

**Vision and Spatial Strategy, Development Strategy and Strategic Policies**

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Vision and Spatial Strategy	<p>General Issues</p> <p>Object that the Local Plan review is premature pending the Greater Exeter Strategic Plan (GESP)</p> <p>Object to overall level of development- too much housing. Impact on transport and countryside.</p> <p>Support overall approach. Request additions to refer to making best use of brownfield land and making best use of agricultural land for local food production.</p>	<p>Persimmon Homes SW (6121)</p> <p>Individual (1953)</p> <p>CPRE Mid Devon (6212)</p>	<p>The Greater Exeter Strategic Plan is at a very early stage of consultation and will not be adopted until at least 2019 or 2020. It is not an option to delay publication of the Local Plan Review to 2020 as this would leave a long period of uncertainty and likely to result in sporadic development.</p> <p>Mid Devon District Council is fully involved in the GESP's preparation and has cooperated fully with neighbours on the Local Plan Review.</p> <p>Concerns noted- Are echoed in some site specific objections (Q.V). However the Local Plan is required to meet objectively assessed need, so far as is consistent with the NPPF.</p> <p>Noted. Overall support welcomed.</p> <p>Because Mid Devon is a predominantly rural district, the opportunities for brownfield development are more limited than in more urban areas. The SHLAA and Housing Topic Paper consider windfall opportunities in more detail.</p>

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Vision and Spatial Strategy (cont)	Focus of Development on Cullompton/Urban Extensions		
	Support spatial vision focus on Cullompton. Evidence needs to be made public	Lightwood Land c/o Pegasus Group (6686)	Support noted. Evidence is largely available on the Council's website. Further information will be published online when available.
	Support overall approach to growth in the Plan, including major growth at Cullompton, subject to sufficient infrastructure being put in place, including investment to relieve impact on the highway network. The Neighbourhood Plan is broadly supportive of the Local Plan's spatial strategy.	Cullompton Town Council (90)	Support noted. The need for significant infrastructure is noted and will be ensured through the Local Plan/ Masterplanning. Whilst developer contributions will fund a significant proportion of the required infrastructure, it is recognised that there will be a need for public funding.
	Support overall approach and numbers. Colebrook (CU21) should be made a core allocation for 100 dwellings, with potential additional 400 on adjacent land as core allocation or longer term contingency.	Mr Force and Mr Christian (c/o Genesis Town Planning) (3780)	Comments Noted. The Local Plan allocates Colebrook as a contingency that could come forward to meet a shortfall in supply. However the site also has highways constraints.
	Junction 27 of M5 Issues (see also comments on new J27 Policy)		
Object to inclusion of Junction 27. Concern with deliverability/site assembly, evidence of need, impact on town centres, wider rural economy traffic impact and Implication on housing numbers No need for more low paid jobs.	CPRE (6212) Willand Parish Council (44) Individual (4165, 6159,588, 6721,6766, 1953,4676) Hermes ( c/o Rocke Associates) (6269)	Comments noted. The Council's evidence indicates that Junction 27 is acceptable in terms of its impacts and will provide a boost to the local economy. A more detailed response to these concerns can be found in the Junction 27 Policy section.	

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Vision and Spatial Strategy (cont)	Insufficient housing supply increase has been given to uplift in housing need to meet the need for Junction 27.	CPRE Mid Devon (6212) Lightwood Land; Pegasus Group on behalf of (6686) Mr Force and Mr Christian (3870) Friends Life c/o G L Hearn (3871) Individual (4165) Persimmon Homes SW (6121)	The Local Plan Review has increased housing provision by 260 dwellings (to 7860 dwellings) in recognition of potential additional demand arising from development at Junction 27. This is a mid-point figure of various economic forecasts, partly because it is likely that Junction 27 will result in a reduction in the high rate of commuting. Meeting objectively assessed need requires an objective assessment to be made of likely requirements rather than defaulting to the highest possible projection. The Council's consultant supports a mid-point position being taken.  Further details of how the Local Plan Review has met in full its Objectively Assessed Need (OAN) are set out in the Council's Housing Topic Paper.
	Support the inclusion of Junction 27 in the Plan. Recommend modifications to Vision to make it more favourable to economic success and reflect Junction 27.	Friends Life Ltd c/o G L Hearn (3781)	Noted. The Council considers that the existing wording strikes a good balance between the economy, society and environment; and places sufficient weight on tourism (see also Policy DM22)
Development Strategy	Housing General		
	Local Plan Numbers should be increased (e.g. to 420 dwellings per annum) to fully meet OAN e.g. provide additional affordable housing and meet extra demand from Junction 27.  Housing numbers should not take a mid-point of forecasts.	Barratt David Wilson Homes c/o LRM Planning (6229) Home Builders Federation (149)	The Local Plan is based on a recent SHMA and contains more than sufficient sites to meet the Local Plan requirement. Further details of how the Local Plan Review has met in full its Objectively Assessed Need (OAN) are set out in the Council's Housing Topic Paper.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Development Strategy (cont)	<p>Issues relating to the SHMA</p> <p>The SHMA predates 2014 based population and household projections. 2016 household projections and household representation rates should be applied.</p> <p>Object to using long term (30 year migration trends).</p> <p>The Local Plan only takes a mid-point of SHMA figure.</p> <p>The SHMA excludes consideration of housing arising from Junction 27 of the M5.</p> <p>The SHMA should give greater weight to affordable housing backlog and affordability, and increase numbers accordingly.</p>	<p>Home Builders Federation (149)</p> <p>Lightwood Land: Pegasus Group on behalf of (6686)</p> <p>Individual (6404)</p> <p>Barratt David Wilson Homes c/o LRM Planning (6229)</p>	<p>Demographic projections</p> <p>The SHMA remains an up to date assessment of various drivers of housing growth. The 2014 based household projections (published 2016) are lower than the previous projections. DCC have provided updated assessments of OAN based upon 2016 household sizes etc, which shows the SHMA to remain up to date.</p> <p>In general, the use of longer term migration rates can iron out short term anomalies, and is appropriate. However the Council's evidence does not rely solely upon any one piece of data, and has been reassessed by DCC modelling.</p> <p>Junction 27</p> <p>The Local Plan housing requirement has been increased by 260 dwellings to account for employment demand arising from J27. This is based on additional assessment of derived demand for housing by Edge Analytics.</p> <p>Further details of how the Local Plan Review has met in full its Objectively Assessed Need (OAN) are set out in the Council's Housing Topic Paper.</p>
	<p>Welcome increase of numbers to 7,860 homes. This should not be a ceiling on growth but a minimum figure.</p>	<p>Harcourt Kerr (1090)</p> <p>Persimmon Homes SW (6121)</p> <p>Individual (6404)</p>	<p>Noted. Local Plan requirements are not a maximum and the Plan allocates sufficient sites to exceed the requirement. However housing numbers cannot be exceeded without regard to infrastructure and environmental constraints.</p>

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Development Strategy (cont)	Object that the Local Plan Review is too reliant on three major urban extensions (at Tiverton and Cullompton) which account for 60% of the Plan requirement. The housing trajectory is too optimistic about the delivery of urban extensions. This could undermine five year housing land supply. Other sites including rural sites, and more development at Crediton should be brought forward to meet the potential shortfall from Urban Extensions	<p>Persimmon Homes SW (6121)  Richard and Lucy Percy c/o  Jillings Heynes Planning (4635)  Waddeton Park Ltd (4675)  Gladman Developments (5040)  Gallagher developments c/o  Turley (5673)  Kach Developments c/o PCL  Planning (6739)  Progress Land Ltd (c/o Jillings  Heynes, 6758)  Dial Holdings c/o PCL Planning  (2315)</p>	<p>Cranbrook in East Devon demonstrates that large urban extensions are deliverable and that there is sufficient effective demand in Devon.</p> <p>The Local Plan is not starting afresh with the Urban Extension proposals: East Tiverton has a resolution to grant planning permission, on 29 March 2017.</p> <p>However the housing trajectory recognises that urban extensions take time to deliver and the trajectory for East Cullompton has been pushed back to 2025 in recognition of this.</p> <p>The recognition of Culm Garden Village should help the Council secure necessary funding and support to enable the necessary infrastructure works to deliver the Cullompton urban extensions.</p> <p>This comment is made largely in the context of the promotion of alternative sites. However it is not clear that these are more deliverable than the Local Plan sites, particularly as they have similar infrastructure issues that would need to be overcome.</p>

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Development Strategy (cont)	Cullompton ( see also responses made on Policy S11 and CU Policies)		
	<p>Support overall approach to growth in the Plan, including major growth at Cullompton, subject to sufficient infrastructure being put in place, including investment to relieve impact on the highway network. The Council should commit to completing the NW Extension road within two years.</p> <p>The Town Council is also committed to seeing improved sports and leisure facilities.</p> <p>The Neighbourhood Plan is broadly supportive of the Local Plan’s spatial strategy.</p>	Cullompton Town Council (90)	Support noted
	<p>Support focus on Cullompton as a long term focus for growth. Development could come forward sooner than 2024-25 specifically land at Honiton Road, East Cullompton.</p>	Mr Force and Mr Christian ( c/o Genesis Town Planning) (3780)	Comment Noted. The Local Plan allocates Colebrook as a contingency that could come forward to meet a shortfall in supply. However it is also dependent upon highways improvements being carried out.
East Cullompton adds up to 1,750 not 2,100 in Table 6	Individual (3622)	Typo in Table 6 is noted, but does not affect the overall number in the table (the individual columns are correct but the Total should read 1750 dwellings). The remainder of the dwellings are likely to be built after the Plan period.	

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Development Strategy (cont)	Levels of growth too high, especially at Cullompton. Inadequate highways infrastructure. Will encourage additional commuting.	Individuals (6159, 5811)	The Local Plan is required to meet OAN. The distribution of development has been developed through several consultations on options. Highways infrastructure solutions have been developed.  Development at Cullompton will provide significant employment floorspace (as per Policy S6). However it would be unrealistic to assume than no commuting will occur.
	No mention of Culm Garden Village in the Plan. It is not clear if highway works identified can accommodate 5,000 new dwellings. Not clear if Culm will be a standalone settlement or and urban extension.	Individual (3622)	Noted. Culm Garden Village is likely to be fully built out after 2033, but the 1750 dwellings indicated in Policies CU7-12 will form a first phase. Future plans will address later phases.
	Other settlements/rural areas		
	Object to development in villages. Lack of jobs and there are unsold homes in rural areas.	Individual (6755)	The SHMA identifies affordability issues in Mid Devon but does not indicate areas of low housing demand/need.
	Support rural village allocations. Should be adjusted to indicate that rural sites are likely to provide home throughout the Plan period.	Cottrell, Burns, Pearce and Upham families c/o Harcourt Kerr (6790)	Agree that small rural sites are likely to provide a long term supply of windfall sites. However this does not require a modification to the Plan.

Development Strategy (cont)	Junction 27 of the M5 (See also Junction 27 New Policy)		
	Object to J27. Impact on town centres from retail, loss of agricultural land, need for additional housing. Site is not associated with towns. Retail need not justified.	Willand Parish Council (44) Uffculme Parish Council (54) CPRE (6212) Hermes ( c/o Rocke Associates) (6269) Individual (6159, 5824, 6414, 6766)	Objections noted. However the impact of Junction 27 on landscape, flooding, retail etc has been assessed. The proposal will provide a significant boost to Mid Devon's economy and improve the area's job density. See also specific responses to Junction 27 New Policy.
	Observe that Junction 27 will require substantial upgrading to deliver the proposed development.	Devon County Council (139)	Comments Noted. MDDC and DCC are working closely with the developers and Highways England to agree the best solution to Junction 27 improvements.
	Miscellaneous matters		
	The Plan should be more supportive of rural employment. More than two rural sites could be allocated.	Harcourt Kerr (1090)	Paragraph 2.15 of the Plan notes that small rural windfalls have provided a range of sites. Policies S13, S14, DM18 and the NPPF support rural employment. Other rural employment opportunities are likely to come forward as a result of permitted development rights for agricultural buildings.
	Support overall strategy. Significant progress has been made following flood modelling. Note that additional site specific flood modelling will be required.	Environment Agency (6734)	Support welcomed and comments noted.
	Request additions to refer to making best use of brownfield land and making best use of agricultural land for local food production.	CPRE Mid Devon (6212)	Comments Noted. The Local Plan focuses development to urban areas and the Council is aware of the need to prioritise brownfield sites. However because it is predominantly rural, there are insufficient brownfield sites available to meet housing need. Policies S1(i-j), S9(b), DM20 and DM26 provide a framework to promote local food production.

S1 Sustainable development Priorities	General/Housing Numbers		
	Levels of growth too high, especially at Cullompton. Inadequate highways infrastructure. Will encourage additional commuting.	Individual (6159, 5811)	Comments noted, but the Plan is required to meet objectively assessed needs insofar as consistent with the NPPF. The development Strategy is informed by Options consultation and supported by Cullompton Town Council.
	Object to overall levels of housing: no justification for a +10% buffer. Support the emphasis on market towns, but greenfield developments likely to harm high quality agricultural land.	CPRE Mid Devon (6212) Individual (5211)	Comments noted, but the Plan is required to meet objectively assessed needs insofar as consistent with the NPPF.
Crediton's housing numbers should be increased (in context of the promotion of Pedlerspool site)	Gleeson developments c/o Vail Williams (6685) Uffculme Parish Council (54)	See also representations on Policy S12. Crediton's housing figure has been increased to 786 dwellings, but this is not intended to be a maximum. See also Policies S12 and CRE5	

S1 Sustainable development Priorities (cont)	Cullompton		
	<p>Support overall approach to growth in the Plan, including major growth at Cullompton, subject to sufficient infrastructure being put in place, including investment to relieve impact on the highway network. The Town Council is also committed to seeing improved sports and leisure facilities. The Neighbourhood Plan is broadly supportive of the Local Plan's spatial strategy.</p> <p>Would like to see MDDC condition all new houses in Cullompton with wiring and meters to import/export electricity to the National Grid.</p>	Cullompton Town Council (90)	<p>Positive approach welcomed. The need to ensure proper masterplanning and infrastructure provision (including highways improvements) is noted.</p> <p>Requiring all homes to supply the National Grid would affect viability and go beyond the NPPF.</p>
	<p>Support focus on Cullompton as a long term focus for growth. Development could come forward sooner than 2024-25 specifically land at Honiton Road, East Cullompton.</p>	Messrs Furness, Cann and Family Iain Bath Planning (4216)	<p>Support noted. The Plan phasing is based on expected time that it will take to overcome infrastructure constraints, but does not restrict development coming forward sooner if infrastructure constraints can be overcome.</p>

S1 Sustainable development Priorities (cont)	Support overall approach and numbers. Colebrook (CU21) should be made a core allocation for 100 dwellings, with potential additional 400 on adjacent land as core allocation or longer term contingency. Colebrook score better in the SA than its position as a contingency site suggests	Mr Force and Mr Christian (c/o Genesis Town Planning) (3780)	Comments Noted. The Local Plan allocates Colebrook as a contingency that could come forward to meet a shortfall in supply. However it is also subject to highways infrastructure issues.
	Junction 27 (see also Junction 27 New Policy)		
	J27 proposals render the Plan unsound. Impact on rural economy and town centres. No economic need and retail case has not been made. Object to knock on need for housing at Blundells Road and High Town Sampford Peverell, and Willand Impact on road network, Adequate motorway facilities already at junctions 28 and 30.	Willand Parish Council (44) Uffculme Parish Council (54) Individual (6159, 5824, 6414, 6766) CPRE (6212) Hermes (c/o Rocke Associates) (6269)	Objections noted. However the impact of Junction 27 on landscape, flooding, retail etc have been assessed and are considered to be acceptable. The proposal will provide a significant boost to Mid Devon's economy and improve the area's job density. See also specific responses to Junction 27 New Policy.
	Support policy but recommend amendments to make the policy more pro-development, specifically in relation to J27.	Friends Life Ltd c/o G L Hearn (2781)	Comments Noted. The Council considers that the current wording of the Local Plan is sufficiently supportive of development and draws an appropriate balance between economic, social and environmental issues.
	Miscellaneous Matters		
	Affordable housing levels should be higher (35%)	Individual (6677)	Comments noted. The Local Plan meets affordable housing needs identified in the SHMA. Levels of affordable housing are governed by viability.
	Plan should give greater weight to climate change and biodiversity.	Individual (6677)	Policy S1 (j) and Policy S9 deal with climate change.
	Make reference to green infrastructure in clause (i)	Natural England (6242)	Comments Noted. DM26 requires the provision of Green Infrastructure.

S2 Amount and Distribution of Development	General/Housing Numbers		
	Support general approach of locating development in the most sustainable locations. Additional work needed to establish transport impacts and necessary mitigation works needed, especially impacts on Junctions 27 and 28 of the M5.	Highways England (211)	Overall support welcomed. The need for highways works is acknowledged, and will be worked up in continued collaboration with Highways England.
	Welcome increase of numbers to 7,860 homes. This should be a minimum level and not a ceiling to growth. Numbers could be increased further.	Home Builders Federation (149) Waddeton Park Ltd c/o PCL planning (4675) Dial Holdings Ltd (c/o PCL Planning)( 2315) Gleeson developments c/o Vail Williams (6685) Individual (6404) Lightwood Land c/o Pegasus group (581) Summerfield Developments c/o Collier Planning (6691)	Local Plan requirements are not a maximum level of growth. However they do set out an approximate number that local planning authorities consider can be achieved within environmental, infrastructure etc constraints. Therefore the Council would not wish the figure to be stated as a minimum.  The Local Plan meets objectively assessed needs and over provides by about 10% above the requirement of 7,860 in order to provide flexibility. The Council's monitoring indicates that small sites are performing well, which will provide housing numbers until larger sites to come on stream.

<p>S2 Amount and Distribution of Development (cont)</p>	<p>Object that housing numbers take a midpoint of the SHMA and do not allow an increase for market signals or to ensure provision of affordable housing. Increase numbers to 720 per year.</p>	<p>Home Builders Federation (149)  Barratt David Wilson Homes c/o LRM Planning (6229)  Individual (6404)  Summerfield Developments c/o Collier Planning (6691)</p>	<p>The SHMA examines market signals and does not recommend an increase in housing numbers. Housing affordability is not markedly worse in Mid Devon than the Devon wide or national picture.</p> <p>The SHMA also notes that s106 is only one route from which affordable housing is provided. Policies S14 and DM6 provide a positive framework for rural exceptions sites.</p> <p>Further details of how the Local Plan Review has met in full its Objectively Assessed Need (OAN) are set out in the Council's Housing Topic Paper.</p>
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<p>S2 Amount and Distribution of Development (cont)</p>	<p>Object that the Local Plan Review is too reliant on three major urban extensions (Tiverton and Cullompton) which account for 60% of the Plan requirement. The housing trajectory is too optimistic about the delivery of urban extensions. This could undermine five year housing land supply. Other sites including rural sites, and more development at Crediton should be brought forward to meet the potential shortfall from Urban Extensions</p>	<p>Persimmon Homes SW (6121)  Richard and Lucy Percy c/o  Jillings Heynes Planning (4635)  Waddeton Park Ltd (4675)  Gladman Developments (5040)  Gallagher developments c/o  Turley (5673)  Kach Developments c/o PCL  Planning (6739)  Progress Land Ltd (c/o Jillings  Heynes, 6758)  Barratt David Wilson Homes  c/o LRM Planning (6229)  Dial Holdings c/o PCL Planning  (2315)  Gleeson developments c/o  Vail Williams (6685)  Mr Lee c/o Amethyst (6750)  Summerfield Developments  c/o Collier Planning (6691)</p>	<p>Concerns are noted. However promoters of East Cullompton have made representations that the site is deliverable.</p> <p>Culm Garden Village has government support and is not relied on until the mid 2020s. Tiverton Eastern Urban Extension and North West Cullompton are both proposed in the previous Plan and so work is not starting afresh with the Local Plan Review.</p> <p>Cranbrook in East Devon demonstrates that there is demand for large urban extensions and that they can “take off” and provide significant levels of housing.</p> <p>Rural sites and windfall have provided a significant amount of housing in recent years and will help augment short term housing supply.</p> <p>It is not clear whether the sites being promoted by major housebuilders can be delivered any faster than the sites Proposed by the Local Plans, particularly as they are subject to similar highways constraints. Rural windfalls, as allowed by Policies S13, S14 and DM6 are likely to provide a more flexible source of housing for smaller housebuilders.</p>
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S2 Amount and Distribution of Development (cont)	Cullompton		
	Support Cullompton as a major growth area. Community should be involved in planning the area. Suitable housing, roads and recreation provision should be made to accommodate the ageing community.	Lightwood Land c/o Pegasus group (581) Individual (5211)	Support noted.
	Support focus on Cullompton as a long term focus for growth. Development of sites promoted at Crediton could come forward sooner than those in large urban extensions.	Messrs Furness, Cann and Family Iain Bath Planning (4216) Progress land Ltd C/o Jillings Heynes (6758)	Support noted. The Plan phasing is based on expected time that it will take to overcome infrastructure constraints.
	Objection to level of development at Cullompton due to highways and flooding problems, loss of agricultural land, sewerage.  Object that level of development at Cullompton is disproportionate to its population size. Rate of growth would be 4.2 times of Tiverton's in proportion to the towns' population.  Some representations suggest rural areas (including Sampford Peverell) could accommodate development, which could help sustain rural communities.	Broadhembury Parish Council (1483) Individual (3748, 5811,6267, 6690,6791,6721, 588, 6690)	Objections noted. The need for careful masterplanning and provision of infrastructure is acknowledged.

S2 Amount and Distribution of Development (cont)	Highway improvements, flooding and a range of other infrastructure need to be provided at Cullompton before housing development commences	Kentisbeare Parish Council (602) Michael Speirs Associates (3052)	Comments noted and agreed. See responses above.
	Object to reduction in commercial floorspace in Cullompton from 65,000 to 57,000 Sq m. Council and local business association would like to see it increased.	Cullompton Town Council (90) Michael Speirs Associates (3052) Individual (5211) Jo Amor, Tiverton (6688)	Concerns noted. The Local Plan allocates a buffer above the identified commercial floorspace need identified in the ELR. In addition a significant amount of employment is likely to arise from spaceless growth (e.g. working from home or peripatetic work). However, the Local plan does not restrict further commercial floorspace coming forward should applications arise.
	Support overall approach and numbers. Colebrook (CU21) should be made a core allocation for 100 dwellings, with potential additional 400 on adjacent land as core allocation or longer term contingency. Colebrook score better in the SA than its position as a contingency site suggests	Mr Force and Mr Christian (c/o Genesis Town Planning) (3780)	Comments Noted. The Local Plan allocates Colebrook as a contingency that could come forward to meet a shortfall in supply. However it is also reliant on the delivery of highways works set out in CU21(b) and paragraph 3.149; and for this reason is considered to be more appropriate as a contingency site.

S2 Amount and Distribution of Development (cont)	Junction27		
	Broadly support Junction 27 Policy. Greater emphasis should be made to deliver B1, B2 and B8 uses.	Mr and Mrs Disney c/o Blackmore and Wooton families c/o Harcourt Kerr (4412)	Support noted. The Local Plan identifies sufficient land, with a buffer, to meet the needs of Class B employment. However a significant amount of employment will arise from non-class B uses. In particular the Tourism Study identifies an opportunity to Improve Mid Devon's Tourism offer.  See also responses to new J27 Policy.
	Object to inclusion of J27. Concern with deliverability/site assembly, evidence of need, impact on town centres, wider rural economy traffic impact and Implication on housing numbers	Willand Parish Council (44) CPRE (6212) Broadhembury Parish Council (1483) Individual (6408, 6724, 588) Progress Land Ltd (6758) Hermes ( c/o Rocke Associates) (6269) Sampford Peverell and District Sustainable Villages (5825) Jo Amor, Tiverton (6688)	Comments noted. Objections noted. However the impact of Junction 27 on landscape, flooding, retail etc. has been assessed. The proposal will provide a significant boost to Mid Devon's economy and improve the area's job density. See also specific responses to Junction 27 New Policy.
	Update table to refer to additional land provided at Junction 27.	Lightwood Land c/o Pegasus group (581)	Noted.
	Amend Policy S2 to make more supportive of economic development, particularly Junction 27.	Friends Life Ltd c/o G L Hearn (3781)	Comments noted. The Council considers that the current Local plan wording is appropriate.

S2 Amount and Distribution of Development (cont)	Object to J27: impact on housing numbers. Rationale for 260 additional dwellings is not clear.	Willand Parish Council (44) Progress land Ltd C/o Jillings Heynes (6758)	Comments Noted. The Council has increased housing numbers arising from Junction 27 in line with advice from Edge Analytics. The rationale is set out in the Council's Housing Topic Paper.
	Requests additional controls to require ethical/sustainable trading.	Sampford Peverell and District Sustainable Villages (5825)	Broad support for Junction 27 is welcomed. However, a requirement to ensure ethical/ sustainable training would go beyond planning's remit.
	Unclear why housing needs for J27 are not spread out amongst rural areas rather than concentrated at Samford Peverell and Blundells. Unclear why commercial allocations elsewhere have not been reduced.	Individual (3730)	See also comments on Policies SP2 and TIV16. These sites are close to Junction 27 so could minimise the need to travel.
	Rural Areas		
	Object to development in rural areas, especially Hemyock: highway capacity, school places and impact on AONB	Individual (4268)	Impact on AONB will be assessed in the context of Policies S9, DM27 and the NPPF.
	The Plan could be bolder in identifying rural employment sites. Note that this does not affect overall direction of the Plan. The Plan relies too much on sites within urban extensions which need residential pump priming, (land at Willand is promoted)	Harcourt Kerr 91090) Mr and Mrs Disney c/o Harcourt Kerr (4412)	Paragraph 2.15 of the Plan notes that small rural windfalls have provided a range of sites. Policies S13, S14, DM18 and the NPPF support rural employment. Much rural diversification would be permitted development. The Council is confident that sites identified in urban extensions will come forward.

