is programmed in for later in the plan period to reflect the fact that the adjacent site will need to be partially built out first and for M5 junction improvements to have taken place. A condition of the planning permission on adjacent site will be for access road to be completed up to boundary in early phase of development. Site commencement within the middle of the plan trajectory is compliant with the NPPF which requires the plan to be deliverable within the plan period. No justification therefore for deletion.</p>

CU15 Exeter Road	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Halsall Construction Ltd (5864); Individual (2160)	Support noted.
	Concern over width of road and access – road widening may be required.	Individual (5211)	An application to develop part of this site now received permission. Devon County Council has stated that the access is to the required width with adequate visibility.
	States is satisfied that Swalcliffe House does not need to be knocked down to accommodate access road.	Individual (2155)	Comment noted. Overall site total reduced to reflect likelihood that lower number of properties to be achieved on the Swalcliffe land.
CU16 Cummings Nursery	Welcomes reference to retaining floodplain as green infrastructure.	Environment Agency (943)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	Has concerns about the sustainability of the allocation, particularly in relation to how residents will access the town centre without use of cars.	Mid Devon CPRE (486)	Improvement works to the motorway junction will address connectivity for pedestrians.
	Criterion (f) to be added and supporting text amended to make reference to consideration being given to the inclusion of a section of road to form part of the town centre relief road.	Individual (4052)	Not agreed. This site has reserved matters permission for 100 dwellings.
	Objects to housing in this location – first the vitality of the high street needs to be restored and consideration given to building a ring road.	Individual (5352)	The Local Plan Review includes proposals for a town centre relief road. Once built, this road will divert traffic away from the high street. This is anticipated to have a positive impact on the vitality of the high street.
CU17 Week Farm	Welcomes reference to retaining floodplain as green infrastructure and retaining buffer to west of site.	Environment Agency (943)	Support noted.
	Supports allocation – will deliver M5 improvements and access to Honiton Road, and supports Council's flexible approach to employment uses.	Mr P Bazeley c/o LSN Architects (2156)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.

	Allocation should include space for retail outlets of similar size to Aldi.	Individual (5211)	Retail Study indicates there is very little need for further convenience goods floorspace within Cullompton up to 2026. The East Cullompton allocation however does include a 2ha site for a shopping and community centre, in order to provide a local shopping offer, but not something which would compete with High Street provision.
	Developments contributing towards motorway improvements and local road network, but not in themselves being adequate to bring about the changes should not be permitted until all contributions have been secured.	Individual (5867)	The policy stipulates that no development should take place until improvement works to the M5 junction are completed. The signalisation works were undertaken in 2015.
	Delivery of main employment allocations constrained by a number of factors. Development of the site is unable to commence until completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway. There is also a requirement for the provision of an additional point of access to the A373 linking the site, along with the wider Kingsmill employment area, to Honiton Road. There are three landowners.	Friends Life Ltd c/o GL Hearne (3781)	The signalisation works were undertaken in 2015. The Council's SCLAA panel believe the site to be deliverable, and no evidence is put forward by the objector to the contrary.
CU18 Venn Farm	All areas within floodplain to be protected as green infrastructure; welcomes wording retaining floodplain as GI.	Environment Agency (943)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	Supports expansion of Kingsmill Industrial Estate but does not think enough land has been allocated to last until 2033.	Individual (5211)	Support noted. The local plan evidence suggests that enough land has been allocated within the plan.

	<p>Allocation should be extended to incorporate adjacent 8 hectares; new housing growth will benefit from additional employment, Cullompton is strategically placed on M5 and larger site will help support the infrastructure costs of the site (i.e. land needed for flood zone, habitats, link road).</p>	<p>Mr P Bazley c/o LSN Architects (2156)</p>	<p>The Local Plan Review allocates sufficient provision, in excess of this figure in order to provide flexibility. Additional sites are therefore not necessary. Furthermore, given the capacity issues associated with J28 of the M5, any further allocations in Cullompton would need to be delayed until after provision of the significant highway infrastructure works associated with East Cullompton. Other allocated employment sites in the plan are not dependent on the same level of infrastructure provision.</p>
	<p>This area has a history of flooding.</p>	<p>Individual (5631)</p>	<p>The Strategic Flood Risk Assessment notes that 41% of the site is within Flood Zone 2, and 1% is Flood Zone 3a. However, a Flood Risk Assessment accompanied an application on this site the recommendations of which had the support of the Environment Agency. There are a number of pre-commencement and other conditions attached to the permission including provision of drainage strategy, no raising of ground levels in flood zones, requirements about finished floor levels and no development in the green infrastructure/flood zone areas.</p>
	<p>Developments contributing towards motorway improvements and local road network, but not in themselves being adequate to bring about the changes should not be permitted until all contributions have been secured.</p>	<p>Individual (5867)</p>	<p>The policy stipulates that no development should take place until signalisation works to the M5 junction are completed. These works were undertaken in 2015 and the policy has been amended to reflect this. A condition that the development should not be occupied prior to completion of these works was included as part of the recent planning permission.</p>

	<p>Delivery of main employment allocations constrained by a number of factors. Development of the site is unable to commence until completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway. The SCLAA notes that further development east of the motorway could require further investment in junction improvements (beyond the planned improvements to Junction 28). There is also a requirement for the provision of suitable vehicular access which directs development traffic via Saunders Way so as not to increase the use of Kingsmill Road. The SA identifies that the availability of a suitable access is unknown.</p>	<p>Friends Life Ltd c/o GL Hearn (3781)</p>	<p>Signalisation of the slip roads was undertaken in 2015. Planning permission was granted on this site in 2015 and Highways England was satisfied that no further J28 improvements were necessary to enable development of the site. The arrangements for the site access are set out as part of the permission.</p>
CU19 Town Centre Relief Road	<p>Policy should include protection of priority wetland habitat and species.</p>	<p>Environment Agency (943)</p>	<p>Protection is already provided by Policy DM28 'Other protected sites'.</p>
	<p>Welcomes reference to requirement for Flood Risk Assessment and requirement to consider closing the road at times of flooding.</p>	<p>Environment Agency (943)</p>	<p>Support noted.</p>
	<p>Delivery of relief road is a priority.</p>	<p>Kentisbeare Parish Council (76); Individual (5211, 5633, 5630, 5698, 2160, 5085, 2046)</p>	<p>Comments noted.</p>
	<p>Supports relief road through CCA fields – area unsuitable for sports given wet conditions/proximity of motorway.</p>	<p>Individual (1681)</p>	<p>Comments noted.</p>
	<p>Supports the idea of relief road on the eastern side of the motorway once J28a built; would remove need to develop CCA fields/open up options for travel restrictions through High Street.</p>	<p>Individual (5299, 5302, 5085, 3588)</p>	<p>Comments noted. However the area of search still includes the CCA fields as set out in the policies map. Options for travel restrictions through the high street could be considered at the planning application stage.</p>

	Supports extension of 'area for relief road' given it opens up access options for East Cullompton.	Individual (3700)	Support noted.
	Supports requirement for replacement provision of open space and sports facilities – should be done in advance of works being undertaken.	Individual (2160)	Support noted and agree with comments regarding timing of any replacement sports provision. Amendment inserted into supporting text to clarify this point.
	All development should contribute towards the road.	Individual (5211)	At present all residential development in Cullompton resulting in additional traffic generation is required to make S106 payments to mitigate their impact on air quality. The delivery of the relief road is the principal mechanism which air quality payments will fund.
	Road should be progressed before major housing development takes place.	Individual (5211, 5633, 5630, 5698, 2160, 5085, 3579)	Whilst it would be desirable to have the road completed before the houses were constructed, cash flow is important to development, which will need to build and sell houses in order to make money available to fund the road.
	Bridge over M5 a long term aspiration requiring various consents – relief road should be built earlier, with M5 connecting at later stage.	Individual (5211)	The design and location of the bridge over the M5 will affect the route of the Town Centre Relief Road. Therefore the design of both schemes will need to be considered together, including consideration of phasing.
	Road should run from Station Road beside Tesco, through CCA fields linking to Meadow Lane.	Individual (5211)	The final route of the proposed road is not set at this stage, hence why a large 'area of search' has been included within the plan.
	Requests traffic-free pedestrian/wheelchair accessible cycle path from town centre relief road connecting to Last Bridge and Duke Street (associated area on map should be extended).	Individual (5211)	The detailed arrangements for non-vehicular traffic movements will be developed at a later stage. This representation has also identified that it would be appropriate to extend the area identified for town centre relief road to incorporate land to the south to allow consideration of Duke Street bridge as part of the transport solutions.

Objects to relief road through the CCA fields or adjacent to railway line.	Cullompton Rangers FC (2800)	Objection noted. The impact on open space and sports provision will be considered during the assessment of route options for the road.
Requests CCA fields be designated as Local Green Space. Consider that it meets criteria in that it is relatively close to the community it serves, is demonstrably special and has beauty, recreational value, tranquillity and richness of wildlife.	Cullompton Community Association (989)	Not agreed. The area noted is part of an area identified as the potential location for the 'Town Centre Relief Road' as such it would undermine policy CU19 of the Local Plan Review. Furthermore the scale of the identified area is viewed as an 'extensive tract of land' which is inconsistent with National Policy.
Any road through the CCA fields will increase risk of flooding; road will act as barrier to rainfall.	Individual (5299)	A Flood Risk Assessment is currently being undertaken for the proposed road. The Environment Agency will need to be satisfied that there is no negative impact on flood risk as a result of the proposed route.
Write policy to remove bias towards route through CCA fields – preference for route on east of motorway as reduces flood implications and could go via Cummings Nursery allocation.	Individual (4052)	The route is not finalised. The supporting text states that it could be located on either side of the motorway, with a wide area of search identified accordingly.
Concern over impact on existing residents from noise/pollution/safety of relief road on east side of motorway.	Individual (5664)	These issues will be considered in detail at the planning application stage.
If relief road on west side then further investigation needed.	Individual (5664)	Agreed. Further design work, including flood modelling and road design need to be undertaken prior to a public consultation exercise and subsequent planning application can be progressed.
Plans for relief road on Cullompton side, and second motorway junction do not deal with traffic problems at centre.	Individual (5629)	Not agreed. The Town Centre Relief Road will provide an alternative route for vehicular traffic, removing the need for many of these to travel through the high street.

	Bus station should be allocated by Tesco within land safeguarded for relief road.	Individual (5211)	The highway authority states that there is no need for a full bus station; however a suitable hub should be given consideration. Policy CU20 'Cullompton Infrastructure' sets out an aspiration for a bus interchange could be provided in combination with the re-opened railway station.
	Welcomes alternative route which avoids the High Street, but concerned that new route potentially through development area will still be congested (if similar to route by rugby club).	Individual (5837)	Road will be designed as a distributor road to minimise congestion issues.
	Concern over road safety given road will run directly outside main school and sports centre.	Individual (5837)	Road safety is a critical issue which will be considered at design stage.
CU20 Cullompton Infrastructure	Requests additional criterion stating 'provision of works to reduce flood risk'.	Environment Agency (943); Individual (3588)	Agreed. Cullompton is a Critical Drainage Area which requires measures to reduce flood risk (over and above those expected elsewhere). An amendment to the policy is proposed.
	Requests completion of sport and recreation evidence base and devise strategy for delivery of sport and recreation land and buildings; amend policy accordingly.	Sport England (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore merely advisory. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making.
	Transport evidence base lagging behind Local Plan. Cumulative impact of development in the town and the wider district needs to be assessed; further work needs to be undertaken before a new motorway junction can be confirmed as deliverable.	Highways England (1172)	Since this representation was made, ongoing discussions have been undertaken with Devon County Council and Highways England to refine the transport proposals in the area.

Development will result in large increase in traffic and negative impact on local road network/questions capacity of local road network to accommodate additional growth/questions adequacy of plan to tackle traffic issues.	Individual (5621, 5615, 5611, 5697, 5696, 5867, 5561, 5552)	Since this representation was made, ongoing discussions have been undertaken with Devon County Council and Highways England to refine the transport proposals in the area.
Traffic data relied upon is from 2001 and is out of date.	Individual (5811)	The evidence was based on the best available information at the time. The evidence base is regularly updated to reflect new information as it becomes available.
Town centre relief road is a priority.	Individual (5698, 1681, 5811, 2046)	Comments noted.
Supports development of relief road on east side of the motorway.	Individual (5302)	Comments noted, though further work will need to be undertaken to determine whether the road will be on the west or east side of the motorway.
Objects to provision of relief road through floodplain and associated dispersion of flood waters.	Individual (4522)	Comments noted, though further work will need to be undertaken to determine whether the road will be on the west or east side of the motorway. Devon County Council has commissioned additional work to demonstrate that there are options that are acceptable in flood and transport terms. The Council has been working closely with the Environment Agency over highway infrastructure improvements to reduce flood risk. The evidence base will be updated to reflect this work.
Supports new motorway junction.	Individual (5630, 5698)	Comments noted.
Policies do not make explicit reference to proposed new motorway junction and/or should be amended to make provision clear.	Individual (5867, 5811)	The Council recognises that there is further work required on highway options – this has subsequently been commissioned. This further work is required to clarify the highway/motorway issues and will form an update to the evidence base.

	New motorway junction should be delivered within next 3 years.	Individual (5630)	The phasing of the delivery of the road infrastructure will be determined during a detailed masterplanning stage, and is not currently set.
	Partial motorway junction will be inadequate to accommodate additional traffic generation.	Individual (5613)	The Council recognises that there is further work required on highway options – this has subsequently been commissioned. This further work is required to clarify the highway/motorway issues.
	Lack of clarity over impact of proposals on A373, and nature of improvements, if any.	Individual (5811)	The highway authority has not raised any objections regarding the A373. The transport assessments would need to consider the impacts on this road and any mitigation measures necessary.
	Supports the potential reopening of the railway station in order to provide people with sustainable/alternative travel choices.	Highways England (1172); Railfuture (5830); Individual (4522, 1681)	Support noted.
	Designated area for railway station is most appropriate on technical grounds due to straight track and good road access.	Railfuture (5830); Individual (5302)	Comments noted.
	Pleased with safeguarding of land for railway station but unclear over implications for motorway services.	Individual (5211)	Further work is about to be commissioned by the Devon Metro Group with regards to infrastructure, availability of rolling stock and timetabling of potential services. Only once complete will more information on the deliverability, site requirements and potential timescale for reopening be available. The potential for impact on the motorway services will be considered as part of the feasibility work.
	Railway station should be delivered within next three years.	Individual (5630)	Further work is about to be commissioned by the Devon Metro Group with regards to infrastructure, availability of rolling stock, timetabling of potential services. Only once complete will more information on the potential timescale for reopening be available.

	Questions deliverability/funding of railway station/proposal needs further detail about parking.	Individual (5621, 5615, 5613, 5611, 1860, 5561, 5552, 5811)	Further work is about to be commissioned by the Devon Metro Group with regards to infrastructure, availability of rolling stock, timetabling of potential services. Only once complete will more information on the deliverability, site requirements and potential timescale for reopening be available. Parking considerations will be taken into account as part of the ongoing work.
	Footbridge over motorway should be provided.	Individual (5630)	Pedestrian access will be considered as part of the transport proposals for the area.
	Poor/patchy provision for cyclists – railway station development could address this for people commuting to work in Exeter or Taunton by train should be able to cycle from home to the railway station.	Individual (5302)	Comment noted.
	Infrastructure isn't in place to support development/no further development until infrastructure delivered.	Individual (5630, 3209, 1860)	There is a balance to be struck between the delivery of infrastructure and the financial viability of development. Many of the infrastructure improvements in Cullompton are to be funded by development. The timing of the infrastructure provision will be set at the earliest possible point to ensure overall viability is maintained.
	Requests reference be made to need for enhanced recycling centre provision to serve Cullompton.	Devon County Council (626)	The recycling centre provision is not specific to Cullompton, as it is intended to cover a much wider area including Cullompton and Willand. It is already specified as a strategic item in the Infrastructure Plan for the district, and would be misleading to include it here given the specific 'town' focus of this policy.

	Lack of capacity within local healthcare system to accommodate pressure from development/lack of detail about how this will be addressed.	Individual (5621, 5615, 5613, 5611, 5698, 3209, 5561, 1681, 5811, 2046)	NHS England and the local Clinical Commissioning Groups have been consulted throughout the local plan process. Neither organisation has raised an objection to the development proposals nor sought funding for premises. The NHS typically provides its own funding to upgrade or expand GP facilities. Surgeries in Mid Devon have recently successfully applied to this in order to enable expansion.
	Pleased to see safeguarding of land for expansion of secondary school.	Individual (5211)	Support noted.
	Lack of capacity within local schools to accommodate pressure from development/lack of detail about how this will be addressed (suitable land should be allocated at master planning stage for secondary school expansion or amend f to include expansion of 6 th form facilities).	Individual (5615, 5613, 5611, 5698, 3209, 1860, 2160, 734, 5561, 3588, 1681, 5811, 2046)	The capacity of local schools was assessed by Devon County Council and a report forms part of the evidence base underpinning the Local Plan Review. A new primary school is to be provided as part of the NW Cullompton allocation (and in the first phase of development). The East Cullompton allocation includes two primary schools. Land at Cullompton Community College is safeguarded to allow for expansion of the secondary school in order to accommodate the additional pupils. Devon County Council has stated that there are no strategic plans for the provision of 6 th form education in Cullompton. They state that generally speaking the existing 6 th form offer and further education sector can accommodate expected growth levels.
	Extending secondary school will result in loss of leisure facility parking and skate park.	Individual (5552)	Any loss of sports or open space provision will need to meet the tests in national policy. Providing there is not an oversupply of such facilities, replacement provision would need to be made available elsewhere. This will be assessed at the time of any planning application to expand the school.

	Lack of capacity within local policing to accommodate pressure from development/lack of detail about how this will be addressed.	Individual (5613, 5611, 5698)	The police has responded to the consultation and have identified a funding gap for a Criminal Justice Centre, to be based in Exeter, but which would cover the Mid Devon area. This is an item which is included within the Infrastructure Plan, as requested by the police, and would be eligible for funding from CIL/S106.
	Plan should provide additional parking facilities in the town.	Individual (734, 2046)	There are no proposals for additional parking within the plan. However, these do not need to be allocated in order to be developed, as development management policies provide a framework to assess any such proposals.
	Plan should provide for increase in local leisure facilities.	Individual (5561)	DM22 supports leisure proposals.
	Emergency services should be relocated to be beside motorway junction.	Individual (1681)	There are no proposals to relocate the emergency services at this time.
CU21 Colebrook	Policy should include protection of the floodplain and associated wetland habitat. Paragraph d) to be revised to remove specific reference to 1.1ha as the area at risk requires more detailed appraisal than current maps suggest.	Environment Agency (943)	The 1.1ha figure refers to the provision of green infrastructure, rather than specifically the size of the floodplain. Retaining the policy as written ensures a minimum level of provision of green infrastructure but the extent of the floodplain will be determined by hydraulic modelling as part of the Flood Risk Assessment which accompanies any application.
	Considers policy sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.

	<p>Objects to exclusion of 16.8ha site as a full allocation within the plan / objects to inclusion of 4.8 ha as contingency site only. Minimum of 400 dwellings should be allocated with site area of 21.6ha – new allocation required as contribution to additional housing requirement (criticises annual target). Failure to allocate site ignores findings of Council’s Sustainability Appraisal and SHLAA assessment and the promoter’s highways and flood reports (provided with representation). Sites CU14 and CU15 should be made contingency sites instead (as both score less). Without making requested changes considers plan to run risk of being found unsound.</p>	<p>Mr Christian & Mr Force c/o Genesis Town Planning (3780)</p>	<p>The Council has proposed to amend the annual housing target in the plan to reflect the final SHMA report. The scoring of the site is not dissimilar to that for CU14 and CU15, however those sites are almost exclusively flood zone 1 so are sequentially preferable. Furthermore, transport modelling undertaken by the highway authority indicates that significant mitigation to the M5 junction would need to be undertaken before any further development takes place. The site is of a scale that is significant enough to affect the cumulative impact on infrastructure and require additional works to the M5 junction which this site alone cannot mitigate. An amendment is proposed to the text to clarify that the site can only come forward if it can be demonstrated that it does not result in a significant adverse impact on the capacity of Junction 28 and also to clarify that it is the completion of the NW Cullompton through route, rather than the Town Centre Relief Road, which sets a limitation on the earliest point that the site could come forward. It is not agreed that CU14 and CU15 are preferable contingency options as they do not have the quantum of development to be effective as a contingency.</p>
	<p>Accompanying appraisal (submitted with rep) states landscape impact is same as other allocated large sites in Cullompton, i.e. negative impact.</p>	<p>Mr Christian & Mr Force c/o Genesis Town Planning (3780)</p>	<p>Submission of landscape impact noted. Generally reaches same scoring conclusions but assumes greater impact with regard to NW Cullompton and less for Exeter Road allocation.</p>

	Previous stage of Local Plan Review indicated site could accommodate 300 dwellings or more – allocation of this size along with extension to NW Cullompton could deliver large portion of houses needed in order to have deliverable distribution strategy.	Waddeton Park Ltd (3815)	As per above, any additional development over that proposed within the adopted Local Plan requires significant transport improvements to the M5 junction. An additional 300 dwellings alone would be insufficient to cover the cost of the additional mitigation measures required.
	If site comes forward then two pitches should be provided for rugby club as part of green infrastructure.	Individual (5211)	Specifying this in the policy is unduly prescriptive. Policy S5 ‘Public open space’ sets the requirements for open space and related provision. There is sufficient flexibility within the policy to allow the development of part of the site for the rugby club should an agreement be obtained between the landowners/ developers and the sports club.
	Land swap should be done between this site and NW Cullompton so rugby club gets four more pitches, with agreement that if ever sold original landowner benefits.	Individual (5211)	Specifying this in the policy is unduly prescriptive. Policy S5 ‘Public open space’ sets the requirements for open space and related provision. There is sufficient flexibility within the policy to allow the development of part of the site for the rugby club should an agreement be obtained between the landowners/ developers and the sports club.
	There is the possibility of relocating the rifle club from the town centre to this location and providing a proper shooting range.	Individual (5211)	There are no plans to relocate the rifle club within the Local Plan Review. Any such proposal for the club’s relocation could be covered by development management policies.
CRE1 Wellparks	Welcomes wording within para 3.158 that makes reference to surface water management and SUDs.	Environment Agency (943)	Support noted.

	Considers policy unsound - proposed allocation subsumes grade II listed farm complex and alters setting. Disputes assessment in recent planning application and states Historic Environment Appraisal needs to reassess the likely impact which the development will have on the Conservation Area (and presumably listed building?), if concludes there is harm, provide mitigation and if still harm justify allocation.	Historic England (1170)	Historic Environment Appraisal undertaken. This notes that there is scope for harm, but mitigation was proposed as part of recent planning permission. Reserved matters application includes requirement for Heritage Asset Setting Protection Statement which needed to consider setting, hedges and provide detailed cross sections.
	Policy makes no mention of pedestrian access to the site; add e) 'provision of good pedestrian access to all local and town facilities, including those lying to the south of the A377, especially the bus stops and train station'.	Crediton Town Council (678); Crediton Neighbourhood Plan Steering Group (1734)	Agreed. Amendment to policy proposed, to ensure provision mirrors that within recent planning permission.
	Land at Wellparks is more suitable than Cromwells Meadow.	Individual (5380)	Both sites have previously been accepted by an Inspector as suitable locations for development.
CRE2 Red Hill Cross	Welcomes paragraph c), recommends inclusion of a paragraph specifying need for dual use footway from Red Hill Cross to Exhibition Road to the town centre – alternatively amend 3.161 to 'for safety and convenience of pedestrians and cyclists, an all purpose path needs to be constructed from Exhibition Road to the Town Centre'.	Crediton Town Council (678); Sustainable Crediton (2689); Crediton Neighbourhood Plan Steering Group (1734)	Devon County Highways is in discussions with the developers of the Pedlerspool site regarding pedestrian and cycle network improvements. This site could also contribute to such improvements. The policy and supporting text have been amended to make reference to improved access to the town centre and for contributions to be paid for wide network improvements. Specific schemes are not mentioned as this could make the policy unnecessarily inflexible.

	Policy currently unsound - no work in evidence base to assess impact on Shobrooke Park; appraisal needed, if concludes harm set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134.	Historic England (1170)	A Historic Environment Appraisal has been prepared. The appraisal notes the possibility for harm given site can be viewed from Shobrooke Park. However, it notes that mitigation can be achieved via landscaping buffer as was provided in now expired planning permission. The supporting text has been amended accordingly.
	Objection as new houses at this site and Pedlerspool is too much for this area.	Individual (2534)	Site assessment has indicated that the allocation can be accommodated without an unacceptable impact on local infrastructure.
	Objection - landscape setting of Crediton is going to be compromised – Red Hill Cross is visually destructive, and will change character of Crediton.	Individual (366)	This is an existing allocation which is proposed to be rolled forward into the Local Plan Review. The Inspector who oversaw the examination of the AIDPD stated that though there was potential for visual intrusion, he noted that the policy required sensitive design and concluded that there was no evident reason why an acceptable scheme could not be achieved. The same criteria remain in the policy and therefore no change is proposed.
CRE3 Cromwells Meadow	Requests dual use footpath (as part of CRE2) but which could also serve CRE3/alternatively amend 3.162 to state 'An all purpose path for safe access by cyclists and pedestrians needs to be constructed'.	Crediton Town Council (678); Sustainable Crediton (2689); Crediton Neighbourhood Plan Steering Group (1734)	An amendment is proposed to Policy CRE2 and CRE5 regarding improvements to the pedestrian and cycle network.
	Policy currently unsound - no work in evidence base to assess impact on Shobrooke Park; appraisal needed, if concludes harm set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134.	Historic England (1170)	Historic Environment Appraisal has been prepared. The appraisal states that there is less scope for harm than the CRE2 allocation given the backdrop of existing development. Mitigation in the form of landscaping along eastern boundary will address this issue.

	<p>References SHLAA assessment which mentions proximity to flood zones, anecdotal history of flooding and potential for ground water flooding, within an area of archaeological potential, part of site is priority habitat, and will have an impact on Crediton Air Quality Management Area. Sequential test should steer development to areas with least probability of flooding. Sites should not be allocated/permited if there are reasonably available sites with a lower probability of flooding.</p>	<p>Origin3 (5765)</p>	<p>This is an existing allocation which was accepted by an Inspector of being suitable for allocation. The Strategic Flood Risk Assessment notes that only 3% of the site falls within Flood Zone 2, with the remainder in Zone 1. The site is in an area of archaeological potential however the County Archaeologist has stated that any mitigation could be implemented through an appropriately worded condition. None of the site includes a priority habitat – the SHLAA appraisal referred to by the objector covered a larger site area than is proposed for allocation. All sites in Crediton have the potential to negatively impact on air quality. However, the Link Road is now open which is anticipated to have a positive effect on air quality on the eastern side of the town. A greater proportion of vehicular trips head towards Exeter than any other settlement, so any development on the east side of the town is likely to have a lesser impact on air quality in the high street than those (like the objection site) on the western side.</p>
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	<p>Objection as site has history of flooding; existing development left buffer zone between site and flood zone; development will lead to further flooding (including from use of hard surfaces); flooding currently comes close to Willow Walk, beyond area of flood zone identified; proposal takes no account of global warming (particularly given end date of plan of 2033); homes will become uninsurable, requests for compensation.</p>	<p>Individual (2630, 5336, 5379, 5417, 5389, 5380)</p>	<p>This is an existing allocation which was accepted by an Inspector of being suitable for allocation. The Strategic Flood Risk Assessment notes that only 3% of the site falls within Flood Zone 2, with the remainder in Zone 1. National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated. An allowance for climate change is included as standard practice when undertaking the calculation which informs the Flood Risk Assessment.</p>
	<p>Objects to use of Willow Walk as through road – do not wish it to change; existing problem of boy racers on industrial estate, opening up road would create another race track.</p>	<p>Individual (5417)</p>	<p>The highways authority has stated that an acceptable access can be achieved. Planning application will need to be accompanied by Transport Assessment which will comprehensively set out the relevant transport issues on the site and demonstrate that the impact of the proposal is acceptable.</p>
	<p>Objects to use of Cromwells Meadow as through road, road is narrow, with few passing places, and cars parked on blind bends.</p>	<p>Individual (5380)</p>	<p>The highways authority has stated that an acceptable access can be achieved. Planning application will need to be accompanied by Transport Assessment which will comprehensively set out the relevant transport issues on the site and demonstrate that the impact of the proposal is acceptable.</p>

	States SFRA concludes list of flood risk issues which need to be addressed at planning application stage – but requests they be addressed in advance.	Individual (5336)	The purpose of the SFRA is to direct development to the areas of lowest flood risk. 97% of the site is within Flood Zone 1, the area of lowest flood risk. The detailed site-specific Flood Risk Assessment can only be undertaken at planning application stage, which will inform, and be informed by the proposed design solution for the site.
	States Environment Agency has not approved the site.	Individual (5336)	The Environment Agency has not objected to the allocation of this site.
	Building on site would negatively affect our property outlook and value.	Individual (5389)	Loss of view and/or property value are not material planning considerations.
CRE4 Woods Group	Supports policy.	Historic England (1170)	Support noted.
	Supports building on brownfield sites first, such as this site, before greenfield sites.	Individual (366)	Support noted.
CRE5 Pedlerspool	As set out in evidence report, new primary school required in Crediton. Policy should be amended to include provision for this new school.	Devon County Council (626)	Agreed. The school would provide a degree of employment on the site and is proposed to be included instead of the extra care scheme. A modification to the policy is proposed accordingly.
	Extra care units generally provided at minimum size of 50 – there may be a knock on effect in terms of land required to provide an extra facility.	Devon County Council (626)	As per the request above it is no longer proposed to include an extra care scheme within this site.
	Rewrite para 3.171 to state that watercourse is along eastern not southern boundary.	Environment Agency (943)	Agreed. Paragraph re-written to clearly set out that it is the River Creedy which flows to the east of the site, and the requirements which will need to be taken account of within the site-specific Flood Risk Assessment which will accompany the planning application.
	Supports proposal to relocate the rugby club from present site to Pedlerspool, as will provide opportunity to deliver state of the art pitches and facilities to meet the needs of the club and the community now and into the future.	Crediton Rugby Football Club (4341)	Support noted.