S3 Meeting Housing Needs	General/ Housing Needs		
	<p>Welcome increase of numbers to 7,860 homes. Should be a minimum figure or increased further</p> <p>Object that housing numbers take a midpoint of the SHMA and do not allow an increase for market signals or to ensure provision of affordable housing.</p> <p>More evidence is needed that contingency sites will come forward and those leads in times for larger sites are realistic. If the Council cannot demonstrate a five year housing land supply (including meeting backlog within five years) then the Plan cannot be sound.</p>	<p>Home Builders Federation (149) Baratt David Wilson c/o LRM Planning (6229) Individual (6404)</p>	<p>The Local Plan review meets OAN.</p> <p>The Council is fully aware of the importance of maintaining a five year housing land supply. The Local Plan Review will provide ample land to maintain five year supply. Whilst some strategic sites may take longer to come forward (e.g. East Cullompton), the housing trajectory indicates that sites at Tiverton are currently deliverable. Moreover, the over performance of small sites will boost the delivery of housing in the short term.</p> <p>Notwithstanding this, five year supply and the Local Plan housing requirement are separate considerations (although clearly NPPF 49 applies).</p>
	<p>Over reliance on large urban extensions will result in five year supply problems, especially due to highways constraints. Other non-strategic sites should be released in order to meet housing trajectory: especially in Crediton and rural areas.</p>	<p>Waddeton Park c/o PCL Planning (4675) Gallagher estates c/o Turley (5763) Summerfield Developments c/o Collier Planning (6691) Persimmon Homes SW (6121)</p>	<p>See above and Housing Topic paper</p>

S3 Meeting Housing Needs (cont)	Cullompton		
	Support policy of aiming to provide 124 affordable homes per year. This should be seen as a minimum target.	South west Housing Associations and Registered Providers (SW HARP), c/o Tetlow King (6715)	Support welcomed. The figure would not be a maximum. Rural exceptions sites will also provide affordable housing.
	Self build and custom build housing should not be seen as a form of affordable housing, although it will meet an element of housing demand.	South west Housing Associations and Registered Providers (SW HARP), c/o Tetlow King (6715)	Noted. Self build housing is not being promoted as part of the affordable housing target.
	Development of Urban Extensions at Cullompton can help boost affordable housing numbers.	Lightwood Land c/o Pegasus group (581)	Comments noted.
	Junction 27		
	Impact of J27 on housing numbers	Willand Parish Council (44) Individual (6414)	Comments noted. See response above and on J27 New Policy
	Amend para 2.26 to make more supportive of economic development, particularly Junction 27.	Friends Life Ltd c/o G L Hearn (3781)	Comments noted. See response above and on J27 New Policy
	Support focus on Cullompton. Infrastructure needs to be planned in cooperation with the community.	Individual (5211)	Comments noted.
	Miscellaneous ( including Self Build, Gypsies and Travellers)		
Unclear that 60 dwellings at Sampford Peverell will meet the need for jobs arising from J27: there may be pressure on the local housing stock.	Sampford Peverell and District Sustainable Villages (5825)	Comments noted. See above.	

S3 Meeting Housing Needs (cont)	Requirement for self build housing on all sites could jeopardise viability. Should be considered alongside affordable housing in terms of viability impact. Flexible approach needed to ensure that developments are viable.	Gladman Developments (5040) Gleeson developments c/o Vail Williams (6685)	Comments Noted. The impact of self build plots has been viability tested.
	Requirement for gypsy and traveller pitches is over estimated as fails to take into account Gypsy and Traveller Planning Policy (exclusion of people who have permanently ceased travelling from definition). Mortgage lenders will not lend on dwellings close to gypsy and traveller pitches. Off-site provision of pitches for gypsy and travellers is more appropriate due to different needs of travelling community.	Persimmon Homes (6121) Gleeson developments c/o Vail Williams (6685)	Comments noted. This issue is addressed in the Housing Topic Paper. Whilst the need for Gypsy and Traveller sites could be reduced to remove those who had indicated that they have permanently ceased travelling, in line with the definition in the 2015 Planning Policy for Gypsies and Travellers; the consultants who carried out the Gypsy and Traveller Accommodation Assessment did not advise this.
	Reliance on large residential sites to meet all the need for gypsy and traveller sites is unrealistic. Provision should be made in villages and rural areas.	National Federation of Gypsy Liaison Groups (6689)	Concerns noted. The Planning Policy for Gypsies and Travellers (2015) places restrictions on rural sites. The logic is therefore to locate sites close to facilities as part of housing sites. See also Policies S14 and DM7.
	Support requirement for affordable housing-needs to be enforced with developers.	CPRE (6212)	Comments noted.
	Unclear that 60 dwellings at Sampford Peverell will meet the need for jobs arising from J27: there may be pressure on the local housing stock.	Sampford Peverell and District Sustainable Villages (5825)	See comments above and responses to Policy SP2.

S3 Meeting Housing Needs (cont)	Need to update table to pick up actual completions in 2013 and 2014	Individual (3730)	Noted. The Plan is up to date at the time of printing (Jan 2017). The Plan will be updated to include the latest available data at the time of publication. Further updates will be included in the AMR.
S4 Ensuring Housing Delivery	General		
	Deliverability of large urban extensions will jeopardise five year land supply.	Persimmon Homes SW (6121) Richard and Lucy Percy c/o Jillings Heynes Planning (4635) Waddeton Park Ltd (4675) Gladman Developments (5040) Gallagher developments c/o Turley (5673) Kach Developments c/o PCL Planning (6739) Progress Land Ltd (c/o Jillings Heynes, 6758) Barratt David Wilson Homes c/o LRM Planning (6229) Dial Holdings c/o PCL Planning (2315) Gleeson developments c/o Vail Williams (6685) Mr Lee c/o Amethyst (6750)	Issue noted. See comments above.

S4 Ensuring Housing Delivery (cont)	Action levels to trigger contingency sites will be insufficient to secure five year supply of deliverable sites. Two year delay is too long. Need to identify additional sites upfront to secure delivery.	Gallagher estates, c/o Turley (5763) Barratt David Wilson Homes c/o LRM Planning (6229) Lightwood Land ( c/o Pegasus group (6686)	Contingency sites, along with windfalls will help contribute towards flexible provision.
	Contingency sites should become core allocations.	Mr Force and Mr Christian ( c/o Genesis Town Planning) (3780)	Noted. The Local Plan allocates Colebrook as a contingency that could come forward to meet a shortfall in supply. However, they are subject to infrastructure (particularly highways) constraints, and so are more appropriate as contingency sites.
	Bring forward deliverable sites in Crediton to avoid all eggs being in one basket (i.e. reduce over reliance on large urban extensions)	Mr Lee c/o Amethyst (6750)	Comments noted.
	Need to update table to pick up actual completions in 2013 and 2014	Individual (3730)	Noted. Update the table in S4 as an editorial matter.
	Cullompton		
	Support focus on Cullompton as a long term focus for growth. Development could come forward sooner than 2024-25 specifically land at Honiton Road, East Cullompton.	Messrs Furness, Cann and Family Iain Bath Planning (4216) Lightwood Land c/o Pegasus group (581)	Support noted. The Plan phasing is based on expected time that it will take to overcome infrastructure constraints:
	Support growth in Cullompton	Individual (5211)	Support noted
S5 Public Open Space	Need to update evidence of need. Specifically the Playing Pitch Strategy.	Sport England (6268)	Comments noted. The Plan makes provision for a range of open space. There is no requirement in the NPPF to follow Sport England methodology.

S5 Public Open Space (cont)	Supports public open space extra allocation for teenagers. Requests modifications requiring large play areas for all ages. Requests update provide range of open space, including upgrading of existing amenities and space and County Park. Role for developer contributions in achieving this.	Cullompton Town Council (90) Individual (5211)	Comments noted. Will be provided as part of master planning.
	Maintain Objection to Policy raised in April 2015.	Lightwood Land c/o Pegasus group (581)	Comments noted.
S6 Employment	Object to J27. No evidence of need. Unemployment is low in Mid Devon. Impact on town centres. Unlikely to benefit local producers.	Willand Parish Council (44) Sampford Peverell and District Sustainable Villages (5825)	The NPPF requires Local plans to plan positively for economic growth. Although unemployment is relatively low, there is a high level of outwards commuting. See also comments of new J27 Policy.
	Object that Junction 27 will fundamentally affect the deliverability of other employment sites.	Hermes c/o Rocke Associates (6269)	Not agreed. The impact of J27 has been assessed. See also comments of new J27 Policy.
	Object to reduction in employment land at Cullompton	Cullompton Town Council (90) Individual (5811)	The employment land allocation at Cullompton was reduced following representations at the 2015 Proposed Submission consultation, to reflect the findings of the Employment Land Review.
	Support restrictions on retail to protect town centres. The plan should also seek ethical trading practices in accordance with UN agenda 30 Sustainable Development Goals.	Sampford Peverell and District Sustainable Villages (5825)	Support for restrictions on the type of retail in order to protect the vitality and viability of town centres is noted. Whilst laudable, a requirement for ethical trading would go beyond the scope of what planning is able to achieve.
	The Plan should be more supportive of rural employment. More than two rural sites could be allocated.	Harcourt Kerr (1090) Mr and Mrs Disney c/o Harcourt Kerr	See comments above regarding rural employment sites. .

S6 Employment (cont)	Amend explanation to Policy S6 9para 2.48) to set out evidence behind Junction 27, and specifically how it will support the wider economy.	Friends Life Ltd c/o G L Hearn (3781)	Comments noted. The Council consider that this is covered under new J27 Policy.
	Object that the Local Plan already has sufficient employment land without Junction 27. Willand should also be removed from the Plan as it is being landbanked for housing.	Individual (6414)	Comments noted. Please see comments on new J27 Policy. The Council is confident that there is commercial interest in providing employment at Willand.
	Support Policy	Lightwood Land c/o Pegasus Group (6686)	Support noted.
S7 Town Centres	J27 Will harm town centres and will use up retail capacity.	Willand Parish Council (44) Individual (154, 5811, ) Hermes (c/o Roche Associates)	See response above. These comments are concomitant to Junction 27 rather than objections to Policy S7 per se. The Council's evidence indicates that J27 can be achieved without harming the vitality and viability of town centres.
	Support approach. Would like to see substantial economic growth around J28.	Cullompton Town Council (90)	Support noted
	Cullompton town centre should be supported, but the size of shop units is small. Scope for medium sized outlets in the growth area (e.g. Exeter Road or Alexandria Centre).	Individual (5211)	Comments noted
	Maintain original objections. A sequential test should not be applied (as per new text at para 2.48) to east of Cullompton unless applications are for more than 2ha. Recommend amended wording to remove need for sequential test from areas proposed for town centre uses.	Lightwood Land c/o Pegasus Group (6686)	Issue noted. It could be appropriate for Cullompton Eastern extension to have neighbourhood shopping facilities. However it should not undermine the vitality and viability of town centres and therefore the reference to the need for sequential testing is considered justified. Note that upper case policy text has not changed.

S8 Infrastructure	Note funding shortfall to deliver needed highways improvements, including junction 28, Eastern Relief Road and New Link Road. These are essential to delivering the growth proposed by the Local Plan.	Cullompton Town Council (90) Individual (5211,3986)	Noted. The Council has acknowledged the need for highways improvements and is working with partners to achieve these. Please see response to CU Policies
	Junctions 27 and 28 of the M5 are part of the wider strategic highway infrastructure and DCC stress the importance of maintaining the functionality of the highways network. Junction 27 is close to capacity. It is capable of upgrading and substantial upgrades will be required to deliver the Junction 27 proposal .	Devon County Council (139)	Comments noted.
	Comment on education requirements arising from developments in Tiverton, Cullompton, Crediton and Uffculme.	Devon County Council (139)	Comments noted.
	Concern over lack of funding for infrastructure in Cullompton. Not clear if necessary highways infrastructure can be funded through developer contributions. N.b. East Cullompton adds up to 1,750 not 2,100 in Table 6	Individuals (3622, 5211, 6743)	The Council has acknowledged the need to fund infrastructure improvements, which are likely to require public and private funding. See more detailed response under CU Policies. Typo in Table 6 is noted, but does not affect the overall number in the table. This arises from pushing back housing numbers to later in the Plan period.
	Infrastructure requirements at Cullompton are very high. The Plan makes no mention of A373 Cullompton-Honiton Road, which needs upgrading.	Broadhembury Parish Council (1483) Individual (5811,6335)	See CU Policy responses.
	Support focus on Cullompton and Draft Infrastructure Plan. Infrastructure requirements are noted. Need for developer contributions are acknowledged, but must have regard to viability.	Messrs Furness, Cann and Family Iain Bath Planning (4216) Lightwood Land c/o Pegasus Group (6686)	Support Noted.

S8 Infrastructure (cont)	Should work with NHS Commissioners to ensure health care needs of new settlements are met. Should be considered as essential infrastructure.	NHS property Services (6730)	Noted. No evidence of additional need has been put forward. Tiverton is served by a hospital with A and E. The NHS is currently focussing providing care for people in their own homes. However the need for local facilities, such as surgeries etc. will be considered through detailed masterplanning.
	The plan gives insufficient weight to flooding constraints/ impact of Critical Drainage Area	Individual (220)	Not agreed. Policy S9 addresses flood risk. The Council has worked closely with the Environment Agency who is broadly supportive of the Plan.
	Plan appears sound. Significant progress has been made on following flood modelling work. Wording requested on floodplain mitigation (TIV16, DM26, CU19, Junction 27)	Environment Agency (6734)	Support welcomed. Additional text has been added as requested on floodplain mitigation.
S9 Environment	Improve countryside access, including through improved cycle paths, country park. These will help offset the impact of development. Public footpaths etc should be wheelchair accessible.	Cullompton Town Council (90)	Comments noted. These will be brought forward through masterplanning. Please see CU Policies.
	Object to word "environment" in S9(e)	Individual (6414)	Wider comments related to J27. Policy S9 deals with the environment, so there is no need to repeat the word "environmental" in point (e).
	Mention Registered Parks and Gardens	National Trust (170)	Does not strictly relate to a Modification. The list at S9(g) is not comprehensive, but would cover Parks and Gardens.
	Support change to Policy S9. Removal of word "environmental" properly reflects the purpose of the AONB Management Plan.	Blackdown Hills AONB Partnership (1195)	Support noted.

S9 Environment (cont)	<p>Clause e) Suggest amending “within or adjoining” to “within the setting of”</p> <p>Clause f) Suggest that wording is revised to avoid harm as first resort, followed by mitigation and only compensation as a last resort (NPPF para 118).</p> <p>Acknowledge that these comments do not relate to Modifications.</p>	Natural England (6242)	<p>e) Noted. Clause e) does refer to the setting of special landscape qualities. Changing the policy would be a minor amendment.</p> <p>f) Amend Clause f. to reflect hierarchy in NPPF 118. This is considered to be a minor modification.</p>
S10 Tiverton	<p>Concern about loss of agricultural land and green setting, impact of loss of greenfield sites on flooding</p>	<p>CPRE (6212)</p> <p>Individual (3730, 1953)</p>	<p>Comments noted. The Environment Agency and DCC have not raised objections to the allocations in Tiverton. Policy DM20 deals with agricultural land.</p>
	<p>Junction 27 will undermine Tiverton town centre.</p>	<p>Jo Amor Tiverton (6688)</p>	<p>See comments above in relation to Junction 27</p>
	<p>Amend paragraph 2.59 to make more supportive Junction 27 and set that transport constraints can be overcome.</p>	<p>Friends Life Ltd c/o G L Hearn (3781)</p>	<p>See comments above and on new J27 Policy. The Council considers the existing wording is appropriate.</p>
	<p>Support policy and modifications. Welcome emphasis on self-containment.</p>	<p>Highways England (1172)</p>	<p>Support welcomed.</p>
	<p>Provide more housing in Tiverton (site of 2.26 ha east of Exeter Hill is promoted).</p>	<p>Dial Holdings Ltd (c/o PCL Planning)</p> <p>Kach Developments c/o PCL Planning (6739)</p>	<p>Comments noted. See comments above. The Local Plan identifies sufficient sites to meet objectively assessed need with a buffer of around 10%.</p>
	<p>Support Policy S10 including omission of Hartnoll Farm from the Plan (OTIV2).</p>	<p>Individual (6670, 6683)</p>	<p>Support noted.</p>

S11 Cullompton	Support long term development including expansion of Cullompton, subject to necessary infrastructure including Junction 28 improvements, new bridge over J28, town centre relief road, improved pedestrian and cycle links. Flooding and phasing matters will also need to be properly addressed to avoid ad hoc development. A proper range of community facilities will need to be provided.	Cullompton Town Council (90) St Andrews Cullompton (5070) Revd E Hobbs,(1179) Diocese of Exeter (6692) Individual (5211, 6284)	Support and identification of needed infrastructure noted. See comments above and in detailed CU Policy responses.
	Development can come forward more quickly at East of Cullompton which would allow the housing trajectory to be exceeded. Highways assessments are underway to see whether an early phase of development can be released prior to construction of a new junction on the M5.	Lightwood Land (c/o Pegasus Group 6686)	Comments noted. If development of proposed sites can be expedited, then this is welcomed. However, infrastructure issues will need to be properly addressed as per comments above.
	The church is broadly supportive of new community in Cullompton and keen to work to help build the community from the bottom up.	St Andrews Cullompton (5070) Revd E Hobbs,(1179) Diocese of Exeter (6692)	Support welcomed
	Note that development allocations in Cullompton will impact on the strategic road network (particularly Junction 28). Note the need to provide highways improvements.	Highways England (1172)	Comments noted. The Council, DCC and Highways Agency have been working closely to bring forward the necessary highways improvements. See also detailed CU policy responses.
	Increase greenspace allocated in Cullompton including footpaths and cycle tracks	Individual (6783)	Comments noted. Will be brought forward through detailed masterplanning.
	Comment on education requirements arising from developments in Tiverton, Cullompton, Crediton and Uffculme. New secondary school will be required in Cullompton	Devon County Council (139)	Comments Noted.

S11 Cullompton (cont)	<p>Concern that 50% of development is intended to be in Cullompton.</p> <p>Concern over lack of funding for infrastructure in Cullompton. Not clear if necessary highways infrastructure can be funded through developer contributions. How will pedestrian and cycle links to the town centre be improved.</p> <p>N.b East Cullompton adds up to 1,750 not 2,100 in Table 6</p>	<p>Individuals (3622, 6159, 6335, 5811, 6721, 5628,6284 6396,6690,6749) CPRE (6212)</p>	<p>Comments noted. Please see response above.</p> <p>Typo in Table 6 is noted, but does not affect the overall number in the table.</p>
	<p>Object to level of development at Cullompton: Flooding, critical drainage area. Highways, Junction 28 is at capacity, loss of greenfield sites, landscape local need, loss of agricultural land, overhead pylons, impact, sewage constraints, won't meet pylons will limit developability. Deliverability of new railway station is uncertain.</p>	<p>Broadhembury Parish Council (1483) Individuals (1953, 3748,3986, 4530, 5561, 5621, 5628, 5631, 5648,5798, 6255,6277,6399, 6409, 6765, 6690, 6707,6747,6751,6753)</p>	<p>Objections noted, but not agreed with for the reasons set out above. It is noted that there is support for the proposal from Cullompton Town Council. The Council and other stakeholders have acknowledged the need for additional infrastructure.</p>
	<p>Objection to reduction of commercial floorspace. Need to provide more local employment.</p>	<p>Individual (3700)</p>	<p>Comments noted. The Local plan has been modified in accordance with the needs identified in the Employment Land review.</p>
	<p>All developments in Cullompton are limited by capacity of Junction28. No evidence that there is market demand to deliver the proposed level of housing in Cullompton.</p>	<p>Persimmon Homes (6121) Gallagher Estates c/o Turley (5763)</p>	<p>Comments noted regarding Junction 28. See above and detailed CU policies.</p> <p>The Council do not agree that there is no evidence of market demand for housing levels proposed in Cullompton. The experience of Cranbrook indicates that large urban extensions are deliverable.</p>
	<p>Welcome additional wording requiring tree planting. On-site planting is usually preferable.</p>	<p>Woodland Trust (6207)</p>	<p>Support noted.</p>

S11 Cullompton (cont)	Support reference to Green Infrastructure.	Natural England (6242)	Support noted.
	Support focus on Cullompton as a long term focus for growth. Development could come forward sooner than 2024-25 specifically land at Honiton Road, East Cullompton. There is scope to increase the numbers to at least the previous figure of 2100 dwellings and 20,000 sq m of commercial floorspace as part of the overall East Cullompton site allocation.	Messrs Furness, Cann and Family Iain Bath Planning (4216)	Support noted. The Plan phasing is based on expected time that it will take to overcome infrastructure constraints:  Garden Village status could accelerate growth, but the Council is not relying on this for the Local Plan's housing trajectory.
	Support overall approach and numbers. Colebrook (CU21) should be made a core allocation for 100 dwellings, with potential additional 400 on adjacent land as core allocation or longer term contingency. Colebrook score better in the SA than its position as a contingency site suggests	Mr Force and Mr Christian (c/o Genesis Town Planning) (3780)	Noted. The Local Plan allocates Colebrook as a contingency that could come forward to meet a shortfall in supply. However, Colebrook is subject to highways constraints and is more appropriate to retain as a contingency site.
S12 Crediton	Support proposals in Crediton. The Plan should allocate "at least" 786 dwellings or have a higher development figure. Sites promoted at Chapel Down Hill (BDW Homes). Increased number at Pedlerspool/Creedy Bridge(Gleeson Developments). Western Lea/Pitt Lane (Mr Lee/Amethyst). South of Landscore and west of Wynfrith Mews (5-10 dwellings).	Waddeton Park (c/o PCL Planning Barratt David Wilson Homes (BDW) c/o LRM Planning) Gleeson Developments c/o Vail Williams (6685) Mr B Lee c/o Amethyst (6750) Kach Developments (c/o PCL Planning (6739)	Comments noted. The Local Plan has identified sites in accordance with the SHLAA evidence and contains sufficient sites to meet OAN.

S12 Crediton (cont)	Need to provide more employment land in Crediton.	Individual (4676)	Comments noted. The Plan identifies 9,820 sq m of commercial floorspace at Crediton, which has not been the subject of a Modification. The Plan allocates sufficient floorspace to meet the needs identified in the ELR, with a buffer to provide market choice.
	Delete Pedlerspool / Creedy Bridge (CRE5) and extend Wellparks (CRE1). Wellparks is close to town centre facilities.	Individual (4676)	Pedlerspool is a contingency site in the previous site Allocations DPD. An outline application is currently being determined.
	Add specific reference to Green Infrastructure in new criteria (e)	Natural England (6242)	Agree. Add “including green infrastructure” to clause e).
	Support provision of a new primary school at Pedlerspool (CRE5).	Devon County Council (139)	Comments noted.
S13 Villages	Should be a stronger focus on brownfield development. Object strongly to 60 dwellings on agricultural land at Higher Town, Sampford Peverell	CPRE (6212)	Comments noted. See above and response to Policy SP2.
	Village policy (S13) should not constitute a de facto presumption against rural development. Should be amended to allow development in an <i>immediately adjoining</i> settlements.	Gladman Developments (5040)	Policy S13 has not been modified. However it does not create a de facto green belt, but rather allows small scale development appropriate to the scale of settlements.
	Object to development in rural areas, especially Hemyock: highway capacity, school places and impact on AONB.	Individual (4268)	A small level of development proportionate to the scale of settlements will help maintain the viability of rural communities and provide opportunities for smaller housebuilders. This development will be assessed on the basis of development management policies (see DM6-10), but are unlikely to have severe residual impacts on the highway network (not withstanding localised issues that may arise).

S13 Villages (cont)	Investigate sites for Gypsies and travellers on standalone sites in rural areas	National Federation of Gypsies and travellers (6689)	Comments noted. However the 2015 Planning Policies for Gypsies and travellers advises against sites in the open countryside.
	Reliance on large residential sites to meet all the need for gypsy and traveller sites is unrealistic. Provision should be made in villages and rural areas.	National Federation of Gypsy Liaison Groups (6689) Gleeson Developments c/o Vail Williams (6685)	Comments noted. See above.
	The Plan should make more provision for small rural businesses as recommended by the ELR. The Plan relies too much on sites within urban extensions which need residential pump priming, (land at Willand is promoted)	Mr and Mrs Disney c/o Harcourt Kerr (4412) Blackmore and Wooton families c/o Harcourt Kerr (6789)	Comments noted. See response earlier in this schedule.
	Support target of development in rural villages. Housing in villages will help to maintain sustainable rural communities. Target should be expressed as a minimum.	Cottrell, Burns, Pearce and Upham families c/o Harcourt Kerr (6790) Gladman Developments (5040) Waddeton Park c/o PCL Planning	Support noted
	Holcombe Rogus should not be classed as a village due to lack of transport facilities.	Holcombe Rogus Parish Council (60)	This comment does not relate to a modification. However, there are other settlements in the Plan which are classed as villages which are of a similar size or smaller than Holcombe Rogus.
S14 Countryside	Countryside policy (S13) should not constitute a de facto presumption against rural development. Should be amended to allow development <i>immediately adjoining</i> settlements.	Gladman Developments (5040)	Policy S14 has not been significantly modified. However it does not create a de facto green belt, but rather allows small scale development appropriate to the character of rural areas.

S14 Countryside (cont)	Support Sampford Peverell. Capacity likely to be 120 dwellings (rather than 60). Should not be contingent on J27.	Cottrell, Burns, Pearce and Upham families c/o Harcourt Kerr (6790)	Support noted. Para 3.334a of the Local Plan indicates that 60 dwellings is likely to respect the landscape character of the edge of village location. See comments on Policy SP2.
	Reliance on large residential sites to meet all the need for gypsy and traveller sites is unrealistic. Provision should be made in villages and rural areas.	National Federation of Gypsy Liaison Groups (6689) Gleeson Developments c/o Vail Williams (6685)	Comments noted. However the 2015 Planning Policies for Gypsies and travellers advises against sites in the open countryside.
	Sites on the edge of villages should be allowed for residential development, particularly where the Council do not have a five year land supply. The Church of England owns significant amount of land in the District that could be developed should there be an identified need, viz sites at Thorverton and Newton St Cyres. These have no significant constraints and are deliverable:	Church Commissioners c/o Deloitte, (1517)	Comments Noted. Policy S13 has not been Modified. However it does permit suitable small scale development in villages.
	Should be a stronger focus on brownfield development	CPRE (6212)	Comment noted. See response earlier in this Schedule.

## Site Allocations

### Tiverton (TIV1-TIV16)

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
TIV1-TIV5 (mod)	Support inclusion of provision for SUDS in relation to Tidcombe Fen SSSI; advise strengthening criterion to ensure site protected.	Natural England (6242)	Comments of support noted. Policy TIV3(f) makes particular reference to Tidcombe Fen. The quality and quantity of water entering it. The Fen is protected as a SSSI.
	Highways (TIV2): new A361 junction should be completed before TEUE development begins.	Individual (3730)	TIV5 Eastern Urban Extension Phasing includes criterion a) which requires the provision of on and off slip roads on the south side of the A361 to a standard suitable to form construction access prior to any development. Criterion b) also includes the provision of the completed on and off slip roads on the south side of the A361 (forming the southern element of the A361 junction) and the highway link between this junction and Blundell's Road prior to the occupation of any development.
	Drainage (TIV3): No detail on SUDS proposal; need for protection of Tidcombe Fen.	Individual (3730)	Comments noted. DM1 High quality design requires the principle of appropriate drainage including SUDS, including arrangements for future maintenance. A detailed SUDS scheme will be required as part of a Reserved Matters application. Policy TIV 3(f) provides protection to Tidcombe Fen.
	Highways (TIV2): supports new grade-separated A361 junction – necessary to cope with increased demand and reduce impacts on Blundell's Road and nearby villages.	Individual (6683)	Comments of support noted.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
TIV1-TIV5 (mod)	Objects to housing numbers in TEUE allocation. Argue range given is too wide and more specific figure should be achievable; criterion a) should read 'around 1580 dwellings'.	Lightwood Land (East of Cullompton Promoter) c/o Pegasus Group (6686)	Taking into account permissions granted or with a resolution to grant permission subject to a S106 agreement, it is considered that the site would be suitable to provide for 1580 dwellings. Area B has not been fully masterplanned. As such, a specific number of dwellings cannot be indicated for the whole of the EUE. Early indications, through a Feasibility Study, are that a greater number of dwellings may be achieved – up to 1830. This approach to housing numbers reflect that taken by the Inspector on the Allocations and infrastructure Development Plan Document.
TIV14 (mod) Wynnards Mead, Tiverton	Supports deletion of TIV14 Wynnards Mead.	Individuals (870; 5220; 5221; 5324;5327; 5329; 5349; 5364; 5376; 5538; 5544; 5551; 5558; 5560; 5722; 5737; 5738; 5741; 5746; 5890; 5905; 5906; 5907; 5909; 5910; 5912; 5915; 5923; 5927; 5931; 5932; 5935; 5939; 5942; 5965; 5976; 5985; 5989; 6000; 6001; 6002; 6023; 6030; 6032; 6033; 6258; 6276; 6289; 6330; 6352; 6353; 6361; 6374; 6419; 6420; 6421; 6679; 6730)	Support noted.
TIV15 (mod) Tiverton Infrastructure	Supports amendment for enhanced library service provision.	Individual (6683)	Support noted.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
TIV16 (mod) Blundells School, Tiverton	Planning for development should consider the impact on the setting of Knightshayes. Regard should be had to the setting of the historic park and garden with design solutions minimising the impact on the historic designed view out of the park and garden.	National Trust (170)	Comments noted. Policy DM25 states that where development would affect the setting of Knightshayes Court, the Council will have regard to The Setting of Knightshayes Park and Garden: A Historic Landscape Assessment. Applicants are encouraged to contact the Council to check if their site falls within the setting study areas surrounding Knightshayes and consider the implications of this at the design stage.
	Supports allocation of Blundells School.	Blundells School c/o GVA P Stockall (776); Individual (3610; 6670; 6683)	Support noted.
	Supports allocation but concerned about traffic which is already nose to tail with long queues at morning and evening peak times; an extra roundabout will make congestion worse.	Individual (814)	Comments noted. Any planning application for the site will need to be accompanied by a Transport Assessment which will comprehensively set out the relevant transport issues on the site and demonstrated that the impact of the proposal is acceptable.
	Suggests amendment to policy to state 'Design which respects and enhances the character and appearance of the Conservation Area and School Campus'.	Blundells School c/o GVA P Stockall (776)	The policy wording was included following the preparation of the Council's Historic Environment Appraisal. Any application would also need to comply with Policy DM1 'High Quality Design' which requires visually attractive places that are well integrated with surrounding buildings, streets and landscapes. As a result, it is not considered necessary to amend the policy to make explicit reference to the school campus.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
TIV16 (mod) Blundells School, Tiverton	Suggests change to Criterion e) to read 'Provision and enhancement of cycle and pedestrian links in the area required as a direct result of the development'.	Blundells School c/o GVA P Stockall (776)	Not agreed. Policy S8 of the Local Plan Review sets out that development and transport planning will be coordinated to improve accessibility for the whole community and promote the use of sustainable modes of transport. It is therefore considered that the policy as worded is appropriate.
	Suggests removal of '200 dwellings' as this implies a fixed marker and suggests reference to a 'minimum of 200 dwellings' as the overall capacity is yet to be tested in any detail and the key influence (flood zone) is still to be investigated which could result in a higher proportion of developable land.	Blundells School c/o GVA P Stockall (776)	Not agreed. It would be inappropriate with the information currently available to state the dwelling number as a minimum. The Council has already considered any scope to increase the housing numbers at the site. It was concluded that given that the allocation as a whole includes land subject to flooding, increasing the housing numbers above that proposed would give less flexibility in the design of the flood mitigation measures and would likely result in positioning housing closer to areas that would remain subject to flooding. A higher residential development could also lead to a less satisfactory residential environment and leave less land available for a sustainable urban drainage system. Importantly, development of the site must also safeguard a strategic road route through the site to serve as a road access for future development needs beyond the plan period and that would also require land.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
TIV16 (mod) Blundells School, Tiverton	Suggests removal of 'Approximately 8ha' of informal green infrastructure to ensure flexibility is built into the policy wording to assist with deliverability.	Blundells School c/o GVA P Stockall (776)	Not agreed. Remodelling of the site is required to ensure that there is no change to the functionality of the floodplain to deal with a 1:100 year return period flood event, including appropriate allowance for climate change. This remodelling will result in a total of 6ha of developable land and 8ha of flood plain which is proposed to be provided as green infrastructure. It is therefore considered that the reference to approximately 8ha of informal GI is appropriate.
	Reference to the requirement that the scrapyard must be removed prior to residential development should be removed as this potentially presents an unacceptable ransom position for the wider site owners.	Blundells School c/o GVA P Stockall (776)	As stated in the supporting text to the policy, it would be inappropriate to allow redevelopment of land within the site for new housing before the removal of the scrapyard. This is due to the impact on the living conditions and health of the occupiers resulting from its continued occupation. It would therefore be inappropriate to remove this requirement from the policy.
	Policy should be amended to state '28% affordable housing subject to viability'.	Blundells School c/o GVA P Stockall (776)	Not agreed. Affordable housing provision is subject to viability in any case as set out in policy S3 and in accordance with paragraph 173 of the NPPF. It is therefore unnecessary to repeat this in all allocation policies. Viability evidence has indicated that 28% affordable housing is achievable for sites within the towns.
	Policy should remove reference to the site being viable as at this stage the viability of the site is unknown. There are major constraints and infrastructure requirements to overcome.	Blundells School c/o GVA P Stockall (776)	MDDC has been working closely with partners and the site is confirmed to be deliverable within the plan period. Viability work has been undertaken which demonstrates that the overall assumptions which underpin the plan are sound with regard to viability. The specific viability issues relating to this particular development will be considered at the planning application stage.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
TIV16 (mod) Blundells School, Tiverton	Suggests site might be able to sustain more than 200 homes if designs are produced to achieve such request.	Individual (1365)	The Council has already considered any scope to increase the housing numbers at the site. It was concluded that given that the allocation as a whole includes land subject to flooding, increasing the housing numbers above that proposed would give less flexibility in the design of the flood mitigation measures and would likely result in positioning housing closer to areas that would remain subject to flooding. A higher residential development could also lead to a less satisfactory residential environment and leave less land available for a sustainable urban drainage system. Importantly, development of the site must also safeguard a strategic road route through the site to serve as a road access for future development needs beyond the plan period and that would also require land.
	Query logic in reinstating allocation. TIV16 shows land to the north of Blundells School to be primarily floodplain. Site was previously allocated in the Local Plan Part 2 and was discounted as 'the site is not considered deliverable'.	Messrs Persey c/o Jillings-Heynes Planning Ltd (4675)	The site was originally proposed for deletion as it had not come forward. However, it is now understood that the site is available and developable. The flooding issues associated with the development have been examined previously and have been the subject of discussions with the Environment Agency. It is considered that flooding issues can be overcome with mitigation. Remodelling of the site is required to ensure that there is no change to the functionality of the floodplain to deal with a 1:100 year return period flood event, including appropriate allowance for climate change. This remodelling will result in a total of 6ha of developable land and 8ha of flood plain which is proposed to be provided as green infrastructure.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
TIV16 (mod) Blundells School, Tiverton	Site is in complex ownership with no overall control, needs a new link road linking Blundells Road to Heathcoat Way raising serious doubts as to the viability and deliverability of the allocation.	Waddeton Park Ltd c/o PCL Planning (4675)	The site is in multiple ownership. However, MDDC has been working closely with partners and the site is confirmed to be deliverable within the plan period. Viability work has been undertaken which demonstrates that the overall assumptions which underpin the plan are sound with regard to viability. The specific viability issues relating to this particular development will be considered at the planning application stage.
	Cycle and pedestrian links should connect to the proposed allocation. The provision of a bridge over the River Lowman should be included.	Sampford Peverell and District Sustainable Villages (5825)	The policy requires that non-vehicular access into and through the site should be enhanced, through new and improved cycle and pedestrian routes including non-vehicular links to Blundells Road. More detailed options for the provision and enhancement of pedestrian and cycle routes will be considered at the planning application stage.
	TIV16 lies close to Tidcombe Fen SSSI. It is therefore important that any potential impact is assessed as part of the SA and any associated recommendations regarding protection of the SSSI are included with the Local Plan Policy for this site.	Natural England (6242)	An update to the Sustainability Appraisal is provided to ensure consideration of the SSSI is recognised. Nevertheless, the impact of development on SSSI's is recognised in DM28.
	It is not clear if the site will lead to loss of playing fields, sport and recreation land and/or buildings.	Sport England (6268)	Development of the site would not result in any loss of recreation or open space.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
TIV16 (mod) Blundells School, Tiverton	To maintain the overarching spatial strategy, the potential for enhanced yields on existing proposed allocations should have been investigated first due to their inherent sustainability, deliverability and suitability to accommodate housing rather than new sites being introduced.	Gleeson Developments Ltd c/o Vail Williams LLP	A range of options were considered when looking at how an additional housing need associated with Junction 27 could be met. The Council adopted a set of selection criteria for any options considered. There was a need to consider the geographical relationship with J27, sites that were previously consulted on as part of the Local Plan Review Options Consultation, sites considered by the SHLAA Panel and compliance with the Local Plan Review distribution strategy. As such a number of options were put forward and it was considered that the additional housing need should be met at Blundells Road, Tiverton and Higher Town, Sampford Peverell.
	Policy should include 'the creation of additional/compensatory floodplain should secure wider environmental and sustainability benefits.' This is a key consideration of the Environment Agency when consulted on development within the floodplain. The following should also be added to the supporting text '...subject to the provision of wider environmental and sustainability benefits.'	Environment Agency (6734)	Agreed. An amendment is proposed to include an additional criterion stating the following: 'The creation of additional/compensatory floodplain should secure wider environmental and sustainability benefits'. It is also proposed to amend paragraph 3.60c of the supporting text accordingly as follows: 'The Environment Agency has indicated that it is supportive of the carrying forward of the allocation given the opportunity it provides to assist in the provision of wider flood risk mitigation proposals in this area of the River Lowman, subject to the provision of wider environmental and sustainability benefits.'

<b>Tiverton: Non Modifications Comments</b>		
<b>The following comments were made with respect to the elements of the plan which have been unchanged since the 2015 consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the responses to the 2015 Consultation.</b>		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
TIV1-TIV5	Local education provision: new schools/expansion to meet demand from additional development in Tiverton	Devon County Council (139)
	Concerns regarding phasing and delivery of infrastructure associated with TEUE: potential traffic impacts on Blundell's Road (Heathcote Way link?)	GVA (776)
	Query regarding area south of West Manley Lane - retained as green 'buffer'? Objects if area intended for development.	Individual (870)
	Highways: objects if new A361 junction not complete before TEUE development begins.	Individual (870)
	Capacity for further development beyond allocated TEUE, particularly with infrastructure in place/in pipeline in area (e.g. A361 junction). Support retention of TEUE; represents a sustainable and effective means of delivering long-term housing needs of Tiverton.	Dial Holdings Ltd c/o PCL Planning (2315); Waddeton Park Ltd C/O PCL Planning (4675)
	Concerns regarding infrastructure provision to cope with proposed developments: water/sewerage, road traffic, hospital/healthcare facilities	Individual (5753)
	Oppose inclusion of Gypsy and traveller sites within allocations for urban extensions.	Persimmon Homes South West (6121)
	TEUE goes against broader national and local policy (e.g. S10 of this plan) to protect quality agricultural land and make best use of brownfield sites.	CPRE (6212)
	Highways (TIV2): supports new A361 junction – necessary to cope with increased demand and reduce impacts on Blundell's Road and nearby villages.	Individual (6670)
Necessary to preserve green infrastructure, trees and hedges etc. around TEUE (including Manley Lane).	Individual (6670; 6683)	
TIV12 Phoenix Lane, Tiverton	Tiverton has too many charity shops. It needs the retail development described in the original Local Plan to draw residents from the intended housing into the town instead of encouraging them to go to J27.	Individual (2075)

TIV12 Phoenix Lane, Tiverton	Site may be undermined by the DOV development as retailers may opt for J27 over a smaller site in the town centre.	Individual (6688)
TIV13 Tidcombe Hall (Contingency Site)	Supports site but states that it should be allocated as a full allocation given over-reliance on the allocation for Tiverton EUE with insufficient provision made against the realistic possibility of unforeseen issues or delays.	The Frankpitt Family c/o Greenslade Taylor Hunt (4239)
TIV15 Tiverton Infrastructure	TIV15 should include reference to the proposals to co-locate Community Arts Facilities with the High School.	NPS South West Ltd (6389)
	Requests that the flood risk mitigation issues that are the primary drivers for the school to relocate are clearly stated in the Plan.	NPS South West Ltd (6389)

<b>Tiverton: Non Modifications Comments (non-allocated)</b>		
The following comments were made with respect to the elements of the plan which have been unchanged since the 2015 consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the responses to the 2015 Consultation.		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
OTIV2 Hartnoll Farm	Propose that a key component in the delivery of a town focus strategy should be a further urban extension to the east of Tiverton at Hartnoll Farm. Site is deliverable and sustainable extension to Tiverton that is appropriate to the scale of the settlement.	Waddeton Park Ltd c/o PCL Planning (4675)
	Supports exclusion of Hartnoll Farm.	Individuals (6670; 6675; 6683)
OTIV13 Exeter Hill	Suggests that the site should be included as an allocation within the plan given the sites close proximity to the town centre, local primary school and bus services on Canal Hill.	Dial Holdings c/o PCL Planning (2315)
OTIVNEW1 Seven Crosses Hill	Supports exclusion of the site.	Individual (5551)
OTIVNEW3 Land at the Foundry	Suggests site to be included as an allocation	Lowman Manufacturing Company Ltd C/O Heynes Planning & J&K Property Consultants (4564)

**Cullompton (CU1-CU21)**

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU1-6 (mod)	Supports the principle of development	Cullompton Town Council (90)	Support noted
	Supports the allocation	Codex Land PCC Land Promotion Cell c/o PCL Planning (4300); PM Asset Management (6782); Growen Estates c/o Rocke Associates (5748); Individual (5211; 4688)	Support noted
	Additional development should not take place until major highway infrastructure improvements. The existing highway infrastructure cannot accommodate the level of development proposed.	Kentisbeare Parish Council (76); Cullompton Town Council (90); Individual (6344; 6707; 6721)	The proposal includes provision for a new through route between Tiverton Road and Willand Road which will provide an alternative route for some traffic. Policy CU2 g) and h) require financial contributions towards highway improvement schemes and policy CU6 i) requires M5 access improvements before any dwellings are occupied and thereafter broadly in step with development. A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency taking into account results from a comprehensive flood modelling exercise. The Council is working to bring forward the scheme at the earliest opportunity. The transport work to date sets the basis for planning application submission.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU1-6 (mod)	The road through the NW Cullompton urban extension will not be fit for purpose, neither will that already provided through Kingfisher Reach.	Kentisbeare Parish Council (76); Cullompton Town Council (90); Individual (5211)	The new route through the site between Tiverton Road and Willand Road has yet to be fully designed, nor planning permission granted. The design will consider its function and meet the required highway standards. The masterplan SPD refers to it as being a minimum of 6.5m wide with parking provision as part of the design. The road through Kingfisher Reach was designed to Highway Authority requirements as a through route and residential street. It is not yet adopted and hence no on street parking controls are yet in place.
	The number of houses allowed prior to the opening of the through road between Tiverton Road to Willand Road and traffic calming is proposed to be increased from 300 to 500 which is inappropriate without proper infrastructure.	Kentisbeare Parish Council (76); Cullompton Town Council (90); Individual (6344; 6721; 6791; 5648; 6690; 5211)	The approach to the delivery of the road is set out in the masterplan SPD and depends upon sale of sufficient land (500 houses) to fund it. Funding for the road will be released upon sale of land rather than linked to house sales. Road completion within 2-3 years from the commencement of development is proposed which is in advance of the expected delivery of 300 houses (years 4-5).The amendment is necessary to generate sufficient funds from land sales to deliver the road at an earlier stage than if dependent upon house sales.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU1-6 (CU2/3.76; CU6/3.94) (mods)	This is an existing allocation with an adopted SPD with identified infrastructure. The blanket imposition of additional costs (J28 works) will jeopardise delivery. The cost, timing and funding of junction works is unknown with no mechanism to deliver the infrastructure. Query whether the pooling limit for developments to contribute to junction improvements has been exceeded. Object to additional highway infrastructure policy requirements. No clarity over cost, apportionment and not justified.	Persimmon Homes SW (6121)	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 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 should be provided before any dwellings are occupied in order to mitigate the impact of development. The results of queue length monitoring were not available at the time of masterplanning. A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency. Short term improvements that will release junction capacity are also being investigated. Project specific contributions will be sought in compliance with pooling limits.
CU1-6 (mod)	Community infrastructure should be provided in advance of development.	Kentisbeare Parish Council (76)	Policy CU6 phases development in relation to a wide range of infrastructure including education, sports provision and green infrastructure. The masterplan SPD sets out a location and proposals for a local centre, the precise uses within which will be established via planning applications. There is opportunity for additional health provision to come forward within the local centre. The masterplan SPD makes reference to opportunities for community recycling, composting and food production.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU1 (mod)	The increase in the size of the allocation whilst welcomed is not sufficient to ensure development viability. Additional land is controlled that would overcome this. Amend allocation to 1500 with additional of suitable, level land.	Codex Land PCC Land Promotion Cell c/o PCL Planning (4300)	Viability discussions have commenced within the context of pre-application engagement, but not yet concluded. The allocation has been increased in scale from 1,120 (masterplan SPD) to 1,350 which will assist values. A further increase in the scale of the allocation is not considered necessary on terms of housing numbers or for development viability.
CU1 (mod)	Object to reinstatement of land to west north of Tiverton Road previously to be removed from the allocation. Object to inclusion of elevated land in the vicinity of Rull Hill / St George's view that is allocated for green infrastructure in the adopted Local Plan. The current allocation includes land that is unsuitable /unavailable, within floodplain, too steep for residential development or required for other uses (school).	PM Asset Management (6782); Growen Estates c/o Rocke Associates (5748)	With the reconfirmation that the land to the west is available for development, there is not considered to be a reason to exclude it. It forms part of the adopted allocation for the site, is flat and considered suitable for inclusion. The boundaries between development areas and green infrastructure were comprehensively reviewed via the masterplan SPD. The land identified is a broad allocation. Policies recognise that there are constraints associated with the allocation in certain areas and identifies within the policies the issues of flood plain, educational and community needs (CU3 and CU4). Comprehensive masterplanning has taken place and sets out in more 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.
	Focus should be on a more compact and integrated allocation focussed on additional land at Growen Farm and the new local centre /community facilities. Arrangements and distribution is sub-optimal and unlikely to deliver policy requirements.	PM Asset Management (6782); Growen Estates c/o Rocke Associates (5748)	The land identified is a broad allocation. Comprehensive masterplanning has taken place and sets out in more detail the proposed development of the site. Whilst Growne Farm land might be closer to the proposed local centre, the northern land within the allocation is relatively close to the school and its associated facilities.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU1 (mod)	<p>Much of Growen Farm land is identified as green infrastructure. This is inappropriate as it is sustainable with less visual impact. It should be included with other, centrally located land becoming green infrastructure. The green infrastructure provisions preclude the most optimal and viable location for the local centre and most proximal development in relation to it, maximising non-car trips. Growen Farm land in its entirety should be allocated to boost supply and provide flexibility within the allocation. The masterplan SPD was constrained by previous policy and will need to be revisited in light of the adopted Local Plan Review policies.</p>	<p>PM Asset Management (6782); Growen Estates c/o Roche Associates (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 now proposed within the allocation and was considered a more logical extension to the allocation. The furthest extent of Growen Farm site in no further from the town centre boundary as the furthest extent of the added land to the north (Rull land), being about 1.5km. Whilst Growen Farm land might be closer to the proposed local centre, the northern land within the allocation is relatively close to the school and its associated facilities.</p> <p>The Local Plan meets objectively assessed housing need and over provides by about 10% above the requirement of 7,860 in order to provide flexibility.</p> <p>The masterplan SPD relates to the adopted allocation for this site within the Allocations and Infrastructure Development Plan Document. New land proposed as part of the allocation would be considered as an addendum to it.</p>

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU1 (a) (mod)	Greater flexibility should be given to allow for a contribution towards off-site gypsy and traveller pitch provision in lieu of on-site pitch provision.	Codex Land PCC Land Promotion Cell c/o PCL Planning (4300)	The gypsy and traveller pitches are to meet need identified in the GTAA 2015 and accords with Government guidance on such accommodation. Where justified, the Council proposes to consider a flexible approach to pitch provision if a suitable and deliverable off-site location is available. However it is considered that the starting point for pitch provision should remain on-site in accordance with the policy as existing. A site has been identified within the masterplan SPD.
CU1 (a) (mod)	Mortgage lenders are not able or willing to support sites which include gypsy and traveller facilities, accommodation or sites on or within the vicinity of an allocation. Any sites with such provision are indefinitely unviable. It is unreasonable to expect a developer to secure alternative sites. Government infrastructure funding should be available to assist delivery of such accommodation.	Persimmon Homes SW (6121)	The gypsy and traveller pitches are to meet need identified in the GTAA 2015 and accords with Government guidance on such accommodation. Where justified, the Council proposes to consider a flexible approach to pitch provision if a suitable and deliverable off-site location is available. However it is considered that the starting point for pitch provision should remain on-site in accordance with the policy as existing. A site has been identified within the masterplan SPD.
CU1 (c) (mod)	Support flexible approach to type of employment floorspace to recognise it as being wider than B1 /B2 /B8 uses and welcome its reduction to 10,000 sq m, but recommend a further reduction.	Codex Land PCC Land Promotion Cell c/o PCL Planning (4300)	Support noted. A reduction in employment floorspace within this allocation from 21,000 sq m to 10,000 sq m is justified by the Mid Devon Employment Land Review. However a further reduction would not be justified given the range of qualifying uses and the resultant reduction in choice.
	Object to reduction in employment floorspace. Wish to see more employment allocated in Cullompton.	Individual (5211)	A reduction in employment floorspace within this allocation from 21,000 sq m to 10,000 sq m is justified by the Mid Devon Employment Land Review.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU2 (g) (mod)	Solution to town centre congestion is two relief roads, one of which runs through CU1 and will act as a western relief road. The allocation already makes a significant contribution towards alleviating congestion. Criterion g) should be deleted.	Codex Land PCC Land Promotion Cell c/o PCL Planning (4300)	Cullompton is an Air Quality Management Area with the town centre relief road identified as an important mitigation measure necessary to make the impact of development acceptable in planning terms. The provision of the new Tiverton Road to Willand Road is not considered to off-set the requirement for this development to contribute to the town centre relief road. The existing adopted allocation on this site for 1100 dwellings is already required to financially contribute towards the cost of this road under policy AL/CU/15.
CU2(h); CU6 (mod)	Junction 28 improvements were carried out to cater for the level of growth in the adopted plan (1100 dwellings) via develop contribution and Government grant funding. Further contribution sought for additional Junction 28 works should only be sought for units beyond 1120. Contributions should assist allocate sites, not justify the release of unallocated sites that have made no contributions. Criterion h) will reduce available funding for a) – f).	Codex Land PCC Land Promotion Cell c/o PCL Planning (4300)	Allocation and Infrastructure Development Plan Document required financial contributions from development towards capacity improvements are J28 M5 (policy AL/CU/16). In order to accommodate AIDPD development levels an extensive second phase of improvements was proposed. Improvements undertaken at the junction did so go as far as those identified in AIDPD para 6.86 as the second phase and have been found to have not delivered the extent of capacity anticipated as demonstrated by DCC queue length monitoring. Further improvement works are necessary to improve capacity in order to accommodate CU1. The phasing policy CU6 clarifies the timing of development in relation to junction improvement works.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU3/3.81/3.107 (mod)	Support commitments in CU3 to environmental protection and green infrastructure to be provided and funding by new development with extensive tree planting and a commitment to protect and enhance trees and hedgerows. Support recognition of the role of tree planting in flood prevention and carbon reduction. The wording should be more directive.	Woodland Trust (6207)	Support noted. A strategic landscaping and tree planting scheme is already required under policy CU3a) together with 28 hectares of strategic green infrastructure. Amendment to 3.81 to make it more directive is not considered necessary, but for clarity over the extent of carbon reduction that would be realised from tree planting it is proposed to remove 'and tree planting'.
CU3/ 3.81 (mod)	Agree trees absorb carbon dioxide but there is a danger of misinterpretation that local tree planting can mitigate CO2 emissions from new development. 0.7ha of tree planting would be required to mitigate the additional CO2 from a single dwelling. Suggest removal of words 'and carbon reduction' as the likely scale of tree planting will not provide material carbon reduction as implied.	University of Exeter (6260)	Comments noted. In order to provide greater clarity over the extent of carbon reduction, it is proposed to delete reference to the role of landscaping and tree planting in carbon reduction (paragraph 3.81)
CU3/ 3.81 (mod)	Review of carbon storage undertaken by Natural England identifies woodland sequesters 6 tonnes of CO2 per hectare per annum. The effect of tree planting in mitigating emissions from new housing is negligible unless many hectares of woodland are created.	Devon County Council (139)	Comments noted. The development will be required to consider carbon reduction and air quality improvements (policy CU1 h). In order to provide greater clarity over the extent of carbon reduction, it is proposed to delete reference to the role of landscaping and tree planting in carbon reduction (paragraph 3.81)