	<p>Supports allocation of site, is in single ownership, is fairly unconstrained and can be brought quickly and easily; can deliver a substantial portion of Crediton’s growth, has been tested at Examination, and can deliver housing with commercial and leisure uses within easy access of the town centre.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>Support noted.</p>
	<p>Supports policy but requests policy be revised to state 200 dwellings is a minimum and that the affordable housing of 28% is a maximum and is subject to viability.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>Not agreed. The dwelling numbers within any policy are a target, and different numbers may be achieved and justified following more detailed design work undertaken during the preparation of a planning application. It would be inappropriate with the information currently available to state the dwelling number as a minimum, as the site requires a significant quantity of mitigation planting and landscaping given its proximity to the registered historic park of Creedy, the provision of which could be undermined by the proposed policy change. Viability evidence has also indicated that 28% affordable housing is achievable for sites within the towns. This figure is also a target, and is subject to viability whether it is stated or not, in accordance with paragraph 173 of the NPPF. No specific circumstances are set out to justify why the policy wording should be amended. No change is proposed as a result.</p>

	<p>Objects to requirement to provide gypsy and traveller pitches; Gypsy and Traveller Accommodation Assessment does not justify allocations on particular sites, nor is there justification or comparison of options in Sustainability Appraisal; states not a suitable site given other proposed uses; states CRE1 Wellparks more suitable site being associated with commercial development.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>The Gypsy and Traveller Accommodation Assessment sets out the need for sites within the district, rather than assessing the suitability of specific sites. Provision of 5 pitches was a requirement when the site was allocated within the AIDPD. Guidance states that gypsy sites should be located within or adjacent to existing communities where facilities are available for health, education and employment. Larger sites are generally more likely to be able to support the delivery of gypsy and traveller accommodation so, combined with the fact that the AIDPD contingency site already included this provision, Pedlerspool is considered the most suitable allocation within which to make this provision. Siting considerations should be identical to those for the settled community. If Pedlerspool is acceptable for housing then it is also considered suitable for some traveller pitches.</p>
	<p>Supports inclusion of 25 extra care units in lieu of employment but provision of these cannot be linked to delivery of housing, which could be hindered if so; policy should be amended to consider positive reception to larger facility.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>Following the request from Devon County Council for a school on the site which is seen to be a higher priority. This is to be included in lieu of the extra care provision and an amendment is proposed accordingly as this provides an employment generating use. Development management policies would be supportive should the developer wish to also proceed with the extra care facility.</p>

	<p>Supports relocation of the rugby club, but delivery of housing cannot be linked to this as timetable for relocation is unknown; this is an undesirable fetter; provision of suitable site for rugby club can be secured through the masterplanning and application process; such options have been tried elsewhere, i.e. East Devon, and have been shown to hinder delivery of housing which is contrary to the NPPF; criterion d) of policy should be deleted and policy amended to state that housing will be considered positively if rugby club not required; amend policy to require masterplanning to ensure accommodation of policy requirements.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>A phasing strategy is required to ensure that the community benefits associated with developing this site are not proposed for delivery at a later stage in the development which could jeopardise their provision. The policy is flexibly worded to state that these be provided 'broadly in step' which would allow some housing to come forward first to aid cash flow. Other policies within the plan, notably S4 'Ensuring housing development' set out the mechanism by which the Council will ensure sufficient supply of land for housing. The rugby club support the decision to move, (confirmed within their representation) and therefore an amendment which considers alternative options should the rugby club not be required are unnecessary.</p>
	<p>Objects to specific green infrastructure annotation on map; GI should be informed by ecological survey; importance of GI is recognised, it should be incorporated within overall allocation. Allocation should incorporate whole area outside of flood plain.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>The policy notes (as did the AIDPD inspector) that the provision of the GI reflects the sensitivities of the location, with the upper slopes to the west and south of the site more visually prominent and adjacent to Creedy Park, the historic locally listed park and garden. The need for planting on the eastern side is justified in criterion d). Heritage and landscape constraints have informed the GI annotation, not just ecological as indicated by the objector. It is accepted that the distribution of GI may change in response to detailed survey work undertaken in the preparation of a planning application; however it would be inappropriate to amend it in advance of this work. The sequential test that development should be directed away from the areas of greatest flood risk. The area to the east of the allocation is flood zone 3, the area of greatest flood risk. It would be inappropriate to therefore include this in the allocation.</p>

	<p>Supports access arrangements and highway improvements; new Link Road enhances accessibility and reduces traffic on most constrained parts. Development will provide enhancements along Old Tiverton Road adjacent to the site, as well as provision of new roundabout on to A3072. Whilst there is potential for cumulative highway impact from various sites on east of Crediton, any contributions must be fairly and reasonably related in scale and kind to development. Transport Assessment will inform appropriate level of contribution. Criterion h) should be amended to ensure improvements are fairly and reasonable related in kind and scale.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>Criterion h) states that access and improvements arrangements must be suitable and appropriate. This would ensure that any planning obligations are compliant with paragraph 204 of the NPPF. This achieves the outcome desired by the objector. No change is recommended as a result.</p>
	<p>Policy currently unsound – what is impact on registered parks of Shobrooke and Creedy? Landscape assessment only considers Creedy but is inadequate in terms of assessment of impacts and mitigation. Historic environment appraisal needs to assess impact upon park and garden, if concludes harm then set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134.</p>	<p>Historic England (1170)</p>	<p>The Council has now undertaken a Historic Environment Appraisal of the allocation. The appraisal notes the potential for harm arising from the change in rural landscape to a developed area which could affect the quiet rural setting of Creedy Park and Shobrooke Park. The appraisal concludes that mitigation in the form of landscape planting is required along the north eastern and south west boundaries. The adjoining boundary with Creedy Park, given close proximity is vulnerable to harm which can be mitigated through new tree planting along the full length of the boundary to reinforce the existing screening provided by trees on the edge of Creedy Park. In regard to archaeology Devon County Council's Historic Environment Team require mitigation via a standard worded condition.</p>

	<p>Concern that allocation does not accord with sustainability principles, with site some distance from town centre and public transport links, and further separation arising due to topography of site requiring green space on south side.</p>	<p>Crediton Town Council (678); Crediton Neighbourhood Planning Steering Group (1734)</p>	<p>The suitability of the site was considered when it was accepted as an allocation within the AIDPD. When assessing sustainability a site which is adjacent to a town, which provides a range of services and facilities, is inherently more sustainable than locating a similar quantum of development in more remote locations. However, as requested by the objectors' amendments to the policy for this site, and CRE2 and CRE6 are proposed to ensure improvements are made for pedestrians and cyclists to be access the town centre.</p>
	<p>Concern that allocation cuts into river valley, will split two parklands and neither enhance nor protect town setting.</p>	<p>Crediton Town Council (678); Crediton Neighbourhood Planning Steering Group (1734)</p>	<p>The AIDPD Inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary.</p>
	<p>Requests if comes forward then highest design standards should be applied to housing and infrastructure; development should blend in to existing landscape and features, not be imposed on it.</p>	<p>Crediton Town Council (678); Crediton Neighbourhood Planning Steering Group (1734)</p>	<p>As per above the policy requires design which takes account of the riverside location and local distinctiveness. The Inspector considered that the policy set sufficient standards. No change is recommended.</p>

Requests dual use footpath (as part of CRE2) but which could also serve CRE5.	Crediton Town Council (678); Crediton Neighbourhood Planning Steering Group (1734)	Devon County Highways is in discussions with the developers of the Pedlerspool site regarding pedestrian and cycle network improvements. The policy and supporting text have been amended to make reference to improved access to the town centre and for contributions to be paid for wide network improvements. Specific schemes are not mentioned as this could make the policy unnecessarily inflexible.
Requests addition of 'there needs to be good access to buses, sustainable transport and all-purpose paths'.	Sustainable Crediton (2689)	The policy includes requirements for access to local bus routes and sustainable modes of transport.
Requests attention paid to footpaths and cycle paths connecting to rest of town and QE Academy.	Sustainable Crediton – Boniface Trail Campaign (5217)	As per above an amendment is proposed to ensure the delivery of improvements to local pedestrian and cycle networks.
Supports relocation of rugby club if proposal can demonstrate meeting E4 of national playing fields policy (i.e. replacement provision is made of equal or better quality); however, concern that evidence base for open space and play area strategy does not follow Sport England methodology and cannot support 'surplus' comments that would allow sport and recreation land to be lost without adequate replacement. Requests detailed assessment be carried out.	Sport England (169)	Policy CRE6 'Sports fields' is consistent with national policy and Sport England guidance in that it requires provision of a suitable site for the rugby club, with no net loss in provision, prior to redevelopment taking place.
Supports full allocation of site as contributing towards meeting housing need through delivery of alternative distribution of development within district.	Waddeton Park (3815)	Site is proposed as a full allocation.

	<p>Site has significant environmental constraints, being 98% grade 2 agricultural land, north eastern part is priority habitat, is adjacent to further priority habitat, and potential for landscape impact; site stated as not immediately coming forward, so inconsistent that site with environmental constraints and delivery risks is preferred to deliverable site of similar size (Chapel Downs).</p>	<p>Origin3 (5765)</p>	<p>Environmental constraints were considered by the Inspector during the examination of the AIDPD. He concluded that there were sufficient protections within the policy. Delivery risks are relatively low. The site was released by a decision of Cabinet on 7th August 2015 as a contingency to ensure a sufficient buffer within the Council's five year land supply position. A planning application was already being prepared and is due to be submitted. The SHLAA panel consider the site to be deliverable, and it is anticipated that the first units on the ground will be completed by 2017/18.</p>
	<p>Objection as site subject to flooding; development will exacerbate flooding; difficulty in getting insurance as a result.</p>	<p>Sandford Parish Council (64); Individual (2534, 1673)</p>	<p>The Strategic Flood Risk Assessment notes that 97% of the site is within Flood Zone 1, the area with least risk of flooding. Provided that development within the highest vulnerability category is located outside of Flood Zone 3, the exception test will not be required. Furthermore, national planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated. An amendment to the supporting text sets out more detail on specific issues to be considered when undertaking the Flood Risk Assessment.</p>

	<p>Objects as site is inappropriate due to impact on valuable landscape grounds/landscape setting of Crediton compromised.</p>	<p>Sandford Parish Council (64); Individual (366)</p>	<p>The AIDPD inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary.</p>
	<p>Objects as allocation is contrary to Core Strategy to limit development in open countryside, policy COR2 to preserve environmental qualities of district, COR7 to minimise development on greenfields, COR8 to provide adequate infrastructure, COR9 to meet future social and economic needs of community as would be physically separate from rest of town and effectively be separate town.</p>	<p>Sandford Parish Council (64)</p>	<p>Through the preparation of a new Local Plan, the Council has undertaken a thorough review of the development strategy for the district assessment of the land supply required to meet objectively assessed needs for development. This site is in a sustainable location, being adjacent to a town which provides a wide range of services and facilities. Policy criteria set out how the site can be incorporated within the settlement, through improvements to connections for pedestrians and cyclists. The proposal also includes provision of a new primary school, which gives the option to reduce the length of trips to school for those living on the north east side of the town.</p>
	<p>If allocated, Community Infrastructure Levies should accrue to Sandford Parish Council, not Crediton.</p>	<p>Sandford Parish Council (64)</p>	<p>Noted.</p>
	<p>If allocated, Stonewall Lane, whilst cannot be widened, could be upgraded.</p>	<p>Sandford Parish Council (64)</p>	<p>Upgrading is proposed within the policy.</p>

	<p>Objects on landscape grounds, encroachment on Creedy Valley, unspoilt area of characteristic Mid Devon landscape; is contrary to principles established by Natural England in implementing European Landscape Convention 2000; conflicts with Mid Devon’s Landscape Character Assessment and invalidates all stated landscape-scale policies; contradicts PPS7, PPG15 and Devon Structure Plan landscape policies.</p>	<p>Individual (1673)</p>	<p>The AIDPD inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary. Note that PPS7, PPG15 and the Devon Structure Plan have been revoked and have no weight when determining current planning proposals.</p>
	<p>Objects to allocation as would destroy context of Creedy Park within the landscape, removing open views of aspects of the part; would result in loss of linking open landscape between Creedy and Shobrooke Parks.</p>	<p>Individual (1673)</p>	<p>The AIDPD inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary.</p>

	<p>Objects as development could impact on protected species (white-clawed crayfish, otter, native trees, barn owls, buzzards, bats, winter feeding birds). No Environment Impact Assessment has been carried out, no acknowledgement of features of nature conservation in policy; failure to address species protected by habitat regulations infringes UK and EU law.</p>	<p>Individual (1673)</p>	<p>Assessment of the impact on protected species would be undertaken as part of the determination of the planning application. The site is not subject to any ecological designations. The planning application will be accompanied by habitat surveys. If protected species are identified then mitigation measures will need to be proposed. If the impact on those species is considered unacceptable then planning permission will not be granted.</p>
	<p>Objections as development of site likely to worsen air quality within the town.</p>	<p>Individual (2534)</p>	<p>Any planning application on the site will need to undertake an air quality assessment as part of their submission. Planning permission will be withheld if there is an unacceptable impact on air quality. The opening of the Link Road should have had a beneficial impact on development on the east side of Crediton, and has effectively 'unlocked' this site.</p>
	<p>Objection as developing site ruins pleasant approach to town/visually superb piece of land.</p>	<p>Individual (5294)</p>	<p>The AIDPD inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary.</p>
	<p>Objection as wrong place for housing or industry.</p>	<p>Individual (5294)</p>	<p>The proposed site has previously been considered acceptable for mixed use development. No change proposed. The site does not include any industrial uses. The proposed site now includes housing and a school.</p>

Objections as insufficient capacity within local and wider road network to accommodate development (cites poor capacity of new road by leisure centre, overused country land surrounding site, dangerous road to Tiverton).	Sandford Parish Council (64); Individual (2534, 1673)	The highways authority state that the Transport Assessment will determine if any junctions will have capacity issues and will put forward mitigation. No mitigation is expected beyond that which is set out within the policy.
Objection as gypsy pitches should be located elsewhere in more isolated position.	Individual (2534)	The suitability of the site for gypsy pitches was accepted by the previous Inspector. Guidance states gypsy pitches should be within or adjacent to settlements to ensure better access to education and healthcare.
Objection to loss of agricultural land/need land for food production.	Individual (2534, 1673)	The loss of agricultural land has been considered in the Sustainability Appraisal which accompanies the plan.
Objection to loss of greenfield sites – use brownfield first.	Individual (2534)	Given the rural nature of Mid Devon there is only a limited supply of brownfield land available and so inevitably greenfield land has to be made available for development. The plan includes a number of brownfield allocations where such land is available and deliverable.
Objection – land to south of town should be considered – given most movements head to Exeter / or simply consider other unspecified parts of Crediton.	Individual (2534, 5294)	The Council can only allocate land which is available, suitable and deliverable. Land to the south of the QE academy school, and adjoining Exeter Road was assessed by the Council. However, limitations on access meant that the Council's SHLAA panel considered the sites not to be deliverable.
Objection – no public transport on north side of town, local bus service to be cut soon, better bus services to other parts of town.	Individual (2534)	The highway authority would seek improvements to bus provision as part of the planning permission.
Objection to site – however it is suitable for sports pitches if necessary.	Individual (5294)	The site is proposed for a mixed use of housing and community facilities. The redevelopment of the site will enable the rugby club to move to new facilities which are better suited to their needs.

CRE6 Sports fields, Exhibition Road	Supports proposal to relocate the rugby club from present site to Pedlerspool, as will provide opportunity to deliver state of the art pitches and facilities to meet the needs of the club and the community now and into the future.	Crediton Rugby Football Club (4341)	Support noted.
	Supports relocation of rugby club if proposal can demonstrate meeting E4 of national playing fields policy (i.e. replacement provision is made of equal or better quality); however, concern that evidence base for open space and play area strategy does not follow Sport England methodology and cannot support 'surplus' comments that would allow sport and recreation land to be lost without adequate replacement. Requests detailed assessment be carried out.	Sport England (169)	The policy reflects national policy and Sport England guidance in requiring replacement provision to be made first. Only once provision is made on CRE5 would this site be able to be redeveloped.
	Exhibition road is flat and ideal for an all purpose path to include cyclists to go to Haywards School, QE and the town centre, possibly via a cut through Crediton dairy.	Sustainable Crediton (2689)	Land is available to provide a link along Exhibition Road through to Pedlerspool. An amendment to the policy has been proposed accordingly. Other land proposed by the representor is unlikely to be deliverable given land ownership constraints.
	There is a risk to relying on delivery of a site seeking to redevelop a playing field which does not have a confirmed replacement location and for which the necessary approvals are not yet in place.	Origin3 (5765)	A replacement location is identified in CRE5 Pedlerspool. The replacement location is supported by the rugby club. A planning application, which includes the replacement provision, is currently being prepared.

	Removing sports facilities and sending them elsewhere is removing green areas from the town – which should be retained in view of poor air quality. This cannot be beneficial to the town – the NPPF is trying to create Healthy Communities.	Mid Devon CPRE (486); Individual (366)	The relocation of the sports facilities will allow the club to improve the quality of its provision through delivery of modern premises. The impact on air quality will be assessed as part of any planning application, though with the opening of the Link Road (a precursor for allowing this site to come forward), is anticipated to have positively impacted on air quality on the east side of Crediton.
	Objects to allocation as would result in loss of sports/community facility in area; queried where rugby club would go.	Individual (5216, 5417)	A replacement location is identified in CRE5 Pedlerspool. The replacement location is supported by the rugby club.
	Objects due to impact on road safety.	Individual (5417)	No justification regarding road safety is provided. The highway authority is satisfied with the proposed allocation. The planning application will be accompanied by a Transport Assessment which will comprehensively assess the transport impacts of developing the site.
	Objects to allocation on flooding/drainage grounds.	Individual (5216)	The site is within Flood Zone 1, the area with least risk of flooding. National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated.
CRE7 Stonewall Lane	Point d) noted and e) welcomed. Requests that the issue of lack of footway on west side of Jockey Hill from Deep Lane running south for 50 yards is addressed as part of the development, so pedestrians not forced to cross at the brow of the hill to access Alexandra Road.	Crediton Town Council (678); Crediton Neighbourhood Plan Steering Group (1734)	The highway authority has noted that land availability and topography may be an issue but such considerations could be taken on board at application stage.

	Strongly supports allocation as will allow Queen Elizabeth's to sell land and invest in substantial sports facilities for the school and community.	Queen Elizabeth's (5386)	Support noted.
	Excellent opportunity to provide for pedestrians, cyclists, school students and wheel chair users. The issue of how to turn into Deep Lane needs to be considered.	Sustainable Crediton (2689)	Noted. These issues can be considered at application stage.
	Contributions must be directly related to developed and fairly and reasonably related in scale and kind. Given potential for cumulative highway improvements resulting from development of Stonewall Lane and Pedlerspool, criterion d should be amended to reflect this.	MJ Gleeson c/o Bell Cornwell LLP (3775)	The CIL regulations and the NPPF state set out the criteria against which planning obligations must be agreed. There is no need to repeat these requirements in local policy. However, the supporting text to CRE7 has been amended to include reference to the need to cumulatively assess impact of the site along with Pedlerspool, in order to mirror the provision set out in CRE5.
	Plan indicates road at Stonewall Lane can't be widened but it could be upgraded to help traffic flows.	Sandford Parish Council (64)	Policy requires realignment of Stonewall Lane through the site to increase the width. Further to the east where the road cannot be widened it is proposed to be upgraded through the inclusion of passing places.
CRE8 Barn Park	Footpath improvements are needed between Barnfield and Landscore (Tinpot Lane) to enable a good pedestrian route from the development to the Western Road campus / improved pedestrian access is needed between QE, Barnfield and QE Western Road.	Crediton Town Council (678); Crediton Neighbourhood Planning Steering Group (1734); Sustainable Crediton (2689)	Can be looked at as part of a package of improvements at design stage.
CRE9 Alexandra Close	Concerned about location of access, need for adequate visibility.	Individual (5344)	The highway authority has stated that an adequate access is achievable.

	Concern about capacity of foul and surface water drainage to accommodate flows from development.	Individual (5344)	This will be assessed at planning application stage. The development will need to fund an assessment of capacity and improvement works if required. Any development will have to comply with Policy DM1 which sets provisions regarding drainage and SUDs.
	Concern about how many and what type of dwellings to be built, quality, when commenced, and effect on adjoining property values.	Individual (5344)	The allocation is for 15 dwellings. The type, quality and design of these will be determined at application stage. Effect on property value is not a material planning consideration.
CRE10 Land south of A377	Policy would be sounder if it referred to the need to ensure that ground and floor levels are set at sufficiently high enough level to cater for flood risk from the River Yeo.	Environment Agency (943)	Noted. Amendment to supporting text referencing latest flood data and implications for redevelopment has been agreed with the Environment Agency and inserted into the text.
	Policy should also refer to the land south of the Tesco store on Joseph Locke Way which also had outline planning permission.	Crediton Town Council (678)	This site was not put forward as part of our call for sites to be considered for development. However, it is within the settlement limit and therefore could still come forward for commercial development in future, subject to meeting other standard policy considerations.
	Considers policy unsound - proposed allocation subsumes grade II listed farm complex and alters setting. Historic Environment Appraisal needed to assess the likely impact which the development will have on the listed buildings at Wellparks and Downe House Park and Garden. If concludes there is harm, provide mitigation and if still harm justify allocation as per NPPF paragraphs 133 and 134.	Historic England (1170)	The Council has undertaken a Historic Environment Appraisal (HEA) to examine the potential for harm to arise as a result of development allocations. The site is on the opposite side of the road from the Wellparks farm complex, but could be competitive with it and the setting of the Downes Estate. Accordingly an amendment to the policy is proposed to require appropriate landscaping and sensitive design and materials given its proximity to local heritage assets.

	<p>Supports the principle of the allocation but objects to settlement limit as should be extended to fully cover the land within planning permission (ref 09/00244/MOUT); land is unquestionably suitable for a development allocation given planning history, established adjoining uses and accessible location.</p>	<p>Tesco Stores Limited C/O Burnett Planning (4323)</p>	<p>Area immediately to the east of CRE10 allocation was within the original 06/02670 and 09/00244 applications, however no development was proposed upon it as it formed part of the landscape buffer screening part of the site from views from the A377. The area to the south east contains the swales which are part of the sustainable urban drainage to address flood risk, and are not appropriate for development. The small area to the south of the allocation up to the edge of the swale is partly covered by a recent consent sought by Mole Avon. This is the only amendment to the settlement limit considered appropriate. Nevertheless the Environment Agency have advised that following updated modelling on the flows of the Rivers Yeo and Creedy there is increased flood risk to parts of the site covered by previous outline consents. Amendments to the supporting text are proposed alongside the change in to the settlement limit setting out the impact of the latest flood modelling and the subsequent scope for development.</p>
	<p>Policy should refer to mixed use development including commercial and residential uses, given wider site has accommodated mixed uses and is consistent with strategy for Crediton to improve access to housing within the town, expand employment opportunities and quantity and quality of retail (plus noting environmental constraints which limit opportunities for housing elsewhere).</p>	<p>Tesco Stores Limited C/O Burnett Planning (4323)</p>	<p>Area requested for inclusion is entirely within Flood Zone 2, and is partly within Flood Zone 3. Residential development is classed as 'most vulnerable' and should be directed towards areas of lowest flood risk. Furthermore, locating residential development within an area of predominantly commercial uses raises concerns about the quality of the environment being created for future residents.</p>

	Reference to commercial development should include flexibility to accommodate full range of commercial uses as set out elsewhere at paragraph 2.12.	Tesco Stores Limited C/O Burnett Planning (4323)	The policy already refers to 'other suitable commercial uses'. No change is required.
CRE11 Credton infrastructure	The policy would be more effective if 'provision of works to reduce flood risk' were included in the list.	Environment Agency (943)	Agreed. Amendment proposed.
	In support of community infrastructure suggests amending i) to 'community and activity facilities, including provision for children/youth and elderly people through a new [unified] cultural hub.	Credton Town Council (678); Credton Neighbourhood Planning Steering Group (1734); Credton Town Team (5821); Individual (5394)	This would be covered by the scope of the term 'community facilities'. No change to the policy necessary.
	Under a) should be 'enhanced pedestrian and cycle facilities to serve developments and enable journeys to school and Exeter'.	Sustainable Credton (2689)	Not agreed. Request adds unnecessary detail into policy.
	Policy mentions infrastructure, including 'potential highway improvements', which needs to be more specific and further work undertaken to the transport evidence base in order to be able to provide more detailed requirements in line with Circular 02/13, paragraph 18.	Highways England (1172)	Specific highway improvements will be derived from the Transport Assessments undertaken when preparing the planning applications on allocations. Furthermore development allocations in Credton are unlikely to impact on the Strategic Road Network given the distance between the town and the nearest part of the network, and the relatively low level of development proposed in Credton.
	Policy should include new primary school requirement – the need for which is set out in the DCC Community Infrastructure Report.	Devon County Council (626)	This is a generic policy which sets out the overarching infrastructure requirements for each town. The specific requirement for a new school has been added to Policy CRE5 and it is unnecessary to stipulate it here.

	Requests completion of sport and recreation evidence base and devise strategy for delivery of sport and recreation land and buildings; amend policy accordingly.	Sport England (169)	There is no specific requirement within national policy to follow sport England guidance, which is therefore merely advisory. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making.
	Concerned about infrastructure required to support housing and employment provisions of plan. Includes roads, public transport, sewerage and water supply and schools. CIL and deepening budget cuts means not enough money for infrastructure – coherent strategy required.	Sandford Parish Council (64)	Infrastructure requirements have been considered as part of the allocation process. S106 or CIL is likely to make significant contributions towards infrastructure; however some money will need to be sought from external funding sources.
	Concern about capacity of schools to accommodate housing growth.	Individual (5417)	Devon County Council has undertaken an assessment of school capacity taking account of the proposed growth of the town. Contributions from development will need to be sought. A new primary school is proposed to be included on the Pedlerspool allocation.

Non-allocated town sites

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
OTIV2 Hartnoll Farm	Supports exclusion on basis of loss of grade 1 agricultural land.	Halberton Parish Council (58); Individual (2480, 2283, 4022, 2314, 4165, 3379, 4059, 2575, 3954, 2694, 4443)	Support noted.
	Supports exclusion as concerned about impact of additional traffic (over and above that anticipated from EUE); concern route through Halberton likely the preferred option for many driving to train station.	Halberton Parish Council (58); Individual (5252, 2283, 4022, 2314, 4165, 3379, 4059, 3954, 2694, 870)	Support noted.

	<p>Supports exclusion of site due to negative impact on canal - is crucial to preserving setting of the historic Grand Western Canal an amenity which acts as green lung and recreational space for Tiverton EUE/ construction would destroy character on which country park relies to serve purpose; would destroy rural views from tow path; canal also county wildlife site and Local Nature Reserve; concern that allotments/tennis courts/car parks are not natural green buffers, not the view expected from canal.</p>	<p>Halberton Parish Council (58); Grand Western Canal Joint Advisory Committee (194); Individual (5247, 4022, 2314, 3379, 3954, 2694, 4443)</p>	<p>Support noted.</p>
	<p>Supports exclusion of site as preserves distinct separate identities of Tiverton and Halberton and rural space between/site is outside settlement limits of both/loss of green area of separation between settlements.</p>	<p>Halberton Parish Council (58); Grand Western Canal Joint Advisory Committee (194); Individual (5247, 2480, 5252, 2283, 4022, 2314, 4165, 3379, 2694, 4443)</p>	<p>Support noted.</p>
	<p>Supports exclusion of site/decision not to extend boundary further east (no reasons given).</p>	<p>Tiverton Civic Society (5648)</p>	<p>Support noted.</p>
	<p>Supports exclusion of site and requests references to further development East of EUE (at paragraph 3.9) be removed.</p>	<p>Blundell's School (4240)</p>	<p>Support noted.</p>
	<p>Supports exclusion of Hartnoll Farm as Manley Lane, the furthest extent of Tiverton EUE is historic boundary in landscape of Tiverton (town council and previously borough) and rural parish of Halberton – division has long history and should be respected.</p>	<p>Individual (5247, 4022)</p>	<p>Support noted.</p>

Supports exclusion due to specific concerns about additional traffic impact in Halberton, which has little scope for road widening or re-routing, road surface is being currently destroyed (high repair costs and potential liabilities).	Individual (2283)	Support noted.
Supports exclusion due to pollution – air quality and noise.	Individual (2283, 2575)	Support noted.
Supports exclusion as traffic will potentially cause structural damage to houses on high street – represents a practical obstacle which should baulk any further development.	Individual (2283)	Support noted.
Supports exclusion of site due to lack of capacity of local public services.	Individual (2283)	Support noted.
Supports exclusion of site due to unsustainable loading on to existing utilities, including drainage and sewerage, electric, telephone facilities and other infrastructure.	Individual (2283, 4059)	Support noted.
Supports exclusion of site as would inflict years of disruption and travel chaos on local residents.	Individual (2283)	Support noted.
Supports exclusion as would have negative impact on tourism (including companies which make use of the canal).	Individual (2283, 4165, 3379, 3954, 4443)	Support noted.
Supports exclusion of site as the pets of new residents could affect day to day cleanliness of towpath (dogs) and affect birdlife (cats).	Individual (2283)	Support noted.
Supports exclusion of the site as development would increase risk of flooding (could impact on flooding Halberton by mill stream)/doubts sufficiency of EUE attenuation ponds and concerned given previous breaching of canal.	Individual (2283, 4022)	Support noted.

Supports exclusion of site as would negatively impact Tiverton town centre, being further away from residents / concerns over car use and sustainability from distance to town centre services.	Individual (4022, 2314)	Support noted.
Supports exclusion as would negatively impact on SSSI, potentially through surface water run off.	Individual (2314, 4615, 3379, 4059, 3954, 2694)	Support noted.
Supports exclusion as site is visible from south and west and development would have an adverse visual impact on the character and appearance of the area.	Individual (4615, 3379, 3954, 2694)	Support noted.
Supports exclusion as site would require additional feeder road which would be prohibitively expensive / feeder road would negatively impact on residents of Gornhay Orchard.	Individual (3379, 3954)	Support noted.
Supports exclusion – brownfield sites should be considered first/bring unoccupied or derelict buildings back into use.	Individual (2575)	Support noted.
Supports exclusion as development of the site would result in loss of local biodiversity.	Individual (2575)	Support noted.
Supports exclusion – there are better sites available such as north of Gornhay Cross which is closer to the town centre, away from Knightshayes and not in flood plain.	Individual (3954)	Support noted.
Objects to exclusion – Council should abandon plan and put forward revision based on Option 1 from consultation of January 2014. The would include allocation of Hartnoll Farm, plus either contingency and additional village sites (Waddeton rep) or Exeter Hill (Dial Holdings rep).	Waddeton Park Ltd (3815); Dial Holdings Ltd c/o PCL Planning (2315)	The Council has carefully considered all the options put forward in the January 2014 Local Plan Review consultation and has determined that the most sustainable option for development is to concentrate the majority of development at Cullompton.

	<p>Objects to exclusion – site could provide substantial proportion of Tiverton and district’s housing need. New junction designed to accommodate up to 2000 dwellings.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>Sufficient land has been allocated elsewhere in the District to meet the housing needs of Mid Devon. While it may be possible for the proposed grade separated junction onto the A361 to accommodate up to 2000 dwellings the full allocation of this site would take the number of new dwellings on Tiverton Eastern Urban Extension and Hartnoll Farm (if allocated) would far exceed this limit.</p>
	<p>Objects to exclusion – no ecological, archaeological, surface water, geotechnical and transport constraints to developments (providing junction is in place); site is in one ownership.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>There are transport constraints on the development - see above. The canal is a heritage asset which has a setting that would require protection, whilst the site lies in an area of archaeological potential for prehistoric activity and would require archaeological investigation. Habitat surveys have also indicated that the site comprises a range of habitat types, including hedgerows which are of the greatest value as they are mature, well connected and species-rich. Majority of the site is also Grade 1 agricultural land, the loss of which cannot be mitigated.</p>

	<p>Objects to exclusion – site can accommodate 1000 dwellings (at 35 per hectare, with full mix of types and sizes, and an element of affordable housing), at least 20,000sqm employment (6.97ha allowed to wrap around existing Hartnoll Business Centre), primary school (1.95ha allowed), neighbourhood/local centre (to serve retail/social needs of community inc. 2000sqm mix of uses including community hall/space, local shops, restaurant/café, pub and/or hot foot takeaway) and green infrastructure (12.07ha inc amenity open space, children’s play, allotments/orchards, buffer planting, sports/playing field provision off-site on adjacent land to south). Site can accommodate not only 500 dwellings currently allocated towards EUE area B, but more of Tiverton’s future demand.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>Area B of the currently allocated Eastern Extension is already allocated for development and masterplanning work to bring it forward is underway. Adequate land has been allocated elsewhere in the Mid Devon Submission Plan to meet the requirements of Mid Devon’s housing need.</p>
	<p>Objects to exclusion – beyond 2000 dwellings would require alterations to Blundell’s Road, which only requires acquisition of land from one landowner; concept and design work already undertaken – costs of link road £7-11m; road may not be necessary if proposed traffic calming works past Blundell’s School deter greater number of drivers than predicted by Saturn model.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>It would be irresponsible to allocate Hartnoll Farm on the basis that the traffic calming past Blundell’s School may result in deterring more drivers than predicted by the Saturn model. Any allocation of this site would trigger the need for the relief road to Heathcoat Way.</p>

	<p>Objects to exclusion – recognise concerns from community about setting of villages/urban encroachment, but proposal includes substantial offset from canal to be permanent green infrastructure.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>In combination with Tiverton Eastern Urban Extension (which is already allocated) development at Hartnoll Farm would represent a significant lengthening of Tiverton in an easterly direction along the valley floor. Two issues emerge; firstly as development extends ever easterly, the distance from town centre services increases as well as reliance on the private car and secondly the town will significantly close the gap between its urban area and Halberton, which currently has its own identity. The coalescence of the two settlements is a negative impact which would only be moderately reduced through the provision of the green infrastructure offset.</p>
	<p>Objects to exclusion – recognise traffic concerns of local residents, would ensure proposals are designed to ensure desire line for motor vehicles is towards new junction on to A361.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>There are traffic impacts associated with Hartnoll Farm as referred to above. As previously stated, sufficient land has been allocated elsewhere in the District to meet the housing needs of Mid Devon. While it may be possible for the proposed grade separated junction onto the A361 to accommodate up to 2000 dwellings the full allocation of this site would take the number of new dwellings on Tiverton Eastern Urban Extension and Hartnoll Farm (if allocated) would far exceed this limit.</p>
	<p>Objection to exclusion of this site and preference of East Cullompton – decision made on the basis of subjective views about the special nature of Halberton.</p>	<p>Individual (5820, 5648)</p>	<p>East Cullompton is part of a preferred strategic approach reflecting the views of the local community and issues of sustainability. The East Cullompton allocation is supported by the Town Council. Hartnoll Farm would not provide the quantity of development proposed at East Cullompton and is therefore not a like-for-like replacement.</p>

OTIV4 Blundells School	Supports deletion of site, although there remains the opportunity to promote green infrastructure and contributions towards WFD objectives through the policy area, specifically the industrial estate.	Environment Agency (943)	However, on 22 nd September, Mid Devon District Council resolved to reallocate land at Blundells School for residential development. Since this representation was received, there have been further discussions with the Environment Agency. The Agency supports the allocation as part of wider measures to reduce flood risk associated with this part of the River Lowman.
OTIV13 Exeter Hill	Supports exclusion of site – would negatively impact on privacy, loss of light and general amenity of adjoining properties due to topography.	Individual (3982, 5210)	Support noted.
	Supports exclusion of site – field is used for grazing of heavy horses which draw canal barges; if lost there may not be suitable available sites within a practical distance of the canal.	Individual (3982, 5210)	Support noted.
	Supports exclusion – proposal would be contrary to policy to ‘retain green setting provided by steep open hillsides...’, site is opposite Knightshayes and would spoil outlook.	Individual (3982, 5210)	Support noted.
	Supports exclusion – access off Devonshire Rise problematic – already overcrowded with parked cars and problems for refuse vehicles; Exeter Hill is unsuitable for secondary access due to absence of footway/insufficient width for provision; danger to pedestrians; Exeter Hill/Canal Hill junction is substandard.	Individual (3982, 5210)	Support noted.
	Supports exclusion – concerned about drainage and run-off.	Individual (3982, 5210)	Support noted.
	Objects to exclusion – Hartnoll Farm not only site that could provide for growth of Tiverton, unlike that site it is not high quality agricultural land.	Ken Parke Planning Consultants (5209)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.