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU4 (mod)	Modifications fail to provide for a local centre and associated facilities including a swimming pool and suitable land is not identified and safeguarded for these.	PM Asset Management (6782); Growen Estates c/o Roche Associates (5748)	The recent masterplanning SPD exercise established a location for community facilities together with the location of a local centre, the latter forming part of the employment floorspace required by CU1c). The swimming pool project is a community aspiration rather than a CU1 development requirement and is understood to be coming forward within the emerging Cullompton Neighbourhood Plan.
	Local centre viability and footfall will be delivered via integration with development rather than a location opposite open space and with single sided frontage to the new road.	PM Asset Management (6782); Growen Estates c/o Roche Associates (5748)	The recent masterplanning SPD exercise established a location for community facilities together with the location of a local centre, the latter forming part of the employment floorspace required by CU1c). The local centre is positioned on the new through road in an accessible location where open space will also act as a community benefit. The masterplan SPD already considers development / road frontage relationships.
	Affordable housing percentage needs careful consideration due to ongoing viability issues.	Codex Land PCC Land Promotion Cell (c/o PCL Planning 4300)	Viability discussions have commenced within the context of pre-application engagement, but not yet concluded. Affordable housing percentage is considered to be an appropriate target.
CU5 (mod)	Support amendment to CU5e) to refer to offsite tree planting where sufficient cannot be accommodated on site.	Woodland Trust (6207)	Support noted.
CU6 (mod)	Supports the provision of a new primary school with early years at NW Cullompton.	Cullompton Town Council (90); Devon County Council (139)	Support noted

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU6/3.95 (mod)	Requirement for transfer of land for the school with right of access before any development commenced is not logical or deliverable as it can only be delivered in parallel with development not prior.	Persimmon Homes SW (6121)	Requirement is for transfer of land for the school together with right of access (not physical means of access at this stage in the development). This updates policy to reflect masterplan SPD and allows DCC control of the site at an early stage in order to expedite delivery of this urgently needed additional primary school. The masterplan requires a construction access to the school within 6 months of the commencement of development.
CU6 (mod)	Additional recreation areas are required together with safe, separate pedestrian routes to the town centre.	Cullompton Town Council (90); Individual (5211)	Policy CU2 requires pedestrian and cycle routes throughout the development and between it and the town centre. The development will provide 28ha of green infrastructure.
	Northern bridge over the M5, railway and river should be provided to link NW Cullompton with East Cullompton	Cullompton Town Council (90)	A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency which will enhance cross motorway transport movement via a range of modes.
	Policy CU6 should include the trigger by which services to the school site are provided prior to the occupation of no more than 50 dwellings on the Persimmon land control parcel, or within 18 months of the commencement of the development whichever is the sooner.	Devon County Council (139)	Amendment not considered necessary as it is already included with the masterplan SPD infrastructure requirements p75.
	Supports the requirement for the development to make financial contributions towards capacity improvements at junction 28 M5 and for M5 access improvements before any dwellings are occupied and thereafter broadly in step with development.	Highways England (1172)	Support noted.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU6 (mod)	Unable to comment on adequacy of transport infrastructure included in the plan to accommodate development at Cullompton. The plan proposals and strategy appear to be some way ahead of the transport evidence base being used to support it.	Highways England (1172)	Noted. The plan recognises that J28 improvements are needed to deliver capacity to accommodate the development proposed. Planning applications will be accompanied by detailed transport assessment and mitigation measures to address impact upon J28. Highways England has seen all the emerging evidence base as it has become available and further has emerged since the consultation, which Highways England has been fully engaged over.
CU6 (mod)	Concern over affordability, deliverability and viability of strategic allocations at Cullompton with need to overcome significant long term infrastructure constraints. Lack of certainty / evidence these can be overcome and no clear direction or understanding of the M5 junction improvements or town centre relief road requirements. Plan is unsound. Lack of certainty Cullompton allocations can be delivered in the plan period.	Gallagher Estates Ltd c/o Turley (5763); Persimmon Homes South West (6121)	The plan establishes the area within which the town centre relief road will be located and that financial contributions will be sought from development. The Council has commissioned extensive work on Cullompton highway infrastructure and hydrology. A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency. Short term improvements that will release junction capacity are also being investigated. The plan sets out development requirements in relation to highway infrastructure improvements.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU6 (mod)	There will be a long lead in time before any housing completions and it will not be able to deliver sufficient housing early in the plan period to meet need. The housing trajectory for CU1 is unrealistic and misleading. At least 363 dwellings will not be completed in the plan period. Timing of M5 junction works is unknown There is overreliance on large sites such as this.	Gallagher Estates Ltd c/o Turley (5763); Mr Force and Mr Christian c/o Genesis Town Planning (3780)	A masterplan SPD for the majority of the site was adopted in 2016, environmental impact assessment work is in an advanced stage and planning applications are being prepared. It is understood that their receipt is likely to be in May /June 2017 and to include a full application for part of the site. Much of this allocation is carried forward from the Allocations and Infrastructure Development Plan Document 2011. It has therefore been found sound previously and progress has been made since to bring it forward. A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency. Short term improvements that will release junction capacity are also being investigated.
CU6 (mod)	Annual delivery rates are unrealistic, especially when in conjunction with East Cullompton.	Gallagher Estates Ltd c/o Turley (5763); Persimmon Homes South West (6121)	Within the same housing market area annual completions of 412 (13/14), 363 (14/15), 290 (15/16) and 170 (first 3 quarters of 16/17) have been achieved at Cranbrook. Cullompton is located at only an additional 10 minute drive time from Exeter and in 2016 has seen housing completions from several different outlets simultaneously: Cummings Nursery (Devonshire Homes), Kingfisher Reach (Barrett David Wilson) and Saxon Fields (Barrett David Wilson).
CU6 f) and 3.70 (mod)	Object to modification to insert requirement for traffic management measures on Willand Road.	Persimmon Homes South West (6121)	Such measures are identified as necessary within the masterplan SPD for the site and based on DCC highway advice.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU6 (mod)	The policy is unnecessary and overly prescriptive. The masterplan SPD deals with phasing in detail and there is no need to repetition.	Codex Land PCC Land Promotion Cell c/o PCL Planning (4300)	Since earlier iterations of the Local Plan Review a masterplan SPD for the site has been adopted. Amendments are necessary to CU6 to update it following the greater level of detail on phasing now available. It is still considered appropriate to set out phasing requirements for CU1 within policy.
	Support revised green infrastructure requirement phasing.	Woodland Trust (6207)	Support noted.
	Significant highway improvements at junction 28 M5 are required to support future development growth. We have worked closely with MDDC, DCC and their consultants to identify whether an acceptable design solution for the Cullompton relief road, new motorway junction and new overbridge can be delivered which will not increase flood risk. Significant progress has been made following extensive flood modelling work and we anticipate agreement in principle of the highway improvements can be achieved. The scheme will be subject to detailed design work and further consultation.	Environment Agency (6734)	Comments on scheme progress and anticipation of agreement of the scheme in principle noted.
	There is no plan to deal with increased congestion in Cullompton town centre resulting from the increased scale of the development.	Individual (6791)	The plan provides for the delivery of a town centre relief road and towards which development on this site will make financial contributions (CU2g, CU19)
	There is no justification for the increase in the scale of development.	Individual (6791)	Suitable land is available and deliverable as part of a slightly enlarged allocation that will assist in meeting objectively assessed housing need

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU7 (mod)	Notes changes in housing numbers and states support for requiring a range of community facilities and resisting ad-hoc development of phases with no overall reference to the overall vision and development strategy.	Exeter Diocesan Board of Finance c/o Diocese of Exeter	Support noted.
	Unable to comment on adequacy of transport infrastructure included in the plan to accommodate development at Cullompton. The plan proposals and strategy appear to be some way ahead of the transport evidence base being used to support it.	Highways England (1172)	Noted. The plan recognises that J28 improvements are needed to deliver capacity to accommodate the development proposed. Planning applications will be accompanied by detailed transport assessment and mitigation measures to address impact upon J28. Highways England has seen all the emerging evidence base as it has become available and further has emerged since the consultation, which Highways England has been fully engaged over.
	East Cullompton Development will have a long lead in time.	Mr Force & Mr Christian C/O Genesis Town Planning (3622)	The modification to the Local Plan trajectory sets back implementation by 3 years to reflect the lead in time for development east of Cullompton as a result of highway infrastructure dependence. Subsequent to publication of the Modification version of the Plan the government has proposed that land east of Cullompton could form a Garden Village. The Garden Village expression of interest identifies opportunities for earlier build out.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU7(mod)	Due to the scale of infrastructure requirements the lead in time is unrealistic.	Gallagher Estates Ltd c/o Turley(5763)	The modification to the Local Plan trajectory sets back implementation by 3 years to reflect the lead in time for development east of Cullompton as a result of highway infrastructure dependence. Subsequent to publication of the Modification version of the Plan the government has proposed that land east of Cullompton could form a Garden Village. The Garden Village expression of interest identifies opportunities for earlier build out. A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency taking into account results from a comprehensive flood modelling exercise. The Council is working to bring forward the scheme at the earliest opportunity. The transport work to date sets the basis for planning application submission.
	Concerned about impacts on A373, flooding, loss of agricultural land, NHS capacity, school, security, sewerage and lack of public transport.	Individual(4688, 5626,5783,6267)	The overall numbers within the plan period have been reduced for the development east of Cullompton and as such this is a change to the plan, the issues raised are issues that have also been made in the 2015 consultation and have been responded to previously.
	The supporting text to CU7 should include reference to the garden village and the figures in the plan updated accordingly.	Lightwood Land c/o Pegasus Group(6686)	The Garden Village announcement was made after the plan was published and is considered to positively aid the delivery of the east Cullompton allocation. The Council is working with the promoters and the HCA to explore opportunities that this may present to accelerate its infrastructure requirements and its delivery. It is not agreed that the figures should be changed as it is too early to understand the extent to which accelerated growth could occur on the site.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU7(mod)	The level of development anticipated within the plan period should read 'at least'.	Lightwood Land c/o Pegasus Group(6686), Progress Land Ltd c/o Jillings Heynes Planning Ltd (6758)	The figure of 1,750 within the plan period does not preclude more development occurring on the site during the plan period. The Council will consider earlier delivery at an increased rate as part of an early review of the plan following work on the Greater Exeter Strategic Plan and as a greater understanding of the planning potential of Garden Village status takes shape.
	The level of development anticipated within the plan period should be at least 2,100.	Messrs Furness, Cann & Family C/O Iain Bath Planning(4216)	The figure of 1,750 within the plan period does not preclude more development occurring on the site during the plan period. The Council will consider earlier delivery at an increased rate as part of an early review of the plan following work on the Greater Exeter Strategic Plan and as a greater understanding of the planning potential of Garden Village status takes shape.
	Unclear as to why the number of units to be delivered over the Plan period has been reduced.	Progress Land Ltd c/o Jillings Heynes Planning Ltd (6758)	The start date for delivery of the allocation has been reassessed to take account of the likely lead in time for the delivery of infrastructure requirements such as M5 junction improvements. The Council will consider earlier delivery at an increased rate as part of an early review of the plan following work on the Greater Exeter Strategic Plan and as a greater understanding of the planning potential of Garden Village status takes shape
	Concerned about flooding, infrastructure, highways access, and lack of jobs.	Individual (6707, 6708, 5561)	Although the overall numbers have been reduced for the development east of Cullompton and as such this is a change to the plan, the issues raised are issues that have also been made in the 2015 consultation and have been responded to previously.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU7(mod)	A number of points have been raised with regard to impacts arising due to the scale of development proposed east of Cullompton. These issues include loss of agricultural land, hedgerows, increase in traffic, heritage, biodiversity, not to a scale appropriate to Cullompton's character, topography,	CPRE Devon(6714)	Although the overall numbers have been reduced for the development east of Cullompton and as such this is a change to the plan, the issues raised are issues that have also been made in the 2015 consultation and have been responded to previously. There also appears to be confusion with regard to the scale of the proposed garden village much of which would be beyond the plan period.
CU7(mod)/ Para 3.98	The modification to paragraph 3.98 should be more positively worded.	Lightwood Land c/o Pegasus Group(6686)	Comments noted, however a change is not deemed necessary. A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency taking into account results from a comprehensive flood modelling exercise. The Council is working to bring forward the scheme at the earliest opportunity. The transport work to date sets the basis for planning application submission.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU7(mod)/ Para 3.98	The EA has worked very closely with MDDC, DCC and their consultants. This work will identify whether an acceptable design solution for the Cullompton Relief Rd, new motorway junction and overbridge can be delivered which will not increase flood risk. Key to this process is the production of a hydraulic model which represents current conditions this will be able to assess the impact of various highway layouts and proposed schemes to provide the required highway improvements. Significant progress has been made following extensive flood modelling work and the EA anticipate that agreement, in principle, of the highway improvements can be achieved by submission.	Environment Agency (6734)	Comments welcomed.
CU8(mod)	Various comments on providing greater detail and provision of provided safe routes for pedestrian and cyclist	Individual (3622)	The precise nature of pedestrian and cycle provision will be informed by detailed masterplanning. The emerging M5 junction improvement scheme will also accommodate segregated pedestrian and cycle movements.
CU9(mod)	The effect of tree planting at mitigating emissions from new housing is negligible as a means of carbon storage unless many hectares of land are turned over to new woodland	Devon County Council (139)	Comments noted. The development will be required to consider carbon reduction and air quality improvements (policy CU11). In order to provide greater clarity over the extent of carbon reduction, it is proposed to delete reference to the role of landscaping and tree planting in carbon reduction (paragraph 3.81)

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU9(mod)/3.017	Agree trees absorb carbon dioxide but there is a danger of misinterpretation that local tree planting can mitigate CO2 emissions from new development. 0.7ha of tree planting would be required to mitigate the additional CO2 from a single dwelling. Suggest removal of words 'and carbon reduction' as the likely scale of tree planting will not provide material carbon reduction as implied.	Tony Norton (6260)	Comments noted. In order to provide greater clarity over the extent of carbon reduction, it is proposed to delete reference to the role of landscaping and tree planting in carbon reduction (paragraph 3.81)
CU9(mod)	The word 'significance' should be added to criterion h in connection to setting of listed buildings.	Lightwood Land c/o Pegasus Group(6686)	Comments noted, however it is not considered that a further change is necessary.
CU10(mod)	A change to criterion a sought to allow for two school provision.	Lightwood Land c/o Pegasus Group (6686)	This is not considered necessary as the site area in criterion a should be sufficient to allow for this flexibility.
CU10(mod)/Para 3.111	Policy states health care provision could be accommodated. With increase population and existing pressure on facilities, new facilities are necessary.	Individual (6275)	Policy allows flexibility for further consultation with health care providers over provision required.
CU11(mod)	Welcome additional wording requiring tree planting off site only when it cannot be accommodated on site.	Woodland Trust (6207)	Support noted.
CU11(mod)	All tree planting in line with CU11 should be on-site and never off-site.	(4201)	The change suggested to the plan increases the emphasis on on-site provision than was in the previous version of the plan. Policy CU9 underlines the importance of environmental protection and green infrastructure.
CU12(mod)	The change from 'in broad step' to 'broadly in step' does not change the meaning but lacks definition. Greater flexibilities sought with respect to when affordable housing provided.	Lightwood Land c/o Pegasus Group (6686)	Comments noted. A change is not deemed necessary to the plan. Any variations would need to be the subject of more detailed justification demonstrated at masterplanning and application stages.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU12(mod)	East Cullompton should benefit from M5 J27 2015 signalisation capacity.	Lightwood Land c/o Pegasus Group (6686)	DCC has made it clear that any additional capacity arising from the 2015 signalisation has already been utilised in connection with other development and is not available for the proposed allocation.
CU12(mod)/Para 3.116 - 3.117	Concerns raised regarding a potential funding gap for transport infrastructure and whether development is dependent on this funding being secured.	Individual (3622; 5648; 6690)	The strategic allocation is dependent on a comprehensive solution to transport issues. It has always been recognised by the Council that the scheme is likely to require both private and public infrastructure funding. Should a greater level of development east of Cullompton come forward beyond the plan period as part of the Garden Village proposal, this will increase the amount of developer contribution as well as enhancing the case to lever in public funding.
CU12(mod)	Modifications to policy recognise that employment and housing allocations at Cullompton rely up provision of significant highway improvements to J28 and M5. Additional requirements secure required infrastructure improvements prior to occupation of employment uses.	Friends Life Ltd C/O GL Hearn (3781)	Comments noted

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU13 Knowle Lane (mod)	Argues that housing allocations CU13-CU16 are all constrained by the same requirements for no further development to take place until significant improvements on J28 have been implemented. The Plan is not sound as growth is predicated on infrastructure directed at one settlement, the amount of which and the timing of which are unknown.	Persimmon Homes South West (6121)	As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
	Significant progress has been made following extensive flood modelling work and at the time of writing, the Environment Agency anticipate that agreement, in principle, of the highway improvements can be achieved.	Environment Agency (6734)	Comment noted.
	Support allocation but concern that full potential of site has not been recognised. Suggests a larger site area to include land to the south of Knowle Lane.	Land Value Alliances c/o Ian Jewson Planning Ltd (6740)	The amendment to the policy was following the update to the planning permission granted for 266 dwellings on site.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU14 Ware Park and Footlands (mod)	Argues that housing allocations CU13-CU16 are all constrained by the same requirements for no further development to take place until significant improvements on J28 have been implemented. The Plan is not sound as growth is predicated on infrastructure directed at one settlement, the amount of which and the timing of which are unknown.	Persimmon Homes South West (6121)	As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
	This is an example where delivery is reliant upon M5 access improvements and where there is insufficient evidence to demonstrate how and if the M5 works will be delivered within the plan period.	Gallagher Estates Ltd c/o Turley (5763)	As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
	Significant progress has been made following extensive flood modelling work and at the time of writing, the Environment Agency anticipate that agreement, in principle, of the highway improvements can be achieved.	Environment Agency (6734)	Comment noted.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU15 Land at Exeter Road (mod)	Argues that housing allocations CU13-CU16 are all constrained by the same requirements for no further development to take place until significant improvements on J28 have been implemented. The Plan is not sound as growth is predicated on infrastructure directed at one settlement, the amount of which and the timing of which are unknown.	Persimmon Homes South West (6121)	As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
CU16 Cummings Nursery (mod)	Argues that housing allocations CU13-CU16 are all constrained by the same requirements for no further development to take place until significant improvements on J28 have been implemented. The Plan is not sound as growth is predicated on infrastructure directed at one settlement, the amount of which and the timing of which are unknown.	Persimmon Homes South West (6121)	As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
	Significant progress has been made following extensive flood modelling work and at the time of writing, the Environment Agency anticipate that agreement, in principle, of the highway improvements can be achieved.	Environment Agency (6734)	Comment noted.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CU17 Week Farm (mod)	Significant progress has been made following extensive flood modelling work and at the time of writing, the Environment Agency anticipate that agreement, in principle, of the highway improvements can be achieved.	Environment Agency (6734)	Comment noted
	Suggests that a policy mechanism is put in place to monitor the delivery of employment allocations and if required, to bring forward contingency sites. Representation makes specific reference to CU7-CU12 East Cullompton, CU17 Week Farm and CU18 Venn Farm with regard to the modification requirement of highway improvements to J28 of the M5 motorway.	Friends life Ltd c/o GL Hearn (3781)	A policy mechanism similar to that of S4 for employment allocations is not considered necessary given that the Local Plan Review includes a range of supportive and flexible policies for the provision of employment development and other opportunities exist within the wider planning system as a result of permitted development right changes. As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
CU18 Venn Farm (mod)	Significant progress has been made following extensive flood modelling work and at the time of writing, the Environment Agency anticipate that agreement, in principle, of the highway improvements can be achieved.	Environment Agency (6734)	Comment noted.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU18 Venn Farm (mod)	Suggests that a policy mechanism is put in place to monitor the delivery of employment allocations and if required, to bring forward contingency sites. Representation makes specific reference to CU7-CU12 East Cullompton, CU17 Week Farm and CU18 Venn Farm with regard to the modification requirement of highway improvements to J28 of the M5 motorway.	Friends life Ltd c/o GL Hearn (3781)	A policy mechanism similar to that of S4 for employment allocations is not considered necessary given that the Local Plan Review includes a range of supportive and flexible policies for the provision of employment development and other opportunities exist within the wider planning system as a result of permitted development right changes. As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
CU19(mod)	Supports a town centre relief road.	Individual(5211)	Support noted.
	Supports acknowledgement of implications of M5 closures.	Individual(5211)	Support noted.
	We would advise adding the following text 'Any loss of floodplain at this location should be mitigated by the creation of additional/compensatory floodplain which should secure wider environmental and sustainability benefits including the provision of appropriate ecological and biodiversity enhancements'.	Environment Agency (6734)	Mid Devon District Council is amenable to adding this text to 3.143a and has included this as a potential further minor modification.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU19(mod)	Risk of new road through Cullompton Conservation Area. Woodland Trust would like to be consulted on potential impacts for woods and trees.	Woodland Trust(6207)	Comments noted.
	Infrastructure scheme has three major obstacles: funding and delivery, flood plain constraints, land availability.	Individual(5561)	The strategic allocation is dependent on a comprehensive solution to transport issues. It has always been recognised by the Council that the scheme is likely to require both private and public infrastructure funding. Should a greater level of development east of Cullompton come forward beyond the plan period as part of the Garden Village proposal, this will increase the amount of developer contribution as well as enhancing the case to lever in public funding. Comments noted, however a change is not deemed necessary. A major junction 28 M5 improvement and town centre relief road scheme has been drawn up in conjunction with the Highway Authority and Environment Agency taking into account results from a comprehensive flood modelling exercise. The Council is working to bring forward the scheme at the earliest opportunity. The transport work to date sets the basis for planning application submission.
CU20(mod)	Fail to tackle likely problems on A373.	Individual(5628)	The issues raised are issues that have also been made in the 2015 consultation and have been responded to previously.
	Supports CU20 with respect to safeguarding land at Meadow Lane for the expansion of the community college, but wish to see a land swap.	Individual(5211)	Support noted. The respondent is in discussions with the Council with regard to this matter.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CU20(m) (mod)	The EA has worked very closely with MDDC, DCC and their consultants. This work will identify whether an acceptable design solution for the Cullompton Relief Rd, new motorway junction and overbridge can be delivered which will not increase flood risk. Key to this process is the production of a hydraulic model which represents current conditions this will be able to assess the impact of various highway layouts and proposed schemes to provide the required highway improvements. Significant progress has been made following extensive flood modelling work and the EA anticipate that agreement, in principle, of the highway improvements can be achieved by submission.	Environment Agency (6734)	Comments welcomed.
CU21 Land at Colebrook (CONTINGENCY SITE) (mod)	Suggestion include in criterion b) as for NW Cullompton and East Cullompton, J28 mitigation clause.	Devon County Council (139)	The mitigation is referenced in the supporting text, agreed that an amendment to the policy is made to reflect this.

<b>Cullompton : Non Modification Comments</b>		
The following comments were made with respect to elements of the plan which have been unchanged since the 2015 Consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the response to the 2015 Consultation.		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
CU1	Employment: no plans to stimulate employment opportunities; people living in development will commute out of area	CPRE (6212); individual (5486; 5487)
	Alternative sites: development should be spread across Mid Devon	Individual (5486; 5487)

CU2	Highways: development should include more straightforward access to Willand Road at the far roundabout north of Cullompton.	Individual (4201)
	Highways: proposal for swimming pool in NWC requires road wide enough for large vehicles accessing this facility	Individual (5211)
	Highways: concern regarding Kingfisher Reach and link to NWC; do not wish to see NWC Road develop in same way as Kingfisher Reach.	Individual (5211)
	Highways: traffic impact and associated safety issues on Tiverton Road/roads into NWC development	Individual (5486; 5487)
	Highways: no evidence that Tiverton Road – Willand Road link will relieve town centre traffic congestion.	Individual (3622)
CU2/CU6	Highways: concern regarding phasing - will road infrastructure be improved before NWC development begins? Will development go ahead even if funding not secured? (Relief road, J28a etc.)	St Andrews Church (5070); individual (5211; 3622)
	Highways: potential for further development in NWC – relief road will have to cope with more traffic than is presently modelled.	Individual (5211)
CU2	Pedestrian/cycle infrastructure: need for clear safe and separate pedestrian routes into the town centre.	Individual (5211)
	Pedestrian/cycle infrastructure: need for footway linking primary school to proposed swimming pool	Individual (5211)
	Pedestrian/cycle infrastructure: re-routing of PROW footpath via community orchard as requested by Cullompton Town Council	Individual (5211)
CU2/CU6	Bus services: contributions to routes serving NWC; how long term and how sustainable once they end?	Individual (3622)
CU3	Water/drainage/sewerage: present water supply would be insufficient	Individual (5753)
	Water/drainage/sewerage: current disposal system at Tiverton is overloaded.	Individual (5753)
CU3/CU6	Water/drainage/sewerage: Culm Lea sewage pump station and Culm Lea sewage works would require upgrade before NWC development.	St Andrews Church (5070); individual (6288)
CU3	Flooding: building on land liable to flooding	CPRE (6212); Growen Estates c/o Rocke Associates Ltd (5748); individual (5486; 5487)
	Environmental impact: development on prime agricultural land	CPRE (6212); individual (5486; 5487)

CU3	Environmental impact: much of land allocated for development too steep for residential.	Growen Estates c/o Rocke Associates Ltd (5748); individual (6782)
	Environmental impact: disruptive and destructive to wildlife	Individual (5486; 5487)
	Environmental impact: risk to ancient hedgerows and small woodlands	CPRE (6212)
CU3/CU5	Green Infrastructure/sustainability: arrangement and distribution of land use for NWC not sustainable (as laid out in proposals map). Using part of GI allocation for residential could create a more compact/integrated/accessible development.	Growen Estates c/o Rocke Associates Ltd (5748); individual (6782)
CU4	Retail: potential for some medium sized retail outlet in NWC development.	Individual (5211)
	Recreational facilities: NWC development requires additional recreational areas, enhanced through planting.	Individual (5211)
CU4/CU6	Education provision: no plans for additional school facilities	Individual (5486; 5487)
	Health care provision: no plans for additional facilities; new hospital required (RD&E at full capacity)	Individual (5486; 5487; 5753)
CU4	Health care provision: questions viability of residential care facility in both NWC and EC development proposals.	Individual (5621)
	Policing: doubling population	Individual (5486; 5487)
	Lack of safeguarded land for local centre and associated facilities	Growen Estates c/o Rocke Associates Ltd (5748)
CU5	Sustainability: creation of separate townships/dormitory settlement either side of M5; unsustainable in own right, no benefit to town.	CPRE (6212); individual (6351)
	Sustainability: development encourages car use; additional traffic on M5 and increased air pollution.	CPRE (6212)
	Sustainability: climate change impact of building additional road network around Cullompton.	Individual (6677)
	Carbon Reduction: A guideline amount of energy use from renewable and low carbon energy should be identified based on best practice (CU2 only mentions 'a proportion')	Individual (3622)
CU7	Supports allocation	Cullompton Town Council (0090); Messrs Furness; Cann & Family C/O Iain Bath Planning (4216); Lightwood Land c/o Pegasus Group(6686) Individual (5211)

CU7	Supports allocation subject to concerns being addressed	Individual (6283)
	Alternative sites: required number of dwellings in Mid Devon could be met elsewhere (e.g. Tiverton/Crediton) without the need for the proposed East Cullompton development.	Kach Developments c/o PCL Planning Ltd (6739)
	Oppose (general): no need for a new settlement	Dial Holdings Ltd c/o PCL Planning (2315); Waddeton Park Ltd C/O PCL Planning (4675)
	Scale: concerns regarding the scale of the proposed development.	Individual (6707; 2979; 3329; 4641; 5561; 5621; 6369; 6383; 6672; 6705; 6733)
CU7/CU12	Phasing: up to 500 houses should be allowed without a Masterplan.	Lightwood Land c/o Pegasus Group (6686)
	Phasing/infrastructure (general): infrastructure for East Cullompton needs to be put in place before housing construction commences. Lack of guarantee on funding/delivery.	Kentisbeare Parish Council (0076); Individual (5211); Cullompton Town Council (0090); individual (5628; 5631; 6335; 6344; 6383; 6426; 6672; 6693; 6709; 6711; 6712; 6733)
CU7	Concern over impact on business	Upton Lakes and Lodges Ltd (5997); individual (4496)
	Insufficient local employment opportunities; promotes commuting out of town.	Cullompton Town Council (0090); CPRE Devon (6212); individual (5561; 5211; 5621; 5807; 6274; 6283; 6335; 6344; 6369; 6383; 6672; 6733; 6764)
	East Cullompton development would create a separate unsustainable settlement/dormitory town.	CPRE Devon (6212); individual (6369; 6369; 6370)
	Won't help regeneration of Cullompton town centre.	Individual (6370)
	Concern regarding impact of development on value of property	Individual (5760)
	Impact on future economic growth if traffic issues not addressed	Individual (6764)
	Question ability of affordable housing element (80 % market value) to meet local need.	Individual (6272)
	Oppose allocation at East Cullompton; question deliverability of housing output required.	Persimmon Homes South West (6121)
CU7/CU8	No detail or justification in plan for developer led contributions to J28	Persimmon Homes South West (6121)
CU7	Request property and land at 1 Newlands Cottage be included with East Cullompton allocation.	Individual (5760)
	Criterion (c) has not been updated to take account of other proposed changes to the pre-submission Plan that now incorporate custom build within the self-build category.	Lightwood Land c/o Pegasus Group (6686)

CU7	Lack of consultation/communication on East Cullompton proposal.	Individual (6426)
CU7 (MAP)	Cullompton settlement limit on policies map appears to cut across properties. Gardens and part of neighbouring property are shown outside of settlement area. Please rectify to show all land associated with properties inside settlement limit.	Individual (6292)
CU8	Traffic data not the most up to date	Individual (4496)
	Concerns regarding increased traffic implications.	Kentisbeare Parish Council (0076); St Andrews Church c/o Mr Andrew Southall (5070); Upton Lakes and Lodges Ltd (5997); individual (2979; 4016; 4496; 4641; 5561; 5621; 5753; 5790; 5807; 6272; 6274; 6283; 6335; 6344; 6350; 6369; 6383; 6426; 6711; 6711; 6712; 6731; 6733; 6745; 6764)
	Concerns regarding increased traffic on M5	Individual (6159; 6350; 6383; 6733; 6745; 6764)
	Concerns regarding increased traffic on A373	Individual (3329; 3559; 4641; 5561; 5628; 6274; 6283; 6335; 6350; 6369; 6370; 6383; 6705; 6709; 6711; 6712; 6764; 6767)
	Concern regarding increased traffic on minor roads south of Cullompton. Increased demand due to development of Exeter Airport Science Park and potential J28a.	Individual (6369)
CU8/CU12	Lack of information regarding detailed highways improvements. Need for improvements before development starts.	Kentisbeare Parish Council (0076); individual (3329; 4530; 5621; 6159; 6335; 6369; 6370; 6426; 6429; 6731; 6745; 6764)
	No development until eastern relief road and J28 improvements implemented	Individual (6159; 6350)
	HGVs and other vehicles accessing industrial estate should be diverted away from residential area	Individual (6711; 6712)
CU8	The local plan should support improving footpaths to enable them to be wheelchair accessible.	Cullompton Town Council (0090); individual (5211)
CU8/CU12	Lack of safe pedestrian/cycle infrastructure to link with Cullompton town centre and other facilities on western side of M5. Need for improvements before development starts.	Kentisbeare Parish Council (0076); individual (6344; 6275; 6745)
CU8	Lack of public transport provision	Individual (6672)
	Railway station re-opening should be pre-requisite	Individual (6159; 6672)
	Questions delivery of the railway station.	Individual (5621; 5628; 6344)

CU9	Insufficient information regarding SUDS.	Upton Lakes and Lodges Ltd (5997); individual (4496; 5750; 6340; 6344)
	Approach to SUDS in public open space inconsistent.	Lightwood Land c/o Pegasus Group (6686)
	Impact of loss of fields on flood risk	Individual (6731)
	Concerns regarding flooding	Kentisbeare Parish Council (0076); St Andrews Church c/o Mr Andrew Southall (5070); Upton Lakes and Lodges Ltd (5997); CPRE Devon (6212); individual (2979; 3559; 4496; 4530; 5561; 5750; 5790; 5807; 6272; 6283; 6340; 6344; 6350; 6369; 6370; 6383; 6426; 6429; 6693; 6705; 6731; 6733; 6745; 6764; 6767)
	Flood data not the most up to date/ SFRA not updated.	Kentisbeare Parish Council (0076); Upton Lakes and Lodges Ltd (5997); individual (4496; 5561; 5631; 5750; 5790; 5807; 6283; 6335; 6340; 6344; 6369; 6383; 6429)
	Concern regarding flooding and drainage in area around Upton Lakes.	Upton Lakes and Lodges Ltd (5997)
	Concern regarding impact of highways proposals for J28/Cullompton relief road (CU8) on flood plain.	Upton Lakes and Lodges Ltd (5997); individual (6369)
	Additional pressure on sewerage.	Kentisbeare Parish Council (0076); Individual (3329;3559; 4496; 4530; 5561; 5753; 5760; 5790; 6272; 6283; 6340; 6344; 6369; 6400; 6426; 6429; 6745)
	Additional pressure on water supply.	Upton Lakes and Lodges Ltd (5997); individual (3329; 4496; 5753; 6400)
	Protection and mitigation for impact on character, loss of enjoyment and amenity for visitors to local tourist accommodation at Upton Lakes.	Upton Lakes and Lodges Ltd (5997); individual (4496)
	Impact on character and appeal of Willand as a separate village	Individual (6283)
	Impact on character of Cullompton	Individual (6745)
	Concern about landscape implications/ character of local area	Individual (5561; 6383; 6731)
	Loss of agricultural land.	CPRE Devon (6212); individual (5561;5621; 5753; 5790; 5807; 6283; 6335; 6344; 6383; 6400; 6426; 6693; 6731; 6733)
	Recognise that East of Cullompton proposals attempt to make use of poorer quality agricultural land	CPRE Devon (6212)
	Focus should be on brownfield site development	Individual (6400; 6426; 6693; 6731)
Consideration should be given to wildlife and biodiversity issues in area around Upton Lakes.		

CU9	Risk to ancient hedgerows and small woodlands/wildlife impact	CPRE Devon (6212); individual (5760; 6344; 6426)
	Ecological Study needed.	Individual (5561; 4496)
	Great Crested Newt impact assessment should be undertaken.	Upton Lakes and Lodges Ltd (5997); individual (4496)
	Continue to support the inclusion of reference to consideration of impact on the AONB in relation to this major development. We reiterate that as well as visual impact other issues such as lighting/light pollution will need to be considered.	Blackdown Hills AONB Partnership (1195)
	Request provision of green infrastructure around properties at Newland Cottages	Individual (5760)
	Objects that all green infrastructure will be provided within the site boundary.	Lightwood Land c/o Pegasus Group(6686)
CU10	Additional pressure on surgeries. Need for increased health care provision	Individual (3329; 4641; 5561; 6274; 6283; 6340; 6344; 6350; 6733)
	Additional pressure on hospitals.	Individual (4530; 5561; 5753; 6274; 6426; 6733)
	Concerns regarding increase in crime/ pressure on police.	Individual (4530; 2979; 6369; 6283)
	Provide new refuse treatment/incineration facility that meets current air pollution standards.	Individual (6283)
	New community facilities should be flexible enough to allow for 'acts of worship'.	St Andrews Church c/o Mr Andrew Southall (5070); individual (6359)
	Additional pressure on schools/existing schools at capacity.	Individual (3329; 4641; 5561; 6274; 6283; 6344; 6350; 6745)
	New Secondary School needed as part of Garden Village.	Cullompton Town Council (0090); individual (5211)
	Questions need and viability for new residential care or nursing homes.	Individual (5621)
	There is a need for more bungalows and retirement complexes.	Cullompton Town Council (0090); individual (5211)
Concerns regarding impact on overhead powerlines.	Individual (4016)	
CU10/12	Community facilities/sports pitches in place before housing construction commences	Kentisbeare Parish Council (0076);
CU11	Increased air pollution; health impacts	Individual (6274; 6709; 6712; 6733)
CU14 Ware Park and Footlands	Suggests should be contingency and Colebrook a baseline allocation.	Mr Force & Mr Christian c/o Genesis Town Planning (3780)
CU15 Land at Exeter Road	Suggests should be contingency and Colebrook a baseline allocation.	Mr Force & Mr Christian c/o Genesis Town Planning (3780)

CU17 Week Farm	Part ownership of client and support the identification of development within the plan for employment development.	Messrs Furness, Cann & Family c/o Iain Bath Planning (4216)
	Suggestion to include allocation within the wide CU7-CU12 allocation to benefit from the overall Masterplan approach.	Messrs Furness, Cann & Family c/o Iain Bath Planning (4216)
	Support the flexibility of the supporting text which enables the consideration of proposals for alternative employment-generating uses on their merits.	Messrs Furness, Cann & Family c/o Iain Bath Planning (4216)
CU19	Support principle of Town Centre Relief Road (TCRR)	Cullompton Town Council (0090); Messrs Furness, Cann & Family C/O Iain Bath Planning (4216); individual (4201; 6765)
	Suggest eastern relief road has 40 mph speed limit in line with Willand Road.	Individual (4201)
	Local plan should show mitigation of impacts of relief road on CCA fields and sports/recreational amenities located within this area.	Individual (3052; 5211)
	The local plan does not set out the method of relocating the cricket club, football club, bowls and other clubs affected by the relief road through the CCA fields to alternative land.	Individual (5211)
	Any loss of the recreational and amenity land from CCA fields could be compensated for by having an equivalent area of land for public recreation on the eastern side of M5.	Individual (4201)
	Impact of TCRR on flood plain. No mention of how this will be managed.	Individual (5561; 5621; 6277; 6288; 6344; 6409; 6707)
	Concern regarding impact on CCA fields	Cullompton Town Council (0090); individual (5561; 6707)
	Concern that £55m estimated cost of TCRR is too low	Individual (5561)
	Further analysis and detailed plan for TCRR needed before any further development in Cullompton goes ahead.	Individual (6159; 6429)
	No detailed plans/firm commitment to TCRR.	Individual (5561; 6344; 6370; 6707)
	Duke Street & Old Hill should be included in the Local plan to provide an improved pedestrian route, particularly to the secondary school.	Individual (5211)
	Importance of TCRR due to impact on Cullompton High Street of M5 closures.	Individual (5211)

CU20	Commitment to provision of community facilities/infrastructure, relief road and other transport infrastructure before commencement of development.	Kentisbeare Parish Council (0076)
	Reopened Cullompton station should have parking provided.	Broadhembury Parish Council (1483)
	Concern regarding funding for Cullompton infrastructure	Individual (3622)
	Concern regarding lack of existing infrastructure to support proposed developments in Cullompton (J28, flood prevention, health care etc.)	Individual (4641; 5634; 5808; 5811; 6277; 6288; 6344; 6350; 6747)
CU21 Land at Colebrook (CONTINGENCY SITE)	Site should be considered as a baseline allocation.	Mr Force & Mr Christian c/o Genesis Town Planning (3780); Waddeton Park Ltd c/o PCL Planning (4675); Kach Development c/o PCL Planning Ltd (6739)
	Suggest a larger site with greater quantum of development.	Mr Force & Mr Christian c/o Genesis Town Planning (3780)
	Suggests capacity of 300 dwellings or more.	Waddeton Park Ltd c/o PCL Planning (4675); Kach Development c/o PCL Planning Ltd (6739)
OCU2	Alternative sites. Support principle of NWC expansion; however allocation of Growen Farm site for development would help NWC proposal in following ways: meet need for more housing, low visual impact, deliverable well-drained site, allow re-distribution of layout to create more compact and sustainable development.	Growen Estates c/o Roche Associates Ltd (5748); individual (6782)

## Garden Village

<b>Non Modification Comments</b>
The following representations made comments following the success of Mid Devon District Council's expression of interest for a Culm garden village. The first phase of the garden village is proposed to be on land allocated in the Local Plan Review East of Cullompton which was included in the Local Plan Review Proposed Submission (2015) document. No modifications have been proposed in the Local Plan Review Proposed Submission (2017) (incorporating proposed modifications) document as a result of the Garden Village announcement.
<b>Comments made by (customer ID in brackets)</b>
Kentisbeare Parish Council (76); Cullompton Town Council (90); Devon County Council (139); St Andrews Church (5070); Persimmons Homes South West (6121); CPRE Mid Devon (6212); Lightwood Land, East of Cullompton Promoter c/o Pegasus Group (6686); Exeter Diocesan Board of Finance c/o Diocese of Exeter (6692); Tanner and Tilley Development Consultants (6754); Individual (2979; 3232; 3329; 3622; 3788; 4193; 4201; 4284; 4298; 4641; 4688; 4832; 5211; 5365; 5561; 5621; 5634; 5635; 5648; 6159; 6256; 6257; 6259; 6261; 6267; 6271; 6274; 6283; 6335; 6343; 6344; 6351; 6359; 6369; 6370; 6393; 6398; 6400; 6414; 6426; 6672; 6681; 6690; 6693; 6705; 6707; 6709; 6714; 6724; 6731; 6747; 6764; 6403)

## Crediton

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CRE1(mod)	Mentions different routes which can be used to service Wellparks	Crediton Transport Group (2803)	Policy includes a criterion which sets out CRE1 improved pedestrian and cycle access to the town centre and facilities to the south of the A377.
CRE2(mod)	Refers to path proposed along Exhibition Road to serve residents at Pedlerspool, Red Hill Cross and Cromwells. Doesn't agree it is the correct path	Crediton Transport Group (2803)	The policy has been amended to enable greater flexibility in providing improved access to the town centre for pedestrians and cyclists.
	Queries the amendment in criterion c) of this policy.	Crediton Town Council (6225)	The policy has been amended to enable greater flexibility in providing improved access to the town centre for pedestrians and cyclists.
CRE5 (mod)	This allocation identifies a school site, with timings for the transfer to be negotiated. The County Council would consider it appropriate for the site to be offered at the reserved matters stage, which would enable the school to be delivered in line with development.	Devon County Council (139)	Comment is noted. Comment does not require a change to policy as it adds unnecessary detail.
	Refers to path proposed along Exhibition Road to serve residents at Pedlerspool, Red Hill Cross and Cromwells. Doesn't agree it is the correct path	Crediton Transport Group (2803)	The policy now includes a criterion for improved access to the town centre for pedestrians and cyclists. The criterion is flexible to allow for a comprehensive approach to pedestrian and cycle route improvements in relation to allocations CRE2 Red Hill Cross, CRE5 Pedlerspool and CRE6 Sports Fields.
	Support the removal of the requirement of extra care housing and in its place require 'a serviced site of 1.1 hectares for a new primary school' with the supporting text.	Gleeson Developments Ltd. c/o Vail Williams LLP (6685)	Support noted.

<b>Crediton: Non Modification Comments</b>		
The following comments were made with respect to elements of the plan which have been unchanged since the 2015 Consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the response to the 2015 Consultation.		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
CRE1 Wellparks	The evidence of recent planning permission for CRE1 in Crediton is contrary to "promoting low carbon or renewable energy".	Sustainable Crediton (647)
CRE2 Red Hill Cross, Exhibition Road	Object due to surface water run off into the River Creedy and flood plain.	Individual (6334)
CRE3 Cromwells Meadow	Object due to surface water run off into the River Creedy and flood plain.	Individual (6334)
	Representation notes that they are objecting to a modification however their reference is to the amendment of housing numbers of the site from 50 dwellings in the existing Local Plan to 35 dwellings in the Local Plan Review. This was not proposed as a modification as part of the 2017 Local Plan Review Proposed Submission (incorporating proposed modifications) consultation.	Persimmon Homes South West (6121)
CRE5 Pedlerspool, Exhibition Road	Object due to surface water run off into the River Creedy and flood plain.	Individual (6334)
	Suggests at least 326 dwellings. Object to requirement of 5 gypsy and traveller pitches. Also suggests greater area for Pedlerspool site.	Gleeson Developments Ltd. c/o Vail Williams LLP (6685)
CRE6 Sports fields, Exhibition Road	Agree with proposed deletion of the school campus site in CRE6 in order to facilitate the Rugby club's move to a more appropriate location. However we believe it is essential that a replacement site is identified within the Local Plan to allow the creation of a single site secondary school in the future.	Queen Elizabeth's School Crediton (6741)
CRE7 Stonewall Lane	Stonewall Lane is to be widened to allow for vehicles and to serve new housing area on the adjacent playing fields. Please ensure a pedestrian path.	Crediton Transport Group (2803)
CRE11 Crediton Infrastructure	Propose amendment to criterion i) to include reference to the elderly and a new community hub.	Crediton Town Team (5821)

OCRE10 Westwood Farm	Promotes land at Westwood Farm as being suitable for residential development.	C/O Amethyst Planning (6750)
OCRE11 Land at Chapel Down Farm	Promotes Land at Chapel Down Farm as being suitable for residential development.	LRM Planning Limited c/o Barratt David Wilson Homes (6229)
OCRENEW1 Land South of Landscore	Promotes new site, Land South of Landscore to be considered for residential development.	Growen Estates c/o Rocke Associates Ltd (5748).

## Land at Junction 27 (J27)

### Supporting representations

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
<b>Support</b>	Support the Local Plan Proposed Submission (incorporating proposed modifications) to include Land at J27 for Tourism, Leisure and Retail Development. Suggest modifications to the wording of the local plan and J27 policy provisions.	G L Hearn on behalf of Friend Life Ltd (3781);	Support noted. Modifications not accepted.
Evidence	Junction J27 now has sufficient evidence to support its inclusion in the Local Plan. Based on reports undertaken by site promoters to address previous objections and the findings of consultants acting for the Council, J27 allocation is now allocated in the Local Plan	(1365)	Support noted
	Support allocation at J27	Federation of small Businesses, Mid Devon Branch (1613); Individual (6340;)	Support noted
Jobs	Support. Will provide job opportunities. Access to big retail names and career paths.	(0437); Federation of small Businesses, Mid Devon Branch (1613);	Support noted
	Will bring opportunities for many of Mid Devon's small businesses	Federation of small Businesses, Mid Devon Branch (1613);	Support noted
	Support J27 allocation, Mid Devon at a disadvantage without a coast line. J27 allocation provides a fantastic opportunity. J27 has good transport links.	Individual (5663;)	Support noted

	Support the allocation at J27. Will bring greater prosperity and opportunity to the district. Plan sound and legally compliant.	Federation of small Businesses, Mid Devon Branch (1613); (Individual (0437); 2310; 3294; 4934; 5218; 5651; 5702; )	Support noted
	Will bring additional tourist spend to Mid Devon which currently has lowest number of day and overnight visitor compared to other areas in the county (source Visit England.)	Federation of small Businesses, Mid Devon Branch (1613); Individual (0437);	Support noted
	Mid Devon needs attraction that can compete with other venues in the South west. Well located at gateway to south west.	(0437); Federation of small Businesses, Mid Devon Branch (1613); Individual (5218)	Support noted
	I support the inclusion of Policy 27, 'Land at Junction 27 of the M5 Motorway' in the Local Plan Review consultation as I believe it will bring greater prosperity, employment and opportunity to the District, and as such I believe the Local Plan Review to be legally compliant and sound.	Individual (6263; 6299; 6436; 6437; 6438; 6439; 6440; 6441; 6442; 6443; 6444; 6445; 6446; 6447; 6448; 6449; 6450; 6451; 6452; 6453; 6454; 6455; 6456; 6457; 6459; 6460; 6461; 6462; 6463; 6464; 6465; 6466; 6467; 6468; 6469; 6470; 6471; 6472; 6473; 6474; 6475; 6476; 6477; 6478; 6479; 6480; 6481; 6482; 6483; 6484; 6485; 6486; 6487; 6488; 6489; 6490; 6491; 6492; 6493; 6494; 6495; 6496; 6497; 6498; 6499; 6500; 6501; 6502; 6503; 6504; 6505; 6506; 6507; 6508; 6509; 6510; 6511; 6512; 6513; 6514; 6515; 6516; 6517; 6518; 6519; 6520; 6521; 6522; 6523; 6524; 6525; 6526; 6527;	Comments noted

		6528; 6529; 6530; 6531; 6532; 6533; 6534; 6535; 6536; 6537; 6538; 6539; 6540; 6541; 6542; 6543; 6544; 6545; 6546; 6547; 6548; 6549; 6550; 6551; 6552; 6553; 6554; 6555; 6556; 6557; 6558; 6559; 6560; 6561; 6562; 6563; 6564; 6565; 6566; 6567; 6568; 6569; 6570; 6571; 6572; 6573; 6574; 6575; 6576; 6577; 6578; 6579; 6580; 6581; 6582; 6583; 6584; 6585; 6586; 6587; 6588; 6589; 6590; 6591; 6592; 6593; 6594; 6595; 6596; 6587; 6598; 6599; 6600; 6601; 6602; 6603; 6604; 6605; 6606; 6607; 6608; 6609; 6610; 6611; 6612; 6613; 6614; 6615; 6616; 6617; 6618; 6619; 6620; 6621; 6622; 6623; 6624; 6625; 6626; 6627; 6628; 6629; 6630; 6631; 6632; 6633; 6634; 6635; 6636; 6637; 6638; 6639; 6640; 6641; 6642; 6643; 6644; 6645; 6646; 6647; 6648; 6649; 6650; 6651; 6652; 6653; 6654; 6655; 6656; 6657; 6658; 6659; 6660; 6661; 6662; 6663; 6664; 6665; 6666; 6667; 6768; 6769; 6770; 6771; 6772; 6773; 6774; 6776)	
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	Support J27 allocation. Existing transport infrastructure nearby (M5, Tiverton Parkway) lends itself to this kind of development.	Individual (6658; 6699; 6737; 6777; 6784; 6785)	Comments noted
	Support J27 allocation. Existing service station/hotel complex sets some level of development precedence.	Individual (6658)	Comments noted
	Support J27 allocation. Existing infrastructure and solar panel developments; hard to argue area in unspoiled.	Individual (6785)	Comments noted
	Support J27 allocation. Create employment opportunities/benefit local economy. Important with growing regional population.	Individual (6295; 6279; 6304; 6305; 6306; 6307; 6311; 6312; 6314; 6315; 6316; 6318; 6324; 6332; 6333; 6365; 6416; 6658; 6699; 6737; 6744; 6752; 6777; 6779; 6785; 6789)	Comments noted
	Support J27 allocation. Employment opportunities for local people would reduce need to travel out of district for work.	Individual (6784; 6785)	Comments noted
	Support J27 allocation. Regional hub to attract investment; support growth in local centres/towns in district rather than detract from them.	Individual (6777)	Comments noted
	Support J27 allocation. Would provide a site with requisite scale and concentration of operators. Businesses constrained elsewhere in region by lack of suitable development and premises to accommodate business needs.	Individual (6777)	Comments noted
	Support J27 allocation. Bring together producers, farmers, rural businesses from region.	Individual (6699; 6777)	Comments noted