Objects to exclusion – site could provide mix of market and affordable housing (at 30%).	Ken Parke Planning Consultants (5209)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.
Objects to exclusion – no need for access off Exeter Hill, access would be via Devonshire Rise.	Ken Parke Planning Consultants (5209)	Objection noted. The highway authority has stated that there are access difficulties given the substandard nature of the junction with Canal Hill and the gradient and topography of the site as well as the lack of footways. However, they have noted that several points of access could be explored.
Objects to exclusion – site is only grade 3b agricultural land, only moderate quality and not ideally suited towards arable uses.	Ken Parke Planning Consultants (5209)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.
Objects to exclusion – is in flood zone 1, area of least likelihood of flooding.	Ken Parke Planning Consultants (5209)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.
Objects to exclusion – established planting/trees on boundaries form a strong natural barrier and act as transition between urban environment and countryside.	Ken Parke Planning Consultants (5209)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.
Objects to exclusion – sloping site, development would follow same tiered principle of adjacent residential development so as not to appear unduly prominent.	Ken Parke Planning Consultants (5209)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.
Objects to exclusion – site is available, suitable for development and deemed deliverable in the SHLAA assessment. Would provide logical extension to town.	Dial Holdings c/o PCL Planning (2315)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.

	Objects to exclusion – more than one potential access point, Exeter Hill is safe and satisfactory access can be achieved.	Dial Holdings c/o PCL Planning (2315)	Objection noted. The highway authority has stated that there are access difficulties given the substandard nature of the junction with Canal Hill and the gradient and topography of the site as well as the lack of footways. However, they have noted that several points of access could be explored.
	Objects to exclusion – could accommodate 80-100, not 55 as suggested by Council. No more than 28% affordable housing should be provided.	Dial Holdings c/o PCL Planning (2315)	A 55 dwelling limit was stipulated by Devon County Council Highways as the maximum that could be accommodated on this site based on highway grounds. The provision of 80-100 dwelling would therefore not be deliverable.
	Object to exclusion – SA highlighted landscape impacts, but not a valued/designated landscape as per NPPF, and impact exaggerated/landscape impact not substantiated by evidence, will be seen against backdrop of town, and can be assimilated with careful design and strategic planting.	N Jillings for Devonshire Homes (1050); Dial Holdings c/o PCL Planning (2315)	Agreed. The site was considered by the Inspector during the Examination of the Allocations and Infrastructure DPD. He concluded in consideration of visual impact that it would be a relatively modest extension to the urban area, set below the skyline, but nevertheless it would be more intrusive than other allocations. Please see SA update for response to comments on the SA.
	Is a smaller, deliverable site which should be allocated.	N Jillings for Devonshire Homes (1050)	Objection noted, however site would be visually intrusive given elevated position and likely to give rise to landscape impacts which cannot be fully mitigated.

OTIVNEW Land at the Foundry	Alternative site put forward to be allocated for large format town centre uses up to 7,200 sqm convenience and comparison goods GIA (A1), catering uses A3, A4 and A5 a hotel (C1). Site is defined as out of centre, but has equivalent sustainability benefits as other out of centre sites in Tiverton. However, strong pedestrian flow from Tesco car park, suggests site is within easy walking distance. States convenience shopping need is greater than the 1,074 sqm identified in Mid Devon Retail Study by 2026.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	Mid Devon's Retail Study states that there is only a limited need for convenience retailing in Tiverton by 2026 (end point of forecasting). The Retail Study concludes that there is only a very limited need for additional convenience floorspace in the town, and states that whilst there could be opportunities to increase the town centre's convenience floorspace offer, there is not the available expenditure to accommodate another large food store. Given there is no need for further convenience floorspace in Tiverton of this quantity no land is proposed for allocation. The SFRA also indicates that the site lies within flood zone 3, and potentially the functional floodplain, where the types of uses proposed are not permitted.
	Raises concerns with Retail Study methodology, notably population growth, use of the 340 annual housing target, spend per head, accuracy of household survey and assumptions on turnover of new floor space. Study underestimates potential for convenience goods spending. Argument for new discount food operator in Tiverton.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	It is considered that the current evidence base in support of the Local Plan is appropriate. This is a tried and tested methodology which has been used by retail planners without any fundamental criticism. No evidence is provided by the objector to justify their criticisms.
	Currently no budget hotel in Tiverton, site could accommodate one as well as associated family orientated public house. Both uses require large sites with car parking and servicing arrangements, which cannot be accommodated within historic town centres.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	Comment no longer relevant given 2016 grant of planning permission for a Premier Inn within the town centre boundary.
	Sequential test undertaken to demonstrate uses cannot be located elsewhere in Tiverton.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	Noted, though as per above, likely site for budget hotel has been identified within town centre boundary.

	<p>Transport note supplied – concludes that transport impacts are not likely to be significant in terms of net change in traffic on the network or network capacity. Location of site also offers excellent opportunities for trip savings through sustainable travel opportunities such as walking, cycling and public transport, or linked trips with the town centre.</p>	<p>Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)</p>	<p>Comments noted.</p>
	<p>Flood risk statement supplied – concludes that Council’s Strategic Flood Risk Assessment takes no account of recent flood defences on River Lowman and overstates flood risk. Updated flood and hydraulic model indicates a 1 in 100 year flood risk (less than previous model). By applying a sequential approach to redevelopment of the site, it can safely be redeveloped by siting new buildings outside Flood Zone 3 whilst preserving current flood storage function on-site.</p>	<p>Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)</p>	<p>The EA disagree with the estimate of flood flows on the River Lowman, which they consider to be too ‘idealistic’. As a result they do not accept that only a small proportion of the site is Flood Zone 3. The EA’s map indicates the whole of the site is within the zone 3, the area of greatest flood risk, the sequentially least preferable area for development. The SFRA indicates that the site may well lie within the functional floodplain, where ‘more vulnerable’ (e.g. hotels) and ‘less vulnerable’ (commercial development) is not permitted.</p>
<p>OTIVNEW Land north of Gornhay Cross</p>	<p>There are areas better suited to development, i.e. north of Gornhay Cross, which is closer to Tiverton, has better transport links, and is close to A361. Is not near Knightshayes and not in flood plain.</p>	<p>Individual (3954)</p>	<p>This land has been definitively confirmed as unavailable for development.</p>

<p>OTIVNEW Land at Seven Crosses Hill</p>	<p>Site put forward of 7.69ha; provides logical sustainable expansion of Tiverton, in light of uncertainty with Tiverton Eastern Urban Extension masterplanning. Site enclosed by established boundary planting, with scope to reinforce boundary trees/hedges to maintain 'soft' green edge to this part of town. No viability issues, no significant on or off-site abnormal development costs, and can contribute to land supply.</p>	<p>XL Planning & Design Ltd (5098)</p>	<p>Appraisal of the site notes that it is unsuitable and likely undeliverable given there are a number of constraints such as very steep topography, archaeological potential, landscape impacts and difficulty gaining highways access.</p>
<p>OCU2 Growen Farm</p>	<p>Supports the enlarged NW Cullompton site area incorporating part of Growen Farm but objects to the current site configuration. The current configuration is sub-optimal and unlikely to deliver policy requirements. The current allocation includes: land that is not available, land within floodplain, areas that are too steep for residential development, and land that is required for other uses (such as school development).</p>	<p>Growen Estates c/o Roche Associates (5748)</p>	<p>The land identified is a broad allocation. The policies recognise that there are constraints associated with the allocation in certain areas and identifies within the policies the issues of flood plains, educational and community needs, Policies CU3 and CU4 specifically. Comprehensive masterplanning is required by CU1 and will set out in greater detail the proposed development of the site. One field in the northern part of the site has been confirmed as only available for Green Infrastructure, not development, and a modification is proposed to the proposals map to show this.</p>
	<p>Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. Need to allocate more land as housing requirement in plan is a minimum, and likely to increase as a result of new SHMA and need to boost significantly additional housing.</p>	<p>Growen Estates c/o Roche Associates Ltd (5748)</p>	<p>The housing requirement in the Local Plan Review has been updated to reflect the latest SHMA figures. The sites allocated in the Proposed Submission Local Plan are considered to be preferable than developing the whole area of land at Growen Farm given the landscape impact.</p>

	<p>Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. The site is within 400m of the proposed local centre, which is not the case for other land in the allocation. Site maximises non-car trips. Development in south also closest to town centre, than north, development on land to south could therefore maximise sustainable modes of transport reducing congestion in town centre.</p>	<p>Growen Estates c/o Rocke Associates Ltd (5748)</p>	<p>The Council's Landscape and Visual Appraisal of the strategic site options (2014) indicated that the most easterly part of Growen Farm has a particularly sensitive character and was least suitable for development. It has accordingly been designated as green infrastructure. The field to the west was considered more robustly separated from the landscape to the north and west by strong hedgerows and was more closely related to land to the south which was previously allocated, and was considered a more logical extension to the allocation.</p>
	<p>Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. Full site has minimal visual impact, unlike revised allocation which proposed development on rising land. The plan fails to afford priority to development of land that is of gentle topography with minimal visual impact over that which is more sensitive owing to its slope and prominence. Land is level and well-drained – no physical constraints to development. More appropriate strategy would be to retain Green Infrastructure (GI) in central location and locate development on less sloping sites such as Growen Farm. Site would be accessible to GI as proposed in adopted plan and with community benefits. GI as proposed would preclude local centre in most optimal/viable location.</p>	<p>Growen Estates c/o Rocke Associates (5748)</p>	<p>Topographical considerations were taken into account in the allocation of the land. However the land allocated for the most part is adjacent to the existing settlement and the decision as to which areas were most appropriate to be allocated as Green Infrastructure (GI) was informed by the findings of the Council's Landscape and Visual Appraisal (2014). Whilst level, well-drained land can be equally ideal for sports facilities as it is development land, such as football or rugby pitches. The land identified for the local centre in the recently adopted masterplan was on previously allocated as GI and accordingly a change to the proposals map is proposed to set this out.</p>

OCU16 Cullompton Rugby Club	Supports exclusion – site required for rugby club which is well used by the community, and does not wish to see it lost for sports use, which would reduce opportunities for a successful/expanding club.	Dramatic Improvement (5235); Individual (5232, 5248, 5246, 5250)	Support noted.
OCUNEW Tiverton Road	Objection to omission of this site. Site is previously developed land and is not affected by constraints of larger, infrastructure-dependent sites. Can accommodate 13-19 dwellings. Site is within walking distance of bus services, and is within single ownership. Site serves wide catchment so redevelopment would not result in loss of a local community facility. Pre-development conditions would cover contamination, transport statement and travel plan, archaeological investigation, biodiversity survey, screening/safety/security from adjacent sub-station.	The Quarry Hospel Hall Trust c/o Steven Abbott Associates (5755)	Development of the site would result in the loss of a community facility which would need to be justified. However, this is a brownfield site within the settlement limit. It therefore does not need to be allocated for an application to be able to come forward (providing the loss of the community facility and other policy factors can be addressed).
OCRE10 Westwood Farm	Supports exclusion of site on the grounds of flooding – brook borders property and regularly floods garden; adjacent field often saturated, water overflows into road.	Individual (1739)	Support noted.
	Support exclusion of site – agree with Council that development on west side of Crediton would worsen traffic congestion and air quality in high street.	Individual (1739)	Support noted.
OCRE11 Chapel Downs	Supports exclusion of site on the grounds of flooding – brook borders property and regularly floods garden; adjacent field often saturated, water overflows into road.	Individual (1739)	Support noted.

	Support exclusion of site – agree with Council that development on west side of Crediton would worsen traffic congestion and air quality in high street.	Individual (1739)	Support noted.
	Object to exclusion of the site – states that a ‘slight’ impact on listed building (as stated in SA) not a significant material consideration, given already on urban fringe and can be dealt with by careful layout and appropriate conditions. Approach is also considered inconsistent with that taken for Wellparks.	Origin3 (5765)	Impact on a listed building could be a significant material consideration. However, it is noted that the circumstances are not dissimilar to that at Wellparks where the allocation is in close proximity to a listed building. However, Wellparks has planning permission, and a mitigation strategy put in place, with the agreement of Historic England. It is unknown at this stage whether such mitigation could be achieved on Chapel Downs.
	Objects to exclusion – states site scores better than Pedlerspool for connections/walking to town centre.	Origin3 (5765)	As the crow flies the nearest part of Pedlerspool allocation is closer to the centre of the High Street (i.e. mid point applying town centre boundary) than the nearest point of the Chapel Downs site.
	Objects to exclusion – states SA notes site contains no commercial proposals, but other allocations also only for housing.	Origin3 (5765)	Comments noted, however both this site and the Pedlerspool site were noted as having a slight positive impact in terms of promoting economic growth given they are both large sites which would provide employment opportunities during construction phases.

	<p>Objects to exclusion – other sites preferred but these have (in some cases) significant constraints and offer greater risk in terms of early delivery – almost all are on east of town where there are significant landscape, habitat and flood plain constraints. Sites score equal or higher on overall score than 4 of 9 sites allocated.</p>	<p>Origin3 (5765)</p>	<p>The Council has responded to the criticisms on individual sites elsewhere in this summary. One of the principal issues with the Chapel Downs site is the impact of traffic upon the high street and air quality. The high street and Exeter Road are designated an Air Quality Management Area. An Air Quality Action Plan for Crediton indicates a range of measures to improve air quality, the most significant being the opening of a link road. This has now been completed, and is anticipated to have a beneficial impact on air quality, primarily on the east side of town as it diverts traffic away from the air quality hot spot along Exeter Road. However, its impact is likely to be much lesser along the high street given it provides no alternative route for traffic heading out to destinations west along the A377. The Chapel Downs site will result in an additional traffic draw through the high street as most likely destinations for journeys are either Exeter or Tiverton. Whilst some mitigation could be provided, the impact of developing sites on the east side of town, is likely to be much lesser than any on the west.</p>
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Village allocations

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Proposed changes
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BA1 Newton Square, Bampton	Objection – development harms elements identified as important within Conservation Area Appraisal, which have not been considered within the Sustainability Appraisal; Historic Environment Appraisal needs to be undertaken to assess if there is harm and if so to suggest mitigation.	Historic England (1170)	A Historic Environment Appraisal has been undertaken that indicates that the impact on the setting of listed buildings is likely to be minimal.
	Site lies in floodplain; any development must take account of surface water build up.	Individual (2075)	Site is located entirely within Flood Zone 1 (least probability of flooding). However, given proximity to Shuttern Brook any planning application would need to be accompanied by a Flood Risk Assessment and Drainage Strategy which would need to take account of and ensure there is no increase in surface water flooding. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Bampton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.
BA2 Stone Crushing Works (Scott's Quarry), Bampton	Sensitive design required.	Individual (2075)	This site already has planning permission. Any subsequent applications will need to comply with Policy DM1 'High quality design'.
	Further development must not exacerbate surface water run-off; inclusion of SUDs and sewage improvements.	Individual (2075)	National planning policy requires that development should not increase flooding elsewhere, including setting out that there is no increase in the volume of surface water or the rate of surface water run-off. The scheme which has consent includes a Sustainable Urban Drainage system. Any revision to the proposal would need to comply with policy DM1 which sets requirements over SUDs and drainage.

	Strongly opposed to any building in/around Bampton.	Individual (5261)	Bampton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.
	Viability of employment development uncertain – Bampton as a place for employment as tested by market and planning system is poor.	Harcourt Kerr (1090)	The existing employment units on the site are all occupied, whilst the units remaining to be built have permission. Permission has recently been granted for variation of conditions which demonstrates the commercial interest in the site. Tenants are lined up for all the units yet to be built.
BA3 Ashleigh Park, Bampton	Development must not exacerbate surface water flooding.	Individual (2075)	National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Bampton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.
BO1 Land adjacent Hollywell, Bow	Site allocation not supported, as considers that site unlikely to be developed for some time.	Bow Parish Council (47)	The landowner's submission indicated that the site is immediately available for development. Understand that the parish council's concern about deliverability of the site is founded on the likelihood that the landowner would not wish to see the property demolished to achieve the access. Therefore policy wording amended following discussions with Devon County Council to state alternative access options will be considered providing they are to the satisfaction of the highway authority.

BO2 West of Godfreys Gardens, Bow	Supports allocation.	Bow Parish Council (47)	Support noted.
BR1 Hele Road, Bradninch	Access is on dangerous bend/poor visibility and access is shared which could reduce capacity; concern about volume of traffic along Hele Road and use of dated traffic data.	Bradninch Town Council (86); Individual (5256, 5840)	The highway authority has confirmed that a suitable access can be achieved to the north of the site.
	No need for further housing in Bradninch, given recent affordable housing development.	Bradninch Town Council (86); Individual (5256)	The plan sets out to meet the district's housing need across the period 2013-33. A central part of the strategy involves the provision of a limited number of small development allocations in villages which have availability of essential services/facilities.
	Site unlikely to be deliverable given sloping/wet nature of land, third party land ownership, avoidance of main sewer and low number of units proposed.	Individual (5213)	The site has been assessed by a panel of housing industry experts (the SHLAA panel) who have confirmed that they believe the site to be deliverable.
	Concern about parking, which is at a premium locally.	Individual (5840)	Comments noted. Any new development will need to meet the minimum standards for parking provision as set out in Policy DM5 'Parking'.
	This is a site designated by the Town Council in the plan for a car park.	Individual (559)	A number of possible locations for car parks (including this site) were included as options during the preparation of the Allocations and Infrastructure DPD in 2007. However, it was noted that these would only be included in the final version if it was clear they could be implemented. None were eventually allocated for these reasons. The Parish Plan (having been prepared in 2010) erroneously states that these sites were allocated as car parks in the adopted plan.
	Bus stop may need to be re-sited, though options for doing so are problematic.	Individual (5840)	Options for the relocation of the bus stop will be considered at the planning application stage.

<p>CH1 Barton, Chawleigh</p>	<p>Proposed allocation has potential to harm setting of Grade 1 church and conservation area; historic appraisal needed to reassess impact, if harm concluded set out mitigation, if harm still present justify allocation.</p>	<p>Historic England (1170)</p>	<p>A Historic Environment Appraisal has been prepared which notes the possibility for harm given that the development area is potentially in the line of sight from the conservation area and the Grade 1 St James church. However, it states that mitigation can be achieved by high quality design together with a landscape buffer on the east side of the site. An amendment is proposed to include a design solution which respects the setting of the conservation area and listed buildings.</p>
<p>CB1 Land off Church Lane, Cheriton Bishop</p>	<p>Supports proposals but requests reduction in area and inclusion of landscaping along northern boundary.</p>	<p>Cheriton Bishop Parish Council (42)</p>	<p>Agreed. Minor modification proposed to reduce the allocation from 30 to 20 dwellings and on a plot of 1.4ha applying a boundary which more closely aligns with the existing pattern of built development. Policy also now includes provision of landscape buffer along the northern boundary to protect the privacy of adjoining residents given topography of site. This modification is not considered to make any changes to the SA score based on the framework provided within the SA however it is considered beneficial for the reasons above.</p>
	<p>Removal of hedge along frontage for footpath provision/road widening unacceptable on traffic/environmental grounds; footpath should instead be provided on inside of hedge.</p>	<p>Cheriton Bishop Parish Council (42); Individual (4489, 4672, 4316)</p>	<p>Highway authority has confirmed that widening of the road is essential for two vehicles to pass. The supporting text has been amended to state that a design solution which provides the footpath on the inside of replacement planting will be looked upon favourably at planning application stage.</p>

	Requests proposal takes account of permitted affordable housing in village, including those within Teignbridge District Council jurisdiction.	Cheriton Bishop Parish Council (42); Individual (5298, 5320, 5330, 4361, 5661, 4672, 4252, 4210, 5781, 4634, 4083, 4296, 4220)	Of the villages listed in proposed policy S13, Cheriton Bishop has had the lowest level of completions since 2006 (9, the highest being 97). Even with the inclusion of the committed scheme in Teignbridge, for 18 dwellings, and the figures for Dartmoor area (2 complete, 1 permitted), the total quantum of development is still in keeping with the level that has taken place and is proposed throughout the other designated villages.
	Supports proposals, seems preferable to others given integration with existing built form and central village location.	Individual (4489)	Support noted.
	Approves of affordable housing in village but not on this site.	Individual (5661, 4168)	Comment noted.

	<p>Objects as development would result in increased traffic along Church Lane/concern about road width (including construction traffic); there are existing issues of road safety (including for pedestrians) and parking problems (which will be exacerbated by Government limitations on parking provision).</p>	<p>Individual (5269, 4163, 5359, 4122, 5320, 5330, 4326, 4361, 5661, 4499, 4672, 4252, 4168, 4167, 4630, 5781, 4634, 4083, 5356, 4220)</p>	<p>The highway authority states that the development will significantly increase traffic along Church Lane and the widening of the road is essential to cater for this increase. A transport assessment will determine what mitigation, if any, will be needed to its junction with the main road in terms of capacity. There is only one accident recorded as “slight” on the road between Glebelands and junction with Church Lane, according to the reported personal injury accident records, which is not considered to be of material consideration of traffic on Church lane. Any other safety concerns can be addressed through section 106 agreements should they be identified agreed and considered necessary. The increase in traffic and the accident record are not considered to be of such a level as to warrant a recommendation that the allocation be removed from the plan. The development will need to provide a minimum level of parking provision in accordance with Policy DM5 ‘Parking’. Mid Devon now uses minimum parking standards, rather than the previous maximum standards in place under the pre-NPPF planning system. The developer will be able to provide more spaces than the policy if desired.</p>
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	Objects as unacceptable impact on privacy of neighbouring dwellings/overlooking/loss of light; plan does not show all adjoining properties giving false impression of impact.	Individual (5269, 4163, 5359, 4122, 5320, 4326, 4361, 4168, 4630, 5781, 4634)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy. However, a landscape buffer is now to be provided along the northern boundary given the difference in topography. The base map has also been updated to show the two new properties now constructed immediately to the north of the site.
	Objects due to loss of view.	Individual (4122, 4361)	Loss of view is not a material consideration in planning.
	Objects as land is steeply, not gently sloping.	Individual (4163, 5320, 5330, 4361, 4499, 4630, 5781, 4634, 4083)	There are variations in the steepness of the slope across different parts of the site, but these are not considered to be prohibitive to delivery.
	Objects as steep land likely to be prohibitively expensive to develop.	Individual (4252)	A panel of housing industry experts (the SHLAA panel) has stated that they believe the site to be financially viable and therefore deliverable.
	Objects to scale of development/questioned density of site, and would result in unacceptable impact on character of village.	Individual (4163, 5359, 5320, 4326, 4361, 5661, 4672, 4167, 4630, 4210, 4316, 5781, 4634, 4083, 4296, 4220)	The site is located between modern housing on its northern and southern boundaries, and no impact is considered likely on the conservation area further to the north. However, to ensure the site fits in with the existing pattern of built development the site size has been reduced and the number of dwellings dropped accordingly.
	Objects as most homes will be large/executive and unaffordable for local residents.	Individual (4163, 5298, 5320, 4168, 4630, 4210, 4296)	The size and mix of dwelling types will be determined at planning application stage. The policy requires 30% of the dwellings to be affordable housing.

	Objects as no need for further housing in village.	Individual (5359, 4326, 4167)	The plan sets out to meet the district's objectively assessed housing need across the period 2013-33. A central part of the strategy involves the provision of a limited number of small development allocations in villages which have the availability of essential services/facilities.
	Objects as no local facilities for young people, such as cinemas/swimming pools; lack of associated investment in facilities.	Individual (5359, 4326, 5661, 4168)	Cheriton Bishop is a village which has the minimum level of essential services/facilities set out in policy S13. As a result it is a suitable location for a small amount of development. New development can assist the viability of those services/facilities currently within the village.
	Objects as no consideration for impact on schools, doctors.	Individual (5320, 5781)	Assessment of school capacity forms part of the evidence base. Devon County Council report confirmed that both the village primary school and the secondary school, QE Academy in Crediton, have capacity to accommodate the additional pupils arising from development. Data provided by NHS England indicates there is patient capacity at the GP surgery in Cheriton Bishop.
	Objects as waste water and sewerage would not be able to cope with additional demand.	Individual (5781)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.

	Objects as local economy not big enough to justify development/forces village to become a satellite of Exeter.	Individual (4361, 4168, 5781)	Objection noted. Cheriton Bishop is a village which has the minimum level of essential services/facilities set out in policy S13. As a result it is a suitable location for a limited level of development meeting local needs.
	Objects to loss of countryside/agricultural land.	Individual (5298, 5359, 4326, 4499, 4672, 4630, 4634, 4083)	Objection noted. Site is on grade 3 agricultural land which is good/moderate, the loss of which has been considered in the decision to allocate the site balancing the loss against other factors (see Sustainability Appraisal for site by site scoring).
	Objects due to impact on landscape in area of outstanding natural beauty; unacceptable visual impact.	Individual (4499, 4672, 4083)	The site is not in an area designated for landscape beauty. The site is however on the fringes of Dartmoor National Park, but sits between two areas of modern housing. The site sits slightly lower in the landform than the housing to the south and offers little/no views of the national park. It is considered that there will not be an unacceptable impact on the park as a result. Dartmoor National Park Authority has not objected to the proposed allocation. Further design considerations can be taken into account at planning application stage.
	Objects as linking the two parts of the village will blur the distinctions between the very different characters.	Individual (4630, 4634)	The site is situated between two areas of modern housing, with the older part of the village beginning further to the north. Furthermore, the results of the Historic Environment Appraisal state that there are no anticipated impacts on heritage as the listed Old Rectory and the Conservation Area are located some distance to the north.

Objects due to impact on flooding; plan only mentions one adjoining watercourse when there are two.	Individual (4499, 4630, 5781, 4634)	The Council's Strategic Flood Risk Assessment mapping indicates the presence of only one unnamed watercourse flowing along the south east of the site. However, it does note that surface water presents a risk to site on the northern and southern boundaries. National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated.
Objects as no safe cycling routes to larger settlements.	Individual (5359, 4326)	No comment.
Objects as permission has previously been turned down on this location.	Individual (5359, 4326)	The new Local Plan Review sets the development strategy and policy framework within which future applications will be determined. The Local Plan Review indicates that the site is suitable for development. Furthermore, each planning application is considered on its own merit.
Objects as suitable sites nearer to Exeter/Okehampton should be considered.	Individual (5359, 4326)	The site will contribute towards meeting the housing needs of Mid Devon, rather than other districts.
Objection as would negatively impact on adjoining property prices.	Individual (4252)	Property value is a not a material planning consideration.
Properties not selling in village indicating no demand.	Individual (4083)	The plan aims to meet the housing needs identified in SHMA Final Report. Some of this need will be for housing in rural areas. Development of the site, which will contribute just under 0.5% towards the overall target, will help to meet that need.

CF1 Barnshill Close, Cheriton Fitzpaine	Support allocation given site falls within context of existing built development and limited visual impact.	Rosebourne Homes c/o WYG (1594); Individual (4614, 4035)	Support noted.
	Supports allocation given close proximity of services including school, bus stops, shop within walking distance.	Rosebourne Homes c/o WYG (1594)	Support noted.
	Supports Local Plan proposals for the village.	Individual (4273)	Support noted.
	Supports small amount of affordable housing, with off-site contribution remaining in village.	Individual (4305, 4306)	Support noted.
	Objects/raises concern over capacity of roads to accommodate additional traffic; negative impact on road safety.	Individual (4305, 4306, 5862, 4204, 4660)	The highways authority state that a statement would be required at application stage and any mitigation measures addressed.
	Objects due negative impact on landscape character.	Individual (4204)	The site is not located within an area designated for landscape value. It sits between existing development to the west and east and can be accommodated within the built pattern of development without adversely affecting the landscape.
	Objects as infilling will ruin character of historic linear settlement.	Individual (4204)	A Historic Environment Appraisal has been prepared which acknowledges that the site forms a significant location in terms of the entry to the more historic core of the village. However, it notes that good design is likely to mean minimal impact to the setting of the listed buildings and conservation area. The application will need to comply with Policy DM1 'High Quality Design' which requires development proposals to make a positive contribution to local character including any heritage or biodiversity assets and the setting of heritage assets.

	Objects as site in elevated position which will overlook/overshadow adjacent properties and/or school.	Individual (4660)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.
	Objects as off-site affordable housing contribution may benefit another location rather than local community.	Individual (4204)	Comments noted, however, following a successful legal challenge against a High Court ruling, government policy now permits off site contributions in rural areas for sites of 6-10 dwellings. The money received will be used to deliver affordable housing in Mid Devon.
	Objects as will affect privacy of adjoining properties.	Individual (4660)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.
	Objects as will negatively affect house prices of adjoining properties.	Individual (4660)	Property value is not a material consideration in planning.
	Objection/concern about capacity of sewerage/mains water.	Individual (4305, 4660)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.

Objection about capacity of health service.	Individual (4660)	NHS England and the local Clinical Commissioning Groups are statutory consultees on the Local Plan. Neither has written in to object to the proposed allocation, which is small in scale and unlikely to have a significant impact on patient numbers.
Objection/concern over low level of public transport provision.	Individual (4305, 4306, 4204, 4660)	Highways authority states that development necessary to support current service.
Concern that primary school does not have capacity/absence of discussion of impact on secondary places in Crediton.	Individual (4305, 4306, 5862, 4204, 4660)	Assessment of school capacity forms part of the evidence base. Devon County Council confirmed that both the village primary school and the secondary school, QE Academy in Crediton, have capacity to accommodate the additional pupils arising from development.
Concern over development causing surface water flooding.	Individual (4305, 4306, 4660)	National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. Specific flood mitigation measures will be considered at the planning application stage. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
Objection as houses not selling in village, indicates no need for housing.	Individual (4660)	The plan aims to meet the housing needs identified in SHMA Final Report. Development of the site will help to meet that need.
Objects to new housing in the village (no reasons given).	Individual (4241)	No comment.
Should follow best practice re energy and ecology sustainability and protection of biodiversity.	Individual (5862)	Improvements to the energy efficiency of buildings and sustainable design are now predominantly addressed through building regulations rather than planning.

CF2 Land adjacent school, Cheriton Fitzpaine	Supports development as extends village in controlled/organic manner, unifies village envelope and is sustainable.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as will help support local facilities and school.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as will provide affordable housing.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as is not at risk of flooding (flood zone 1).	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as will create minimal visual intrusion in landscape.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports small amount of affordable housing, with off-site contribution remaining in village.	Individual (4305, 4306)	Support noted.
	Supports development as will allow young people to remain in village.	Individual (5231, 5311)	Support noted.
	Supports Local Plan proposals for the village.	Individual (4273)	Support noted.
	Objects to inclusion of site and states is less preferable to OCF2 Landboat Farm. Raises concern about scoring between the sites within the Sustainability Appraisal in relation to natural and built environment, flooding, economic growth, community health/wellbeing, infrastructure. States land within the settlement limit should not be taken into account when scoring sites.	Garside Planning Services (3645)	Responses to specific comments are set out below, whilst those in relation to the Sustainability Appraisal scoring (i.e. how most comments in this rep were discussed) are set out in the sustainability appraisal update.
	Objects to inclusion of site and states could impact on potential to expand school in future.	Garside Planning Services (3645)	Devon County Council as education authority has raised no objection regarding the proposed allocation. Further undeveloped land remains on the north and west sides of the school which could be used for future expansion.