	Support J27 allocation. Help develop solutions to support sustainable farming. Links to University agricultural research.	Individual (6699; 6752)	Comments noted
	Support J27 allocation. Educational benefits. Engage schools, colleges and general public on issues of great public interest (rural economy, sustainable food production)	Individual (6091;6307; 6314; 6752)	Comments noted
	Support J27 allocation. Improve leisure and tourism offer in the Tiverton area. Benefits for tourists and locals.	Individual (6091; 6312; 6313; 6314; 6324; 6332; 6333; 6416; 6651; 6658; 6699; 6737; 6744; 6778; 6780; 6784)	Comments noted
	Support J27 allocation. Attract tourists travelling through Mid Devon on route to other destinations.	Individual (6281; 6316; 6319; 6324; 6651; 6658; 6699; 6737)	Comments noted
	Support J27 allocation. Responds positively to Mid-Devon's distinct characteristics. Create a destination that celebrates the area's agricultural heritage.	Individual (6279; 6281; 6307; 6699; 6752)	Comments noted
	Support J27 allocation. Stimulate pride in local farming and explain contribution of the agricultural sector to economy.	Individual (6699; 6752)	Comments noted
	Support J27 allocation. Opportunity for 'Gloucester services' type attraction	Individual (6319)	Comments noted
	Support surf wave proposal; benefits of learning and training in controlled environment.	Individual (6778; 6780; 6781)	Comments noted
	Support J27 allocation. General benefit to local area	Individual (6295; 6308; 6311; 6365; 6416)	Comments noted
	General expression of support for J27 allocation	Individual (6407; 6670; 6683)	Comments noted

	No objection to J27; long recognised as best location for viable development. Support need for housing near the employment hub	Mr G Cottrell & Family, Mr T Burns, Mrs Carol Pearce & Mrs Wendy Upham & Families c/o Harcourt Kerr (6790)	Comments noted
	Support J27 allocation provided it protects/enhances local environment	Individual (6305)	Comments noted
	Supports upgrading directly affected transport infrastructure, specifically pedestrian and cycle provision at J27 to access Tiverton Parkway from east of M5.	Individual (6252)	Comments noted
	Request that consideration is given to include Marshall Farm and the land adjacent to Marshal Farm in Local Plan for potential development at J27	Individual (6293)	Comments noted
	Support J27 but argue room for 'B-class' business operators; widens choice and opportunity. J27 will drive demand for complementary services. Policy should allow for 41000 sq. m of commercial floor space for B1/B2/B8 use classes to north of A38. Development would be viable and deliverable.	Blackmore & Wootton Families c/o Harcourt Kerr (6789)	Comments noted

## Land at Junction 27 (J27)

### Objecting Representations

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
<p><b>J27 – Plan Unsound</b></p>	<p>Plan unsound. Proposal not justified. Plan not positively prepared, not legally compliant, not consistent with National Policy. MDDC has stated plan is sound with or without the allocation. Suggest J27 is removed It's retention does not provide for a justified, positively prepared legally compliant plan, and its removal will not make the plan unsound.</p>	<p>Willand Parish Council (0044); Uffculme Parish Council (0054); Councillor Jenny Roach (0025); Councillor Bob Evans (3614); Jonathan Langh on behalf of Lowman Manufacturing Co.Ltd (4564); Roche Associates on behalf of Hermes (6269); Montagu Evans on behalf of The Crown Estate and TH Real Estate (6234); Petition (by Katy Danby)( 6435); Taunton Deane and West Somerset Councils (6728); Protect Devon (6759); Jillings Heynes Planning on behalf of Progress Land Ltd (6758); Roche Associates on behalf of</p>	<p>Mid Devon District Council consider the Submission Plan (incorporating proposed modifications) January 2017 to be sound. The Council had put forward as an option in January 2014, 96 hectares of land for commercial, leisure, retail and tourism development. When considering the Submission Plan following consultation on the options the Council were not satisfied at that time that there was sufficient evidence to justify an allocation of land at J27. The 2015 submission plan was published for consultation with no allocation at J27. Since that time promoters of the site have via representations provided additional evidence supporting the case for tourism, leisure and retail developments. The Council have also commissioned further studies particularly in respect of retail need and impact and the potential of any allocation to require additional housing provision. The Council requested a report be brought to them prior to the Local Plan being submitted to the Inspectorate to consider the representations received following consultation in 2015 and requested a report on what the implications would be for the local plan progress of allocating land at J27 having regard to the evidence available. The Council considered the evidence available in respect of J27 in September 2016. They resolved, confirmed by the Council meeting in December 2016 when considering all representations and proposed modifications, to publish a modified submission plan for consultation with land at J27 for tourism, leisure and retail development. The site at J27 was smaller than at the options consultation, (71 hectares rather than 96). A number of previously considered town centre uses had been removed from the proposed allocation, eg. cinema, conference venue, concert hall, as well as garden centre and storage and distribution development. The site included in the plan is allocated principally for tourism and leisure development with specific retail development in the form of an outlet shopping village. The site also includes roadside services but planning permission already exists on part of the site for that facility. The Modified Plan was published for consultation in January 2017. The Council considers the modified plan sound, positively prepared having taken account</p>

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		Hermes (6269) Exeter City Council (0141); 3486; North Devon District Council (3605); Individual (3713; 3754; 4134; 4165; 4251; 4298; 4331; 4362; 4373; 4446; 4662; 4683; 4833; 5007; 5190; 5221; 5317; 5318; 5348; 5365; 5391; 5824; 5825; 5921; 6273; 6287, 6290, 6291; 6296; 6303; 6325; 6329; 6354; 6357; 6366; 6371, 6377; 6379; 6397; 6401; 6408; 6409; 6417; 6432; 6671; 6676; 6687; 6696; 6697; 6703; 6706; CPRE Devon (6714); 6718; 6719; 6720; 6721; 6724; 6732; 6742; 6746; 6761; 6767;)	of available evidence, justified, in line with national policy and legally compliant. The Council accepts the plan was sound without the allocation of J27 in 2014 but in the light of evidence now available to the Council the plan is also sound with J27 allocation.
<b>Plan Strategy</b>	The strategy has not been modified so there is no opportunity to	Rocke Associates on behalf of Hermes (6269); Jillings Heynes	The Council's proposed allocation at Junction 27 utilises 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 site occupies a unique location for

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	comment on the revised strategy to include a major commercial development at J27. Proposals for J27 are in direct conflict with the spatial strategy of the submission draft plan. The major allocation represents 35% of commercial floor space provisions within the plan contrary to strategy in S2 and S2.	Planning on behalf of Progress Land Ltd (6758); Individual (6417; 6671; 6680; 6696; 6697; 6718; 6719;)	tourism development adjacent to junction of the M5 motorway/A361 North Devon Link Road and close to a main line Railway Station at Tiverton Parkway. The allocation is specifically aimed at tourism and leisure development serving a wider catchment than the local population. Policy S2 identifies that the J27 allocation meets a tourism / leisure need in a location which is suitable for its regional role.
<b>Plan Strategy</b>	J27 has been superimposed on sustainable development and development distribution strategies which is inconsistent. Since the provisions for J27 in effect represent a different spatial development strategy for the district they are tantamount to a different plan.	Rocke Associates on behalf of Hermes (6269); Jo Amor Tiverton (6688); Jillings Heynes Planning on behalf of Progress Land Ltd (6758); Individual (6327; 6408; 6417; 6671; 6680; 6696; 6697;)	The principle development strategy remains. The addition of the J27 site for tourism, leisure and retail development does not represent a different spatial strategy. All housing and employment allocations remain, principally focused on Cullompton, Tiverton and Crediton as the three main settlements. Paragraph 2.15 of the plan states “there is an excess of commercial land supply in the most suitable locations – Tiverton and Cullompton” and recognises that Crediton is more constrained. The Council have allocated an additional 29% of commercial floorspace at J27 in order to make provision for a high quality tourist and leisure focussed development in the M5 corridor in line with the recommendations of the tourist study. This single allocation does not in itself change development distribution strategy.
<b>Plan Retail Strategy</b>	J27 contrary to retail strategy of the proposed submission Mid Devon Local Plan Review and the NPPF.	Rocke Associates on behalf of Hermes (6269); Jo Amor Tiverton (6688);	The Mid Devon Local Plan makes limited provision for additional retail floorspace within the towns. That provision remains in the plan for Tiverton. J27 is in addition to that retail provision; the provision seeks to address the regional need for additional retail floor space by providing for a DOV adjacent to the M5 motorway. The evidence indicates the regional need can be accommodated at J27 without significantly impacting

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			on existing town centres. (See response on need below).
<b>Tourism Study</b>	The Tourism Study 2014 does not identify a major tourist attraction at J27 as an absolute requirement that is critical to the economic strategy for the district. The study identifies a number of options. Allocation not supported by the 2014 Tourism Study. Justification for the development of a major tourist attraction and retail facility is flawed. Tourism study prepared by Consultant`s acting for J27 site promoters.	Rocke Associates on behalf of Hermes (6269);, Jonathan Langh on behalf of Lowman Manufacturing Co.Ltd (4564); Campaign to Protect Rural England (6381); 6408; CPRE Devon (6714); Individual (6671; 6354; 6364;)	The tourism study identifies a number of options for improving tourism in the District the Mid Devon Tourism Study 2014. The proposed J27 allocation is consistent with: <ul style="list-style-type: none"> <li>• Strand 2: Developing the Accommodation Offer</li> <li>• Strand 5: Catching Passing Tourists / Major Tourist Facility</li> <li>• Strand 6: Fun for the Kids</li> </ul> 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 site occupies a unique location for tourism development adjacent to junction of the M5 motorway/A361 North Devon Link Road and close to a main line Railway Station at Tiverton Parkway.
<b>J27 – Allocation Process</b>	1. Nothing has changed since the Council voted not to include the allocation at the meeting in 2015 (2014) 2. MDDC should hold a meeting to consider and respond to representations on the modification, not submit straight to Inspector. 3. Presentation at Full Council meeting was	Councillor Jenny Roach (0025);	1. The issues at the earlier Cabinet (December 2014) meeting when considering Local Plan Review Options Consultation that led the Council to decide not to allocate the land have been addressed by additional evidence and studies since the December 2014 meeting. 2. It is normal to submit a Local Plan to the Planning Inspectorate following consultation on the submission document without reference to a further Council meeting, unless the Council is intending to make major modifications in the light of representations received, new evidence or changes in national policy. 3. A full Council meeting <a href="https://democracy.middevon.gov.uk/ieListDocuments.aspx?Cid=156&amp;Mid=720&amp;Ver=4">https://democracy.middevon.gov.uk/ieListDocuments.aspx?Cid=156&amp;Mid=720&amp;Ver=4</a> considered whether to allocate an area of land at J27 for tourism, leisure and retail development. Eden/Westwood have been promoting such an allocation but the Council

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	<p>biased in favour of promoter Eden Westwood (EW) proposal, EW map shown at meeting.</p> <p>4. Insufficient weight given to impact the development would have on existing towns.</p> <p>5. Little attention given to type of jobs and effect on existing retail outlets.</p> <p>6. Mid Devon has no Strategic Plan or economic vision for the district.</p> <p>7. Uses will be difficult to control.</p>		<p>were not considering any particular scheme, but whether to allocate land for tourism, leisure and retail use. The land allocation, if adopted, can be brought forward by any developer.</p> <p>4 /5. There have been 3 studies undertaken on behalf of Mid Devon District Council by Nathaniel Lichfield and Partners , <a href="#">Critique of Retail &amp; Leisure Statement July 2015</a>, <a href="#">Addendum to Critique of Retail &amp; Leisure Statement March 2016</a>, <a href="#">Additional Retail Response July 2016</a> examining in detail the impact development would have on existing towns. These studies conclude that the impact would not be significant. There will be a substantial number of jobs creating a range of opportunities in addition to retail.</p> <p>6. The Local Plan Review 2013 to 2033 provides the Strategic Planning document for the district, replacing the Core Strategy 2007 and the Allocations and Infrastructure DPD 2011. The Development Strategy and Strategic Policies are set out in Section 2.0 of the Plan pages 21 to 60.</p> <p>7. Controls are imposed successfully on other DOV`s the most recent being Scotch Corner, North Yorkshire, DL10 6NT, Appeal references APP/V2723/V/15/3132873, APP/V2723/V/16/3143678, granted by the Secretary of State on 1<sup>st</sup> December 2016</p>
<b>J27 Allocation process</b>	<p>The plan presented to be submitted is considered to be UNSOUND with the inclusion of the allocation of the land at Junction 27, because</p> <ol style="list-style-type: none"> <li>1. The decision is not the same as the decision reached in December 2014 (February</li> </ol>	<p>Willand Parish Council (0044); Councillor Bob Evans (3614); Jonathan Langh on behalf of Lowman Manufacturing Co.Ltd (4564); Amor Tiverton (6688); Uffculme Parish Council (0054); Individual 0643; 1588; 2804; 4193; 4201; 4251; 4284; 4331; 4407, 4446; 5007;</p>	<ol style="list-style-type: none"> <li>1. The decision is not the same as the decision made in 2014. Since the 2014 additional evidence has been provided in representation`s by site promoters and by research commissioned by the Council which has resulted in the issues of concern identified in 2014 being addressed. The Council are now satisfied there is sufficient evidence to justify the allocation proposed.</li> <li>2. The 2015 plan was considered sound at that time. The 2017 submission plan is also considered sound.</li> <li>3. Land put forward following the `call for sites` is often promoted by one landowner, or one developer, or groups of owners and developers or parish councils or other interested parties. What is considered is whether the Local Plan has been positively prepared based on a strategy which seeks to meet objectively assessed development</li> </ol>

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	<p>2015 Proposed submission Plan) not to include this land in the plan.</p> <p>2. The then published submission plan (February 2015) was considered sound by offices.</p> <p>3. Dialogue and representations have involved one developer.</p> <p>4. Question the process of the decision making</p>	<p>5011; 5266; 5317; 5318, 5346; 5365; 5660; 5824, 5858, 6262; 6291; 6354; 6377; 6397; 6408; 6414; 6417, 6671; Jo 6696; 6697; 6702; 6408; 6724</p>	<p>needs and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so, and consistent with achieving sustainable development. That the plan proposes an appropriate strategy, when considered against the reasonable alternatives, based on evidence; and the plan is deliverable over its period and based on effective joint working where required on strategic issues. (see duty to co-operate statement.)</p> <p>4. The process has involved full public consultation as required for the preparation of Local Plans</p>

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<b>J27 allocation process</b>	<p>Object to the inclusion of the J27 Tourism, Leisure and Retail allocation at J27 for the following reasons</p> <ol style="list-style-type: none"> <li>1. Plan process, introduction of a large and strategic allocation at such a late stage.</li> <li>2. Robustness of the evidence base for inclusion of J27.</li> <li>3. Failure of proposed policy J27 to reflect dynamic nature of retailing and how DOV's may change.</li> <li>4. Safeguards proposed to ensure DOV does not have a negative impact on the vitality and viability of</li> </ol>	<p>Montagu Evans on behalf of The Crown Estate and TH Real Estate (6234); Jo Amor Tiverton (6688); Rocke Associates on behalf of Hermes (6269); Uffculme Parish Council (0054); Individual (6262; 6371; 6417; 6671; 6696; 6697; 6724;)</p>	<p>The first consultation in the Local Plan Review process took place in January 2014. In that options consultation a site was included as an option at J27 for 200 hectares for mixed commercial and residential development, which included a designer outlet village, leisure, tourism and other uses. When considering the consultation responses and the evidence base when considering the 2015 submission the Council resolved to identify Cullompton East for its preferred strategic housing growth area and resolved at that time not to include the commercial allocation at J27 because at that time insufficient evidence was available to demonstrate, need, a robust sequential site analysis and the potential impact on other centres and other development plan commitments and proposals in the catchment area. The question of impact on housing need had also been inadequately addressed. The Submission Plan without land at J27 being included, was published for consultation February – April 2015. Representations were received in respect of the non-allocation of land at J27. Those representations were considered by the Council together with further studies carried out by consultants employed by the Council to consider the robustness of the evidence base submitted in the representations particularly in relation to retail development. Three consecutive studies were carried out by Nathaniel Lichfield and Partners,</p> <ol style="list-style-type: none"> <li>1. to address the representations received,</li> <li>2. to provide further analysis on questions which remained in the conclusions of the first report, and following the second report;</li> <li>3. questions raised by duty to co-operate partners were addressed in the third report.</li> </ol> <p>Following these detailed reports and having examined other evidence which had arisen during the period, the Council considered at a meeting in September 2016 whether to modify the plan in respect of J27, prior to submission, in the light of the additional evidence which was then to hand.</p> <p>The Council decided in the light of the additional evidence to include land at J27 in the Proposed Submission Plan (including modifications) for tourism leisure and retail</p>

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	existing centres, particularly Exeter		<p>development. The allocation area proposed is smaller than that considered at the options stage and has no provision for warehousing, housing, cinema, conference hall, or garden centre, which had been considered at the options stage.</p> <p>The development focus is now substantially more tourism and leisure focused with some very specific controlled retail provision.</p> <p>The Council are satisfied adequate safeguards can be provided to protect existing centres and the retail offer in Town Centres. Attention is drawn to the safeguards recently imposed by the Secretary of State on an out of town DOV at Scotch Corner, North Yorkshire, DL10 6NT, Appeal references APP/V2723/V/15/3132873, APP/V2723/V/16/3143678, granted by the Secretary of State on 1<sup>st</sup> December 2016</p> <p>Modifications are suggested to Policy J27.</p> <p>MDDC are content to agree the modification requiring an up to date Retail and Leisure Impact Assessment is provided with any planning application for a designer outlet village.</p> <p>Wording to be inserted in policy J27</p> <p><b>Any planning application which includes a “designer outlet shopping centre” should be accompanied by a full Retail and Leisure Impact Assessment.</b></p>
<b>J27 –Allocation process</b>	Question the process of allocation through the plan process. Land not in Submission Plan Feb 2015, (prior to consultation 2015). Now allocated in Submission (modified) version January 2017. Many members of the community have no	Willand Parish Council (0044); 0643; 1588; 2804; Councillor Bob Evans (3614); Montagu Evans on behalf of The Crown estate and TH Real Estate (6234); Jo Amor Tiverton (6688); Uffculme Parish Council ( 0054); Individual 4193; 4201; 4251;	The decision and the reasons not include land at J27 (December 2014 Cabinet) in the Submission Local Plan (2015) are set out in the report and minutes of that meeting. Representations were received during the consultation period on the Submission Local Plan 2015 (Feb - Apr 2015) in respect of land at J27. Representations were received supporting its exclusion as well as representation objecting to its exclusion. As part of those representations evidence was submitted by the promoters addressing the reasons why the land had not been included by the Council at their December 2014 meeting. That evidence together with the evidence opposing its inclusion was considered by the Council. The Council commissioned additional studies relating to retail need and impact.

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	<p>confidence in the process the current position has been arrived at and submit if elements of it do not enjoy the support or confidence of the vast majority of the community it brings into question the “soundness” of the plan. Concerned about pre-planning application discussions influencing Local Plan allocation decisions.</p>	<p>4284; 4331; 4407, 4446; 5007; 5266; 5317; 5318, 5346; 5365; 5660; 5824; 5858; 6291; 6354; 6377; 6408; 6414; 6671;; 6702; 6724;</p>	<p>They also commissioned further work on housing need arising from an allocation at J27.. Three retail reports were prepared for the Council by Nathaniel Lichfield. They addressed the issues previously identified which had prevented earlier allocation relating to need, sequential site analysis, retail impact and trade draw and any potential impact on other development plan proposals and commitments elsewhere. Additionally Edge Analytics carried out work on the need for additional housing requirements of the allocation coming forward at J27. The local plan submission was delayed during 2015 /16 by Mid Devon District Council as a result of the need to undertake a detailed flood risk assessment and flood modelling work required by the Environment Agency relating to strategic road and junction improvements in connection with housing proposals east of Cullompton. During this period of delay with the plan, promoters of land at J27 commenced pre-application discussions with the Council for a scheme involving tourism, leisure and retail proposals. As part of that work studies were posted on the promoter`s web site which addressed a wide variety of issues and a number of issues were brought to the attention of the council. During this period the site area was reduced to 71 hectares and land north of the A38 principally identified for warehousing was removed. On the 27<sup>th</sup> April 2016</p> <p>The Council had before it a <b>MOTION</b> for the first time; submitted by a number of councillors</p> <ol style="list-style-type: none"> <li>1. That the outcomes of the Local Plan Review pre-submission consultation and subsequent technical work together with officer recommendations be considered by Cabinet and Council prior to plan submissions and;</li> <li>2. That the report of these outcomes include the implications to the local plan of making a major modification to the Local Plan Review to allocate land at J27 of the M5 for a leisure/retail/tourism and employment development.</li> </ol> <p><b>Motion(1)</b> was carried</p> <p><b>Motion (2)</b> was carried</p> <p>This meant that prior to submitting the Submission Local Plan to the planning</p>

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			<p>Inspectorate, the outcome of the technical work and issues raised by the representations received would be reported to a meeting of the Council. In addition the report addressed the implications to the local plan of including land at J27.</p> <p>The implications report regarding a potential additional allocation at J27 was considered by Cabinet on the 15<sup>th</sup> September 2017 and by Council on 22<sup>nd</sup> September 2017.</p> <p>The Council considered</p> <ul style="list-style-type: none"> <li>· The additional period of consultation</li> <li>· Why the components of the allocation were highlighted in the presentation</li> <li>· Land availability within the proposed site</li> <li>· The additional housing required</li> <li>· The reduction in the size of the site and why the area north of the A38 was no longer included</li> <li>· The planning performance agreement as part of the pre-app discussions</li> <li>· Concerns of local residents and the consultation process</li> <li>· The impact on local trade</li> <li>· Inward investment and the regeneration of Mid Devon</li> <li>· Employment for young people in the area</li> <li>· The need for tourism attractions in the district</li> <li>· How other areas have thrived following the creation of tourist attractions</li> <li>· The impact of the delay in submission of the plan and the possibility of the continuation of 5 year land supply problems</li> </ul> <p>The Council resolved to</p> <p>1) include land at Junction 27 of the M5 be allocated for leisure, retail and tourism development;</p> <p>2) and associated additional housing sites giving the extra provision of 260 additional homes at Blundells Road, Tiverton and Higher Town, Sampford Peverell.</p>

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			<p>These went forward to the Council meeting on 1<sup>st</sup> December 2017 where all modifications to the Local Plan Review were considered by Council.</p> <p>The Local Plan Review 2013 -2033 Proposed Submission, including the proposed modifications, which principally consisted off</p> <ul style="list-style-type: none"> <li>· Proposed J27 allocation.</li> <li>· Additional hosing requirement associated with J27.</li> <li>· Revised overall housing target figures to reflect a final Strategic Housing Market Assessment.</li> <li>· Updated figures to reflect the latest housing completion and planning permissions.</li> <li>· Updated figures, text and policy map to reflect the adopted NW Cullompton Masterplan and extended site area.</li> <li>· Latest Devon County Council Highways advice.</li> <li>· Government Guidance changes, for example, National Space Standards.</li> </ul> <p>The modified Local Plan was approved by the Council at that 1<sup>st</sup> December meeting for public consultation between 3<sup>rd</sup> January and 14<sup>th</sup> February 2017 prior to submission to the Planning Inspectorate in March 2017</p> <p>During 2016 the Council did engage in pre-application discussions with a promoter of land at J27 under the terms of a Planning Performance Agreement.</p>
<b>J27 Allocation Process</b>	Many members of the community have no confidence in the process the current position has been arrived at and submit if elements of it do not enjoy the support or confidence of the vast majority of the community it brings into	Willand Parish Council (0044); Individual (4331; 4446; 5007; )	The tests of soundness are set out in the NPPF at paragraph 182. Representations have been received which both oppose and support the inclusion of land at J27 for tourism, leisure and retail development as set out in the plan.