	<p>Objects to site and states that potential for landscape and visual impact is greater than OCF2 particularly at western end of the site which would be visible from public highway; development of this site would break the skyline.</p>	<p>Garside Planning Services (3645)</p>	<p>The school site is on moderately higher ground than the objection site. However, within the context of the local landscape, both are relatively contained, with higher ground to north of proposed allocation and to south of objection site, with few opportunities for views in from long distances. The school site is visible from the public highway, but there is existing development along the south side of the road and buildings to the east and the school to the west. These buildings screen much of the site from views and provide a degree of mitigation to any visual impact. Presence of dwellings on south side of highway means that skyline when viewed (from very limited viewpoints to south) is unlikely to be significantly altered.</p>
	<p>No current access to site, construction of which would have negative impact on visual amenity, as opposed to OCF2 which has existing access.</p>	<p>Garside Planning Services (3645)</p>	<p>There is a long site frontage on which to accommodate the appropriate visibility splays in a manner which minimises visual impact. This can be considered at design stage.</p>
	<p>Objects/raises concern over capacity of roads to accommodate additional traffic.</p>	<p>Individual (4305, 4306, 5862, 4204, 4660)</p>	<p>The highway authority states that a statement would be required at application stage and any mitigation measures addressed.</p>

	Objects due to negative impact on landscape character/views.	Individual (4204, 4035)	Within the context of the local landscape, the site is relatively contained, with higher ground to north of proposed allocation and few opportunities for views in from long distances. The school site is visible from the public highway, but there is existing development along the south side of the road and buildings to the east and the school to the west. These buildings screen much of the site from views and provide a degree of mitigation to any visual impact. Presence of dwellings on south side of highway means that skyline when viewed (from very limited viewpoints to south) is unlikely to be significantly altered.
	Objects as infilling will ruin character of historic linear settlement.	Individual (4204)	A Historic Environment Appraisal has been undertaken which states that the site is well away from the main village/conservation area and therefore, there are no heritage assets immediately affected.
	Objects as site would overpower/overlook the school, negatively impacting on school children through pollution, noise, security issues.	Individual (4614, 4035, 4660)	Overlooking, noise and pollution will all be considered at design stage – any proposal will need to comply with the relevant development management policies on these issues.
	Objects due to loss of grade 3 agricultural land.	Individual (4035)	Objection noted. Site is on grade 3 agricultural land which is good/moderate, the loss of which has been considered in the decision to allocate the site balancing the loss against other factors (see Sustainability Appraisal for site by site scoring).

	Concern about capacity of sewerage/mains water.	Individual (4305, 4660)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.
	Concern over low level of bus provision.	Individual (4305, 4306, 4660)	The highway authority states that development is necessary to support current service.
	Concern that primary school does not have capacity/absence of discussion of impact on secondary places in Crediton.	Individual (4305, 4306, 5862, 4204, 4660)	Assessment of school capacity forms part of the evidence base. Devon County Council confirmed that both the village primary school and the secondary school, QE Academy in Crediton, have capacity to accommodate the additional pupils arising from development.
	Concern over development causing surface water flooding.	Individual (4305, 4306)	National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. Specific flood mitigation measures will be considered at the planning application stage. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Objects as would negatively impact on house prices.	Individual (4660)	Property value is not a material planning consideration.

	Objects due to impact on privacy of adjoining properties.	Individual (4660)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.
	Objects due to capacity of health service.	Individual (4660)	NHS England and the local Clinical Commissioning Groups are statutory consultees on the Local Plan. Neither has written in to object to the proposed allocation, which is small in scale and unlikely to have a significant impact on patient numbers.
	Objects as houses not selling in village, indicates no need.	Individual (4660)	The plan aims to meet the housing needs identified in SHMA Final Report. Development of the site will help to meet that need.
	Objects as those who live in White Cross have done so to be outside centre of the village.	Individual (4614, 4035)	Objection noted.
	Objects to new housing in the village (no reasons given).	Individual (4241)	No comment.
	Should follow best practice re energy and ecology sustainability and protective of biodiversity.	Individual (5862)	Improvements to the energy efficiency of buildings and sustainable design are now predominantly addressed through building regulations rather than planning.
CO1 The Old Abattoir, Coplestone	The inclusion of a 100 space car park to serve the railway station is supported.	Devon County Council (626)	Support noted.
	Requests amendment to policy to require provision of landscaping buffer between housing and car park, and raises issue about car park being gathering place for activities that cause concern.	Mr T Newstead c/o Stephen Hargreaves (5832)	Highway authority stated that if landscaped unsavoury activities may be more prevalent than if overlooked. Suitable lighting would also be a deterrent. Such issues can be considered at design stage.

	Affordable housing provision would need to be subject to viability given Council's policy requirements – site will have costs associated with diversion of gas main and provision of SUDs.	Mr T Newstead c/o Stephen Hargreaves (5832)	Policy already makes reference to the affordable housing being subject to viability.
CL2 Hunter's Hill, Culmstock	Support reference to landscape and design and setting of AONB in policy.	Blackdown Hills AONB Partnership (1195)	Support noted.
HA1 Land adjacent Fisher's Way, Halberton	Supports allocation given not within conservation area.	Halberton Parish Council (58); Individual (4447)	Support noted.
	Site is less suitable for farming than OHA1, is adjacent recent affordable housing development and has access in place.	Halberton Parish Council (58)	Support noted.
	Site is less preferable to 'The Pethers' which is not within an area of archaeological potential, not at risk of flooding from groundwater or Grand Western Canal, and has better access to road network.	Garside Planning Services (3645)	Not agreed that objection site has better access, as proposed allocation has existing access (objection site does not). The objection site falls within the same zone for the breach of the Grand Western Canal as the proposed allocation and though generally it has the same risk of groundwater flooding, it does encroach into an area at high risk of groundwater flooding. The Devon County Council Archaeology Team has confirmed that the scale and situation of the proposed allocation will not impact on any known heritage assets and state that they would not need to be consulted should an application come forward. This part of the policy is proposed to be deleted. Therefore both sites score equally for impact on built/historic environment. The proposed allocation is also the preferred site of the parish council.
HE1 Depot, Hemyock	Supports allocation given within settlement and agrees with assessed impact on AONB.	Blackdown Hills AONB Partnership (1195)	Support noted.

	Family member resident on site, wishes to see it developed, but not in near future.	Individual (4376)	Reps 4376 and 5767 (see below) raise significant issues with the potential deliverability of the site. Given it is within the settlement limit, it is proposed to remove the allocation from the plan, and should it become available it can come forward as a windfall site.
	Objects given it is within settlement limit and unnecessary to allocate for residential development/can come forward as windfall.	Waddeton Park Ltd (3815); Messers Brooks & Nicolson c/o Greenslade Taylor Hunt (5767)	As per above the site is proposed to be deleted as an allocation and allowed to come forward as a windfall.
	Does not currently consider site deliverable due to third party access issues and landowners intention to continue trading.	Messers Brooks & Nicolson c/o Greenslade Taylor Hunt (5767)	This response and another rep (4376 – see above) raise significant issues with the potential deliverability of the site. Given it is within the settlement limit, it is proposed to remove the allocation from the plan, and should it become available it can come forward as a windfall site.
	Objects as only affordable housing contribution would be made which would not necessarily benefit local community.	Waddeton Park Ltd (3815)	Objection noted.
	Objects as site should be protected as a rural employment site under the 'Protection of Employment Land' policy.	Waddeton Park Ltd (3815)	Objection noted.
	Objects as road infrastructure very poor.	Individual (4268)	The highway authority had confirmed that development of the site for a residential use is acceptable on the basis of there being an existing transport use. The final number of dwellings deemed to be acceptable would (if still proposed for allocation) be determined by a Transport Statement.
	Objects as insufficient emphasis on AONB.	Individual (4268)	The Blackdown Hills AONB Partnership is satisfied with the policy.
MO1 Greenaway,	Site is already allocated within adopted plan.	Morchard Bishop Parish Council (89)	Comments noted.

Morchar Bishop	Policy should be amended to provide warden controlled sheltered housing.	Mr & Mrs Jeffrey c/o Stephen Hargreaves (5833)	Warden controlled schemes are not favoured by the Housing Department or most Registered Providers as they are generally not viable in the absence of any subsidy to see them delivered. The Council as landlord is moving away from such provision in favour of using lifelines. Specifying that such provision is a policy requirement would potentially render the site undeliverable. However, such schemes are considered to be affordable housing and the policy remains flexible enough that such a scheme could (if viable and meeting an identified need) come forward without requiring a modification to the policy. It would be a judgment for the case officer determining the planning application to consider the merits of any variance from the policy criteria.
	Provision of 20 dwellings at Greenaway more than sufficient to meet future village requirements.	Individual (4117, 5295, 3971, 5263, 5642, 5641, 5604, 5603, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 5594, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4212, 4215, 5589, 5588, 5587, 5586, 5358)	Comments noted.
	Objection to allocations as there is no local need for housing in the village/already sufficient supply as houses regularly for sale/letting.	Mid Devon CPRE (486); Individual (366, 4093)	The plan aims to meet the housing needs identified in SHMA Final Report. Some of this need will be in rural locations. This is a small development, which will contribute about 0.26% of the overall district requirement compared with a parish population for Morchar Bishop of approximately 1.2% of the overall district.

	<p>Objection to allocation and proposes site be retained on current allocation basis, i.e. for 12 affordable dwellings.</p>	<p>Mid Devon CPRE (486)</p>	<p>The Local Plan Review strategy includes the provision of generally small allocations in designated villages. These will include a mix of market and affordable housing. This is a different approach from the adopted plan which allocated only affordable housing exception sites in villages. Many of these sites have not been delivered. This alternative method for delivering some affordable provision in villages on the back of market dwellings reflects guidance in the National Planning Policy Framework.</p>
	<p>Objection to allocation as site is outside settlement limit which should be used to guide development.</p>	<p>Mid Devon CPRE (486)</p>	<p>The new Local Plan determines the extent of settlement limits. Where new development is proposed, the settlement limit is amended accordingly.</p>
	<p>Objection as would have adverse impact on landscape and setting of village/visual impact on approach to village.</p>	<p>Mid Devon CPRE (486)</p>	<p>The allocation is not in an area covered by a landscape designation. The principle of developing the site was accepted via the allocation of the site in the adopted Local Plan. Furthermore, the Historic Environment Appraisal concludes that there are no anticipated heritage impacts associated with the development of this site.</p>
	<p>Objection as is on grade 3 agricultural land.</p>	<p>Mid Devon CPRE (486)</p>	<p>Objection noted. Site is on grade 3 agricultural land which is good/moderate, the loss of which has been considered in the decision to allocate the site balancing the loss against other factors (see Sustainability Appraisal for site by site scoring).</p>

	<p>Objection as likely to cause further flooding from surface water run-off.</p>	<p>Mid Devon CPRE (486); Individual (5699)</p>	<p>National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.</p>
	<p>Objection as no capacity within sewerage network/would require disruptive improvement works.</p>	<p>Individual (366, 5699)</p>	<p>South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.</p>
	<p>Objection as public transport is inadequate resultant reliance on private car.</p>	<p>Individual (366, 5699)</p>	<p>Comments noted.</p>
	<p>Objection as insufficient capacity at school and doctors.</p>	<p>Individual (5699)</p>	<p>Assessment of school capacity forms part of the evidence base. Devon County Council report confirmed that both the village primary school and the secondary school, Chulmleigh Community School, have capacity to accommodate the additional pupils arising from development. NHS England, a statutory consultee, has not raised any objection to the allocation.</p>

	Objection as properties should be built in more accessible location, young people would prefer to live closer to a town or city.	Individual (5699)	Comments noted. Morchard Bishop along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.
	Objection as building houses does not achieve goal of reducing carbon emissions.	Individual (5699)	Achieving sustainable development requires balancing social, economic and environmental factors. The plan aims to meet the housing needs identified in SHMA Final Report. Rising standards in building regulations will set increased energy efficiency targets, whilst the majority of development is focused in the main towns where options for the use of sustainable forms of transport are greater.
	Objection as increased traffic/noise could be detrimental to show quality animals on adjacent land.	Individual (5699)	The Council's Environmental Health section did not raise any initial concerns regarding the impact on air quality through the assessment of the site within the SHLAA process. However, at application stage the proposal will need to comply with Policy DM3 'Transport and air quality' and DM4 'Pollution', which cover noise and air quality and development will not be permitted if there is an unacceptable negative impact arising.
SP1 Former Tiverton	Policy should include provision for chain link fence to prevent cricket balls carrying into site.	Halberton and Sampford Peverell Cricket Club (5403)	Fencing and other appropriate landscaping features will be considered at the planning application stage.

Parkway Hotel, Sampford Peverell	Objection to allocation as insufficient evidence to confirm whether site is viable to deliver a GP surgery on back of small development – considered unsound (not justified).	Taylor Wimpey UK c/o WYG Planning (1708)	The verdict of the SHLAA panel was the site was deliverable. The supporting text acknowledges that viability may well be an important factor and that a reduced affordable housing provision would be considered if justified. No evidence has been provided by the objector to justify their claim. The size of the new surgery is likely to be modest, in that it only needs to replace the existing small surgery currently within the village.
	Objection to allocation – landowners have not implemented previous permissions nor have they brought the site forward for residential development.	Taylor Wimpey UK c/o WYG Planning (1708)	A focus on existing care provision has resulted in the landowner no longer wishing to proceed with delivering a care home in this location. Residential development would not have had policy support being outside the settlement limit in the adopted plan. Only through a review of the Local Plan is the site able to be proposed for residential development.
	Potential for flooding from groundwater sources a fundamental weakness of allocation.	Taylor Wimpey UK c/o WYG Planning (1708)	The EA's 'Areas Susceptible to Groundwater Flooding' Map breaks the likelihood of groundwater flooding into four categories. This site is in the lowest category having the least probability of groundwater flooding i.e. <25%. It is in the same category as the objector's preferred site. There was an error in the supporting text in paragraph 3.224 which stated that the chance of groundwater emergence was 20-25%, when actually the figure was 0-25%. As a result the text is proposed to be amended.

SA1 Fanny's Lane, Sandford	Supports allocation but considers it possible for site to accommodate more than 8 dwellings without adversely impacting on conservation area or setting of church.	Summerfield Developments (SW) Ltd c/o WYG Planning (3773)	Support noted. The total allocation is for 27 dwellings, of which 19 have now been completed, leaving 8 dwellings proposed on the remaining site area. The Historic Environment Appraisal raises major concerns about Park House; a grade II listed building as it would be surrounded on all sides by housing, with none of its park land remaining. The policy provides mitigation in the form of a buffer strip of planting or open space to protect the setting of the listed Park house and Sandford Conservation Area and through a criterion requiring careful design and landscaping to protect views towards Sandford and the historic core around St Swithun's Church. These constraints act against an increase in the proposed dwelling numbers.
	Quantity of development has implications for traffic and sewerage.	Sustainable Crediton (2689)	Highways authority state that a statement would be required at application stage and any traffic mitigation measures addressed. South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.

	Historic environment appraisal required to assess impact of development on listed church and conservation area, if concludes harm to set out mitigation, and if harm remains need to justify public benefits.	Historic England (1170)	A Historic Environment Appraisal has been prepared which raises major concerns about Park House; a grade II listed building as it would be surrounded on all sides by housing with none of its park land remaining. However, the policy provides mitigation in the form of a buffer strip of planting or open space to protect the setting of the listed Park House and Sandford Conservation area and through a criterion requiring careful design and landscaping to protect views towards Sandford and the historic core around St Swithun's Church.
S11 Land at Old Butterleigh Road, Silverton	Supports proposed allocation.	Silverton Parish Council (94); Residents of Hederman Close (4927)	Support noted.
	Any further development should be limited to infill.	Residents of Hederman Close (4927)	Silverton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development. The two sites proposed for Silverton are small scale (some of the smallest of all the village allocations) and one is a redevelopment of existing buildings.
	Plan should set out how the financial contribution for affordable housing will be worked out and that it accords with national guidance.	Pemberton Hutton Developments c/o Jillings Hutton (5786)	There is existing guidance within the Council's adopted "Meeting Housing Needs" SPD. The SPD will be reviewed upon adoption of the Local Plan Review to link it to the latest suite of policies.

<p>Objection as land and road have flooding issues (potentially associated with springs in vicinity); access must be retained to streams on boundary for maintenance; purchasers may struggle to gain insurance.</p>	<p>Silverton Local History Society (5274); Individual (5297, 5335, 5334, 25, 4005)</p>	<p>A detailed Flood Risk Assessment will need to accompany the planning application. This will assess the flood risk from any a variety of sources, including surface water and groundwater flooding. It will need to demonstrate that the development is safe, flood resistant and set out mitigation measures within a drainage strategy for ensuring there is no increase in the volume or likelihood of flooding arising from the development.</p>
<p>Objection as access is via narrow road, with lack of pavement; more housing would exacerbate parking problems and reduce road safety.</p>	<p>Silverton Local History Society (5274); Individual (5297, 5335, 5334, 25, 5272, 4005)</p>	<p>The highway authority state that the road would need to be widened with the inclusion of frontage works to provide defensible space for pedestrians. The development will need to comply with Policy DM5 'Parking' in providing sufficient parking spaces in order to provide for the number of cars likely to arise from the development.</p>
<p>Objection as development would lead to loss of old Devon hedge and/or destroy historically important part of village.</p>	<p>Silverton Local History Society (5274); Individual (5335, 5272)</p>	<p>The results of the Historic Environment Appraisal conclude that there are no anticipated heritage impacts associated with this site.</p>
<p>Concern that proposed grass verge will be of no benefit, and will be eroded by farm vehicles.</p>	<p>Individual (4005)</p>	<p>The highway authority states that the road widening and frontage works are required to service the development. Farm vehicles should be accommodated within the resultant design.</p>
<p>Trees within site need to be replaced, for wildlife reasons and they provide screening between adjacent properties.</p>	<p>Individual (5297)</p>	<p>The trees on site are not currently protected, though could be incorporated into the final design. However the impact on biodiversity will considered at the design stage through the submission of a wildlife survey. The development will need to comply with Policy DM12 to that there is no unacceptable impact on the privacy of adjoining properties.</p>

<p>If site is to be provided then number of properties should be reduced to ensure sufficient on-site parking and turning space for delivery vehicles.</p>	<p>Individual (25)</p>	<p>The proposed dwelling numbers are in line with the density standards applied to all village allocations (i.e. 20-25 per hectare). Parking provision will need to be provided in line with the standards specified in Policy DM5 'Parking'. Turning space will be considered at design stage.</p>
<p>Wildlife, including badgers make use of the site.</p>	<p>Individual (5297)</p>	<p>The impact on biodiversity will be considered at the design stage through the submission of a wildlife survey. The development will not be permitted if the survey indicates there will be an impact on such species which cannot be mitigated.</p>
<p>Site has previously been refused planning permission.</p>	<p>Individual (5335, 5334)</p>	<p>The new Local Plan Review sets the development strategy and policy framework within which future applications will be determined. The Local Plan Review indicates that the site is suitable for development, with the policies in the plan setting the framework against which a future planning application on the site will be assessed.</p>
<p>Concern about capacity of sewage works and associated disruption resulting from improvement works.</p>	<p>Individual (4005)</p>	<p>South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans. The impact of transport will be considered at planning application stage and mitigation measures put forward.</p>

SI2 The Garage, Silverton	Supports proposed allocation.	Silverton Parish Council (94); Residents of Hederman Close (4927)	Support noted.
	Any further development should be limited to infill.	Residents of Hederman Close (4927)	Silverton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development. The two sites proposed for Silverton are small scale (some of the smallest of all the village allocations) and one is a redevelopment of existing buildings.
	Supports allocation as could enhance approach to village if designed to complement adjacent dwellings.	Individual (4005)	Support noted. The policy contains a criterion which requires the design and layout to respect the character of the conservation area.
	Supports allocation of the site as it has good access previously used by lorries associated with previous use.	Individual (4005)	Support noted.
TH1 South of Broadlands,	Supports allocation of site.	Thorverton Parish Council (49); The Church Commissioners c/o Deloitte Real Estate (1517)	Support noted.

Thorverton	Suggests site area should be extended to incorporate allotment land, which could be provided elsewhere (subject to demand); could increase housing provision, make use of existing access and omit need for road widening/footpath creation and loss of hedgerow.	The Church Commissioners c/o Deloitte Real Estate (1517)	Though the allotment land could be provided elsewhere, the option to avoid their relocation is preferable. The highway authority states that the size of the allocation would require the road to be built to an adoptable standard. The garages would need to be in the control of the applicant (which they currently are not). Design of the road would require a carriageway width of 4.8m and 2x 2m footways either side in order to provide adequate visibility to and from oncoming traffic. An overall width of 11.8m would be required between the garages unless alternative footpath arrangements could be provided. There are cost issues associated with the type of materials needed to upgrade the access road through the garages which might make this option prohibitive when compared with the proposed access road set out in the policy.
WI1 Land east of M5, Willand	Supports development of Willand but objects as site not large enough to accommodate projected growth over 20 year period; additional land put forward should also be allocated.	XL Planning and Design Ltd (5098); Gallagher Estates Ltd c/o Turley (5763)	Willand, along with other villages defined in Policy S13 provides a level of essential services/facilities and is therefore suitable for a limited level of residential development.
	Allocation should be increased to 174 dwellings - is stated to be suitable, available and deliverable with no technical or landownership constraints; represents 'infill' between M5 and remainder of village; appropriate buffer zone and planting, as well as protection of habitats would be required	Gallagher Estates Ltd c/o Turley (5763)	Willand, along with other villages defined in Policy S13 provides a level of essential services/facilities and is therefore suitable for a limited level of development.

	Supports policy AL/W1/2 (previous allocation in AIDPD).	Halsall Construction Ltd (5864)	Only part of the previous allocation is retained in the Local Plan Review (i.e. it forms the most southerly part of W11). However, the previous site was allocated as an exception site, which does not need to be allocated, nor be within the settlement limit, in order to come forward.
	Supports proposals for limited housing development in Willand.	Individual (5257, 4362)	Support noted.
	Objects as considers site to have flooding/drainage issues; requests early consultation with relevant agencies.	Willand Parish Council (44)	The site is within Flood Zone 1, the land with the least probability of flooding. Being in excess of 1 hectare, the planning application will need to be accompanied by a flood risk assessment and drainage strategy. The assessment will set out the impact of the development on flooding, and measures to mitigate that impact. There should be no increase in flooding as a result of the development. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Objects as considers land at Mid Devon Business Park a more suitable site.	Neal Jillings for Devonshire Homes Ltd (1050)	Land at Mid Devon Business Park is allocated for employment use. Land at the business park is an unsuitable location for housing, being surrounded on three sides by existing and forthcoming employment development. This decision was backed up by the Council's decision to refuse planning permission for a housing scheme on the site from the objector.
	Objects to affordable housing in Willand.	Individual (5258)	There is an objectively assessed need for affordable housing across Mid Devon. Willand, as a settlement with a range of services and facilities is an appropriate location for such development.

Objects to scale of proposal as out of scale with rest of village.	Individual (5316)	The allocations in villages are all small in scale, this being an appropriate approach in keeping with allowing small residential allocations in locations where there are limited level of services and facilities. As Willand is the largest designated village in Mid Devon, it is appropriate that its allocation is slightly larger than the majority of those proposed in the other locations.
Objects to any development allocations in Willand.	Individual (5342, 5367, 5371, 4344, 5610, 5700, 5673, 5801)	Not agreed. Willand, as a settlement with a range of services and facilities is an appropriate location for such development.
Objects to site due to impact on school and/or parks.	Individual (5351, 5401)	The impact on the primary school has been assessed by Devon County Council. The County Council states that there is sufficient capacity at the local school to accommodate the development. This position has been disputed previously by the Council during recent planning applications. As a result the Council will seek to secure contributions from development to mitigate the impact of the development. The impact on parks is not explained in the representation. It is difficult to foresee what negative impact would take place.
Site would increase village housing stock but no retail nearby.	Willand Parish Council (44)	Willand as a settlement with a limited range of services and facilities is an appropriate location for small scale development. A recent application for a co-op store was granted permission in the village, which will increase the offer of convenience goods for sale locally. The allocation is within acceptable walking distance of existing and proposed retail facilities.
Margin would need to be retained to avoid affecting protected woodland; access point must also not affect woodland.	Willand Parish Council (44)	The policy already includes protection of the trees adjacent to the site.

	Requests footpath be retained if developed.	Willand Parish Council (44)	This is already specified in the policy.
	Site is on a regular bus route.	Willand Parish Council (44)	Comments noted.
WI2 Willand Industrial Estate	Mid Devon Business Park is allocated for industrial use and should remain allocated as such – objects to any change to put housing on site.	Willand Parish Council (44); Individual (4446)	Support for allocation noted.
	Proposed deletion of remainder of phase 1 commercial is premature, removal of phase 2 is understood, though the site may be used to relocate a nearby business.	Willand Parish Council (44)	Phase 2 and the remaining undeveloped parts of Phase 1 are now proposed to be reinstated and the allocation enlarged accordingly. The Council's original reasons for deletion have been addressed as the remainder of the site is now deliverable, with access to Phase 2 having been secured. The viability of delivering employment units in this location, which was another of the Council's concerns, is addressed by the representor's marketing report which demonstrates demand for a range of employment unit sizes in this location and by the submission of a planning application for approx. 13,000sqm employment covering the entirety of phase 2.

	<p>Objects to deletion of employment land 'phase 2'; the land is available and deliverable with access rights now secured.</p>	<p>Pallex SW Ltd c/o WYG Planning (5769)</p>	<p>Phase 2 and the remaining undeveloped parts of Phase 1 are now proposed to be reinstated and the allocation enlarged accordingly. The Council's original reasons for deletion have been addressed as the remainder of the site is now deliverable, with access to Phase 2 having been secured. The viability of delivering employment units in this location, which was another of the Council's concerns, is addressed by the representor's marketing report which demonstrates demand for a range of employment units sizes in this location and by the submission of a planning application for approx. 13,000sqm employment covering the entirety of phase 2.</p>
	<p>States there is demand for employment uses in this location (marketing report enclosed) and that issues affecting Phase 1 more to do with viability/price paid at height of market, rather than lack of demand.</p>	<p>Pallex SW Ltd c/o WYG Planning (5769)</p>	<p>Comments noted and marketing data supplied supports decision to reinstate allocation.</p>
	<p>Phase 2 to be subject to planning application shortly for relocation of Pallex SW Ltd (circa 50,000 sq ft floorspace) and range of smaller units (less than 10,000sq ft); Ecology Habitat Assessment accompanies representation.</p>	<p>Pallex SW Ltd c/o WYG Planning (5769)</p>	<p>Comments noted and application supports decision to reinstate allocation.</p>

	<p>Viability of employment site is poor, has delivered low output for commercial use with none since 2009.</p>	<p>Harcourt Kerr (1090)</p>	<p>Not agreed. Statement that there is lack of demand or poor viability for employment contrary to Alder King marketing report which accompanies rep from Pallex SW Ltd c/o WYG Planning (5769). Planning application for 13,000 sqm on phase 2 and recent permission for extension of neighbouring industrial estate (Pencarrie units) also indicates that employment development is viable in this location.</p>
	<p>Site not viable for employment development and should be allocated for residential development for up to 97 dwellings as per refused planning application.</p>	<p>Neal Jillings for Devonshire Homes Ltd (1050)</p>	<p>Not agreed. Statement that there is lack of demand or poor viability for employment contrary to Alder King marketing report which accompanies rep from Pallex SW Ltd c/o WYG Planning (5769). Planning application for 13,000 sqm on phase 2 and recent consent for extension of neighbouring industrial estate (Pencarrie units) also indicates that employment development is viable in this location. This is an unsuitable location for housing, being surrounded on three sides by existing and forthcoming employment development. This decision was backed up by the Council's decision to refuse planning permission for a housing scheme on the site from the objector.</p>

	Allocation for residential development would reduce reliance on large, infrastructure dependent allocations.	Neal Jillings for Devonshire Homes Ltd (1050)	Two of the large scale allocations have masterplans which are either adopted or significantly progressed. Delivery of units from these sites is anticipated to begin within the next two years. Sufficient smaller sites are allocated in the plan to ensure that there is a regular supply of sites to come through in the early part of the plan period. This is an unsuitable location for housing being surrounded on three sides by existing and forthcoming employment development. This decision was backed up by the Council's decision to refuse planning permission for a housing scheme on the site from the objector.
	Objects to any further development allocations in Willand.	Individual (5342, 5367, 5371, 4344)	Not agreed. Willand is identified a settlement with a range of services and facilities which can support small scale housing growth.

Village sites (non-allocated)

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
OBA1 Bourchier Close, Bampton (previously AL/BA/2)	Supports exclusion of site given re-classification of Bampton as a village.	Individual (2781, 5308, 2075, 2840)	Support noted.
	Supports exclusion as no need for housing given other recent developments in Bampton/no demand for office space in Bampton/existing commercial space elsewhere in village.	Individual (5562, 2840)	Support noted.
	Supports exclusion of the site as would extend village envelope into open countryside.	Individual (2482, 5840)	Comments noted.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Comments noted.

Supports exclusion due to traffic impact on local road network, poor access/inadequate visibility, lack of or capacity of public transport, lack of footpaths/streetlights, implications for safety, lack of parking in village centre.	Individual (5308, 5309, 5562, 2075)	Comments noted.
Supports exclusion as site not supported by local councillors at time of allocation in 2009/10.	Individual (2075)	Comments noted.
Supports exclusion as will alter historic/popular landscape/is close to historic castle.	Individual (2075)	Comments noted.
Concerns about flooding/capacity of sewage system, with history of floods noted.	Individual (5308, 5562, 2075)	Comments noted.
Concerns about capacity of schools/doctors.	Individual (5308, 5309, 5562)	Comments noted.
Concerns re lack of employment opportunities/leisure facilities for the young.	Individual (5309)	Comments noted.
Supports exclusion on sustainability due to negative impact on climate change from residents having to drive to 'strategically placed workplaces'.	Individual (2075)	Comments noted.
Objects to de-allocation of site as application has come forward demonstrating deliverability; site is sustainable, given level of facilities/services in Bampton.	Summerfield Developments Ltd c/o WYG (3773)	The plan proposes 4 allocations within Bampton, more than any other village. Of these two are brownfield redevelopments, whereas Bourchier Close would result in the loss of grade 3 agricultural land. The site is also elevated and visually prominent, and would be more intrusive than other sites proposed to be allocated.
Objects – housing requirement in plan too low, site should be carried forward into new plan to given Bampton's role and function in the district.	Summerfield Developments Ltd c/o WYG (3773)	The Council is proposing to amend the overall housing need figures to reflect the SHMA Final Report. There is sufficient housing supply within the plan, including an element of flexibility, and no requirement therefore to allocate additional sites.

OBA2 South Molton Road, Bampton	Objects to exclusion of site which is deliverable and sustainable, with good access and can provide local highway improvements/road safety benefits.	Colin Rowland c/o J Anning Land Planning Services (4925)	The plan allocates 4 sites within Bampton, more than any other village defined under S13. Further sites are not required.
	Site is in flood zone 1, in area of least risk of flooding; can be provided with a surface water drainage strategy based on SUDs principle; site can be connected to foul sewer network on B3227.	Colin Rowland c/o J Anning Land Planning Services (4925)	Comments noted.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Comments noted.
OBA3 Land at Ball Hill, Bampton	Strongly opposed to any building in/around Bampton.	Individual (5261)	Comments noted.
OBA4 School Close, Bampton (previously AL/BA/1)	Supports deletion of allocation but recommends settlement limit be amended to bring it back to existing hedge boundary.	Mr D. Stephenson c/o Jillings Hutton (5845)	An amendment is proposed to include the remaining part of the allocation OBA4 School Close, Bampton (previously AL/BA/1) to be consistent with the approach taken elsewhere in the plan that all permitted but unimplemented existing allocations be rolled forward into the Local Plan Review.
OBO2 East Langford Farm, Bow	Objects to exclusion of site, is preferable to BO1 'Land adj Hollywell'.	Bow Parish Council (47)	Comments noted, however the shape and location of the site represents an unusual and illogical extension to the built environment. The proposed allocations can be much more easily be assimilated within the existing pattern of the built environment.
	Site is suitable for development – is not known to flood, is unlikely to be archaeological interest and landscape impact can be mitigated.	Mr and Mrs G&D Jackman c/o Stephens Scown LLP (979)	Comments noted, however the shape and location of the site represents an unusual and illogical extension to the built environment. The proposed allocations can be much more easily be assimilated within the existing pattern of the built environment.
	Traffic issues can be overcome via use of alternative access off Station Road, along with implementation of traffic calming scheme.	Mr and Mrs G&D Jackman c/o Stephens Scown LLP (979)	The highways authority note that a transport solution may be achievable, but this will not overcome the reasons why other sites have been preferred as set out above.

OBO3 Land adj Jackman Car Park, Bow	Site should be included within settlement limit and infill permitted.	Individual (5254)	Site is not required.
OBO4 South of Iter Cross (Commercial)	Objects to de-allocation of employment site.	Bow Parish Council (47)	This site has been allocated since 2010 and has not come forward for development. Policies on rural employment development are now more permissive, so the site does not need to remain allocated in order to come forward.
OBO5 South West of Junction Road (commercial)	Objects to de-allocation of employment site.	Bow Parish Council (47)	This site has been allocated since 2010 and has not come forward for development. Policies on rural employment development are now more permissive, so the site does not need to remain allocated in order to come forward.
OCB1 Glebe, Cheriton Bishop	Site is better suited to new development than proposed allocation.	Individual (5269, 4672, 4630)	This is used as public open space, the loss of which is not preferable.
	Developing this site would allow opportunity to address issues of road safety associated with main C30 road; site has better access on to road.	Individual (4163, 5320, 4630)	Site has access on to the main road. However, for the reason set out above it is not preferred.
	Developing this site would have less impact on existing residents.	Individual (5320, 4630)	No clear reason why the impact of this site on existing residents is any different from proposed allocation or that those impacts are unacceptable.
OCB3 Land adj Woodleigh Hall, Cheriton Bishop	Site is better suited to new development than proposed allocation.	Individual (5269)	Not agreed. This site is isolated from the main body of the settlement. The proposed allocation can be assimilated within the existing pattern of the built environment.
OCB4 Land east of Hill View	Developing this site would allow opportunity to address issues of road safety associated with main C30 road; site has better access on to road.	Individual (5320, 4163, 5320, 4361, 4499, 4672, 4630)	Site has access on to the main road. Though this option could have been selected (being adjacent to existing development), the proposed allocation is in closer proximity to local facilities, such as the school, and could reduce walking times and reliance on private car.

	Developing this site would have less impact on existing residents.	Individual (5320, 4361 4499, 4630)	No clear reason why the impact of this site on existing residents is any different from proposed allocation or that those impacts are unacceptable.
	Site is better suited to new development than proposed allocation.	Individual (5320, 5269, 4361, 4499, 4672, 4630)	Not agreed. Please see comments above.
	Site is closer to pub and post office than proposed allocation and a footpath could be provided through the field to Church Lane.	Individual (4361)	Comments noted, however the proposed allocation is nearer the school, and proposed footpath is not in control of that site owner so no guarantee it can be delivered.
OCF1 Glebe, Cheriton Fitzpaine	Supports exclusion of the site/satisfied with Local Plan proposals for the village.	Individual (4273)	Support noted.
OCF2 Landboat Farm, Cheriton Fitzpaine	Supports exclusion of the site/satisfied with Local Plan proposals for the village.	Individual (4273)	Support noted.
	Objects to exclusion of site and states is preferable to CF2 Land adj school. Raises concern about scoring between the sites within the Sustainability Appraisal in relation to natural and built environment, flooding, economic growth, community health/wellbeing, infrastructure. States land within the settlement limit should not be taken into account when scoring sites.	Garside Planning Services (3645)	Responses to specific comments are set out below.

	States that landscape impact has been overstated, with visual impact likely to be less than school site (CF2).	Garside Planning Services (3645)	The school site is on moderately higher ground than the objection site. However, within the context of the local landscape, both are relatively contained, with higher ground to north of proposed allocation and to south of objection site, with few opportunities for views in from long distances. The school site is visible from the public highway, but there is existing development along the south side of the road and buildings to the east and the school to the west. These buildings screen much of the site from views and provide a degree of mitigation to any visual impact. Presence of dwellings on south side of highway means that skyline when viewed (from very limited viewpoints to south) is unlikely to be significantly altered.
	Site could create physical link between adjacent housing.	Garside Planning Services (3645)	These comments are acknowledged and not disputed. It would lead to a considerable length of linear frontage development on the south side of the entrance to the village, whereas the proposed allocation would result in a more balanced design encompassing both sides of the street.
	Questions 'loss of open space' associated with site, with area in question never fulfilling function as is private land; redevelopment could provide accessible public area.	Garside Planning Services (3645)	The land was previously designated as being 'important land for sport and recreation'.

OCFNEW Bramble Orchard, Cheriton Fitzpaine	Objects to plan allocations and submits new land for housing and provision of alternative footpath for school use. Objector owns field which proposes for development, potentially via inclusion in neighbourhood plan. Sale of land for housing would enable owner to address high mortgage costs, but also to release proceeds of sale to purchase Arthur's Wood, which is for sale.	Martin Lee c/o Stags Professional Services (5377)	The personal financial circumstances of applicants are not a material planning consideration.
	Proposal would enable future housing needs of the village without prejudicing intrinsic character and quality of historic core of the village. Site is deliverable and desirable, represents a logical extension to the village in keeping with character and landscape setting.	Martin Lee c/o Stags Professional Services (5377)	The plan already allocates two sites within the village which collectively will provide 29 new dwellings. Both sites will provide some affordable housing for local residents. The site is elevated and separated from the village. There is likely to be a detrimental impact on the landscape given the prominent location of the site. This does not represent a logical extension of the village given the separation of the site from the settlement.
	Site has substantial highway frontage sufficient to provide safe access for all purposes and owner has investigated potential to provide footpath links for pedestrians independent of the existing public highway.	Martin Lee c/o Stags Professional Services (5377)	Advice from the highway authority states that the site is remote from the settlement and will increase reliance on the private motor vehicle. There are no footpaths or lighting. Further issues over topography, road widths and forward visibility. Highways advise that the site be rejected accordingly.
	Site does not lie within area of flood risk, nor is there likely to be an increase in surface water run-off as no increase in impermeable hardstandings proposed. The site is well-related to existing service infrastructure.	Martin Lee c/o Stags Professional Services (5377)	Comments provided by Devon County Council confirm that there are no flood risk issues within the site boundary. The other comments are noted.
OHA1 Land at Blundells	Supports exclusion of site as it is in the conservation area.	Halberton Parish Council (58)	Support noted.

Road, Halberton	The settlement limit should be amended if this site is pursued.	Individual (4447)	No change is currently proposed to the settlement limit around this site. This would be considered in the eventuality that the site was allocated.
	An amendment to the settlement limit may be compromised by the site being within the Halberton Conservation Area.	Individual (4447)	The settlement limit will generally be amended to included proposed allocations. The impact on the conservation area has been a consideration in the decision not to propose allocating this site.
	Supports exclusion of site but requests it be removed from the Sustainability Appraisal as an alternative option.	Individual (4447)	Not agreed. It is a regulatory requirement to appraise alternative options.
	Supports exclusion but questions Sustainability Appraisal scoring and mitigation measures.	Individual (4447)	Responses to the scoring of the Sustainability Appraisal for this site are provided in the SA update.
	Copy of options consultation response. Concern over impact on residential amenity, including potential for overlooking due to the proximity and elevation of the site to existing dwellings.	Individual (4447)	Comments noted. These issues were considered as part of the appraisal of each site.
	Copy of options consultation response. Concern that the development of 25 houses will be detrimental to highway safety of Lower Town which is of restricted width and has a twisting course.	Individual (4447)	Comments noted. These issues were considered as part of the appraisal of each site.
	Copy of options consultation response. Concern over impact on setting of Grade II* listed building and barns.	Individual (4447)	Comments noted. These issues were considered as part of the appraisal of each site.
	Copy of options consultation response. Concern over impact on Halberton Conservation Area.	Individual (4447)	Comments noted. These issues were considered as part of the appraisal of each site.
	Copy of options consultation response. Concern over loss of Grade 1 agricultural land.	Individual (4447)	Comments noted. These issues were considered as part of the appraisal of each site.

<p>OHANEW The Pethers, Halberton</p>	<p>Objects to inclusion of HA1 site and offers preferable alternative. Compares site with Sustainability Appraisal scoring of HA1 Site is stated as being preferable over proposed allocation as has less archaeological potential, less likelihood of flooding and better access.</p>	<p>Garside Planning Services (3645)</p>	<p>Not agreed that objection site has better access, as proposed allocation has existing access (objection site does not). The objection site falls within the same zone for the breach of the Grand Western Canal as the proposed allocation and though generally it has the same risk of groundwater flooding, it does encroach into an area at high risk of groundwater flooding. The Devon County Council Archaeology Team has confirmed that the scale and situation of the proposed allocation will not impact on any known heritage assets and state that they would not need to be consulted should an application come forward. This part of the policy is proposed to be deleted. The proposed allocation is also the preferred site of the parish council.</p>
<p>OHE1 SW of Conigar Close, Hemyock</p>	<p>Site is preferable to proposed allocation HE1 'Depot', as is immediately available, has full services and access in place from adjoining development and would not result in significant wider landscape impact. Would also provide meaningful number of affordable houses in sustainable location.</p>	<p>Messers Brooks & Nicolson c/o Greenslade Taylor Hunt (5767)</p>	<p>Since this representation was received, planning permission has been granted for this site.</p>
<p>OHE2 Culmbridge Farm, Hemyock</p>	<p>Site is in a sustainable location and given the overall number of dwellings needs to increase should be allocated.</p>	<p>Summerfield Developments c/o WYG (3773)</p>	<p>The housing requirement in the Local Plan has been updated to reflect the SHMA final report. The plan allocates sufficient land for housing and this site, in the AONB, is not required.</p>

<p>OHENEW Land adj cemetery, Hemyock</p>	<p>The settlement boundaries of larger villages, such as Hemyock should be extended where there is scope for sensible schemes in sustainable locations that are well related to the development on at least one side. Site should be allocated instead of that proposed. Hemyock is sustainable location with good range of services/facilities; site is close to village centre; can unobtrusively be accommodated within AONB; is contained on three sides by residential development; site can also provide recreational facilities for benefit of wider community. Should be allocated for up to 45 dwellings, no development in floodplain, provision of drainage strategy, mitigation of wildlife impact, provision of informal and formal public open space, allotments, landscaping and suitable design which respects local character. Extension to cemetery also possible.</p>	<p>Waddeton Park Ltd (3815)</p>	<p>Hemyock's inclusion on the list of village under Policy S13 indicates that it is a sustainable location for limited development. However, the village's location within the Blackdown Hills AONB requires particular consideration of the impact on the special qualities of the landscape. Accordingly, a brownfield infill site was proposed, as this would have been least visually intrusive, and also negated the need to develop a greenfield site. The brownfield site is no longer deliverable and is now not proposed as an allocation. However, there are sufficient sites within the plan to meet the Objectively Assessed Need, and therefore it is unnecessary to allocate further land for development.</p>
<p>OMO1 Tatepath Farm, Morchar Bishop</p>	<p>Supports exclusion as would result in increase in traffic on narrow lanes (including construction traffic); access is poor; public transport is limited.</p>	<p>Morchar Bishop Parish Council (89); Mid Devon CPRE (486); Individual (5208, 5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 55936, 5595, 5596, 6063, 4215, 5586, 5587, 5588, 5589, 5358)</p>	<p>Comments noted.</p>

Supports exclusion as Greenaway site (MO1) is more than sufficient to meet needs/site not required as Greenaway not yet developed.	Morchard Bishop Parish Council (89); Individual (5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 5593, 5595, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.
16 properties too many.	Morchard Bishop Parish Council (89);	Comments noted.
Concern over capacity of sewerage and drainage/impact on flooding of development.	Morchard Bishop Parish Council (89); Individual (5208, 5295)	Comments noted.
Supports exclusion – house sales and lettings regularly come up in the village indicates on-going supply.	Mid Devon CPRE (486)	Comments noted.
Supports exclusion – development in the rural areas should be as a result of windfalls only, in order to protect agricultural land/countryside.	Mid Devon CPRE (486)	Comments noted.
Supports exclusion and requests site boundary be amended on east sided to give protection to public assets.	Mid Devon CPRE (486)	Comments noted. Site is not proposed as an allocation so there is no site boundary to amend.

	Supports exclusion of site and requests it be removed from the Sustainability Appraisal as an alternative option.	Individual (5208, 4106, 5234, 4081, 5263, 4117, 5295, 3971, 4082, 4416, 4459, 5642, 5641, 4093, 5604, 5605, 5606, 5607, 5608, 4474, 4473, 5609, 4476, 4108, 4111, 4112, 5603, 4460, 4152, 4110, 4481, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 4471, 4472, 5592, 5593, 4077, 4074, 5595, 5596, 5601, 6063, 4212, 4215, 4681, 4682, 4075, 5590, 5591, 5586, 5587, 5588, 5589, 4076, 5358, 4356)	Not agreed. It is a regulatory requirement to appraise alternative options.
	Development of site would be detrimental to village and character of adjoining listed buildings.	Individual (5208, 5234)	Comments noted.
	Supports exclusion as school has limited capacity for expansion.	Individual (5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.

	Supports exclusion as site is outside settlement limit and would result in loss of views to wider countryside.	Individual (5263, 4117, 5295, 5642, 5641, 4093, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.
	If sheltered housing instead provided on site MO1 'Greenaway', then 'Tatepath Farm' could be location for cross-subsidised affordable housing allocation.	Mr & Mrs Jeffrey c/o Stephen Hargreaves (5833)	No change is proposed to MO1, so a further allocation is not required.
OMO2 Church Street, Morchard Bishop (Gurneys)	Supports exclusion as would result in increase in traffic on narrow lanes (including construction traffic); access is poor; public transport is limited.	Morchard Bishop Parish Council (89); Mid Devon CPRE (486); Individual (5208, 5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.
	Supports exclusion as Greenaway site (MO1) is more than sufficient to meet needs/site not required as Greenaway not yet developed.	Morchard Bishop Parish Council (89); Individual (5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 5593, 5596, 6063, 4212, 4215, 5586, 5587, 5588, 5589, 5358)	Comments noted.

	Supports exclusion – house sales and lettings regularly come up in the village indicates on-going supply.	Mid Devon CPRE (486)	Comments noted.
	Supports exclusion – development in the rural areas should be as a result of windfalls only, in order to protect agricultural land/countryside.	Mid Devon CPRE (486)	Comments noted.
	25 properties too many.	Morchard Bishop Parish Council (89)	Comments noted.
	Concern over capacity of sewerage and drainage/impact on flooding of development.	Morchard Bishop Parish Council (89); Mid Devon CPRE (486); Individual (5208, 5295, 5263, 4117, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.

	Development of site would be detrimental to character of village and/or adjoining listed buildings/archaeological interest.	Morchard Bishop Parish Council (89); Mid Devon CPRE (486); Individual (5208, 4106, 4081, 5234, 5263, 4117, 5295, 3971, 4082, 4416, 4459, 5642, 5641, 4093, 5604, 5605, 5606, 5607, 5608, 4474, 4473, 5609, 5602, 4476, 4108, 4111, 4112, 5603, 4460, 4152, 4110, 4481, 4475, 5599, 4105, 5597, 5598, 5600, 4471, 4472, 5592, 5593, 4077, 4074, 5595, 5596, 5601, 6063, 4215, 4212, 4681, 4682, 4075, 5590, 5591, 5586, 5587, 5588, 5589, 5358, 4356)	Comments noted.
	Supports exclusion – development would have a detrimental effect on the public right of way bisecting the site.	Mid Devon CPRE (486)	Comments noted.
	Supports exclusion as site is outside settlement limit which should be used to guide development.	Mid Devon CPRE (486)	Comments noted.

	Supports exclusion of site and requests it be removed from the Sustainability Appraisal as an alternative option.	Individual (5208, 4106, 5234, 4081, 5263, 4117, 5295, 3971, 4082, 4416, 4459, 5642, 5641, 4093, 5604, 5605, 5606, 5607, 5608, 4474, 4473, 5609, 5602, 4476, 4108, 4111, 4112, 5603, 4460, 4152, 4110, 4481, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 4471, 4472, 5592, 5593, 4077, 4074, 5595, 5596, 5601, 6063, 4212, 4215, 4681, 4682, 4075, 5591, 5590, 5586, 5587, 5588, 5589, 4076, 5358, 4356)	Not agreed. It is a regulatory requirement to appraise alternative options.
	Supports exclusion as school has limited capacity for expansion.	Individual (5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.
	Supports exclusion as site is outside settlement limit and would result in loss of views to wider countryside.	Individual (5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.

	Supports exclusion as would result in loss of trees.	Individual (4093, 4476)	Comments noted.
	Supports exclusion as development would result in loss of privacy for adjoining properties.	Individual (4093)	Comments noted.
	Supports exclusion as negatively affects property value.	Individual (4105)	Not a material planning consideration.
	Objects to exclusion – site could sympathetically accommodate up to 25 dwellings and fit with local environment in central location of village.	Messers LG & MR Partridge (964)	Objection noted. However, this site has the potential to impact negatively on the adjoining heritage assets, of which there are many along Church Street.
	Objects to exclusion – site is conveniently located near to facilities including school, pre-school, pub and church.	Messers LG & MR Partridge (964)	Objection noted.
	Objects to exclusion – the traffic generated would not use the main route through the village.	Messers LG & MR Partridge (964)	Objection noted.
	Objects to exclusion – the ‘walk to school’ footpath would integrate into the development well.	Messers LG & MR Partridge (964)	Objection noted.
ONENEW New Estate Site A, Newton St Cyres	Additional land submitted which has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate (1517)	Appraisal of the site has indicated that there are highway safety issues and the advice of Highways recommended that the site be rejected.
ONENEW New Estate Site B, Newton St Cyres	Additional land submitted which has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate (1517)	Appraisal of the site has indicated that there are highway safety issues and the advice of Highways recommended that the site be rejected.
OSH1 Bowdens Lane, Shillingford	Supports exclusion as development not needed and would crowd out those who bought in rural area by choice.	Individual (4280, 4339, 4329)	Comments noted. Shillingford is not a village listed under Policy S13 as being suitable for a limited amount of development. Consequently no allocations have been proposed.
	Supports exclusion of site as lack of local facilities (school, shop, pub or employment) or inadequate capacity of facilities.	Individual (4280, 4339, 4329, 4176)	Comments noted.

	Supports exclusion as scale of proposal/would radically alter community/set precedent for further development.	Individual (4280, 4339, 4329, 4176)	Comments noted.
	Supports exclusion due to loss of agricultural land.	Individual (4280, 4339, 4329)	Comments noted.
	Supports exclusion as site is close to floodplains/negative impact on sewerage.	Individual (4280, 4176)	Comments noted.
	Supports exclusion of site as likely to result in negative traffic impact, junction is poor with restricted vision, no pavement.	Individual (4280, 4339, 4329, 4176)	Comments noted.
	Supports exclusion as top part of site only 120m from high voltage power lines.	Individual (4176)	Comments noted.
	Supports exclusion as site is outside settlement limit.	Individual (4176)	Comments noted.
	Supports exclusion as less than 2 miles from Exmoor and would comprise their 'dark sky' status.	Individual (4176)	Comments noted.
	Supports exclusion as site is used by bats.	Individual (4176)	Comments noted.
OSP1 Higher Town, Sampford Peverell	Objects to exclusion of site, as one small allocation in the village is inadequate to meet needs of current and future generations.	Individual (3838)	Comments noted. On 22 nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development.
	Site is suitable as site is self-contained area for development.	Individual (3838)	Comments noted. On 22 nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development.
	Site is suitable and has a number of access options.	Individual (3838)	Comments noted. On 22 nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development.
	Site is suitable and could include affordable housing and/or self-build, plus retail outlet.	Individual (3838)	Comments noted. On 22 nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development. This allocation will be subject to 30% affordable housing and 5% self-build.

OSP5 Morrells Farm, Sampford Peverell (SHLAA sites, not Options site)	Site is centrally located and preferable to proposed allocation. Could accommodate 50 dwellings without adverse landscape or conservation area impact. Would remove farmyard use from centre of village and deliver affordable housing.	Taylor Wimpey UK c/o WYG Planning (1708)	Not agreed. The SHLAA assessment identified the potential for impacting on the grade II listed Morrells Farmhouse and a detrimental impact on the setting, significance, character and appearance of the conservation area.
OSI3 East of Hederman Close, Silverton	Supports exclusion of site, as has substantial number of objections previously, and any development in village should be small scale to protect character.	Residents of Hederman Close, Silverton (4927)	Comments noted.
OTHNEW Land north east of Silver Street, Thorverton	Additional land submitted which has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate (1517)	Appraisal of the site has indicated that the principal constraints would be the loss of grade 2 agricultural land and school capacity.
OTHNEW Land to the west of Lynch Close and Cleaves Close, Thorverton	Additional land submitted which has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate (1517)	Appraisal of the site has indicated that the principal constraints would be the loss of grade 1 agricultural land, school capacity and the impact on the adjoining grade II listed building.
OUF1 Land adj Poynings, Uffculme	Supports exclusion as only wishes to see infilling within and no extension of existing settlement limits.	Uffculme Parish Council (54)	Comments noted.
	Considers there to be traffic impacts, landscape and visual impacts from elevated position along rural lane.	Uffculme Parish Council (54)	Comments noted.
OUF2 Land adj Sunnydene, Uffculme	Supports exclusion as only wishes to see infilling within and no extension of existing settlement limits (though acknowledges proposal is relatively minor development which could normally be accommodated).	Uffculme Parish Council (54)	Comments noted.
	Sites lies within Waste Consultation Zone with poor access/visibility.	Uffculme Parish Council (54)	Comments noted.

	Objects to exclusion of site stating it can be accommodated with low visual impact, improved access point, and control of construction traffic along Clay Lane.	Individual (5378)	The access road to the site is a single carriageway lane, extending some distance from the centre of the village. Visibility is less than ideal along certain sections of the lane. The site is also on the rural fringe of the settlement, where the built environment is very low density. This combination of factors has indicated to the Council not to allocate this site.
OUF3 Land west of Uffculme, Uffculme	Supports exclusion as only wishes to see infilling within and no extension of existing settlement limits.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Supports exclusion as site has greatest potential for impact on Uffculme; would extend village in linear fashion along B3440, with inspectors previously supporting no extension beyond 'Harvesters'.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Supports exclusion due to negative traffic impact on local road network given high speeds along Uffculme Road, requirement for road widening, narrowness of Bridwell Avenue.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Is within Halberton parish which would benefit from CIL, though Uffculme infrastructure would have to support site.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Supports exclusion as is grade 1 agricultural land.	Individual (5310)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.

	Supports exclusion as is flood zone 2.	Individual (5310)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Objects to exclusion; Uffculme has a range of facilities, comparable with other S13 settlements but has no allocation; questions absence of assessment of the relative sustainability of settlements identified.	Messrs Persey and Harding c/o Jillings Hutton (4654)	Noted. The Council has considered potential allocations at Uffculme though for site-specific reasons they have not been preferred for development. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Objects to exclusion and disputes LPA claim that allocation would lead to long walking distances to school; states that a secondary school pupil in Uffculme would have a choice whether to walk to school.	Messrs Persey and Harding c/o Jillings Hutton (4654)	The nearest edge of the site lies over 1km from the secondary school and almost 1.5km to the primary school. The IHT Guidelines for 'acceptable' walking distances state that for education up to 500m is the preferred distance and up to 1km is an acceptable distance. Both schools lie beyond these distances. Being out of the acceptable range it is more likely that trips from the development to the schools will be undertaken in a car, not less likely as stated within the representation. The rep dismisses bus travel to schools, however in the case of Uffculme Secondary; this is the most popular mode of transport, accounting for about 50% in 2014. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Objects to exclusion and disputes weight given to appeal decision (on previously refused scheme on part of site).	Messrs Persey and Harding c/o Jillings Hutton (4654)	Objection noted. Following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.

	States principle of development not a concern for Devon County Council who advise on use of archaeological condition/highways conditions.	Messrs Persey and Harding c/o Jillings Hutton (4654)	The condition requested refers to archaeological considerations. This has been reflected in the post-mitigation score. The score for objective B considers various elements related to the built and historic environment including but not limited to archaeology. However, the site has since been granted permission on appeal and is now proposed to be allocated.
	States principle of development not a concern for Environment Agency who raised no objection to planning application.	Messrs Persey and Harding c/o Jillings Hutton (4654)	Comments noted. The site has since been granted permission on appeal and is proposed to be allocated accordingly.
OUF4 Land off Chapel Hill	Site is 'landlocked' and unavailable.	Uffculme Parish Council (54)	Comments noted.
OUF5 Land off Ashley Road, Uffculme	Supports exclusion of site as only wishes to see infilling within and no extension of existing settlement limits.	Uffculme Parish Council (54)	Comments noted.
	Site is within Waste and Minerals Consultation Zones.	Uffculme Parish Council (54)	Comments noted – site lies within the Minerals Safeguarding Area for sand and gravel in the draft Minerals Plan.
	Land is elevated and development would result in overlooking.	Uffculme Parish Council (54)	Comments noted.
	Concern over access and highway issues.	Uffculme Parish Council (54)	Comments noted.
	Objects to exclusion as is adjacent to approved scheme, from which it has adequate highways access.	Individual (3840, 5806)	Objection noted, however site is within Minerals Safeguarding Area and is elevated in comparison with adjoining properties which could be overlooked.
	Objects to exclusion as would have no visual impact being set back from the main road.	Individual (3840, 5806)	As above.
OWI1 Quicks Farm, Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.

OWI2 Dean Hill Road, Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.
OWI3 Lloyd Maunder Way, Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.
OWI4 Lloyd Maunder (commercial), Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction which would have negative impact on local area.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.
OWI5 Land adjacent to B3181, Willand (previously AL/WI/2)	Objects to exclusion of site as is allocated for affordable housing, has good access and good drainage.	Individual (2322)	Objection noted, however site has been allocated for 5 years but only remaining allocated part has come forward. Adjacent allocation will provide affordable housing for the village at a rate of 30%.

Junction 27

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
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<p>OJ27</p>	<p>Insufficient provision has been made for Tourism and Leisure developments, particularly having regard to the conclusions of the Mid Devon Tourism Study, strand 5 & strand 6 and Mid Devon Economic Strategy. Plan not positively prepared because it fails to address the findings of the Mid Devon Tourism Study 2014.</p>	<p>GL Hearn (3781)</p>	<p>The Plan sets out a positive policy on tourism DM22 supporting proposals within or adjacent to defined settlements. This reflects the strategy of the plan which is positive about tourism and leisure facilities. Additionally it permits proposals elsewhere which justify a countryside location and subject to normal environmental and traffic issues. The supporting text of policy DM22 identifies proposals of various size, only differing on the level of supporting evidence required to support the larger schemes. This is a positively prepared policy which does not limit, as an allocation might, tourism enterprises to any specific location. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014.</p>
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	<p>J27 proposal should be included in local plan. <i>* Many mention Westwood/Eden commercial proposal by name, some refer to housing proposal)</i></p>	<p>GL Hearn (3781); Harcourt Kerr (1090); Petroc (3528); Culm Valley in Business Executive Committee (3618); Richard Thorne Consulting (5773); Taste of the West (5828); Individual (5218, 5666, 5663, 5658, 5657, 5656, 5655, 5654, 5653, 5652, 5651, 5650, 5649, 5645, 5644, 5643, 5640, 5758, 5676, 5659, 5880, 5885, 5886, 5947, 5946, 5945, 5887, 6044, 6043, 6042, 5484, 5483, 5482, 5481, 5480, 5479, 5478, 5477, 5476, 5475, 5474, 5473, 5472, 5471, 5470, 5469, 5468, 5467, 5466, 5465, 5464, 5463, 5462, 5461, 5460, 5459, 5458, 5457, 5456, 5455, 5454, 5453, 5452, 5451, 5416, 5415, 5414, 5413, 5412, 5411, 5410, 5409, 1681, 5820, 6059, 6064, 6060, 6061)</p>	<p>Noted. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.</p>
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	<p>Commercial [<i>and housing</i>] development should be allocated at J27 [<i>and north of Willand representation (4386)</i>].</p>	<p>G L Hearn (3781); Hallam Land Management (4386)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. The Council's proposed J27 allocation unlike the option proposal, no longer includes B8 storage/distribution/logistics.</p>
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	<p>J27 is a better option for development than east of Cullompton, better road and rail links, more certainty over delivery. J27 excellent links to motorway system and North Devon. J27 has Tiverton Parkway railway station, close by.</p>	<p>G L Hearn (3781); Hallam Land Management (4386); Harcourt Kerr (1090); Culm Valley In Business Group c/o Templar Strategies (3618); Individual (5561, 5835, 5820, 3748, 5759, 5648, 4641, 5886)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. Any significant development at Junction 27 will require improvements to the motorway junction to enhance capacity. However, the scale of such improvements is considered less with the absence of housing from the Council's proposed allocation.</p>
	<p>An allocation should be made at J27 to provide additional/alternative employment land, [<i>and housing land (representation 4386)</i>] removes uncertainty for growth. Not all allocated land can be delivered. (TIV 1 to TIV6 and CU1 to CU7 and CU13, CU17, CU18)</p>	<p>G L Hearn (3781); Harcourt Kerr (1090); Hallam Land Management (4386)</p>	<p>The Council is confident in the deliverability of its allocations as supported by the plan's evidence base including findings of the SHLAA panel, masterplanning activity, commercial interest and planning applications.</p>

	<p>An insufficient level of employment land has been provided to significantly increase local employment provision and reduce the high levels of out commuting. (Policy S1, S2, S6.)</p>	<p>G L Hearn (3781)</p>	<p>Not accepted. The Local Plan evidence base supports the Council's position on the level of allocations included in the plan. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 to fulfil a primary purpose of leisure and tourism with enabling retail. The Council understands that the promoters (represented by 3781) are no longer pursuing a warehousing/logistics employment element.</p>
	<p>J27 has attributes like no other, is one of the very few locations that can deliver a viable commercial/(and housing, [representation 4386]) development.</p>	<p>G L Hearn (3781); Harcourt Kerr (1090); Hallam Land Management (4386)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014. Strand 5 refers to a tourist proposal aimed at catching passing tourists through the provision of a major tourist facility. Housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan.</p>
	<p>J27 is a location where business wants to be, "Swallow Court" is a good example.</p>	<p>Harcourt Kerr (1090)</p>	<p>Noted. The Council is now seeking to make an allocation at Junction 27, albeit focused on tourism and leisure.</p>

	Land is available and deliverable.	Harcourt Kerr (1090); Hallam Land Management (4386)	Noted. The Council has undertaken further investigation and considers this has now been demonstrated.
	There is already a wide range of development at J27, offices, service station, restaurant, public house, caravan park.	Harcourt Kerr (1090)	Noted.
	Previous Inspectors have commented positively about J27.	Harcourt Kerr (1090)	The Planning Inspector in the 2004/5 local plan examination concluded the Council should consider an allocation at J27. The Council was directed by the Secretary of State not to include land at J27 in 2005. Since then, there have been significant changes in national planning policy and the proposed allocation.
	J27 Provides choice about delivery options.	G L Hearn (3781); Harcourt Kerr (1090); Hallam Land Management (4386)	Noted. On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
	Would be an opportunity for Mid Devon. An exciting opportunity for the area.	Culm Valley in Business Executive Committee (3618); Richard Thorne Consulting (5773); Taste of the West (5828); Individual (5218, 5663, 5658, 5657, 5656, 5655, 5653, 5652, 5651, 5649, 5645, 5644, 5758, 5886, 6044, 6043, 5481, 5480, 5472, 5470, 5458, 5454, 5414, 6060)	Noted. On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.