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	question the "soundness" of the plan.		
<b>J27 – Less specific policy request</b>	If allocation is to be included Policy J27 should be more open, imaginative, opportunity to provide <b>exceptional</b> and major tourism and leisure attraction. Current proposal too restrictive. If J27 is to be allocated the current proposal is to restrictive, community deserve the opportunity to make to right choice for its future development. The allocation should be removed at this time. The restrictive policy will limit opportunities and cannot be considered the best possible way forward.	Willand Parish Council (0044) ; Councillor Bob Evans (3614); Petition (by Katy Danby) (6435); Uffculme Parish Council (0054); Individual (4331; 4362; 6432;)	Willand PC and other have suggested a modifications to the plan policy to make it less specific. MDCC believe the plan policy provides greater control to the LPA over the type of tourism development that is delivered if the policy is specific. Much has been stated that the policy provides only for Eden Westwood to deliver the scheme. The allocation goes with the land not any particular development company. Currently while it is understood the majority of the land is available for development it is in a number of ownerships and therefore the allocation could be brought forward by any development company. Any leisure and tourism based development company can deliver the provisions within the policy.
<b>J27 – NPPF Use Bprownfield land 2. Impact on towns 3. Traffic at J27 4. Tourist come for tranquillity</b>	Object to Policy J27 reasons:- 1. NPPF states all development should be on brownfield land where possible. Less than 2% of J27	Burlescombe Parish Council (0067); Holcombe Rogus Parish Council (0060); Uffculme Parish Council (0054); Willand Parish	1. Mid Devon does not have a significant amount of brownfield land that is available for new development. While in accordance with the NPPF Mid Devon District Council encourages the use of brownfield land whenever possible only 52% of new and converted dwellings were built on brownfield land in 14/15 and only 46% of new employment development took place on brownfield sites. When brownfield sites are available Mid Devon District Council will encourage their reuse. There is no brownfield site within the district which could

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<p><b>5 No need for another service station.</b></p>	<p>allocation is brownfield land, rest is on grade 3a agricultural land.            2. A large development at J27 would have a negative impact on the market towns of Crediton, Cullompton and Tiverton and Wellington, Exeter and Taunton. As significant housing is allocated in these towns it would make sense to direct new retail development to these towns.            3. The development would exacerbate the problems at J27 which reaches capacity at peak times. J27 would require remodelling. Tiverton Parkway is difficult to access. Heavy traffic goes to nearby quarries and Willand Business Park.            4. Mid Devon`s main industry is farming with ancillary businesses serving the agricultural interests. There are no major industrial sites in</p>	<p>Council (0044); Individual 5811;</p>	<p>accommodate the proposed development.            2. There have been 3 studies undertaken on behalf of Mid Devon District Council by Nathaniel Lichfield and Partners , <a href="#">Critique of Retail &amp; Leisure Statement July 2015</a>, <a href="#">Addendum to Critique of Retail &amp; Leisure Statement March 2016</a>, <a href="#">Additional Retail Response July 2016</a> examining in detail the impact development would have on existing towns. These studies conclude the impact would not be significant.            3. The proposed policy requires transport improvements, new or improved access to the M5 motorway and links to Tiverton Parkway. The nature of the improvements required will be accessed via a full Transport Assessment and Travel Plan considered with the Masterplan.            4. According to the Mid Devon Area Profile Produced for Devon County Council, February 2014, by <a href="http://www.ekosgen.co.uk">www.ekosgen.co.uk</a> wholesale, retail and manufacturing are the largest employment sectors in the district. Heathcoat textiles (Tiverton) and 2 Sisters poultry processing (Willand) being two of the larger employers. The service sector also provides reasonable levels of employment. Agriculture is a significant employment sector but the figures are hidden by a high degree of self-employment.            5 The development requires an additional 260 houses over the plan period, 13 extra per annum. This alters the overall figure from 380 per annum (mid SHMA target) to 393 per annum. Of the additional 260 it is proposed to site 60 units at Samford Peverell which has excellent public transport links and easy access to the Strategic Road network.            6. There is already a petrol service station at J27 (as well as J28), a hotel and a burger king restaurant. Planning permission already exists for an improved roadside service area at J27 on part of the allocated site just east of the existing facility.</p>

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	<p>the district. Tourists come to appreciate peace and tranquillity. J27 will affect local amenities.</p> <p>5. Development would require 392 houses to cover job requirement for the development. The 391 include 60 at Samford Peverell. Any additional houses will only increase traffic at the junction. Housing at Sanford Peverell should be removed from the plan as they are in the wrong place.</p> <p>6. Already a service station at J28 no need for another. There is a suggested lorry park and warehousing. Industrial sites exist elsewhere</p> <p>J27 gateway to a county and should not be contaminated by development.</p>		
<p><b>J27 – Impact on towns Traffic</b> <b>Sequential analysis not</b></p>	<p>1. While we welcome the additional facilities at J27 we are concerned impact on Tiverton has</p>	<p>Uplowman Parish Council (0069)</p>	<p>1. No cinema is proposed at J27 and no reason is given by objector why cinema should be affected. There have been 3 studies undertaken on behalf of Mid Devon District Council by Nathaniel Lichfield and Partners , <a href="#">Critique of Retail &amp; Leisure Statement July 2015</a>, <a href="#">Addendum to Critique of Retail &amp; Leisure Statement March 2016</a>, <a href="#">Additional Retail</a></p>

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<p><b>sufficient SP housing should be contingent with J27 Proceeding.</b></p>	<p>not been properly assessed, such as the number of shops that will be affected and the local cinema.</p> <p>2. Volume of traffic generated by J27 will impact on travel from our village, plus need for additional parking at Tiverton Parkway. At a station already at capacity. This negative impact has not been assessed in the economic terms in the plan.</p> <p>3. Areas designated for J27 and additional housing are prime agricultural land, as opposed to other areas further down the motorway which have been discounted. We consider sequential methodology as required by Government to produce a case has not been justified and proposal is likely to affect town centres.</p>		<p><a href="#">Response July 2016</a> examining in detail the impact development would have on existing towns. These studies conclude the impact would not be significant.</p> <p>2. There will be an impact on traffic movements at J27. Policy provides transport improvements, new or improved access and egress to the M5 and links to Tiverton Parkway. With improvements impact should be neutral.</p> <p>3. Other areas referred to not specified so difficult to give a detailed response. Sequential test and its robust approach examined by Nathaniel Lichfield and Partners in their 3<sup>rd</sup> report. The Council concur with Nathaniel Lichfield's findings, that there is no other site within the area which can accommodate the allocation proposal without disaggregation. Disaggregation would put delivery of the proposal at risk and not deliver the Tourism, Leisure and economic benefits of the proposal to Mid Devon. Policy SP2 makes provision that it should come forward only following the commencement of development at J27.</p>

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	4. Additional housing in Sampford Peverell not contingent with J27 proceeding.		
Impact on Towns	<p>1. Adverse impact on Local Towns and Businesses contrary to policy DM15 and DM17 which seek to concentrate development in towns.</p> <p>2. Impact on J27 of the M5 and traffic congestion.</p> <p>3. Light and noise pollution.</p> <p>.</p>	<p>Samford Peverell Parish Council (0071); Rocke Associates on behalf of Hermes (6269); Uffculme Parish Council (0054); Individual 4564; 5251;</p>	<p>1. There have been 3 studies undertaken on behalf of Mid Devon District Council by Nathaniel Lichfield and Partners , Critique of Retail &amp; Leisure Statement July 2015, Addendum to Critique of Retail &amp; Leisure Statement March 2016, Additional Retail Response July 2016 examining in detail the impact development would have on existing towns. These studies conclude the impact would not be significant. Retailing of food other than in Restaurants would not be permitted in the Designer Outlet Village [see conditions used in recent appeal case for a DOV where the Secretary of State imposed restrictive conditions APP/V2723/V/15/3132873, APP/V2723/V/16/3143678, granted by the Secretary of State on 1<sup>st</sup> December 2016]. The Agronomy visitor centre is limited to 1000sq of ancillary retail space.</p> <p>2. The proposed policy requires transport improvements, new or improved access to the M5 motorway and links to Tiverton Parkway. The nature of the improvements required will be accessed via a full Transport Assessment and Travel Plan considered with the Masterplan.</p> <p>3. Environment protection, noise pollution, landscaping and masterplanning are all matters set out in the policy which will need to addressed. Public consultation on the masterplan is proposed.</p> <p>4. The allocation and development will result in the loss of some grade 3 agricultural land. In an area like Mid Devon where brownfied sites are limited in their number new development will inevitably result in the loss of some agricultural land and some green field sites.</p>
FLOOD RISK	<p>Potential flooding /flood risk</p> <p>Site has high water table</p>	<p>Kentisbere Parish Council (0076); Environment Agency</p>	<p>A district wide Strategic Flood risk assessment has been carried out as part of the local plan evidence base. The Environment Agency has been consulted at all stages in the Local Plan review process and meetings with the EA have been held as part of the Duty to Co-operate.</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	<p>so does not drain quickly so roads and field often flood. Photographs of flooding attached to representation (4446 There is no mention of how any proposed development brought forward as a result of the land allocation/ changes around J27 will be mitigated with respect to flooding. Catchment Based Approach required. Updates in Local Plan do not reference flood data 2012, 2014, 2016.</p>	<p>(6734); Individual 0643; 4446; 5070; 5251; 5318; 5667; 5750; 6399; 6409;</p>	<p>The Environment Agency's most recent response to consultation on the Local Plan Review in response to flood risk at J27 states the following.          "Thank you for your consultation of 23 December 2016 providing us with an opportunity to comment on the proposed submission for the Mid Devon Local Plan Review 2013 – 2033 (Incorporating Proposed Modifications).          Having reviewed the Local Plan documents we can report that the suggested policies and strategies regarding the management of flood risk across Mid Devon District Council all appear sound.</p> <p>Junction 27 - We would advise adding the following text '<i>Any loss of floodplain at this location should be mitigated by the creation of additional/compensatory floodplain which should secure wider environmental and sustainability benefits including the provision of appropriate ecological and biodiversity enhancements.</i>'</p> <p>MDDC suggest adding the above as a proposed modification to J27 policy.</p>
<p>Policy J27 Impact on Local Roads/Services</p>	<p>Concerned about the extra pressure the development will put on roads, schools, health facilities and shops. With the expansion of the facilities at Junction 27, there will be an increase in traffic</p>	<p>Cullompton Town Council (0090); 5211; Broadhembury Parish Council (1483); Uffculme Parish Council (0054); Individual 5007, 5211, 5824; 6273; 6282; 6294; 6331; 6399; 6767; 6273;</p>	<p>The support of CTC is for J27 proposals is noted. The J27 policy provisions require improvements to transport infrastructure. Additions to school and health facilities are addressed through the infrastructure requirements of the housing policies in the plan particularly in relation to the strategic housing sites. There will be some impact on local town centres as a result of retail development at J27 but that impact is not considered to be significant. The reports of Nathaniel Lichfield and Partners and CBRE directly address this issue.</p> <p>The majority of traffic visiting the J27 site will use the strategic road network. Some impact on local roads will occur as housing in Cullompton expands and residents will visit</p>

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	<p>travelling through Cullompton putting more strain on existing roads that are already unable to cope. Highways England has twice put a moratorium on housebuilding due to problems with road capacities and the MDDC Local Plan needs to be clearer about how these issues will be resolved</p>		<p>the J27 site. To accommodate the strategic housing growth in Cullompton a new motorway junction and overbridge is planned south of junction J28, a town centre relief road is planned and further improvements are also proposed for J28</p>
<p>Policy J27 J27 allocation should also increase commercial floor space provision in Cullompton.</p>	<p>CTC disagrees with the reduction in commercial floor space in Cullompton. It believes that the development at Jct. 27 and the Exeter and the Greater Exeter Strategic Plan will increase the commercial attractiveness of Cullompton. The allocation of commercial floor space in Cullompton should be substantially increased to make best use of these opportunities.</p>	<p>Cullompton Town Council (0090); Individual 5211</p>	<p>Junction 28 of the motorway is already near or at capacity. There are proposals for a new motorway junction south of J28 to accommodate the planned development commercial and residential. Any increase in commercial provision beyond that planned in the Local plan review provisions and those of the future garden village would require further significant junction improvements beyond those proposed.</p>

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Lack of proven Need /Sequential test.	<p>Not justified, not in accordance with national policy, plan not positively prepared. Cullompton focus of development includes land for housing and commercial. J27 not needed</p> <p>All or some of the uses within the proposed allocation could be located within town centres within the wider catchment. This issue has not been sufficiently addressed by MDDC and or its consultants. Only a limited area of search used. J27 provides for a regional need NDCC suggest a minimum of a 60 drive time is used. NDCC request Mid Devon District Council review area of search based on 60 mins. There is no Mid Devon Local need for the for</p>	<p>3675; Councillor Bob Evans (3614); Jonathan Lanh on behalf of Lowman Manufacturing Co.Ltd (4564); Council for the Protection of Rural England (6212); Montagu Evans on behalf of The Crown Estate and TH Real Estate (6234); Roche Associates on behalf of Hermes (6269); Exeter City Council (0141); North Devon District Council (3605); North Devon District Council (3605); Jonathan Lanh on behalf of Lowman Manufacturing Co.Ltd); (5318); Roche Associates on behalf of Hermes (6269); Campaign to Protect Rural England (6381); Petition (by Katy Danby (6435); Jo Amor</p>	<p>The retail need being provided meets a regional need not a district wide need. It is accepted Mid Devon District does not have a district need for a retail development of this scale. The DOV need is demonstrated in terms of growth within the wider sub-region and as a result it is necessary to consider the implications for surrounding authorities within the sub region.</p> <p>Mid Devon’s comparison goods retail facilities only retain around 25% of the comparison expenditure available from residents within the District, there is potential to claw back some of this expenditure leakage (back from Exeter and elsewhere). This would result in more rather than less sustainable shopping patterns, i.e. shorter shopping trips.</p> <p>Lichfields quantified the level of trade diversion and impact of the DOV on a large number of centres and local authorities across the sub-region, not just Taunton Deane, North Devon and Exeter as suggested. This assessment indicated that the percentage reduction in comparison turnover was very low (in most cases less than 1%) particularly in the context of significant long term retail expenditure growth. Lichfields adopted a proportionate approach that focused on the potential implications for retail allocations within neighbouring authorities, i.e. the areas most likely to be affected by the DOV. The small trade diversion estimates from other authorities e.g. North Somerset, Mendip, West Dorset, Sedgemoor, Mendip, East Devon and Torridge, demonstrated that the potential implication for existing or emerging allocations in these areas would not be discernible. A more detailed appraisal of across all authorities across in the sub-region, as suggested by ECC was not considered necessary or proportionate.</p> <p>It is clear there are cross flows of retail expenditure to and from all authority areas. The Exeter Retail Study indicates Exeter currently attracts around £140 million of comparison goods trade from the Mid Devon area. Most of the expenditure leakage from Mid Devon District, results in longer and less sustainable shopping trips. An analysis of the cross flows of expenditure needs to be balanced, and an objective to increase Mid Devon’s low current market share is not unsustainable.</p> <p>An approach that only assesses needs within authority boundaries would fail to</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	<p>the retail development of the scale proposed. A regional need has not been satisfactorily demonstrated to justify the allocation of the DOV. Insufficient evidence has been prepared to demonstrate it is reasonable to meet comparison retail needs of local authorities within the core catchment of the DOV. NPPF suggests only unmet requirements from neighbouring authorities to where it is reasonable to do and consistent with achieving sustainable development. NDC Policy J27 could act as impediment to sustainable retail growth unless evidence and realistic sequential testing is demonstrated.</p>	<p>Tiverton (6688); Taunton Deane Borough Council (6728); Uffculme Parish Council (0054); Individual 4193; 4284; 4832; 5007; 5190; 5824; 6159; 6287; 6297; 6302; 6360; 6364; 3486; 4641; 0814; 1337; 3486; 5348; 5391; 5825; 6328; 6354; 6397; 6401; 6412; 6414; 6417, 6418; 6671; 6688; 6694; 6701; 6703; 6732; 6761; 4298</p>	<p>recognise the niche role the DOV is expected play, related to the proposed tourist attraction. This type of DOV facility will inevitably attract trade from a wide area that extends beyond authority boundaries. The need for tourism attractions will be qualitative in nature, recognising these attractions will have a wide draw.</p> <p>DOV`s are one of the main areas of growth in retail shopping and have been for the last 15 years. Three new centres have recently received planning approval in the last 18 months, East Cannock, M5 Junction 9 Tewkesbury and the most recent at Scotch Corner on the A1 granted permission by the Secretary of State 1<sup>st</sup> December 2017 where he recognised the wider economic and tourism benefits that can arise from these developments.</p> <p>Given the nature of the development and the wide trade draw, the assessment suggests there will be no significant impact on the development strategy of neighbouring authorities. The implications of the scheme on the emerging development strategies are unlikely to cause significant cross boundary issues. Minor adjustments may need to be made within emerging retail capacity assessments by neighbouring authorities e.g. Exeter and Taunton to reflect the J27 proposals, but these adjustments would not be of strategic significance.</p> <p><b>Sequential approach and disaggregation.</b> The Council can consider the scope to disaggregate or change the content of the proposed allocation at J27, when considering the appropriateness of a plan allocation. The Council can also consider the appropriate area of search for sites. These are matters of judgement for the Council, and having considered whether flexibility and disaggregation and the area of search are appropriate, may conclude the J27 allocation cannot be reduced in size or disaggregated if it is to deliver the development required. It is for the Council to decide how the need for a tourist attraction and DOV should be met and the degree to which the development can or can't be disaggregated when applying the sequential approach for plan making. The Council consider there is synergy between the proposed tourist attraction, themed hotel, restaurants, cafés and food hall, and therefore it would not be appropriate to disaggregate these uses and seek to accommodate these elements on separate sites.</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
			<p>The Council also consider that while the DOV has less synergy with the proposed tourist attraction, its co-location will be beneficial in terms of spin-off trade and linked trips and will provide some enabling development to ensure the delivery of the tourism and leisure facilities and their continued provision.</p> <p>The benefits of co-locating the DOV with the tourist and leisure attractions in term of spin-off trade and linked trips and the need for enabling development to bring forward the other uses are not the only reasons why disaggregation is not considered to be suitable or viable in this case.</p> <p>Experience from other outlet villages of this kind across the country, indicates that DOV's need to be highly accessible. Junction 27 is considered to be a commercially viable location for this proposed use. Outlet villages are generally located some distance from established town centres to prevent them competing directly with that centre. Retail tenants do not want their discount stores in outlet villages to compete directly with their high street store. This issue is widely accepted and is demonstrated by the current location of outlet villages in the UK.</p> <p>The Council satisfied there are no sequentially preferable alternative sites that could accommodate the allocation proposed. The Council consider disaggregation would be unlikely to deliver any of the allocated site uses within the plan period. This approach has been confirmed as appropriate by the Council's retail consultant.</p>
Viability/Interdependency	<p>P27 states "it is not considered viable to disaggregate this allocation given the nature of the interdependency of uses, and argues the DOV is required to deliver the tourism and leisure elements".</p> <p>There is no evidence to support this assertion.</p>	<p>Exeter City Council (0141); North Devon District Council (3605); Jonathan Lanh on behalf of Lowman Manufacturing Co.Ltd (4564); Montagu Evans on behalf of The Crown Estate and TH Real Estate (6234); Campaign to Protect Rural England (6381);</p>	<p><b>Sequential approach and disaggregation.</b></p> <p>The Council can consider the scope to disaggregate or change the content of the proposed allocation at J27, when considering the appropriateness of a plan allocation. The Council can also consider the appropriate area of search for sites. These are matters of judgement for the Council, and having considered whether flexibility and disaggregation and the area of search are appropriate, may conclude the J27 allocation cannot be reduced in size or disaggregated if it is to deliver the development required. It is for the Council to decide how the need for a tourist attraction and DOV should be met and the degree to which the development can or can't be disaggregated when applying the sequential approach for plan making.</p> <p>The Council accept there is synergy between the tourist attraction, themed hotel, restaurants, cafés and food hall, and therefore it would not be appropriate to disaggregate such uses and seek to accommodate these elements on separate sites. The</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	<p>Such evidence must be published and reviewed before it can be relied on. No synergy between the DOV and tourism and leisure aspects. No justification for shops at this location.</p> <p>No viability evidence has been provided which demonstrates the need for retail development to subsidise the tourism and leisure development.</p>	<p>Rocke Associates on behalf of Hermes (6269); Taunton Deane and West Somerset Councils (6728); Individual 6732; 3486; 6417; 5190; 6412; 6671;</p>	<p>Council also consider that while the DOV has less synergy with the proposed tourist attraction, its co-location will be beneficial in terms of spin-off trade and linked trips and will provide some enabling development to ensure the delivery of the tourism and leisure facilities and their continued provision. The Council are satisfied there are no sequentially preferable alternative sites that could accommodate the allocation proposed, assuming no disaggregation. The Council consider disaggregation would be unlikely to deliver any of the allocated site uses within Mid Devon within the plan period</p>
Impact on towns	<p>J27 proposal not compatible with vision in plan at paragraph 1.15 which seeks to “support sustainable economic success” which seeks a “good range of jobs” and tourism and leisure enterprises that benefit the whole district and section on market towns mentions enhancing town centres.</p>	<p>Tiverton Civic Society (1410); Broadhembury Parish Council (1483); Wellington Town Council( 4134); North Devon District Council (3605); Exeter City Council (0141); Jonathan Langh on behalf of Lowman Manufacturing Co.Ltd (4564); Councillor Bob Evans (3614); Council</p>	<p>Mid Devon District Council have commissioned work from Nathaniel Lichfield and Partners to consider the impact of the J27 allocation particularly the retail proposal on the towns in the district and beyond. The conclusion of the three reports undertaken by NLP is that the impact of the J27 retail proposals will not be significant.</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	<p>These aims are not supported by J27 proposals.</p> <p>J27 conflicts with policy S1/S2 which seeks to concentrate development in the three main towns. J27 one of largest developments remote from any of the three main towns.</p> <p>Policy DM14/DM15 specifically protects towns. J27 cuts across efforts to promote sustainable town centre growth.</p> <p>Will have significant adverse impact on local towns Exeter, Taunton, Wellington, Cullompton, Uffculme, Willand, Atlantic Village, (Bideford) and Clark`s Village (Street).</p> <p>Retail facilities already available in Exeter, Taunton, Clark`s Village,</p>	<p>for the Protection of Rural England (6212); Montagu Evans on behalf of The Crown Estate and TH Real Estate (6234); Roche Associates on behalf of Hermes (6269); Campaign to Protect Rural England (6381); Petition (by Katy Danby) (6435); Jo Amor Tiverton (6688); CPRE Devon (6714); Taunton Deane and West Somerset Councils (6728); Protect Devon (6759); Willand Parish Council (0044); Uffculme Parish Council (0054); Individual (0643; 0814, 1337; 1588, 2075; 2052; 3486; 3675; 3713; 3754; 4165; 4193; 4251; 4284; 4298; 4407; 4446; 4641; 4676; 4832; 5007; 5011; 5221; 5251;</p>	

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	Barnstaple and Atlantic Village Bideford.	5266; 5346; 5348; 5365; 5391; 5648; 5667; 5686; 5811; 5824; 5825; 5921; 6159; 6278; 6287; 6291; 6296; 6297; 6301; 6303; 6310; 6325; 6327; 6328; 6329; 6345; 6357; 6360; 6364; 6366; 6369; 6371; 6372; 6375; 6376; 6379; 6259; 6388; 6390; 6396; 6397; 6398; 6399; 6412; 6414; 6417; 6432; 6434; 6435; 6671; 6680; 6687; 6690; 6696; 6697; 6706; 6717; 6719; 6720; 6721; 6724; 6732; 6761; 6766; 6767;)	
Restricted Retail	P27 commits to restricting DOV to controlled goods. Deep concerns about the ability of the policy wording to provide sufficient protection.,	North Devon District Council (3605); Council for the Protection of Rural England (6212); Montagu Evans on behalf of The Crown Estate and TH Real	The policy is specific in terms of retail and refers particularly to a designer outlet centre retailing controlled goods. A similar proposal has recently been permitted 1/12/16 by the Secretary of State Secretary, at Scotch Corner, North Yorkshire APP/V2723/V/15/3132873, APP/V2723/V/16/3143678, where he imposed restrictive conditions on the type and sale of goods that could take place to protect nearby town centres. Similar conditions would be imposed on any J27 DOV retail permission.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	<p>particularly due to emphasis on viability. If Policy J27 remains NDC provide some specific wording which</p> <ol style="list-style-type: none"> <li>1. Maximum retail unit size</li> <li>2. 90% of floor area given over to and retained discounted goods.</li> <li>3. Term surplus/sample stock is removed.</li> </ol>	<p>Estate (6234), Jo Amor Tiverton (6688); Taunton Deane and West Somerset Councils (6728); Individual (4165; 4446; 5825;)</p>	
Transport	<p>Any search for sites should seek a site closer to the Town Centre. Suggest a shuttle bus between Tiverton and J27 should be provided for within the policy if current allocation retained. No proposals have been included to improve bus from local settlements.</p>	<p>North Devon District Council (3605); Taunton Deane and West Somerset Councils (6728);</p>	<p>Mid Devon District Council is satisfied that there are no available alternative sites closer to the Town Centres. The regional nature of the allocation proposal will draw visitors from a wide catchment area. The policy provisions includes transport improvements to ensure appropriate accessibility for all modes and could include dedicated shuttle bus links.</p>

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	While developers have made reference to Tiverton Parkway it can only be accessed from Exeter or Taunton by train.	4407	Tiverton Parkway Station is accessible from many stations beyond Exeter and Taunton.
	J27 will conflict with Town Centre first strategy, and Policy TIV12 and S10 a) Tiverton. Consider trade diversion from Tiverton will be higher than 5.21 % indicated in NLP report.	Jo Amor Tiverton (6688);	NLP have undertaken detailed research on behalf of MDDC to look at trade diversion. MDDC are satisfied the trade diversion figures for Tiverton are reasonable and not significant. Some Individual traders may experience more significant impacts depending on the nature of their retail offer.
	No demonstrated need for the development at J27; tourist facility of this type will only diminish other attraction of the area. Mid Devon already has tourist attractions, Bear Trail, Cullompton; Diggerland, Willand; Fishing lakes, Goodiford: Knighthayes, Tiverton, Killerton House,	Council for the Protection of Rural England (6212); ; Petition (by Katy Danby) (6435); Petition (by Katy Danby) (6435); 6703; 6717; 0643, 0814; 3675; 1337; 4832; 5007; 5318; 6390; 6417; 6434; 4201; 6375; 6376;	Mid Devon currently has lowest number of day and overnight visitor compared to other areas in the county (source Visit England.) Additional visitor attractions will help increase visitor numbers and overnight or longer visitor stays.