	Westwood/ Eden provides local attraction for local families/and tourists.	G L Hearn (3781); Richard Thorne Consulting (5773); Petroc (3528); Individual (5218, 5663, 5656, 5646, 5645, 5758, 5880, 6043, 5484, 5480, 5479, 5478, 5473, 5471, 5468, 5461, 5457, 5454, 5451, 5414)	On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific.
	Westwood/Eden provides opportunity to take advantage of the influx of tourists to the area.	G L Hearn (3781); Culm Valley in Business Executive Committee (3618); Taste of the West (5828); Individual (5654, 5649, 5646, 5643, 5758, 5659, 5880, 5885, 5886, 5484, 5483, 5477, 5473, 5471, 5469, 5467, 5464, 5463, 5461, 5454, 5414, 5412, 5409)	On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014. Strand 5 refers to a tourist proposal aimed at catching passing tourists through the provision of a major tourist facility.
	In keeping with character of area, West Country known for surfing and food.	Taste of the West (5828); Individual (5644)	On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation policy makes reference to a surf facility and agronomy which could include a focus on local food production.
	Would claw back trade to Mid Devon.	Individual (5663, 5480, 5467)	The Council's retail consultant NLP acknowledges that the proposed allocation may result in the clawing back of some of the existing out-of-district comparison retail expenditure.

There is a need for something special in Mid Devon. Put Mid Devon on the map.	Richard Thorne Consulting (5773); Taste of the West (5828); Individual (5657, 5646, 5645, 5886, 5469, 5456, 5454, 6059)	Noted. On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
Surf park will bring new people to the area.	Individual (5655, 5643)	This is accepted.
Will provide retail opportunities.	Individual (5468)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres.
South west in need of new investment.	Individual (5652)	Comment noted. This is recognised within the plan's strategy which promotes a prosperous rural economy.
Council should support opportunity for jobs/ economic benefit and investment. Will benefit the economy.	G L Hearn (3781); Richard Thorne Consulting (5773); Taste of the West (5828); Petroc (3528); Individual (5640, 5484, 5483, 5479, 5654, 5946, 6043, 5483, 5473, 5454, 5478, 5464, 5463, 5457, 5456, 5452, 5451, 5415, 5414, 5409, 1681, 6059, 6064)	Comment noted. This is recognised within the plan's strategy which promotes a prosperous rural economy.
Provides local employment opportunities. Would remove need to travel for work. Would enable young people to stay in the area.	G L Hearn (3781); Petroc (3528); Taste of the West (5828); Individual (5218, 5646, 5640; 5758, 5880, 5885, 5886, 6043, 5887, 5478, 5477, 5476, 5474, 5468, 5462, 5461, 5457, 5454, 5416, 5415, 1681)	Development as proposed by the Council at J27 would provide job opportunities.

	This individual suggests an allocation of a 60 acre site for “Heritage Transport Museum Showground” at J27.	Individual (3700)	The proposed allocation at Junction 27, whilst including a travel hub, it is not envisaged for a 60 acre site for “Heritage Transport Museum Showground”. The plan already allows for suitable tourism proposals to come forward under policy DM22.
	Land at J27 lower grade than the land proposed east of Cullompton.	Individual (5631, 1681)	Agricultural Land Classifications concluded that J28 had the least area classified as the best and most versatile land (BMV) i.e. Grade 1, 2 and 3a as compared to other strategic options. Junction 27 proposed allocation land is a mix of 3a and 3b.
	J27 obvious place for development.	Individual (3788)	Comment noted. On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
	J27 development should be viewed positively.	G L Hearn (3781); Richard Thorne Consulting (5773); Culm Valley in Business Executive Committee (3618); Petroc (3528); Taste of the West (5828); Hallam Land Management (4386); Individual (5464)	On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
	Eden involvement provides vision and ability to position Mid Devon as a centre of educational excellence in subjects such as environmental sciences, agri-tech and food technology.	Petroc (3528); Taste of the West (5828)	It is to be noted that the Council is proposing a land allocation at Junction 27, which is capable of being provided by a range of developers rather than being project specific. The proposed policy makes reference to education space within the agronomy facility.

	Gateway location to Devon and Cornwall, with good road and rail links – need to start to leverage these aspects for benefit and betterment of the area.	Culm Valley in Business Executive Committee (3618)	On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014. Strand 5 refers to a tourist proposal aimed at catching passing tourists through the provision of a major tourist facility. The site is located near a major road junction for traffic entering Devon and the West Country.
	Council should have vision.	Individual (5459)	The Local Plan incorporates a vision for the plan area.
	Exeter and Taunton don't want J27 to go ahead, they want revenue from Mid Devon.	Individual (1681)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres (including Exeter and Taunton) is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. Potential impact of the proposed allocation on Exeter and Taunton, together with retailing in other local authority areas has been the subject of Duty to Cooperate meetings. The Council considers it has fulfilled its Duty to Cooperate obligations.
	Would help local towns by bringing people into the area.	Individual (5415, 5412)	It would be logical to conclude that the proposed allocation at Junction 27 would be likely to bring visitors into the area. The wording of the proposed allocation makes reference to enhancing transport provision including transport connections to Tiverton and Cullompton.

	Plan unsound and not in line with objectives a Local Plan should seek to achieve if J27 is not included.	G L Hearn (3781), Richard Thorne Consulting (5773)	It is considered that the plan is sound with or without an allocation as proposed at Junction 27. This point was considered in the report that went before Council on 22 nd September 2016.
	Plan unsound as infrastructure required to deliver development east of Cullompton has not been demonstrated to be achievable or deliverable. Evidence missing.	G L Hearn (3781); Hallam Land Management (4386)	Not agreed. It is considered that the proposed allocations included in the plan are justified and deliverable. Since this representation has been received, MDDC officers have been in regular discussions with Devon County Council, Environment Agency and the Highways England with regard to infrastructure requirements as a result of proposed development in and approximate to Cullompton. These discussions have informed work on a refined evidence base.
	J27 and land north of Willand should be allocated for new community to secure immediate and long term housing and employment growth.	Hallam Land Management (4386)	On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4 th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan.

	<p>J27 and land north of Willand has;</p> <ul style="list-style-type: none"> • Good public transport links • Cycle path linking to station, Tiverton, Willand and Uffculme runs through site . • Has existing road infrastructure capacity and capable of being improved. • Attractive location in market terms • Close to Uffculme Secondary school and services in Willand. • Retention 	<p>Hallam Land Management (4386)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. The Council acknowledges the good transport links at Junction 27 within the context of its proposed tourism/leisure allocation including reference to a travel hub and proposes accessibility for all modes including paths for pedestrian and cycle links.</p>
	<p>Sustainability Appraisal Fails to adequately assess J27, is inconsistent in its weightings, fails to have regard to the sustainability credentials of J27.</p>	<p>Hallam Land Management (4386)</p>	<p>The approach of the Sustainability Appraisal to the sustainability credentials of J27 in the context of the options assessment is considered appropriate; however, the Council's approach to development at J27 has now changed with the decision to make a different and smaller allocation. The Sustainability Appraisal update will form part of the Council's documentation available at major modifications consultation stage.</p>

	<p>Suggest half of Cullompton housing allocation be sited at/near J27 of M5, area has</p> <ul style="list-style-type: none"> • More efficient M5 motorway access • Railway station • Footbridge over M5 and railway • Cycle paths • Good access to Cullompton • Access to A38 and A361 • J27 lower grade land • No flooding issues 	<p>Kentisbeare Parish Council (76)</p>	<p>For a development to function effectively in this location there is a critical mass needed. A smaller scale development would not afford the opportunities to enhance local facilities and provide the necessary infrastructure.</p>
	<p>J27 is a better option for development than Hartnoll Farm, accessible to A361 and M5, close to Tiverton Parkway, easy to commute to Exeter/Taunton for employment.</p>	<p>Individual (3954)</p>	<p>No land at J27 or Hartnoll Farm is allocated for residential development. While J27 is close to the M5 and Tiverton Parkway, Hartnoll Farm is closer to the facilities provided by Tiverton.</p> <p>Neither site was considered preferable for a proposed allocation for residential development.</p>

	<p>Westwood Eden proposals would not adversely affect any adjoining centres or put any planned investments at risk.</p>	<p>GL Hearn (3781)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. NLP has also advised the Council that the allocation as proposed would not adversely affect any planned investment for town or city centres within the retail study area.</p>
	<p>Westwood/Eden proposals would generate approximately 2200 FTE jobs.</p>	<p>GL Hearn (3781)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. Analysis of job creation has now taken place with regards to the Council's proposed allocation resulting in an expectation of 1186 FTE jobs.</p>

	<p>The inclusion of the suggested Westwood/Eden allocation and suggested policy would make the plan sound.</p>	<p>GL Hearn (3781)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. It is considered that the plan would be sound with or without an allocation at Junction 27 in the form proposed by the Council.</p>
	<p>Plan does not meet requirements of Paragraph 28 of NPPF in failing to have regard to the Mid Devon Tourism study.</p>	<p>GL Hearn (3781)</p>	<p>The Plan sets out a positive policy on tourism DM22 supporting proposals within or adjacent to defined settlements. This reflects the strategy of the plan which is positive about tourism and leisure facilities. Additionally it permits proposals elsewhere which justify a countryside location and subject to normal environmental and traffic issues. The supporting text of policy DM22 identifies proposals of various sizes, only differing on the level of supporting evidence required to support the larger schemes. This is a positively prepared policy which does not limit, as an allocation might, tourism enterprises to any specific location. On 22nd September, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014.</p>

	<p>Opposed to development at/near J27, support its exclusion from the plan.</p>	<p>Uffculme Parish Council (54); Willand Parish Council (44); Individual (5240, 5251, 5253, 5257, 5258, 4193, 5361, 3486, 5265, 5360, 5271, 3609, 1680, 4837, 5290, 5292, 5293, 4372, 5301, 4201, 4174, 5307, 5310, 4354, 5313, 5314, 4284, 5316, 5317, 5318, 5321, 5342, 5345, 5346, 5347, 5348, 5337, 5351, 5328, 5717, 5365, 5367, 5369, 5371, 5000, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 3978, 5660, 5667, 5636, 5632, 2804, 5619, 4446, 643, 5618, 5620, 5610, 4362, 4590, 5888, 5706, 5704, 5703, 5700, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 5889, 4625, 5673, 3943, 5555, 5557, 1252, 4251, 3674, 4331, 4219, 5549, 5787, 5852; 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5784, 5782, 4407, 5775, 4662, 5778, 4289, 5408, 5407, 5401, 5771, 5764, 5834, 5286, 5825, 5839, 5839, 5804, 3614, 4357, 5816, 5822, 5007, 5801, 5824, 4311, 5393, 5392, 5391, 5387, 5390, 5034,</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The rationale for which is set out within the report considered by Council on that date.</p>
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	<p>Welcome lack of retail/leisure development at J27 Believe retail/leisure development at J27 could have a negative impact upon vitality and viability of Exeter.</p>	<p>Exeter City Council (141)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The rationale for which is set out within the report considered by Council on that date. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres (including Exeter) is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. Potential impact of the proposed allocation on Exeter, together with retailing in other local authority areas has been the subject of Duty to Cooperate meetings. The Council considers it has fulfilled its Duty to Cooperate obligations. There is no equivalent offer in Exeter and accordingly, impact is not considered to be significant.</p>
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	<p>Support plan proposals for development at main towns Cullompton, Tiverton etc. Development at Cullompton more appropriate supported by local council.</p>	<p>Uffculme Parish Council (54); Individual (5360, 1680, 4284, 5313, 5317, 5318, 5342, 5345, 4120, 5265, 5290, 5314, 5347, 5348, 5337, 5351, 5328, 5367, 5371, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5667, 5636, 5619, 4446, 643, 5618, 5620, 5610, 4590, 5888, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 5889, 4625, 5673, 4251, 3674, 4219, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5784, 4407, 5775, 4662, 4289, 5408, 5407, 5401, 5825, 5804, 3614, 4357, 5816, 5822, 5007, 5801, 5824, 4311, 5393, 5392, 5387, 5034, 5381, 5382)</p>	<p>Support noted. Housing is not being pursued at Junction 27. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.</p>
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	<p>J27 proposal incompatible with MDDC policy of concentrating housing and employment allocation at or near existing centres of population.</p>	<p>Uffculme Parish Council (54); Individual (2512, 5230, 4042, 5361, 3486, 5360, 5270, 3609, 5290, 5293, 4201, 5307, 4284, 5345, 5350, 5365, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5660, 5787, 5782, 4407, 5778, 5825, 5804, 3614, 5816, 5824)</p>	<p>Comments noted. The Council's proposed allocation at Junction 27 does not include housing or traditional B class employment uses.</p>
	<p>Adverse economic impact on existing local towns, villages and businesses.</p>	<p>Uffculme Parish Council (54); Willand Parish Council (44); Individual (2512, 5230, 5233, 4120, 4042, 5251, 4193, 5361, 3486, 5360, 5270, 4837, 5290, 5292, 5301, 4201, 5307, 4354, 5314, 4284, 5345, 5346, 5347, 5348, 5350, 5337, 5717, 5365, 5369, 5000, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5667, 4446, 643, 5618, 5620, 5700, 4625, 4251, 3674, 5549, 5787, 5782, 4407, 5775, 4662, 5778, 5408, 5764, 5825, 5804, 3614, 5816, 5822, 5007, 4311, 5392, 5391, 5387, 5390, 3842, 5383)</p>	<p>The Council's retail consultant NLP advises that there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. NLP has also advised the Council that the allocation as proposed would not adversely affect any planned investment for town or city centres within the retail study area.</p>

	<p>Impact on historic assets not assessed. Assets are Registered Garden of Bridwell, Uffculme Conservation Area, Grade 1 Bridwell Park, Grade II*Chapel and Stables. Impact on the vitality and viability of the historic towns of Uffculme, Sampford Peverell and Aysford not assessed.</p>	<p>Historic England (1170)</p>	<p>The Council's proposed allocation is considerably smaller than that considered at the options stage. The impact assessment of the proposed allocation on heritage assets will form part of the Council's documentation available at major modifications consultation stage.</p> <p>This document will assess potential impacts upon the immediate settings of Leonard Moor Cottages, Higher Houndaller Farm as well as on the landscape settings of nearby conservation areas, the Grand Western Canal conservation area and of the registered park and garden at Bridwell which is set on rising land to the east.</p>
	<p>Implications of retail proposal on nearby historic towns and villages should be assessed.</p>	<p>Historic England (1170)</p>	<p>Retail impact assessment information forms part of the evidence base. The Council's retail consultant NLP has concluded that the retail impact on the study area of the allocation as proposed within the plan is not significant.</p>
	<p>Would threaten development of Cullompton.</p>	<p>Individual (2512, 5230, 5361, 5307, 5313, 5314, 5318, 5321, 5350, 4407, 4662, 5390)</p>	<p>Not agreed. NLP has advised the Council that the allocation as proposed would not adversely affect any planned investment for town or city centres within the retail study area. Importantly, the Council's proposed allocation at Junction 27 is for a different form of development from that allocated at Cullompton.</p>
	<p>Set precedent for further development and "a new town".</p>	<p>Uffculme Parish Council (54); Individual (2512, 5230, 5345, 5347, 5350, 5387, 5390)</p>	<p>The Council's proposed allocation at Junction 27 is for a different form of development from that considered at the options stage. It does not propose a new town, housing or traditional B class employment uses.</p>

	<p>Loss of open countryside/greenfield site. Devon "Gateway" should remain undeveloped.</p>	<p>Uffculme Parish Council (54); Individual (2512, 5230, 5233, 4120, 4042, 5253, 5361, 3486, 5271, 4837, 5290, 5292, 5301, 4201, 5307, 5310, 5313, 5314, 4284, 5318, 5321, 5345, 5346, 5347, 5348, 5350, 5365, 5369, 5000, 3978, 5660, 4590, 5888, 5674, 5889, 4625, 5555, 5557, 3674, 4219, 5418, 4407, 5775, 5764, 5834, 5839, 5804, 5393, 5391, 5390)</p>	<p>Mid Devon is a rural district with a limited supply of deliverable and available previously developed land. The balance of brownfield and greenfield allocations in the Local Plan is considered appropriate. The Council's proposed allocation at Junction 27 provides an opportunity to utilise the potential of the site as a unique leisure destination at the gateway to Devon and Cornwall in accordance with recommendations of the tourism strategy. The proposed Junction 27 allocation site is not wholly greenfield as it already accommodates a roadside service area including a hotel and has planning permission for an expansion of roadside facilities.</p>
	<p>Loss of valuable agricultural land.</p>	<p>Individual (2512, 5230, 4042, 4201, 5361, 5360, 4837, 4284, 5317, 5667, 2804, 5703, 5782, 5408, 5824, 5392, 5387, 5390, 5388)</p>	<p>Junction 27 proposed allocation land is a mix of 3a and 3b. As defined by national policy, only part is therefore best and most versatile agricultural land.</p>

	<p>Objections by Parish and Town Councils, Exeter City, Taunton Deane, North Devon and East Devon Councils.</p>	<p>Individual (2512, 5230, 4120, 5361, 3486, 4201, 5317, 5350, 5717, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5619, 643, 5706 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5889, 4625, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5782, 5825, 5804, 3614, 3614, 5816, 5393, 5387)</p>	<p>Potential for development on land at Junction 27 has been the subject of Duty to Cooperate meetings. The Council considers it has fulfilled its Duty to Cooperate obligations. Major modifications consultation allows parish and town Councils, together with other authorities the opportunity to make representation on the Council's proposed allocation.</p>
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	<p>Not needed/wanted by local population. Not supported by local people.</p>	<p>Uffculme Parish Council (54); Individual (2512, 5361, 5230, 5253, 4193, 5360, 4372, 4201, 5314, 5316, 5747, 5711, 5716, 5712, 5713, 5714, 5715, 2318, 5636, 5619, 4590, 5706, 5604, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 4625, 5555, 5557, 4331, 5549, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5825, 5804, 3614, 5816, 5387)</p>	
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	<p>Unsuitable location as access would be by road. J27 and local roads can't accommodate Increase in traffic. Existing infrastructure can't accommodate proposal.</p>	<p>Uffculme Parish Council (54); Willand Parish Council (44); Individual (5233, 4120, 4042, 5361, 5253, 3486, 5360, 5270, 4837, 5290, 5292, 2512, 5230, 4837, 5292, 5301, 5307, 5310, 5313, 5318, 5321, 5345, 5346, 5347, 5348, 5350, 5337, 5365, 5369, 5660, 643, 5618, 5620, 5782, 4407, 5775, 5408, 5401, 5764, 3614, 3614, 4311, 5392, 5387, 5390, 5034, 5381, 5382, 5383)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is recognised that such a proposal would have a transport impact. The Highways Authorities (DCC and HE) consider that there are technical mitigation measures that could be undertaken to address such impacts. The precise scale and nature of such improvements will be the subject of more detailed analysis as any scheme progresses through the various planning stages.</p>
	<p>Jobs claim 4000 is not justified.</p>	<p>Individual (5233, 5391)</p>	<p>The latest assumptions which were used to inform the Council's decision of 22nd September 2016 were that there would be 1,186 full time equivalent jobs.</p>
	<p>No evidence to support job creation.</p>	<p>Individual (5307, 5350, 5888, 3614, 5392)</p>	<p>As part of the representations made, seeking the allocation of the land for development, the promoters have provided a breakdown of where in the proposed development jobs will be created. Since this representation was received, a more refined estimated job creation figure has become available. Please see the cabinet report dated 15th September 2016.</p>
	<p>Would not create the kind of skilled jobs, careers, training opportunities and apprenticeships for the young of the area.</p>	<p>Individual (5782, 5387)</p>	<p>The proposed allocation could provide a variety of both skilled and unskilled jobs which could provide opportunities for apprenticeships.</p>
	<p>Employment on the J27 site will detract from other areas where there is a need for job creation.</p>	<p>Individual (5313, 5321, 5632)</p>	<p>The proposal widens the opportunities in the area and it is not considered that this will compromise the ability for other areas in the plan to realise growth and prosperity.</p>

	Loss of trees (ancient Oaks particularly).	Individual (4042, 5360, 3978, 4590, 4219)	Tree protection and landscaping would be considered at the masterplan/ planning application stage.
	Loss of wildlife.	Individual (3486, 4837, 4201, 3978, 4446)	Biodiversity would be addressed at the masterplan/planning application stage. A fauna and flora survey would be required to ensure any biodiversity issues were addressed as part of any planning application.
	“Gateway to Devon” should not be a service station, warehouses etc. with bolted on tourist zones, & shops.	Individual (4042, 5361, 5360, 5290, 5292, 5293, 5301, 5764, 5839)	The Council’s proposed allocation at Junction 27 provides an opportunity to utilise the potential of the site as a unique leisure destination at the gateway to Devon and Cornwall in accordance with recommendations of the tourism strategy. Planning permission has been previously granted for roadside service facilities (not implemented).
	Devon is known for its countryside. Best Countryside experience is the countryside itself.	Individual (4042, 5253, 4193, 5360, 1680, 5301, 4354, 4407, 4662, 5764, 5834, 5839, 5392)	Comments noted.
	Poorly thought out development, more suited to city suburb.	Individual (4042, 4193, 3486, 5290, 4201, 4354, 5675, 4625 5834, 5839, 5383)	Comments noted. The Council’s retail consultants have concluded that there are no sequentially preferable alternative sites that could accommodate the development proposed.
	J27 while an important location should be left undeveloped until a more appropriate proposal comes forward may be 10 to 20 years away.	Individual (4193)	It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. The inclusion of a policy can provide the local authority with greater control over the nature of development that could come forward on the site given that a speculative application could be submitted at any stage.

	No certainty Westwood will be constructed, will be viable in long term, could turn into something else.	Uffculme Parish Council (54); Individual (4193, 3614)	It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. It is considered that with the retail enabling development the allocation could be brought forward as proposed. The proposed allocation policy is clear as to the type of development which would be deemed acceptable by the local planning authority.
	Unsustainable development.	Uffculme Parish Council (54); Individual (3486, 5360, 1680, 5307, 5636, 5618, 5549)	The National Planning Policy Framework acknowledges that sustainability relates to environmental, social and economic factors. These factors should not be considered in isolation. The proposed allocation could bring about increased prosperity for the area and would reduce trip lengths from Mid Devon residents seeking these uses elsewhere. The proposed allocation also aims to catch passing tourists travelling on the motorway and rail network who would be travelling anyway and thus combining trips.
	Retail development is not required.	Willand Parish Council (44); Individual (3486, 5290, 5317, 5717, 5418, 5392, 5388)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres.

	<p>The public can already access retail and other services at most other junctions and local towns. Tourism already catered for by existing towns.</p>	<p>Individual (5360, 5717, 5365, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5619, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 4625, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5825, 5804, 5816, 5392, 4382, 5314, 4625)</p>	<p>Not agreed that most other junctions and local towns provide the offer that is proposed in the allocation. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres and provide a different retail offer. A tourism venture of the scale proposed does not currently exist in Mid Devon.</p>
	<p>Flooding risk locally and Culm Valley from rain water run-off.</p>	<p>Individual (5270, 4446)</p>	<p>Strategic flood risk assessment does not identify the area at particular risk from flood. The site is in Flood Zone 1. National planning policy requires that development should not increase flooding elsewhere, including setting out that there is no increase in the volume of surface water or the rate of surface water run-off. Policy DM1 (f) requires appropriate drainage provision including sustainable urban drainage schemes.</p>

	<p>Development at J27 would have an unacceptable landscape impact.</p>	<p>Individual (1680, 4837, 5290, 5292, 5889)</p>	<p>A landscape assessment has been undertaken to inform the plan however, a more detailed landscape and visual impact assessment will need to be submitted at planning application stage. Development of this site would inevitably have an impact on the landscape. Masterplanning of the site would need to ensure that any development would need to achieve high levels of design which could achieve an iconic gateway to Mid Devon whilst also incorporating appropriate mitigation where necessary.</p>
	<p>There are empty industrial estates and buildings in the locality, no need for further sites.</p>	<p>Willand Parish Council (44); Individual (5290, 5717, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5619, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5889, 4625, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 4407, 5825, 5804, 5816)</p>	<p>The Council's proposed allocation at Junction 27 does not include traditional B class employment uses. It is not considered that use of existing buildings could accommodate a retail and tourism offer as ambitious as that set out in the proposed allocation.</p>

Extra houses would be needed to meet the need of the people in the additional jobs created. Not allocated for in Local Plan.	Uffculme Parish Council (54); Willand Parish Council (44); Individual (5290, 4251, 4219, 5775, 5839, 3614, 5392)	On 22 nd September 2016, Mid Devon District Council resolved to propose additional residential allocations to meet the additional housing requirement resulting from the decision to allocate land at Junction 27 for mixed use leisure, tourism and associated retail. The level of which reflected evidence provided by the Council's demographic consultants.
Exeter and Taunton are easily accessible by Car, Bus, Train, provide excellent shopping and entertainment, no need for more at J27.	Individual (5290)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres.
Scale out of keeping with rural area and current buildings.	Individual (4201, 5316, 5317, 4662)	Comments noted.
Leisure facilities should be in local towns for use by residents and tourists.	Individual (4284)	A tourism venture of the scale proposed does not currently exist in Mid Devon and it is not envisaged that a leisure and tourism offer as ambitious as that set out in the proposed allocation would be likely to come forward in the local towns.
Would lead to the coalescence of Willand, Uffculme and Sampford Peverell.	Individual (4284)	The proposed allocation would not join Willand to Uffculme or Sampford Peverell. The larger site area, previously considered at options consultation which incorporated housing, could potentially lead to some coalescence of nearby settlements.
Will not benefit local people wealth created will be for non-locals.	Individual (5317, 5555, 5549)	Some local people would be likely to be employed on the site.
People travel to Exeter and Taunton for work out of choice so they can live in a rural area.	Individual (5317)	It is accepted some people make that choice.
Noise/ air pollution from facilities proposed and increased activity. Light pollution from facilities and events.	Individual (5346, 5348, 5775)	Policy DM4 requires potential noise and light pollution to be addressed by a pollution impact statement and mitigated where necessary.

	Not near any major emergency service centres.	Individual (5348)	The site is well connected to the strategic road network.
	Land availability uncertain, not all landowners are willing to sell their land.	Individual (5667, 3978, 4446, 643, 4590)	Developers and their agents have indicated land is available for development. The Council has approached land owners in the area and is satisfied that there is willingness from landowners for a development of this nature to come forward. Whilst one landowner is not currently prepared to release his land for development, there is still sufficient land available for a scheme to come forward.
	Alternative sites are available for the uses proposed.	Uffculme Parish Council (54); Willand Parish Council (44); Individual (3614)	The sequential site analysis has concluded no sequentially preferable alternative sites that could accommodate the development proposed.
	Theme/surf park would become an eyesore in time. Scheme has potential to become a white elephant.	Individual (4590, 4219, 5549, 4662)	Development of the site would need to achieve a high quality of design and comply with design policies in the plan.
	Amending proposal to smaller scheme/ adding Eden does not alter the fundamental objections raised.	Individual (5675, 4625, 4662, 3614)	Comments noted.
	Development opportunities exist along M5 from J23 to J30 with spare capacity.	Individual (5674, 5889, 4625)	Development opportunities do exist at junctions along the M5.
	Developers concede leisure elements would be loss making, subsidised by warehousing.	Individual (4625)	The retail elements of the proposal are necessary to enable the tourism and leisure uses to come forward. The proposed allocation does not include land for warehousing.
	Willand has insufficient infrastructure to accept further development to the north and J27.	Willand Parish Council (44)	It is recognised that such a proposal would have a transport impact. The Highways Authorities (DCC and HE) consider that there are technical mitigation measures that could be undertaken to address such impacts. The precise scale and nature of such improvements will be the subject of more detailed analysis as any scheme progresses through the various planning stages.

	Willand is opposed to any expansion of the Village including to the north and J27.	Willand Parish Council (44)	Comments noted.
	Facilities already provided in nearby towns.	Willand Parish Council (44)	There are facilities provided in nearby town but not of the nature of those proposed in the allocation.
	J27 proposals would need a huge car park.	Individual (4219)	The proposed allocation would indeed require car parking provision.
	J27 proposals inappropriate in both scale and nature for the site.	Individual (5782)	Comments noted.
	Tiverton Parkway can only be accessed by rail from Taunton and Exeter where most of the facilities planned for J27 are available.	Individual (4407)	Tiverton Parkway is accessible from many other stations north and south of the station. There are facilities provided in Taunton and Exeter but not a surf park or retail outlet centre.
	Developers do not have Mid Devon interests at heart.	Individual (4662)	It is to be noted that the Council is proposing a land allocation at Junction 27, which is capable of being provided by a range of developers rather than being project specific.
	No requirement for Surf Lake, Beaches are only a few miles away. Surf park already permitted only 70 miles away.	Individual (4284, 5365, 4219, 5390, 3842, 3614)	Comments noted.
	Mid Devon has low unemployment and does not need extra jobs, workers at J27 would have to commute in.	Willand Parish Council (44); Individual (5390, 5388, 5383)	The proposal has the potential to play an important role in ensuring future prosperity of the district and reduce the proportion of out commuting. In retail terms, there is a regional need.

Development Management Policies

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
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Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM1 High Quality Design	Representation reiterates relevant clauses in policy in relation to Exebridge Caravan Club.	Caravan Club c/o Savills (5789)	Noted.
	Suggestion to include DCC Waste Management and Infrastructure SPD in paragraph 4.5.	Devon County Council (626)	Agreed, amendment proposed to include DCC Waste Management Infrastructure SPD in paragraph 4.5.
	Point d) suggest strengthening this statement by replacing 'encourage' with 'enable' or by adding after 'also' 'enable and'.	Crediton Neighbourhood Plan (1734); Crediton Town Council (678)	Agree, amendment proposed to reflect comment.
	Support this policy.	Pegasus Planning (3678); Willand Parish Council (44)	Support Noted.
	Criterion f) should state preference for soft landscaped SUDs i.e. a hierarchical approach.	Environment Agency (943)	Agree the suggestion is relevant but would be better placed as an amendment to the supporting text. An amendment is proposed to supporting text to set out preference for soft landscaped SuDs.
	Amend Policy to reflect Active Design principles and implementation.	Sport England South West (169)	The relevant principles are already generally reflected in the plan policies.
DM2 Renewable and low carbon energy	Criterion d) should be amended to "Biodiversity (avoiding habitat fragmentation where possible)".	Hallam Land Management (4386)	Suggestion would weaken policy.
	Paragraph 4.8 the word 'waste' should precede 'materials'.	Devon County Council (626)	Agree , amendment proposed to reflect comment.
	Concerned applications are not determined according to policy.	Uffculme Parish Council (54)	Comment refers to the application process rather than policy itself.
	Policy not strong enough on importance of renewable energy provision.	Sustainable Crediton (2698)	Not agreed, DM2 seeks to maximise renewable and low carbon energy while ensuring that adverse impacts are addressed satisfactorily.
	Support this policy.	Willand Parish Council (44); Historic England (1170)	Support noted.
DM3 Transport and air	Policy is very relevant to Mid Devon which is reliant on private vehicles.	Uffculme Parish Council (54)	Comment noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
quality	Support this policy.	Willand Parish Council (44)	Support noted.
	Suggested wording for policy to relate to a diagram of strategic transport routes/major transport routes.	Mid Devon CPRE (486); Individual (366)	Policy does not relate to a diagram to avoid becoming dated. The impact on the routes requested would be considered through a Transport Assessment.
	Policy could also refer to Transport Statements – which are less detailed than Transport Assessments.	Devon County Council (626)	Agree, a modification is proposed in the supporting text to set out that in some cases a transport statement may be acceptable in lieu of a transport assessment.
	Policy could also refer to safe access to the transport network.	Devon County Council (626)	Agree, a modification is proposed to DM3 to reflect the comment.
DM4 Pollution	How is the stated accordance with WFD (Water Framework Directive) and RBMP (River Basin Management Plan) carried through from the SA to the policy?	Environment Agency (943)	The policy requires applications to be accompanied by a pollution impact assessment and mitigation scheme where necessary where there is a risk to negatively impacting the quality of water. To ensure applications are in accordance with the WFD and RBMP the supporting text refers to the above to ensure they are considered when determining applications.
	Support this policy.	Willand Parish Council (44)	Support noted.
DM5 Parking	Suggestion to endorse housing to be built in rectangle layout with car parking in the square.	Individual (5211)	The policy does not preclude this type of parking. However the suggestion may not be appropriate in all cases and therefore a more flexible approach is preferred.
	Car parking spaces provided too far away will lead to parking on pavements.	Individual (5211)	Comment is noted. The preference of the provision of parking in close proximity to the property it services is noted in para 4.21 with reference to the Mid Devon Parking SPD principles.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Parking standards should be 1-3 beds = 2 parking spaces, 4 beds = 3 parking spaces not including the garage.	Individual (5211)	Further evidence would be required to endorse the suggestion. The policy and previously adopted parking SPD is based on 2011 census data in which no data has been released to allow a cross-tabulation between dwelling type, size and car ownership. Also note that the standard is a minimum, in which greater parking provision may be provided.
	Mobility scooter storage space should be 1000mm x 1700mm in Parking Supplementary Planning Document.	Individual (5211)	This would require an amendment to the Parking SPD rather than DM5 in the Local Plan Review.
	Increase off road parking provision criteria in all new developments – notably seen inadequate around west Cullompton Tiverton Road.	Individual (3700)	As noted in the NPPG in terms of parking, there are many different approaches that can support successful outcomes including on-street and off-street parking. Car parking should be considered in context to ensure the most successful outcome can be delivered in each case. It is always preferential to locate parking in close proximity to the property it services with key principles set out in the Council's Parking Supplementary Planning document (SPD. Also note that the parking provision in policy relates to a minimum, greater parking could be provided. The example provided in the comment is believed to be an application which was permitted prior to the parking policy adopted in 2013 which has been carried forward in the Local Plan Review and the Parking SPD.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Should resist applications which result in loss of on-plot parking.	Uffculme Parish Council (54)	As noted in the NPPG in terms of parking, there are many different approaches that can support successful outcomes including on-street and off-street parking. Car parking should be considered in context to ensure the most successful outcome can be delivered in each case.
	Should be a minimum of 2 parking spaces per house.	Individual (5630)	Further evidence would be required to endorse the suggestion. The policy and previously adopted parking SPD is based on 2011 census data which has calculated a requirement of 1.7 parking spaces per dwelling.
	Support this policy	Willand Parish Council (44)	Support noted.
	New dwellings should have a garage with additional parking.	Individual (5357)	Policy 4.21 makes reference to the principles in the Mid Devon Parking SPD. One of which recognises that where garages or car ports are provided they will not count as parking spaces and therefore will development will be required to provide the minimum parking standards in addition to the garage or car port.
	Support flexibility	Pegasus Planning (3678)	Support noted.
	Standards for electric vehicle points are higher than reasonable and not evidenced.	Pegasus Planning (3678)	In line with the NPPF the LPA has considered how facilities can be incorporated in developments for charging plug-in and other ultra-low emission vehicles in Mid Devon. This policy is needed to encourage their development in Mid Devon and has been carried forward from the previous Local Plan Part 3 adopted in 2013. The Renewable Energy cost assumption is set out in the Mid Devon Viability Assessment including the updated version published September 2016 which takes into account the potential cost implication of policy DM5 including electric vehicle charging points.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM6 Rural exceptions sites	Support this policy.	Uffculme Parish Council (54); Willand Parish Council (44)	Support noted.
	Should meet a proven local need and remains as this type of housing in perpetuity.	Uffculme Parish Council (54)	Points noted in comment are covered in the policy.
	Supports policy AL/DE/6 (policy reference for rural exceptions policy in the AIDPD).	Halsall Construction Ltd (5864)	Support noted.
	Support low cost, self-build and sheltered accommodation but in the right place.	Individual (5490)	Each case will be considered on its own merit at the application stage.
DM7 Gypsy and traveller accommodation	Criteria must be set out irrespective of need.	The National Federation of Gypsy Liaison Groups (3597)	National policy sets out the requirement for local planning authorities to establish accommodation needs to inform the preparation of local plans and make planning decisions. National planning policy for traveller sites sets out that when considering planning applications for traveller sites the existing level of local provision and the need for sites should be considered. However it is considered that the policy should be clarified to set out the circumstances in which this policy will be relevant in-line with the other strategic policies in the Plan.
	Welcome paragraph 4.38 which states areas of flood plain will not be suitable.	Environment Agency (943)	Support noted.
	Support this policy.	Willand Parish Council (44)	Support noted.
DM8 Rural workers' dwellings	Support this policy.	Willand Parish Council (44)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM9 Conversion of Rural buildings	Concern policy is manipulated to allow large scale industrial estates.	Uffculme Parish Council (54)	The policy enables redundant or disused rural buildings to be converted to employment uses as well as other uses such as residential and tourism provided the criteria of the policy and other policies in the Local Plan are complied with. Many large scale industrial estates are unlikely to arise given the limitation of the policy to be applied to redundant or disused building of substantial and permanent construction. Large scale employment will be considered on a case by case basis and the policy will be applied appropriately taking into account other planning policies and material considerations specific to the proposal in question. It is noted that DM18 'Rural employment development' is a related policy, therefore a modification to cross-refer to this policy is suggested in the supporting text.
	Suggests re-writing policy based on Brecon Beacons example.	Individual (1691)	The Brecon Beacons policy is written in a different context to Mid Devon. The Brecon Beacons is a National Park in which they have a statutory purpose to conserve and enhance cultural heritage within a National Park whereas Mid Devon is a district and does not carry National Park status.
	Support this policy.	Willand Parish Council (44)	Support noted.
	Conversion of buildings can harm significance of historic asset.	Historic England (1170)	When considering a planning application policies in the Local Plan should not be considered in isolation. DM25 aims to protect and minimise the impact on heritage assets.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM10 Replacement dwellings in rural areas	Support this policy.	Willand Parish Council (44)	Support noted.
DM11 Residential extensions and ancillary development	Support this policy.	Willand Parish Council (44)	Support noted.
DM12 Design of Housing	Suggestion to endorse housing to be built in rectangle layout with car parking in the square.	Individual (5211)	The policy does not preclude this type of layout. However the suggestion may not be appropriate in all cases and therefore a more flexible approach is preferred.
	Varied materials and colours make developments more attractive.	Individual (5211)	The policy does not preclude varied materials and colours. However the suggestion may not be appropriate in all cases and therefore a more flexible approach is preferred.
	External space for refuse / recycling must be provided as part of design of housing.	Sustainable Crediton (2689); Individual (5211)	Criteria already require external space for refuse and recycling and the Council is preparing a Supplementary Planning Document.
	Housing suitable for older people should be considered. Do not think that DM12 is suitable in addressing the needs of older peoples housing and an individual policy should be adopted. The NPPF specifically notes “the full range of retirement and specialised housing for those with support or care needs”.	South West Harp Consortium (1581); Individual (5211)	Housing suitable for older people has been considered by criterion g) Level 2 Part M, in which on sites of 10 houses or more the provision of 30% of dwellings will be built to level 2 of building regulations Part M ‘access to and use of dwellings’. The specific quoted NPPF reference in the representation refers to part of the definition of ‘older people’ in the glossary of the NPPF.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Reasonably sized dwellings should be considered.	Individual (5211)	DM13 aims to provide reasonably sized dwellings by adopting the Nationally Described Space Standard, for clarity it is proposed that DM12 and DM13 are combined.
	Further detail should be provided on conditions.	Individual (5211)	As set out in national guidance it is important that conditions are tailored to tackle specific problems rather than standardised or used to impose broad unnecessary controls.
	Does not reflect government's commitment for zero carbon. Houses should be built to Passivhaus standards and from 2016 level 6 Code for sustainable homes and BREEAM Excellent rating.	Sustainable Crediton (2689)	The Government abandoned the zero carbon policy and off-site allowable solutions in July 2015. The Government has created a new approach for the setting of technical standards for new housing to help rationalise the many different existing standards which also withdraws the Code for Sustainable Homes. National policy allows for the setting of housing standards in respect of water efficiency, access and space. In terms of energy efficiency this is now reliant on building regulations Part L which was amended in 2013 to set higher energy efficiency standards.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	<p>Does not reflect Ministerial statement 25th March 2015. Criterion c), d) and g). Any modified version of these policies should be assessed by the Council in terms of the impact and effect of such policies in the local area on: 'need', 'viability', 'affordability' and 'timing'.</p>	<p>Home Builders Federation (149)</p>	<p>For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy. The policy is in line with recent national government policy. MDDC has previously included housing standards in our adopted Local Plan supported by evidence and agreed by an Inspector. Furthermore the MDDC 2014 viability assessment for the Local Plan Review includes assumptions about dwelling size. Furthermore the 2016 viability assessment update assumed the Nationally Described Space Standards throughout and has considered that it only has a nominal effect on viability. On this basis the need, viability and timing is justified.</p>

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	DM12 should be revised to either reflect the new National Technical Standards (with the required evidence) or remove those points conflicting with the PPG. Similarly in order to introduce the optional accessibility, adaptability and wheelchair housing standards that evidence is to be provided demonstrating clear need for housing for people with specific needs. Also required to provide evidence in seeking to apply the new Building Regulations optional water requirement.	South West RSL Planning Consortium c/o Chris Burton (1581)	For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy. The policy is in line with recent national government policy. MDDC has previously included housing standards in our adopted Local Plan supported by evidence and agreed by an Inspector. The MDDC 2014 viability assessment for the Local Plan Review includes assumptions about dwelling size and the 2016 viability assessment update assumed the Nationally Described Space Standards throughout and has considered that it only has a nominal effect on viability. On this basis the proposed housing standards in the policy are justified. The plan does not propose to include an optional water efficiency standard.
	Support this policy.	Willand Parish Council (44)	Support noted.
	New dwellings should have decent sized gardens.	Individual (5357)	Criterion e) aims to provide appropriate private amenity space.
	30% of dwellings to meet Level 2 of Part M Building Regulations is not evidenced.	Pegasus Planning (3678)	A 30% requirement to meet Level 2 of Part M Building Regulations is supported by the latest evidence set out in the 2016 viability assessment which confirms that 30% is viable. This was also supported by the previous viability assessment addendum published in 2014.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Not enough flexibility. 30% to be built to Level 2 of Building Regulations Part M presents uncertainty for viability.	Hallam Land Management (4386)	A 30% requirement to meet Level 2 of Part M Building Regulations is supported by the latest evidence set out in the 2016 viability assessment which confirms that 30% is viable. This was also supported by the previous viability assessment addendum published in 2014.
	Shouldn't just rely on building regulations to meet specific needs for older people.	Blue Cedar Homes (3787)	The use of building regulations to meet the specific needs of older people is in response to new national policy which creates a new approach for setting technical standards for new housing. This rationalises the many differing existing standards currently available. However nothing in the policy precludes facilities for older people coming forwards.
	Allow small developments of age restricted properties.	Blue Cedar Homes (3787)	Allowing small developments of age restricted properties is not precluded from the plan. They provide one way of providing homes for older people. However a more flexible approach has been taken to provide homes suitable for older people without excluding the use of these dwellings by others.
	Doesn't mention the term 'Active Design'.	Sport England (169)	The relevant principles are already generally reflected in the plan policies.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM13 Dwelling sizes	No evidence and therefore not justified.	Persimmon Homes South West c/o CLP Planning Ltd (3640); Hallam Land Management (4386)	For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy. The policy is in line with recent national government policy. MDDC has previously included housing standards in our adopted Local Plan supported by evidence and agreed by an Inspector. The MDDC 2014 viability assessment for the Local Plan Review includes assumptions about dwelling size and the 2016 viability assessment update assumed the Nationally Described Space Standards throughout and has considered that it only has a nominal effect on viability. On this basis the policy is justified.
	Missing a bullet point (h) from the National Space Standards.	Pegasus Planning (3678)	For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy. The criterion the comment is referring to wasn't in the draft version of the space standards and was added after the Local Plan Review proposed submission consultation had started.
	Criterion h) should read 2.3m rather than 2.5m.	Pegasus Planning (3678)	For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Dwelling sizes in policy are higher than those in Viability Appraisal 2014 (Figure 4).	Pegasus Planning (3678)	The study acknowledges that there will be a variety of sizes coming forward in practice and could be influenced by the Governments Housing Standard Review. The study therefore uses a £sq.m approach in which the indicative 'Value Levels' used can be applied to varying dwelling sizes and is broadly in line with those in the national standard. Following this a 2016 update to the viability assessment has been undertaken in which the 2016 assessment assumes the Nationally Described Space Standards throughout and it is considered that it only has a nominal effect on viability.
	Viability Appraisal does not include the additional built in storage space required by the Nationally described space standards, a review of the Viability Appraisal is required.	Pegasus Planning (3678)	A 2016 update to the viability assessment has been undertaken in which the 2016 assessment assumes the Nationally Described Space Standards throughout and it is considered that it only has a nominal effect on viability.
	Criterion f) word 11 should be NOT.	Willand Parish Council (44)	For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Does not reflect Ministerial statement 25 th March 2015. Any modified version of these policies should be assessed by the Council in terms of the impact and effect of such policies in the local area on: need, viability, affordability and timing.	Home Builders Federation (149)	The policy reflects the optional technical standards for new dwellings referred to in the ministerial statement 25 th March 2015. MDDC has previously included housing standards in our adopted Local Plan supported by evidence and agreed by an Inspector. Furthermore the MDDC 2014 viability assessment for the Local Plan Review includes assumptions about dwelling size. On this basis the need, viability and timing is justified. For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM14 Town centre development	Minimum A1 retail use at ground floor level within the primary shopping frontage should be 70% in Crediton.	Crediton Town Council (678); Crediton Neighbourhood Plan (1734)	Following changes to permitted development rights it is proposed that the policy is amended to ensure primary shopping frontages at ground floor levels will not fall below 85% of A1-A3 uses. The percentage reflects the average primary shopping frontage make up within town centres in Mid Devon since 2009. There is further opportunity through the Crediton Neighbourhood Plan to develop a policy to reflect 70% A1 shop frontage if this is a specific issue considered by the Neighbourhood Planning group for Crediton Town Centre. Evidence setting out the need for a 70% A1 use in the Crediton primary shopping frontage along with an article 4 direction to remove the new permitted development rights that allow flexibility between A1-A3 will be required to enable this.
	Support this policy.	Uffculme Parish Council (54); Individual (4662)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	DM14 (and DM16) when coupled with DM15 does not suggest sufficient flexibility. Vitality of the town centres is achieved by concentrating on footfall, aiming for higher quality and avoiding the trap of mono-use for the sake of it. The policies generally need to chime so as not to exclude the market demand for larger retail floor-plates and reflect emerging shopping habits. There should be no worry about over-demand/under supply as the market will self-adjust and policies should be flexible enough to cope.	Harcourt Kerr (1090)	DM14 sets out a wide range of permissible uses in town centres, seeking to diversify customer choice while protecting and enhancing the viability of the town centre, its historic character and accessibility. The policy is flexible enough to respond to rapid change; coupled with DM15 the policies apply a sequential approach to retail development in towns.
	Should Bampton be removed from the list as it is no longer a town.	Willand Parish Council (44)	Remove Bampton from this policy.
DM15 Development outside town centres	Support this policy.	Uffculme Parish Council (54)	Support noted.
	DM14 (and DM16) when coupled with DM15 does not suggest sufficient flexibility. Vitality of the town centres is achieved by concentrating on footfall, aiming for higher quality and avoiding the trap of mono-use for the sake of it. The policies generally need to chime so as not to exclude the market demand for larger retail floor-plates and reflect emerging shopping habits. There should be no worry about over-demand/under supply as the market will self-adjust and policies should be flexible enough to cope.	Harcourt Kerr (1090)	DM15 applies a sequential approach to retail development in towns. This is to ensure the vitality and viability of town centres are not harmed by out-of-centre development in accordance with National policy. DM14 sets out a wide range of permissible uses in town centres, seeking to diversify customer choice while protecting and enhancing the viability of the town centre, its historic character and accessibility. The policy is flexible enough to respond to rapid change.
	Should Bampton be removed from the list as it is no longer a town.	Willand Parish Council (44)	Remove Bampton from this policy.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Concern over decision to utilise threshold of only 500m ² rather than 2500m ² contained in paragraph 26 of the NPPF.	Pegasus Planning (3678)	The 500m ² is based on the Mid Devon Retail Study which is a recommended locally set floorspace threshold. The 2,500m ² as noted in the comment is the default threshold where there is no locally set threshold as explained in the NPPF.
DM16 Fronts of shops and business premises	DM14 (and DM16) when coupled with DM15 does not suggest sufficient flexibility. Vitality of the town centres is achieved by concentrating on footfall, aiming for higher quality and avoiding the trap of mono-use for the sake of it. The policies generally need to chime so as not to exclude the market demand for larger retail floor-plates and reflect emerging shopping habits. There should be no worry about over-demand/under supply as the market will self-adjust and policies should be flexible enough to cope.	Harcourt Kerr (1090)	DM14 sets out a wide range of permissible uses in town centres, seeking to diversify customer choice while protecting and enhancing the viability of the town centre, its historic character and accessibility. The policy is flexible enough to respond to rapid change. DM16 supports DM14 to help retain the town centre's character and appearance. DM15 applies a sequential approach to retail development in towns.
	Support this policy.	Willand Parish Council (44)	Support noted.
DM17 Rural shopping	Support this policy.	Willand Parish Council (44)	Support noted.
DM18 Rural employment development	Support this policy.	Willand Parish Council (44); Caravan Club c/o SAVILLS (5789)	Support noted.
DM19 Protection of employment land	The relaxation of this protection to allow other uses should be robustly examined.	Uffculme Parish Council (54)	It is considered that the criteria in the policy provide adequate provision to ensure the safeguarding of viable employment sites, whilst still allowing flexibility in line with the National Planning Policy Framework. Robust examination of applicant's case will be undertaken at application stage.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Support this policy in that it broadly reflects paragraph 22 of the NPPF. The worth of the policy however is in interpretation and implementation and the local planning authority must engage with the principles set out in the policy wording in development management decisions.	Devonshire Homes Ltd c/o Neal Jillings (1050)	Support noted.
	Period noted in criterion b) should be 5 years or at least 3 years. Short term is open to abuse and manipulation of facts.	Willand Parish Council (44)	The 18 month marketing period is considered to be appropriate in view of the on-going fluctuations in the national economy and will be kept under review in subsequent local plans. A 3 or 5 year requirement could be deemed unreasonable to those marketing their land or buildings given the significant length of time suggested in the comment.
	Support flexibility of the policy to allow the release of employment land.	Pegasus Planning (3678)	Support noted.
	Criterion c) – ability to undertake a sequential viability test for a ‘general’ development option is questioned – even if commercial use is viable, does not result in commercial interest.	Pegasus Planning (3678)	The policy requires a sequential viability test to ensure that a site for mixed use development is considered in preference to the total loss of employment. As set out in national policy the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. In some cases commercial development may not be appropriate, in which the opportunity for non-employment use is made available in Policy DM19.
DM20 Agricultural development	Support this policy.	Willand Parish Council (44)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM21 Equestrian development	Support this policy.	Willand Parish Council (44)	Support noted.
DM22 Tourism and leisure development	Support this policy.	Willand Parish Council (44)	Support noted.
	Overly restrictive on development of existing caravan sites which are located in the countryside and not directly adjacent to an identified settlement. Greater flexibility should be provided.	Caravan Club c/o SAVILLS (5789)	The policy applies a sequential approach to tourism and leisure development to ensure the location of the development is sustainable in line with National Policy. The policy does not preclude tourism and leisure development in the countryside but requires justification to ensure the benefits of the development outweigh any harm.
	Unclear whether diversification in accommodation type would be acceptable.	Caravan Club c/o SAVILLS (5789)	The policy does not preclude diversification in accommodation type however each application will be judged on its own merits.
	Does not allocate strategic tourism site in accordance with the Tourism study.	Friends Life Ltd c/o GL Hearn (3781)	The role of this policy is for development management. On 22 nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
DM23 Community facilities	Support this policy.	St Andrews Church (1179); Willand Parish Council (44); The Theatres Trust (1628); Pegasus Planning (3678); Diocese of Exeter (6081)	Support noted.
	Should be positive regarding new provision and caution in relation to loss.	Uffculme Parish Council (54)	The policy supports the comment made.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Should include police infrastructure and facilities. Suggested amendment to supporting text 4.70 to include words 'safety, security, police infrastructure and facilities'. Also define Infrastructure or community facilities in the glossary.	Devon and Cornwall Police c/o WYG (5762)	This is an unnecessary addition to the supporting text given that the text already generally refers to types of community facilities that police provision may be categorised under such 'health and wellbeing' and police provision is included in the Infrastructure Delivery Plan anyway. However it is considered useful to define the terminology in a glossary. Community Facilities are therefore proposed to be defined in the glossary in response to the comment. The definition of the term 'Infrastructure' varies according to the context. A list of elements of infrastructure for which improvements are sought through the planning process are detailed in the Infrastructure Plan 2015.
DM24 Protection of Local Green Space and recreational land/buildings	Request Bampton Millennium Green to be designated as Local Green Space.	Bampton Society (1319); Mid Devon CPRE (486)	Include Bampton Millennium Green as Local Green Space. The green space is in reasonably close proximity to the community. It is demonstrably special to the local community in conformity with the purposes of a Millennium Green, it is local in character and is not an extensive tract of land.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Bickleigh Church Green should not be designated as Local Green Space. There is no historic significance and it is private land.	Individual c/o J Anning Land Planning Services (5827); Individual (5237)	Remove designation of Bickleigh Church Green as Local Green Space. Since the proposed submission consultation, the reconsideration of Bickleigh Church Green has been reconsidered as a local heritage asset and has been removed from the register. Reasons for its removal include the lack of historic significance as a 'green' and historic community use of the space appears to be very occasional and therefore does support the claim that the plot has been used as a community space. For the reasons above it is considered that Bickleigh Church Green no longer meets the second test in para 77 of the NPPF and therefore should be undesignated as a Local Green Space in the Local Plan Review.
	Support inclusion of proposed Local Green Spaces in Bickleigh.	Bickleigh Parish Council (41)	Remove designation of Bickleigh Church Green as Local Green Space. Since the proposed submission consultation, the reconsideration of Bickleigh Church Green has been reconsidered as a local heritage asset and has been removed from the register. Reasons for its removal include the lack of historic significance as a 'green' and historic community use of the space appears to be very occasional and therefore does support the claim that the plot has been used as a community space. For the reasons above it is considered that Bickleigh Church Green no longer meets the second test in para 77 of the NPPF and therefore should be undesignated as a Local Green Space in the Local Plan Review.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Request Bickleigh, land north of Highfield in combination with land south of Glen View to be designated as Local Green Space. For the following reasons: in the heart of the village, lovely open space with extensive views of the village, castle and valley, important open space in the conservation area, valued by villagers as integral part of the village landscape.	Bickleigh Parish Council (41)	The site proposed is a field in close proximity to the community. However it is no more 'beautiful' than other fields in the local area or other villages in Mid Devon. The comment also states that this is an 'important open space in the conservation area' however without a conservation area appraisal or evidence provided by the representation this cannot be substantiated. Therefore it is considered that this site would not meet the second test in para 77 of the NPPF to be designated as a Local Green Space.
	Support Nick's Farm Field, Bradninch designated as Local Green Space.	Bradninch Town Council (86); Individual (773)	Support noted.
	Request field on the opposite side of W end Road, Bradninch, marked West End on the Policies Map and known as Banbury Field to be designated as Local Green Space as this ancient farm includes that field.	Bradninch Town Council (86); Individual (773)	The site proposed is a field in close proximity to the community. However the historic significance of the site as suggested by the comment is unsubstantiated. The Conservation Area Appraisal makes no specific reference to the field and the important features and listed buildings with the conservation area are not associated with this site. Therefore it is considered that this site would not meet the second test in para 77 of the NPPF to be designated as Local Green Space.
	Request the Glebe, Cheriton Fitzpaine (OCF1) to be designated as Local Green Space.	Mid Devon CPRE (486)	No detail is provided in the representation as to why this site should be designated as Local Green Space. It is considered that the site does not meet the tests in the NPPG to be designated as Local Green Space and therefore no change is proposed.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Request Cullompton Community Association 32 acres of public open space in Cullompton designated as Local Green Space.	Cullompton Community Association (989)	The area noted is part of an area identified as the potential location for the 'Town Centre Relief Road' as such it would undermine policy CU19 of the Local Plan Review. Furthermore the scale of the identified area is viewed as an 'extensive tract of land' which is inconsistent with National Policy to be designated as Local Green Space.
	Support Morchard Bishop OMO2 'Church Street' excluded as a Local Green Space.	R W Partridge & Sons (964)	Support noted.
	Request Morchard Bishop OMO2 'Church Street' locally known as Gurneys to be designated as Local Green Space.	Mid Devon CPRE (486); Individual (4416, 4459, 5642, 5641, 5208, 4106, 4081, 5263, 4117, 5295, 3971, 4082, 4093, 5604, 5605, 5606, 5607, 5608, 4474, 4473, 5609, 5602, 4476, 4108, 4111, 4112, 5603, 4460, 4152, 4110, 4481, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 4471, 4472, 5592, 5593, 4077, 4074, 5595, 5596, 5601, 6063, 4212, 4215, 4681, 4682, 4075, 5591, 5590, 5589, 5588, 5587, 5586, 4076, 5358, 4368, 4356, 366)	Although there were a number of representations supporting OMO2 to be designated as Local Green Space 'to prevent the character and well-being of the village being destroyed', no detail has been provided as to why this site itself is demonstrably special to the local community. Furthermore the landowner has set out reasons why he believes the site should not be designated as Local Green Space including reasons for why the green area is not demonstrably special to the local community including that it is an agricultural field of no more beauty, tranquillity or richness of its wildlife to any other field as such it is considered the site would not meet the tests in national policy to be designated as Local Green Space. Therefore no change is proposed.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Request Morchard Bishop, St Gatiens Garden Church Street to be designated as Local Green Space.	Individual (4093)	No map of the Local Green Space has been provided and it is not clear what area this request is referring to on OS maps. Furthermore the representation does not set out how the site meets the three requirements of the NPPF to be designated as a Local Green Space therefore no change is proposed.
	Request Morchard Bishop, the sports and recreational field Wood Lane to be designated as Local Green Space.	Individual (4093)	Policy DM24 already affords protection for this site from development as it is a sports and recreational field, therefore the proposed change is considered unnecessary.
	Request Sandford Millennium Green to be designated as Local Green Space.	Bampton Society (1319); Mid Devon CPRE (486)	Include Sandford Millennium Green as Local Green Space. The green space is in reasonably close proximity to the community. It is demonstrably special to the local community in conformity with the purposes of a Millennium Green, it is local in character and is not an extensive tract of land.
	Recommend land east of junction with Manley Lane, and to Manley Bridge should be designated as a Green Buffer Zone – Tiverton.	Tiverton Civic Society (1410)	The area suggested by the comment is an extensive tract of land and therefore is not in conformity with the NPPF.
	Safeguard existing play spaces, green areas and sports pitches – General.	Individual (5211)	The policy is in conformity with the comment made.
	Support this policy.	Willand Parish Council (44)	Support noted.
	Evidence base does not follow Sport England methodology.	Sport England (169)	The policy and evidence base is in line with the NPPF and guidance. The Sport England Methodology would provide further detail regarding provision for sport however it is not required for the purposes of developing Local Plan Review policies.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM25 Development affecting heritage assets	Support this policy.	Willand Parish Council (44); Pegasus Planning (3678)	Support noted.
	Only provides some assistance to those making decisions. Should replace policy with suggested wording in representation.	Historic England (1170)	This policy is a replica of that which forms part of Local Plan Part 3 'Development management policies' which was re-written by the inspector and adopted in 2013. In line with National guidance, in drafting policies undue repetition has been avoided by using criteria which sets out principles that are common to the different types of heritage assets. As such the full replacement policy by Historic England is not recommended; however aspects of the suggested policy have been incorporated and are proposed as a modification to criterion b) of the policy.
	The setting study areas surrounding Knightshayes or Killerton should be shown on the Council's Public Access system and referred to in the supporting text.	National Trust (170)	This information is available on the Council's website. Weblinks can change over time and links can be broken. It is proposed that the weblink will be removed and replaced with reference to websites rather than the links provided e.g. 'available on the Mid Devon District Council website'. Currently, constraint information is not shown on the Council's Public Access planning application system.
	If heritage assets cannot be preserved in situ, they should be preserved in record.	Devon County Council (626)	Reference to the potential for 'preservation by record' is noted in the supporting text para 4.79.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM26 Green infrastructure in major development	Can this policy be used as a vehicle to help deliver objectives of the WFD and measured from the RBMP? Greater clarity needed.	Environment Agency (943)	As set out in the supporting text applicants are encouraged to explore opportunities for wider environmental measures which may include the objectives of the WFD and RBMP. However the purpose of this planning policy is to manage development rather than deliver the objectives of other directives and frameworks.
	Emphasise the importance of protecting and enhancing existing biodiversity in criterion a).	Environment Agency (943)	S9 covers the comment request. Also criterion a) already notes 'a net gain in biodiversity. The purpose of DM26 is to manage the provision of GI in major development proposals.
	Disagree with wording '...the Council will balance the benefits of the development against the objectives of this policy.' Suggested wording '...the Council will look to the development to provide or contribute towards off-site green infrastructure.'	Environment Agency (943)	The existing wording is considered appropriate in the policy to enable flexibility. However it is noted that there is scope in policy to be strengthened with reference to off-site contributions as suggested in the comment. A modification is therefore proposed.
	Support this policy.	Willand Parish Council (44); The Woodland Trust (3625)	Support noted.
	Suggestion to provide a Trees and Woodland SPD.	The Woodland Trust (3625)	Suggestion is in relation to a SPD rather than requiring an amendment to the Local Plan Review.
	Green infrastructure should protect and enhance the heritage assets of the district.	Historic England (1170)	It is agreed that green infrastructure in some cases can serve the purpose of protecting or enhancing heritage assets. For clarity reference to this is suggested as a modification to the supporting text.
	Support this policy however object to policy S5.	Pegasus Planning (3678)	Support noted. Comments regarding S5 are discussed within that section.
	Could improve policy by specifically mentioning allotment provision.	Devon County Council (626)	The supporting text refers to policy S5 which sets out the provision of allotments as part of public open space.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM27 Protected landscapes	Paragraph 4.94 should be amended to be consistent with national policy as 'or adjoining' applies equally to AONBs. Suggested wording 'where major developments are proposed within or adjoining the protected landscapes'.	Blackdown Hills AONB Partnership (1195)	It is noted that 'or adjoining' in the context of para 4.94 applies to AONB's. A change to the supporting text is therefore proposed. The wording suggested by the respondent has not been incorporated as this would imply that major developments within national parks would be considered by the Mid Devon District Council, whereas National Parks are the Local Planning Authority for their area.
	Support this policy.	Willand Parish Council (44); Blackdown Hills AONB Partnership (1195); Exmoor National Park Authority (115)	Support noted.
	Consideration should also be given to light pollution to minimise impacts on the Dark Sky Reserve status of Exmoor National Park.	Exmoor National Park Authority (115)	A modification to the supporting text is proposed under para 4.94 to consider light pollution.
	Final paragraph of policy should be amended for clarity that development in National Parks will not be covered by Mid Devon Local Plan.	Exmoor National Park Authority (115)	Paragraph 4.90 already states that a small area of the district incorporates a very small part of Dartmoor National Park in Cheriton Bishop parish, for which Dartmoor National Park Authority is the Local Planning Authority. For Exmoor, no area within the district falls within the National Park. Para 4.94 already distinguishes consideration is for <i>adjoining</i> major development in respect of National Park's, therefore no change is proposed in response to this comment.
DM28 Other protected sites	Should include compensatory measures in policy.	Environment Agency (943)	Agreed that compensatory measures may be considered in some cases. An amendment is proposed to criterion c) with additional supporting text to set out the context for the use of compensatory measures.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Support this policy.	Willand Parish Council (44)	Support noted.
	Ancient woodland and ancient trees should have absolute protection. It is not possible to mitigate.	The Woodland Trust (3625)	Para 4.97 acknowledges the issue of mitigation with regard to ancient woodland and trees. The policy has been developed to be strict but flexible to respond to a range of potential future proposals. Development which would lead to any loss of ancient woodland or trees, the benefits would have to clearly outweigh the loss.
	Mid Devon's landscape is receiving relatively little protection within this Local Plan Review.	Mid Devon CPRE (486)	Disagree with statement. The Local Plan includes S9 a strategic policy which aims to preserve and enhance the distinctive qualities of Mid Devon's. Greater detail is also provided in DM27 and DM28.
DM29 Enforcement	Support intentions to publish a Local Enforcement Plan.	Uffculme Parish Council (54)	Support noted.
	Support this policy.	Willand Parish Council (44)	Support noted.

Policies Map

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
Policies Map Tiverton	The allocation for an energy recovery facility under Policy W6 of the Devon Waste Plan should be indicated within the Eastern Urban Expansion.	Devon County Council (626)	Whilst the site is identified within the adopted Devon Waste Plan as a potential site for a energy and waste facility, to date no such proposals have come forward from a potential operator. The policies map does not set out the exact location of the facility.
	Part of TIV10 Roundhill allocation that overlaps rear gardens at Lower Cotteylands.	Individual (5262, 5326)	It is proposed to remove the small area that overlaps the rear gardens of Lower Cotteylands from the allocations map.

	Part of TIV9 allocation that overlaps small area at the side of 17 Arnold Crescent.	Individual (5870)	It is proposed to remove the small area that overlaps the side of 17 Arnold Crescent from the allocations map.
Policies Map Cullompton	Amend allocation CU1-CU6 to reflect land north of Rull Lane as Green Infrastructure rather than proposed mixed use development.	Rull Hamlet Association (1796); Individual (1901)	The adopted NW Cullompton masterplan has taken this amendment into account and this will be reflected in revised allocation maps along with any other masterplan amendments.
	Disagree with site configuration for North West Cullompton i.e. Growen land should not have the majority of it designated as Green Infrastructure. Configuration as proposed would preclude local centre in most optimal/viable location.	Growen Estates c/o Rocke Associates Ltd (5748)	As noted in the response for CU1-CU6 North West Cullompton, the decision as to which areas were most appropriate to be allocated as Green Infrastructure (GI) was informed by the findings of the Council's Landscape and Visual Appraisal (2014). Following the allocation process, masterplanning of the site gives the opportunity to adjust the balance between the areas identified for GI and development. This approach has been applied during the recent masterplanning of the existing NW Cullompton allocation which resulted in such places. The land identified for the centre in the recently adopted masterplan was previously allocated as GI and accordingly a change to the proposals map is proposed to set this out.
	Green Infrastructure should be to the north of Rull Lane. NW Cullompton.	Individual (1901)	Agreed comment corresponds with a comment made by Rull Hamlet Association (1796) discussed in the NW Cullompton summary. Policies map to be amended to reflect this.
	Proposed development east of Cullompton [CU7-CU12], outline goes across private garden believe this is in error.	Individual (5563, 5370, 5818)	Change to policies map to exclude outline over private garden.

Policies Map Crediton	Area of CRE5 should be amended on map and Green Infrastructure determined only through masterplanning.	MJ Gleeson c/o Bell Cornwell LLP (3775)	As noted in the summary response for CRE5 Pedlerspool, the GI annotation mirrors that as set out when the site was allocated within the AIDPD, and therefore has been considered appropriate by an Inspector. The policy notes that the location of the GI reflects the sensitivities of the location, with the upper slopes to the west and south of the site more visually prominent and adjacent to Creedy Park, the historic locally listed park and garden. The need for planting on the eastern side is justified in criterion d). Heritage and landscape constraints have informed the GI annotation, not just ecological as indicated by the objector. Therefore no change to the policies map is proposed.
	Settlement limit boundary should be amended to include land identified for development in application site specified [in relation to CRE10].	Tesco Stores Limited C/O Burnett Planning (4323)	Area immediately to the east of CRE10 allocation was within the original 06/02670 and 09/00244 applications, however no development was proposed upon it as it formed part of the landscape buffer screening part of the site from views from the A377. The area to the south east contains the swales which are part of the sustainable urban drainage to address flood risk, and are not appropriate for development. The settlement limit needs to be amended to incorporate the entire site that has received planning permission (14/02044/MFUL). At present the southern part of the site extends beyond the settlement limit for Crediton.

Policies Map Bampton	Settlement boundary should be amended to reflect deletion of AL/BA/1.	Individual c/o Jillings Hutton (5845)	An amendment is proposed to include the remaining part of the allocation OBA4 School Close, Bampton (previously Al/BA/1) to be consistent with the approach taken elsewhere in the plan that all permitted but unimplemented existing allocations be rolled forward into the Local Plan Review.
Policies Map Bradninch	Recently developed affordable housing on Millway is not shown on the policies map.	Bradninch Town Council (86); Individual (773, 5843)	Policies map to be updated to show recently developed affordable housing on Millway. This was not previously shown due to a time lag between the completed housing and OS mapping updates.
	Believe wildlife site should be extended.	Individual (773)	The county wildlife site is not a designation by the Local Plan Review. Any updates to the County Wildlife site layer will be updated in subsequent policies maps.
	Priority Habitats in Bradninch appear to be random.	Individual (773)	The priority habitats layer is not a designation by the Local Plan Review. This is a layer compiled and provided to us by Natural England. Any updates to the priority habitats layer will be updated in subsequent policies maps.
	Believe River Culm flood plain should be a habitat area.	Individual (773)	Habitat areas layer is not a designation proposed by the Local Plan Review. This is a layer compiled and provided to us by Natural England. Any updates to habitat areas will be updated in subsequent policies maps.
	Policies map should extend to Hele.	Individual (773)	Hele is not classed as a village in Policy S13 and does not have other planning designations to display such as conservation areas.
Policies Map Cheriton Bishop	Area of land to the north of 'The Old Rectory' and 'Brackenwood' is shown as within the Conservation Area boundary, however the 1991 Conservation Area shows this site to be outside. The settlement limit is therefore also incorrect.	Individual (4489)	Amend conservation area boundary on policies map to the 1991 Conservation Area boundary. The settlement boundary differs from the conservation area boundary therefore no change is required to the settlement boundary.

Policies Map Newton St Cyres	Would like settlement limit extended to allow infill in Half Moon Village.	Newton St Cyres Parish Council (46)	Not agreed, 'Half Moon Village' is some distance from the main Newton St Cyres village which provides the principle amenities and school. Furthermore existing development at 'Half Moon Village' is very dispersed and therefore there is no obvious settlement boundary.
Policies Map Thorverton	Support Thorverton Local Green Space but suggest amendment to boundary to reflect the boundary of the Green's deeds.	Individual (5215)	Amend boundary of Thorverton Local Green Space to follow suggested boundary as set out in this comment.
Policies Map Uffculme	The Waste Management Facility should be omitted as it is no longer in the Devon Waste Plan.	Devon County Council (626)	Remove waste management facility from policies map.
Policies Map General	PRoWs should be shown on the policies map.	Individual (773)	PRoW will still be considered when looking at a planning application, however to ensure maps are as clear as possible to demonstrate policies such as development allocations they have not been included on the policies map.
	Reference to 'Minerals Consultation Zone' should be amended to 'Minerals Consultation Area'.	Devon County Council (626)	Policies map to be amended to reflect comment.

Miscellaneous comments

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Recommend that the Plan takes a holistic approach to the water environment e.g. ensure water resources and efficiency are considered.	Environment Agency (943)	No change. Policy S1 considers the conservation of natural resources; S9 also required the efficient use and conservation of water.

	Recommend policies take a catchment based approach.	Environment Agency (943)	The catchment based approach provides a useful model for collaborative working which will be particularly useful with respect to masterplanning work for larger sites. A Catchment based assessment will be undertaken as part of the masterplan work for east Cullompton as agreed with the Environment Agency.
	Production of a Green Infrastructure Strategy will form an important Supplementary Planning Document.	Environment Agency (943)	No change. Comment requests a new SPD rather requires a change to the Local Plan Review.
	The Environment Agency has recently delineated default Source Protection Zones, development proposals will need to address risks to controlled waters.	Environment Agency (943)	No change. Source protection zones will be considered at the planning application stage. Policies such as and DM4 will ensure risks to controlled waters are addressed.
	Local/public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of policies and decisions on people sharing particular protected characteristics.	Equality and Human Rights Commission (2389)	Comment provided was a statement by respondent which requires no change to Local Plan Review policies. An Equality Impact Assessment has been undertaken as part of the evidence base.
	Note that proposals do not affect the current or (future) operation of the mainline network in Great Britain.	Office of Rail Regulation (3677)	Noted.
	The vital role that telecommunications play in both the economic and social fabric of communities merit the inclusion of a policy which refers specifically to telecommunications development. Draft telecommunications policy has been recommended.	Mobile Operators Association c/o Mono Consultants Ltd (1516)	S1 in combination with DM policies and the NPPF provide sufficient guidance for telecommunications development.

	<p>Would like to see the promotion of a cycle/access routes e.g. link between Tiverton and Exeter, routes around Tiverton and Cullompton.</p>	<p>Individual (3972, 5211)</p>	<p>S1 supports the comment made. The aspirations of the comment are in part beyond the scope of Mid Devon however policies in the proposed Local Plan Review do not preclude development proposals which provide the routes suggested.</p>
	<p>Oppose to any further development on green field sites in Mid Devon.</p>	<p>Individual (3694)</p>	<p>Local Plans are key to the delivery of sustainable development, seeking opportunities to achieve each of the economic, social and environmental dimensions of sustainable development. In the case of Mid Devon the increase in housing need is greater than which can be provided by only brownfield land, as such to meet housing need, development on green field sites is required. Appropriate previously developed land is allocated in the Local Plan.</p>
	<p>How the Council oversees and retains strong influence over large housing developments e.g. wish to see statement of intent about level of direct provision of housing by the council.</p>	<p>Individual (5302)</p>	<p>Comment refers to the role of a different department in Mid Devon District Council rather than requiring a change to the Local Plan Review.</p>
	<p>General concerns over provision of services, facilities and infrastructure in Mid Devon.</p>	<p>Individual (5306)</p>	<p>The Local Plan Review aims to protect our town centres, infrastructure including community facilities is guided by need and existing services and facilities are protected.</p>
	<p>Would like to self-build.</p>	<p>Individual (3729)</p>	<p>The Local Plan Review is supportive of self-build development. The Council maintains a Self-Build Register which contains details of anyone who has registered their interest in developing a self-build property in Mid Devon. The information will be used to understand the demand for self-build housing in Mid Devon, informing policies to improve the supply of land for custom build housing.</p>

	Concerns over the priority habitat layer.	Individual (2827)	The priority habitat layer is a National layer provided by Natural England. Any updates to the layer provided by Natural England will be reflected in subsequent maps.
	Policies should apply best practice in terms of ecology and sustainable energy.	Individual (5864)	The Local Plan Review recognises the importance of ecology and sustainable energy in a number of policies such as S1 and S9. Also note that following the government's housing standards review, improvements in the energy efficiency in buildings now primarily fall within the field of building control rather than planning.
	Local Plans should cover minerals planning.	Individual (4552)	Devon County Council is the responsible body for minerals planning. The Local Plan Review takes into account important minerals conservation areas through the proposal maps. It also notes the Devon County Council's Waste and Minerals Plan in the supporting text.
	The Local Plan is legally compliant, sound and has complied with the duty to co-operate.	Individual (5865, 373)	Noted.
	The Local Plan is legally compliant and sound.	Individual (5871)	Noted.
	The Local Plan is not legally compliant, sound and has not complied with the duty to co-operate.	Individual (5624)	The respondent submitted both a written submission and an online survey. The survey sets out the comment but without further information.

	<p>Include sites identified for car parking in Bradninch. Sites were previously identified for car parking but have now disappeared from the Plan.</p>	<p>Bradninch Town Council (86); Individual (773)</p>	<p>A number of possible locations for car parks were included as options during the preparation of the Allocations and Infrastructure DPD in 2007. However, it was noted that these would only be included in the final version if it was clear they could be implemented. None were eventually allocated for these reasons. The Parish Plan (having been prepared in 2010) erroneously states that these sites were allocated as car parks in the adopted plan. Sites for small parking areas within Bradninch are still possible without allocating.</p>
	<p>Would like to see other disused stations and lines reinstated/protected e.g. old Tiverton Junction station at Willand.</p>	<p>Railfuture (5830)</p>	<p>Without significant further work on costings, feasibility and funding, the inclusion of reopening Willand Station and in particular a new line to Tiverton in the Local Plan could not be supported as it would be premature. These proposals do not currently form part of the metro scheme although the Council is commissioning a timetable study which includes consideration of the role of the Willand loop.</p>
	<p>Support a proposal to provide a new cultural hub for Crediton.</p>	<p>Crediton Town Team (5821)</p>	<p>Cultural facilities are supported by S12 for Crediton and would not need to be allocated in order to come forward.</p>
	<p>Extend wildlife site at Charwell.</p>	<p>Bradninch Town Council (86)</p>	<p>Wildlife sites are not designated by the Local Plan Review. Any future updates to the wildlife sites layer will be amended in subsequent proposal maps.</p>
	<p>Further clarification on reasoning for designation of priority habitats required.</p>	<p>Bradninch Town Council (86)</p>	<p>A priority habitat is not a designation made by the Local Plan Review. Any future updates to the priority habitats layer will be amended in subsequent proposal maps.</p>

	Replace key diagram with previous key diagram in Core Strategy.	Mid Devon CPRE (486); Individual (366)	The Core Strategy key diagram is out of date in comparison to the key diagram in the Local Plan Review. Amendments to the diagram have been made to future proof its use.
	Definition of community facilities should be in glossary.	Devon and Cornwall Police c/o WYG (5762)	Add definition of community facilities in glossary.

Community Infrastructure Levy (CIL) Consultation – Summary of Representations

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
Residential CIL charge			
CIL	The infrastructure costs associated with strategic sites is significant and the scale of onsite delivery renders the use of a Section 106 Legal Agreement more appropriate to secure the associated infrastructure. We consider appropriate phasing and infrastructure delivery will overcome short-term viability issues to ensure that the site (East Cullompton) is deliverable over the longer term. The sites delivery should be managed through a Section 106 Agreement rather than CIL and support the zero rate for strategic sites.	Pegasus Planning (3678)	This comment is noted and supports the provisions for the Strategic Sites as proposed.
CIL	The evidence contained with the Viability Assessment (2014) supports the Council's Draft Charging Schedule and that the CIL rate for strategic sites should be set at a nil-rate.	Pegasus Planning (3678)	The support for the charging schedule as published is noted.

<p>CIL</p>	<p>There is concern that there is an insufficient provision of affordable housing being delivered over the proposed plan period. It is suggested that the Local Plan should be adapted to reflect this and that either a higher affordable housing target or an increased housing target is required in the Local Plan.</p> <p>As it stands we support for the CIL Charging Schedule particularly through the use of affordable housing thresholds as a way of differentiating between CIL rates and recognising that extra care can fall within the C2 Use Class.</p>	<p>South West HARP Planning Consortium (1581)</p>	<p>Representation has some contradictions. Supports CIL charge as things stand but suggest a higher housing or affordable housing target ought to be promoted. The overall housing target is proposed to be increased to 7,860, which would yield 110 affordable dwellings per year at 28%. The SHMA forecasts a need of 124 affordable dwellings per year; the local plan has been changed to reflect this. It is highly likely that the Council and its housing association partners will be able to provide at least 20 additional affordable dwellings per year through non-planning actions such as investment from the HCA, exceptions sites and delivery on council owned land. Analysis by the Joseph Rowntree Foundation indicates that s106 did not provide 100% of the affordable housing completions in any of the last 10 years. The local plan sets targets of 28% in the urban areas on sites of 11 houses or more and 30% in the rural areas on sites of 6 or more. The affordable housing targets are based on viability evidence. Increasing the Affordable Housing target would make some sites unviable and so reduce the delivery of affordable homes overall.</p> <p>As things stand the representation expresses support for the CIL charging Schedule while promoting an increased housing target overall.</p>
<p>CIL</p>	<p>The £100 per sq. m rate is counter intuitive with respect to NPPG guidance in that planning obligations are changed to facilitate and encourage greater delivery of housing from small scale developers.</p>	<p>Devonshire Homes Ltd (1050)</p>	<p>All new developments are required to contribute to the provision of necessary infrastructure in the locality. Without the provision of such infrastructure new development would not be able to take place. Contributions to infrastructure are normally made via Section 106 Obligations or by a Community Infrastructure Levy. Objector refers to Paragraph 12 of NPPG section on planning obligations in their rep - this no longer exists. Paragraph 031 Reference ID: 23b-031-20160519 now states, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development.</p>

<p>CIL</p>	<p>Differential rates should not be used as a means to deliver policy objectives. The proposed CIL rate in Mid Devon seeks to recover under different means; a zero sum game that actively acts against what the NPPG and the Government seek.</p>	<p>Devonshire Homes Ltd (1050)</p>	<p>The differential rates are based on the variation in residential land values identified by Dixon Searle in their viability report. While land values can vary on a site to site basis, Figure 10, page 67 of the Dixon Searle report clearly shows the general range of residential land values and patterns. Generally residential land values are likely to be higher in the areas outside Tiverton, Crediton and Cullompton. The differential rates are therefore justified between urban and rural areas based on the viability evidence provided. The Dixon Searle report states at Paragraph 3.2.6 “ <i>The higher values and typical scheme types coming forward away from Tiverton, Cullompton and Crediton are likely to drive improved viability in the rural areas / smaller settlements and our view is that this could support some - - - - newly introduced CIL differentiation for all areas outside these 3 main settlements;”</i> The differential in land values between urban and rural areas has been largely maintained in the latest viability assessment (August 16)</p>
<p>CIL</p>	<p>The rate of £40 per sq. m for dwellings incorporated in Zone 2 (Dwellings in Tiverton, Cullompton and Crediton) is supported; however it was felt that the extent of this rate required further clarification.</p>	<p>Bell Cornwell LLP (3775)</p>	<p>CHANGE It is recognised that Zone 2 (iii) Tiverton, Cullompton and Crediton could be more clearly defined. Adding some additional text to the charging schedule, to identify the areas of Crediton, Tiverton and Cullompton as identified for Zone 2 (iii) should resolve the issue. SUGGESTED CHANGE – under Definitions of Charging Zones in the charging schedule, add, “Zone 2 (iii) is land within the defined settlement limits of Cullompton, Tiverton and Crediton but excludes land in Zone 1.”</p>

CIL	The rate for some forms of rural housing is inappropriate which could potentially have the long term effect of constraining land based development and farm based diversification development opportunities with consequential impacts on the long term sustainability of the rural economy and jobs, rural communities and ultimately on the goods and services, both environmental and food related. CIL charging should not apply to these dwellings, which will have been justified as a requirement for the specific business. MDDC has failed to provide evidence to support this charge.	CLA – County Land & Business Association (3649)	Those developing agricultural workers dwellings will generally already own the land, which significantly aids viability. Any reduced sales price when they are determined no longer required on the particular holding reflects the reduced demand because of the occupancy restriction (because only a reduced pool of people are eligible to buy them) rather than being due to issues of affordability.
CIL	Whilst there is support for the reconsideration of the appropriate charge associated with CIL Several representations state that the CIL charge is set too low at a time when infrastructure improvement is needed more than new homes. It was felt that transport infrastructure needs significant improvement before any attempt to increase the number of homes in the town of Cullompton and that poor and inadequate infrastructure is a key issue for the local population.	Pegasus Planning (3678); Individual 3579; 3588	The CIL levy set is based on viability evidence taking account of the financial contribution development schemes can afford to contribute towards the levy and remain viable. The viability of schemes across the district varies whether they are urban or rural based. Town schemes show lower levels of viability and hence contribute lower levels of CIL. While the overall need for infrastructure is recognised and identified in the Infrastructure Plan, the NPPF requires us to consider viability and because development has to fund infrastructure that's why it's provided in step with development and it is not always possible to provide the infrastructure in advance of development proposals. It may be necessary to provide the infrastructure in step with or from a consortium of developments. The Strategic Sites seek to provide the necessary infrastructure in step with the developments proposed as set out in the local plan policies and where adopted masterplans.
Strategic Sites CIL Exemption			

<p>CIL</p>	<p>i - It was felt that the use of a disaggregated approach towards the Charging Schedule is inappropriate and that it should be abandoned and replaced with a single, District-wide charge.</p> <p>ii - Clarity is required with regard to whether and what the requirements for the strategic allocations will be ensuring land assembly and delivery in a comprehensive way.</p> <p>iii - The zero rates in the urban extensions is not justified in the absence of any certainty that the necessary site and strategic infrastructure will be provided.</p>	<p>Bell Cornwell LLP (3775) Individual (5236)</p>	<p>i - The differential rates are based on the variation in residential land values identified by Dixon Searle in their viability report. While land values can vary on a site to site basis, Figure 10, page 67 of the Dixon Searle report clearly shows the general range of residential land values and patterns. Generally residential land values are likely to be higher in the areas outside Tiverton, Crediton and Cullompton. The differential rates are therefore justified between urban and rural areas based on the viability evidence provided. The Dixon Searle report states at Paragraph 3.2.6 “ <i>The higher values and typical scheme types coming forward away from Tiverton, Cullompton and Crediton are likely to drive improved viability in the rural areas / smaller settlements and our view is that this could support some - - - - newly introduced CIL differentiation for all areas outside these 3 main settlements;”</i></p> <p>The differential in land values between urban and rural areas has been largely maintained in the latest viability assessment (August 16)</p> <p>ii - Each of the three Strategic areas are subject to prior application Masterplanning, involving all statutory consultees and the local community. Those Masterplans (will or have) clearly set out the infrastructure requirements and the delivery timetable of the strategic sites.</p> <p>Policies in the Local Plan Review set out the principle infrastructure and policy requirements including a public masterplanning exercise for all three strategic sites which set out the principle infrastructure and policy requirements. Two of the Masterplans have already been prepared. Tiverton Eastern Area Extension Masterplan is approved and adopted. Cullompton North West Extension Masterplan approved and adopted.</p>
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			<p>On the third strategic site Cullompton East, Masterplanning has not commenced. However policies CU7, CU8, CU9, CU10, CU1, and CU12 set out the principle infrastructure and policy requirements.</p> <p>The rate for the Strategic Sites is set at zero as infrastructure provision and/or financial contributions will be provided/collected by Section 106 Planning Obligations.</p> <p>The Tiverton Eastern Extension Masterplan and Cullompton North West Masterplan, show infrastructure provision on these strategic sites is best provided by 106 Obligations.</p>
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Other CIL charge comments			
CIL	Whilst the CIL document is a 'living document' that should be kept under review, it was felt that there is a need for a more formal mechanism for review to be put into place.	Bell Cornwall LLP (3775)	An annual index-linked adjustment to rates is set out in CIL Regulation 40 (as amended). This will involve the use of the 'All-in Tender Price Index', published by the Building Cost Information Service (BCIS). The adjustment to charge rates will be applied from 1st January each year, using the index figure published by the BCIS for the previous 1st November. The Council will have a duty to keep its adopted levy rates under review to ensure that they remain appropriate over time. The Council will need to consider both the planning policy context within which the levy operates as well as wider economic and market-related changes over time, which may indicate the need to adjust rates to ensure that they do not adversely impact on the overall viability of development across the District. If evidence emerges to indicate that the adopted charge rates are no longer appropriate, the Council will commence the process of a formal review of the Charging Schedule. This will involve the same evidence requirements, consultation opportunities and examination that were required to introduce the initial Charging Schedule.
CIL	To follow the detailed logic of the Local Plan Review it was felt that the new CIL Charging formula is not likely to very quickly fulfil the desirable aims in expanding community aspirations in infrastructure, leisure and sport.	Individual (3700)	It is recognised that the modest CIL rates imposed on development in Mid Devon will take time to make any significant contribution to the infrastructure requirements outside of the provisions identified in the strategic sites.
CIL	The finances secured through CIL should benefit the site from which it originally came from.	Individual (3943)	CIL can be spent District Wide and is not site specific this accords with the provisions set out in National Policy and CIL Guidance. Some or more than was collected from the site may be spent in the locality. 15% of CIL funds collected (or 25% where there is an adopted Neighbourhood Plan, Neighbourhood Development Order or Right to Build Order) is paid directly to the Parish or Town Council. Explanatory Notes about CIL will be provided to accompany the charging schedule.

CIL	The Local Plan should be in place prior to the CIL being adopted. The Council need to have a clear understanding of the level of residential development to be brought forward in the plan period when preparing the charging schedule as this will directly influence the scale of CIL that will be generated.	Gladman Developments (5312)	Infrastructure needs are drawn from the infrastructure assessment that was undertaken as part of preparing the Local Plan. This is because the plan identifies the scale and type of infrastructure needed to deliver the area’s local development and growth needs (paragraphs 162 and 177 of NPPF). In determining the size of its infrastructure funding gap, the charging authority considers known and expected infrastructure costs and the other possible sources of funding to meet those costs. This process helps the charging authority to identify a levy funding target. The Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. Charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy. The Community Infrastructure Levy examination should not re-open infrastructure planning issues that have already been considered in putting in place a sound relevant Plan however in practice joint Local Plan and CIL examinations is common practice.
CIL	The Council should consider how the CIL might fund measures relating to the historic environment in support of infrastructure to deliver sustainable development and sustainable communities.	Historic England (1170)	The Council has a number of Conservation areas at risk. The Council has therefore amended the Regulation 123 list to include “Public realm improvements and enhancements”.
CIL	The Council should consider raising the CIL threshold for small developments, it was felt that the basic rate of 15% is not enough when the levy is used to produce Neighbourhood Plans, new infrastructure in play areas, parks and green spaces, cultural and sports facilities, some schools, police stations, district heating schemes and other community safety facilities.	Individual (2075)	The provision of 15% (25% where there is a Neighbourhood Plan) of CIL being provided to Town and Parish Councils is set in National Legislation. The 15% is the statutory provision which must be given to Town or Parishes Councils it does not prevent local communities for applying for additional CIL funding for specific projects that fall with the provisions of the 123 list. The CIL levy itself is based on viability evidence of development sites. Raising the CIL levy is not supported by the viability evidence.

CIL	In general, there is support for the use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision for sporting facilities and their maintenance. It may be more effective if the contributions are sought through planning obligations as opposed to CIL unless there is a specific project identified. If such a project is deliverable, then it may be more appropriate to fund through CIL and consequently should be on the Reg 123 list.	Sport England (169)	The policy provisions for the strategic sites requires provision of Children`s play areas and sports pitches. Amenity open space, parks, sports and recreation grounds. A suitable site for relocating Crediton Rugby Club is also required by the plan. All these are required to be provided by the developments. In addition the CIL 123 list makes provision for Leisure Facilities (sports facilities defined as publicly owned leisure centres, gyms and swimming pools.
CIL	The Council has produced a CIL Charging Schedule that is urban focused and the high rural levy will put at risk new developments in rural areas Viability assessments must be underpinned by robust evidence that takes account of the differences in economic viability between urban and rural developments. The Council should consider the use of different rates for rural areas if the charging schedule is not to prevent critically needed rural developments from coming forward.	CLA – County Land & Business Association (3649)	The differential rates are based on the variation in residential land values identified by Dixon Searle in their viability report. While land value can vary on a site to site basis, Figure 10, page 67 of the Dixon Searle report clearly shows the general range of residential land values and patterns. It is clear that generally residential land values are likely to be higher in the areas outside Tiverton, Crediton and Cullompton. The differential rates are therefore justified between urban and rural areas based on the viability evidence provided when considered overall. The Dixon Searle report states at Paragraph 3.2.6 “ <i>The higher values and typical scheme types coming forward away from Tiverton, Cullompton and Crediton are likely to drive improved viability in the rural areas / smaller settlements and our view is that this could support some - - - - - differentiation for all areas outside these 3 main settlements; “</i>
Instalments Policy			
CIL	Several representations stated The Council have not produced an Instalments or Exemptions Policy or a policy on the introduction of relief from CIL to comment on despite stating that they will ‘consider the introduction of relief when it considers the adoption of CIL after examination’ and that they will prepare an instalments policy before adoption.	South West HARP Planning Consortium (1581); Bell Cornwall LLP (3775); Gladman Developments (5312)	The Council will provide an Instalment. There is no requirement to have a policy on Exceptional Circumstances Relief. The power to offer relief can be activated/deactivated at any point AFTER a charging schedule is approved. The Council will keep under review the basis for having a policy, but do not intend to produce one at this stage.

CIL	There is a need to review CIL tariffs once they have been set. The economic climate will inevitably change over the course of the plan period and as such the levy rates should be set to maintain development viability.	Gladman Developments (5312)	CIL rates will be adjusted annually to take account of inflationary changes. In addition to annual indexation, the Council have a duty to keep its adopted levy rates appropriate over time. The planning policy context within which the levy operates as well as wider economic and market-related changes over time may indicate the need to adjust rates. If evidence emerges to indicate that the adopted charge rates are no longer appropriate, the Council will commence the process of a formal review of the Charging Schedule. This will involve the same evidence requirements, consultation opportunities and examination that are required to introduce the initial Charging Schedule.
CIL	There is as yet no instalment policy. Larger developments with significant upfront costs can be significantly affected by the front loading payment of CIL. Levy requirements can be critical to viability and an Instalments Policy should be prepared by the Council.	Bell Cornwell LLP (3775)	An instalment policy will be provided by the Council at submission.
Infrastructure Plan/Reg 123 list			
CIL	Greater clarity is needed over what is meant by 'other infrastructure' so that uncertainty does not stunt economic growth as encouraged by the NPPF.	Bell Cornwell LLP (3775)	Examples of "other Infrastructure" are listed in the policy document relating to 106 obligations. It is not a comprehensive list and it is not possible to compile such a list. Such additional infrastructure requirements will be site specific.

CIL	It is inappropriate to set the levy based on a partial understanding of the infrastructure costs and particularly where the total money needed for infrastructure is unknown.	Gladman Developments (5312)	<p>Infrastructure needs are drawn from the infrastructure assessment that was undertaken as part of preparing the Local Plan. This is because the plan identifies the scale and type of infrastructure needed to deliver the area's local development and growth needs (paragraphs 162 and 177 of NPPF).</p> <p>In determining the size of its infrastructure funding gap, the charging authority consider known and expected infrastructure costs and the other possible sources of funding to meet those costs. This process will help the charging authority to identify a levy funding target.</p> <p>The Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. Charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy.</p> <p>The Community Infrastructure Levy examination should not re-open infrastructure planning issues that have already been considered in putting in place a sound relevant Plan.</p>
CIL	The Council should consider using some of the CIL finances derived from developments north of Newton St Cyres towards improving the road infrastructure south of Crediton as new developments in this area impact on road usage throughout the parish. In addition, the Council should consider a cycle/footpath between Crediton and Exeter to be included within the Local Plan with financial contributions provided through CIL.	Newton St Cyres Parish Council (46)	There are no proposals for the improvement of the A377 south of Crediton or Newton St Cyres and DCC Cycle Strategy set out their ambitions for the Devon cycle network. But due to limited funding it did not seek to extend the cycle network and an Exeter-Crediton cycle link was not prioritised. The strategy is now adopted. The route is heavily constrained and deliverability would be very unlikely with the plan period.
CIL	The strategic provision of public open space/green infrastructure should include improvements and/or extensions to public rights of way and recreational trails.	Devon Countryside Access Forum (1534)	The strategic provision of open space/green infrastructure could include extensions and improvements to public rights of ways within those areas.

CIL	One respondent refers to upgrades to the waste water treatment facilities and states that maintenance to the access roads should be completed as a prerequisite, that these roads are made safe, secure and fit for purpose, before any facilities upgrades.	Collipriest Lane Action Group (3594)	The road leading to the Sewage Treatment Works in Tiverton known as "Collipriest Road/CollipriestLane" is a principally a private road shared by a number of householders, land owners and South West Water. Its maintenance and improvement is a matter for those having rights over the roadway. It is not a highway for motor vehicles maintainable at public expense.
CIL	The Council may wish to clarify how development specific planning obligations and S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets.	Historic England (1170)	The Council has a number of Conservation areas at risk. The Council has therefore amended the Regulation 123 list to include "Public realm improvements and enhancements".
CIL	The Regulations 123 list should refer to the conservation and enhancement of Mid Devon's historic townscape, heritage assets and/or their settings to support the funding of appropriate initiatives.	Historic England (1170)	The Council has a number of Conservation areas at risk. The Council has therefore amended the Regulation 123 list to include "Public realm improvements and enhancements".
CIL	No payment in kind policy has been produced by the Council. There is a danger of development paying twice particularly with open space provision.	Bell Cornwell LLP (3775)	The CIL Regulations provide the Council with the discretion to accept CIL payments 'in kind', such as through the transfer of land or the completion of infrastructure works on or off the development site. The Council is proposing to allow payments in kind in line with the CIL Regulations. It will remain in the Council's discretion whether to accept payments in kind.

<p>CIL</p>	<p>Demand for Criminal Justice Centre (CJC), Exeter. Devon & Cornwall Police consider it appropriate that a proportion of the funding gap for the CJC is met by CIL and financial contributions via planning obligations from the strategic sites as part of the development proposals in Mid Devon. CJC should be identified as critical infrastructure in Plan rather than desirable.</p>	<p>Devon and Cornwall Police (5762)</p>	<p>The CJC is identified in the Mid Devon Infrastructure Plan as desirable Strategic Infrastructure and an allocation of £1.05 million from CIL and developer contributions is identified. The IP defines critical infrastructure as that ‘required to deliver the strategic objectives of the Local Plan. Critical requirements contribute to delivering the wider strategic aims of the Plan, and may also mitigate the impacts of development schemes. The plan may fail without the delivery of this infrastructure’. Whilst ‘Desirable’ is infrastructure required to ‘enhance the effectiveness, efficiency and quality of infrastructure or services, creating a better place to live and work.’ Failure to fund the CJC is not likely to result in the failure of the plan, and hence is not critical.</p>
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