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	<p>Silverton, Coldharbour Mill wool museum, Uffculme;</p> <p>Plan not sound or sustainable with J27 allocation.</p> <p>Will not attract tourists to Tiverton. Will not encourage people to break journeys further west and south.</p>		
	<p>Area has an oversupply of employment land J27 not required.</p>	<p>Individual (6414)</p>	<p>Paragraph 2.15 of the plan states “there is an excess of commercial land supply in the most suitable locations – Tiverton and Cullompton” and recognises that Crediton is more constrained.</p> <p>The Council have allocated an additional 29% of commercial floorspace at J27 in order to make provision for a high quality tourist and leisure focussed development in the M5 corridor in line with the recommendations of the tourist study.</p>
Jobs	<p>Will bring only low paid low skilled jobs. Low levels of unemployment jobs not needed.</p>	<p>Martin Lee (Planning Consultant) on behalf of F.J.Skinner (5190); Petition (by Katy Danby) (6435); Individual 5317; 5318; 5348; 5365; 5660; 5686; 5824; 5825; 6159; 6273; 6364; 6369; 6399; 6406; 6414; 6732; 6761;</p>	<p>Allocation at J27 will provide a range of jobs.</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
		4165; 4314; 4832; 5007;	
	Promoters plans fail to demonstrate how the development will provide any economic benefit to Mid Devon. MDDC's own commissioned study indicated local centres of commerce would be adversely affected.	Petition (by Katy Danby) (6435); Individual (4407; 4832; 5251; 5317; 5348; 5365; 6417; 6717)	Allocation will provide nearly 1200 additional jobs within the locality post construction as well as potentially draw nearly 3,000,000 visitors to the site which will have significant economic and tourism benefits to the local economy. The adverse impact on local towns has not shown to be significant.
	Already HGV's access B3181, capacity has not been addressed must be a condition on any planning application Contrary to policy DM3 and DM4 which seek to reduce pollution risk. Heavy traffic already comes from industrial expansions at Wiiland, Hitchcocks Farm and the Abattoir, and Quarry, and additional housing sites.	; Petition (by Katy Danby) (6435); Protect Devon (6759); Individual (5266; 4314; 5365; 5660; 5686; 5824, 5858, 5921; 6376; 6397; 6399; 6432; 6680 6761;)	Work is currently taking place with DCC and Highways England to identify the scale of improvements required to accommodate the development allocation at J27. DCC are already considering proposals to improve A361 Tiverton Parkway Junction as one of a number of improvements to the A361.
ROADS	J27 M5 is a strategic	Devon County Council	DCC acknowledge the strategic location of J27 to the district and wider region.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
<p>Policy J27 J27 M5 junction capacity and required improvement.</p>	<p>location not just for the District but for the wider sub region. Improvements have taken place to ensure the junction operates throughout the year, even at peak times. J27 is close to capacity at peak times. Development at this location can only be accommodated if it can be shown the junction operates efficiently throughout the year. Significant amounts of quarry traffic uses the junction. Highways England not yet in a position to agree likely scale of improvements. NDC also seek improvements to A361 Tiverton Parkway Junction.</p>	<p>(DCC) (0139); Highways England (1172); Tiverton Civic Society (1410); North Devon District Council (3605); Petition (by Katy Danby (6435); CPRE Devon (6714); Protect Devon (6759); Petition (by Katy Danby (6435); CPRE Devon (6714); Protect Devon (6759); Individual (1588; 1953; 3486; 0814; 13373675; 3713; 3754; 4373; 4676; 4832; 5007; 5011; 5251; 5346; 5348; 5365; 5391; 5660; 5686; 5824; 5858; 5921; 6259; 6273; 6278; 6287; 6290; 6291; 6296; 6297; 6301; 6302; 6303; 6310; 6325; 6327; 6328; 6329; 6331; 6357; 6360; 6364; 6372; 6375; 6376; 6379; 6380; 6388; 6390; 6397; 6399; 6401;</p>	<p>The junction is potentially capable of improvement but substantial upgrades will be required. Work is currently taking place with DCC and Highways England to identify the scale of improvements required to accommodate the development allocation at J27. DCC are already considering proposals to improve A361 Tiverton Parkway Junction as one of a number of improvements to the A361.</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
		6432; 6434; 6680; 6687; 6694; 6696; 6697; 6701; 6702; 6704; 6706; ); 6718; 6719; 6720; 6761; 6766;)	
Transport/Sustainability	Unsustainable development will rely exclusively/mainly on car transport for visitors and workforce.	1337; Tiverton Civic Society (1410); North Devon District Council (3605); Jonathan Lanh on behalf of Lowman Manufacturing Co.Ltd (4564); Martin Lee (Planning Consultant) on behalf of F.J.Skinner (5190); North Devon District Council (3605); 6380; Campaign to Protect Rural England (6381); Taunton Deane Borough Council (6728); CPRE Devon (6714); Protect Devon (6759); Willand Parish Council (0044); Individual (2502;3486; 3675; 3713; 4407; 4641; 4676; 4832;; 5317;	There has been a preliminary Transport Assessment undertaken to consider the levels and type of traffic attracted to the site. It is likely that 90% of visitors and the workforce will arrive by private transport and 10% by bus/rail or other public transport.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
		5318; 5348; 5365; 5824; 5921; 6287; 6296; 6297: 6301; 6303; 6325; 6327; 6328; 6329; 6357; 6360; 6379; 6384; 6390; 6399; 6412; 6687; 6703; 6704; 6706; 6718; 6719; 6732;)	
Land north of A38.	Broadly welcome J27 Policy initiative. Will assist in cementing serious investment into the district. Request that land to the north of the A38, as in the original options proposal for commercial use, is put forward as part of the J27 allocation. This will allow the provision of B1, B2 and B8 uses to come forward on this part of the site. The site is close to good road and rail links.	Harcott Kerr representing Mr and Mrs Disney (4412); Harcott Kerr representing Blackmore and Wootton families (6789);	<p>The Council would not wish to see land to the north of the A38 allocated for B1, B2 and B8 use. The Council have consistently objected to B1, B2 and B8 use at or around Junction 27 and have been supported by Planning Inspector's at the Core Strategy Inquiry in 2007 and the Inspector into the Allocations and Infrastructure DPD in 2010/11.</p> <p>The Council specifically excluded land north of the A38 from the current allocation. The Council have identified an allocation south of the A38 only and specifically allocated for tourism, leisure and a specific type of retail development. The Council consider J27 an important gateway junction to Devon and Cornwall and would only wish to see development of high quality specifically related to tourism and leisure activities. The Council consider there is more than sufficient employment land allocated elsewhere for B1, B2 and B8 development</p> <p>The Council would not wish to see the modification to table 9 as suggested.</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	<p>Suggest Policy J27 policy amended to include 41,000sq m of commercial floor space within use classes B1,B2 and B8 (14.3 ha gross additional land making a total of 85ha) On land to the north of the A38 as shown on the plan attached to our representation.</p> <p>Suggest modification to table 9 as shown in our representation.</p>		
<p><b>J27 No need for surf beach/shopping</b></p>	<p>Question the need for an artificial lake, beach and out of town shopping centre. Snowdonia surf park built on brownfield site, Surf lake/wave permitted near Bristol 2/3 ago. Not progressed due to insufficient financial backing. Real surf beaches available locally, no need for surfing lake, Snowdonia surf park built on brownfield site.</p>	<p>Willand Parish Council (0044); Petition (by Katy Danby (6435); Individual 0643; 4641; 0643; 1588; 0814; 1337; 2979; 4298; 5251; 5391; 5825; 5921; 6159; 6345; 6360; 6369; 6432; 6698; 6702; 6717;</p>	<p>The Policy specifies an Outdoor Adventure Zone, it identifies a number of activities that may take place in that area. Other outdoor adventure zone activities may take place. The policy is specific in terms of retail and refers particularly to a designer outlet centre retailing controlled goods. A similar proposal has recently been permitted by the Secretary of State Secretary, at Scotch Corner, North Yorkshire APP/V2723/V/15/3132873, APP/V2723/V/16/3143678, where he imposed restrictive conditions on the type and sale of goods that could take place to protect nearby town centres but recognised the appeal schemes would be of major benefit to the local economy, and that there would also be spin-off benefits in term of local tourism. He considered that these benefits carry significant weight in favour of both proposals.</p>

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
Tranquillity/ Adverse Landscape Impact	J27 proposals will have detrimental landscape impact. Tourism study revealed people appreciate countryside and lack of congestion; Extra development/ traffic will destroy the attraction of the area..	Protect Devon (6759); Uffculme Parish Council (0054); Petition (by Katy Danby) (6435); Individual (0643, 1337, 1588; 2502; 4201; 4641; 4832; 5251; 5318; 5348; 5825; 5921; 6287; 6345; 6366; 6375; 6388; 6390; 4251; 4193; 4284; 4407; 4676; 4683;; 6290; 6296; 6303; 6325; 6327; 6328; 6329;; 6357;; 6369;; 6376; 6380; 6384; 6399; 6414; 6418, 6434;; 6687; 6690; 6694; 6696; 6697; 6698; 6703, 6704; 6706; CPRE Devon (6714); 6718; 6719; 6720; 6732; 6742;)	Development of the site will have an impact on the local immediate landscape and character. The development as a tourist and leisure destination will be require it to be visible and while landscaping and mitigation design measure can soften and lessen the landscape impact the development will be visible from nearby viewpoints and locations. Accepting development at J27 will inevitably change its character and appearance.
	Plan does not conform to the NPPF particularly on grounds of community engagement,	Councillor Bob Evans 3614;	Full consultation has been carried out at all stages of the local plan process. The full details of the Local Plan consultation process are set on the Council's website.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	collaborative with local community and sustainability.		
Land Availability	Not all the land allocated is available for development, which calls into question the deliverability of the allocation. Map of unavailable land attached to representation (4446) and (3614)	Individual (0643; 3614; 4446; 5317; 5318; 5660; 5667; 5686; 6397);	The Council is satisfied that the majority of the land required to deliver the allocation is available for development or will be made available for development. The Council is aware that there is one land owner who has indicated their wish not to make their land available. The Council is satisfied this should not prevent allocation proposals as a whole.
Loss of green field/Agricultural land, NPPP states use of brownfield Land.	Loss of good grade agricultural land and open countryside, loss of culm grassland and woodland. Gateway to Devon largely undeveloped. NPPP states all development should be on brownfield land where possible. Less than 2% of J27 allocation is brownfield land, rest is on grade 3a agricultural land. No brownfield first policy in the plan. Eden Cornwall built on Brownfield site.	Samford Peverell Parish Council (0071); 0643; Tiverton Civic Society (1410); Uffculme Parish Council (0054); Willand Parish Council (0044); Council for the Protection of Rural England (6212); Burlescombe Parish Council (0067); Holcombe Rogus Parish Council (0060); Petition (by Katy Danby) (6435); Jonathan Langh on	The allocation of J27 will use green field land for development. Mid Devon does not have a significant amount of brownfield land that is available for new development. While in accordance with the NPPF Mid Devon District Council encourages the use of brownfield land whenever possible only 52% of new and converted dwellings were built on brownfield land in 14/15 and only 46% of new employment development took place on brownfield sites. When brownfield sites are available Mid Devon District Council will encourage their re-use. There is no currently available brownfield site within the district which could accommodate the proposed allocation.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
		behalf of Lowman Manufacturing Co.Ltd (4564); Martin Lee (Planning Consultant) on behalf of F.J.Skinner (5190); Campaign to Protect Rural England (6381); Individual (1953; CPRE Devon (6714); Protect Devon (6759); Individual 2052; 3486; 3675; 3713; 4193; 4201; 4251; 4284; 4298; 4407; 4641; 4676; 4683; 4832; 5011; 5391; 5634; 5667; 5753; 5811; 5825; 5921; 6159; 6687; 6704; 6706; 6287; 6290; 6291; 6296; 6301; 6302; 6303; 6323; 6325; 6327; 6328; 6329; 6356; 6357; 6360; 6364; 6366; 6369; 6372; 6375; 6376; 6379; 6380; 6384; 6385; 6388; 6390; 6396; 6399;	

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
		6414; 6434; 6694; 6696; 6697; 6698; 6701; 6703; 6704; 6706; 6717; 6718; 6719; 6720; 6724; 6732;; 6766; 6767;)	
Fauna and Flora	Adverse impact on and loss of fauna and flora. Impact not evaluated properly.	Martin Lee (Planning Consultant) on behalf of F.J.Skinner (5190); Individual (0643; 2052; 3978; 4201; 4251; 4298; 4683; 4832; 5667; 6302; 6327; 6369; 6376; 6379; 6385; 6399; 6414; 6734)	<p>Across much of the site, there is a complex pattern of relatively geometric but substantial hedges and hedgerows. Trees are found both within hedges and in the fields, probably originating from former field boundaries. There are also several blocks of woodland, some mixed coniferous and deciduous, which lie between the service area and Pitt Farm. The pattern of hedges along the straight lanes across the site and down the B3181, as well as the well vegetated boundaries across the site north of Pitt Farm, help to define its character.</p> <p><b>Habitat Survey</b> The Phase 1 habitat survey indicated that the site features a variety of habitat types, including Biodiversity Action Plan habitats. The many mature trees found throughout are important for biodiversity and the hedgerows act as wildlife corridors. The hedgerows and woodlands / copses add to the structural diversity and wildlife potential of the site. If the site is developed upon it is recommended that the hedgerows and woodlands are retained where possible. The hedgerow running along the road from Braddons Farmhouse to the B3181 junction is particularly species rich in places. Key species present or potentially present Bat species; Badger; Dormouse UK and Devon BAP), Barn Owl; Hedgehog (UK BAP); Amphibian species; Reptile species; Nesting birds</p>
Listed Buildings/Heritage	Adverse impact on Listed Buildings Gardeners Nursery and 1 Leonard Noor.	Individual (0643)	The impact on these listed buildings will need to be carefully assessed when planning applications come forward.
Conference Centre	There are conference centres available in Exeter. With hotels	Individual (3486;)	There is no conference centre proposed in the current allocation for the site.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	proposed on site it is unlikely visitors will go elsewhere in Mid Devon.		
Local Opposition	Large number of people in the local community and elsewhere against the J27 proposal. Local Parish Council`s opposed to scheme. Exeter, North Devon and Taunton opposed to scheme. Inadequate local consultation.	Individual (1953; 2804; 3614; 4251; 4407, 4662; 5007; 5011; 5318; 5365; 5921; 6372; 6379; 6432, 6671; 6680;)	Consultation has taken place at all stages of the Local Plan Preparation. Consultation took place at the Issues and Options stage 2014, Submission Stage 2015, Submission Stage (with Modifications) 2017. Representations have been received both supporting and opposing the allocation.
History of site	The Secretary of State Local Plan 2005/6, and Inspectors examining the Core Strategy 2007, Allocations and Infrastructure DPD 2010/11 have all found sites for commercial development at J27 unsustainable.	Council for the Protection of Rural England (6212); CPRE Devon (6714); Protect Devon (6759); Individual (3614; 5667; 5824; 6418;)	The Secretary of State directed the Council not to include an area of land for commercial development in the Local Plan 2005/6. The inspector at the Core Strategy Inquiry in 2007 also declined to include land at J27 as did the Inspector into the Allocations and Infrastructure DPD in 2010/11.
AONB Blackdown Hills	Believe that there should be some reference to the potential impact on the	Blackdown Hills AONB Partnership (1195);	The Blackdown Hills AONB Partnership have not suggested any wording or suggested modification to the policy which would provide the protection they seek.

<b>Policy/para Policy J27</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
	AONB in relation to this major development.		
Plan Delay	Inclusion of J27 is the cause of the plans delay. (2804) . The delay in plan allowed a predatory revision of the plan. (3614);	Individual (2804; 3614, 4331)	This not the case. The inclusion of J27 has not been the principle reason for the delayed submission of the plan. The reason for delay has been the need for a detailed flood risk assessment and detailed flood models to consider the impact of a relief road, new motorway junction and overbridge in the flood plain at Cullompton to facilitate the housing and employment growth proposed east of Cullompton. The Environment Agency (EA) would not support the provision of those additional transport facilities across the Cullompton flood plain without a detailed flood risk assessment and detailed flood models being undertaken to demonstrate the proposals can be accommodated without increasing flood risk. This work has only recently been completed. The work was set out in a report on the Local Plan in Cabinet report (paragraph 1.5) The funding for the work was also agreed at that meeting. It was anticipated at that time the work would be completed early summer 2016. The FRA and modelling work has taken considerably longer than originally envisaged. (FRA work commenced 2015 - completed to satisfaction of EA late March 2017).
Duty to Cooperate	Fails to comply with Duty to Co-operate. J27 proposal indicates a lack of co-operation with Exeter and Devon as a whole. Insufficient evidence provided of Duty to cooperate.	Jonathan Lanh on behalf of Lowman Manufacturing Co.Ltd (4564); Rocke Associates on behalf of Hermes (6269); CPRE Devon (6714); 4251; 5317; 6354; 6671; 6676;	A duty to co-operate statement will be submitted with the Local Plan to the Planning Inspectorate. Duty to co-operate meetings have been held with other authorities and these are detailed in the statement. Most Devon authorities have endorsed the duty to co-operate statement but those who have objected to retail development at J27, maintain their planning objection to the retail element of the allocation.
Aftercare	No provision for restoring the land after project failure	Individual (4251; 5348)	It is unlikely once the site is developed for a tourism and leisure use that it will revert to its former use of agricultural land. Part of the site is already in commercial use.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
Housing	Allocation of additional housing site at Blundells`s School, Tiverton (TIV/16) is undeliverable because of complex ownerships. Hartnoll should be allocated instead.	PCL Planning Ltd on behalf of Waddington Park. (4675);	The Council considered both Hartnoll Farm and Blundells`s School site as housing options to cater for the additional housing demand arising from the J27 allocation. The Council considered the loss of high grade agricultural land at Hartnoll and the potential for Tiverton to merge with the village of Hlberton were reasons why Hartnoll should not be identified in preference to Blundells which is partially brownfield and closer to the facilities of Tiverton town.
Housing	Question how much housing need required for J27; Council must publish evidence base to justify additional housing need arising from J27	Samford Peverell and District Sustainable Villages (5825); Pegasus Group on behalf of Lightwood Land (6686); Jillings Heynes Planning on behalf of Progress Land Ltd (6758); Individual (4833; 6685);	The analysis of housing need arising from the J27 allocation was undertaken by Edge Analytics on behalf of the Council. Their report which is part of the Council`s evidence base takes a point between the high and low housing growth forecasts. The report indicates an additional 260 on the 7600 already in the Local Plan for the plan period is reasonable adjustment for the J27 allocation.
Housing	Advanced yields on existing proposed allocations should have been actively investigated before “additional allocations to accommodate	Vail Williams on behalf of Gleeson Developments Ltd (6685);	This representation seeks to increase the level of housing on the Pedlerspool site in Crediton. As part of the search for additional housing sites to provide the 260 additional units required to meet the implications of J27 a number of sites were considered. Tiverton and Samford Peverell were chosen to provide the additional housing as they were reasonably well located to the proposed employment allocation.

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
	additional housing growth associated with increased employment growth at j27 site.		
Housing	Housing at Sampford Peverell not required, will not serve people at J27, only put in for J27 allocation.	Individual (6286; 6331; 6345; 6355; 6372; 6406; 6717)	The additional 60 houses at Samford Peverell, Policy SP2 were included as an additional housing allocation to increase housing provision overall in the plan to cater for part of the increase housing need arising from the allocation of the site at J27. The allocation SP2 is 60 out of the plan total of 7860. The SP allocation is not specifically intended for persons at J27 it is the addition of 60 extra dwellings in the total provision within the plan to cater for overall housing need now J27 is allocated.
Services/TIC	Site has existing roadside facilities. Services available at Taunton Deane, J28 and J30. A tourist information building on the site has not been used for many years. (New roadside services have permission at J27 and that's all that's required . All that's needed at J27 is improved roadside services.)	Taunton Deane Borough Council (6728); Individual (5011; 6159; 6372; (6377; 1588; 0814; 4201; 5346; 5348; 6412; 6696; 6697; 6698; 6701; 6742;) 6720);	Planning permission already exists to develop part of the site for Roadside Services.
Increase noise, light and air pollution.	Noise and light pollution from development	Samford Peverell Parish Council (0071); 5346;	The allocation Policy J27 makes provision for environmental protection and enhancement including noise mitigation. Proposals for a major facility of this size will

Policy/para Policy J27	Summary of main comments	Comments made by (customer ID in brackets)	Response
		5348; 4564; 5251; 6302; 6364; 6388, 6399; 6414; 6696; 6720; 6761;	require detailed masterplanning which will address the issues of noise and light pollution together with other environmental impacts to ensure mitigation measures are provided where necessary to reduce noise and light impacts to an acceptable level.
Housing	J27 will not provide sufficient jobs for the housing development east of Cullompton.	Individual (5621);	Cullompton has its own areas designed for employment development. Employment land is also allocated in Willand, Tiverton and Crediton within the district. 147,000 square metres of employment land is designated in the Local Plan.
Mitigation	Mitigation measures for J27 proposal are weak. Habitats Regulations Assessment : Report December 2017 concludes :- The J27 allocation , alone and in combination with the Local Plan proposals will not have an adverse impact on the Culm Grasslands SAC. Criterion `e) of the policy should therefore be revised. A number of Priority Habitats exist within the site. Important these are retained and enhanced. Provision of Green	Council for the Protection of Rural England (6212); Natural England (6242); Individual (6379, 6414)	It is noted that the J27 allocation and development is not considered to adversely impact on the Culm Grasslands SAC. Criterion e) can be deleted from the policy.

<b>Policy/para Policy J27</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
	Infrastructure should be set out as a policy requirement in the plan.		
Free School.	Request for a Free School site at J27.	Education Matters (6246);	The request is noted.
Housing numbers	Policy S3 makes provision for 393 dwellings for J27 allocation, should be removed as unsustainable	CPRE Devon (6714);	The 393 is the overall plan provision per annum to provide the 7860 over the plan period. The original figure was 380 (7600) over the plan period. The 393 has only added 13 per annum over the plan period to cater for J27 allocation.

## Rural Areas (Allocated)

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
BA4 (mod) School Close, Bampton	Supports proposed changes to policy BA4.	Individual (2781)	Support noted.
CB1 (mod) Land off Church Lane, Cheriton Bishop	Supports provision of landscape buffer including replacement hedgerows.	Woodland Trust (6207)	Support noted.
	Criterion d) is a welcome safeguard but no details are given in terms of what would constitute an acceptable buffer.	Individual (4634)	The provision of a landscape buffer along the northern boundary aims to protect the privacy of adjoining residents given the topography of the site. Options for what constitutes an acceptable landscape buffer will be considered at the planning application stage.
	Northern landscape buffer strip provides a break between existing new neighbouring properties and the proposed development. A similar buffer must be provided at the southern end to reduce impact on amenity.	Individual (4634)	The site is widely visible from the north and therefore a landscape buffer is considered appropriate to reduce the impact on amenity of the neighbouring properties. It is not considered that the same level of impact would occur at the southern end of the site and therefore no changes to the policy are proposed. However, any application would need to comply with Policy DM1 'High Quality Design' which requires visually attractive places that are well integrated with surrounding buildings, streets and landscapes, and do not have an unacceptably adverse effect on the privacy and amenity of the proposed or neighbouring uses.
	20 dwellings now to be accommodated on the reduced site size with 30% affordable housing. All 14 main properties should not be of the executive large type but a mixture of sizes.	Individual (4672)	Any planning application for the site would need to provide a mix of dwelling sizes and types appropriate to the evolving needs of Mid Devon's population.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
CF1 (mod) Barnshill Close, Cheriton Fitzpaine	There is no functional relationship or intervisibility between the Conservation Area and the proposed site. The site is surrounded on all sides by relatively new development from the 1980s onward. The additional text is therefore considered unnecessary.	Mrs A Hawkings and Mr D Parsons c/o WYG (6748)	Not agreed. The proposed modification reflects the findings of the Council's Historic Environment Appraisal which acknowledges that the site lies outside of the designated conservation area. However, it also states that the site forms a significant location in terms of entry to the more historic core of the village. The amendment reflects this and requires good design to minimise any impact to the setting of listed buildings as well as the conservation area.
HE1 (mod) Depot, Hemyock	Notes deletion of the allocation and welcomes lack of alternative allocation.	Blackdown Hills AONB Partnership (1195)	Comments noted.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	<p>Consultation/process issues: no consultation with Parish Council and limited time/opportunity for local residents to engage in consultation process/prepare objections. Question imposed timescales.</p>	<p>Sampford Peverell Parish Council (0071); Cllr Jenny Roach (0025); individual (1588; 2742; 3754; 3729; 5346; 5858; 5921; 6254; 6262; 6285; 6286; 6291; 6294; 6300;6310; 6331; 6336; 6337; 6338; 6341; 6342; 6347; 6348; 6354; 6355; 6360; 6364; 6367; 6368; 6375; 6376; 6377; 6387; 6391; 6392; 6402; 6404; 6408; 6413; 6417; 6424; 6428; 6430; 6431; 6432; 6433; 6695; 6696;6697; 6701; 6702; 6710; 6713; 6720; 6725; 6726; 6761; 6762; 6792)</p>	<p>The Higher Town site was the subject of two month consultation in 2014 as part of the options consultation. In response to this consultation there were over 1,200 representations received of which only five were with regard to the Higher Town site, two in support, three objections. Although the response was low, the site received more support than the other sites in Sampford Peverell. The Parish Council was consulted at that time and took the opportunity to respond: "Members of Sampford Peverell Parish Council are of the opinion that the Higher Town site is the best situated of those offered in terms of access for limited development". The Parish Council wished to see a low density development so as not to require infrastructure improvement, or significant expansion of the village primary school, the general store, the medical centre, or enhancement of transport provision.</p> <p>The Higher Town site was not included within the 2015 Local Plan as there was no need for the site at that time to meet the then objectively assessed housing need. Since then a higher level of housing need has been calculated which has prompted MDDC to reconsider the Higher Town site. The proposed modifications' six weeks consultation has provided another opportunity for people to comment. The timing of MDDC plan submission date has sought to meet the Government deadline and has also sought to make progress on the plan following delays occurred in the process. Nevertheless, the Council resolved to re-consult on the plan prior to submission, including holding exhibitions to ensure public engagement.</p>

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	General objection: opposes proposal for 60 houses on this site.	Individual (6411)	Objection noted.
	Association with J27: need for J27 is developer driven. Removal from Local Plan would take away need for SP2 allocation.	CPRE Devon (6714); individual (6354)	National planning policy acknowledges the importance of ensuring housing numbers and employment opportunities are considered in tandem. The Council decision to pursue a commercial allocation at J27 has led to a need for additional housing. Due to the increase in housing numbers required in the plan as a result of the J27 allocation and the subsequent allocation of this site as a result, policy SP2 is subject to the commencement of development at J27.
	Association with J27: concern development will go ahead even without J27 proposal; no provision for re-instatement of settlement boundary if J27 removed from Local Plan.	Sampford Peverell Parish Council (0071); individual (6428)	Policy SP2 is subject to the commencement of development at J27. Adoption of the Local Plan Review will reinstate the Council's 5 year housing land supply.
	Association with J27: if J27 employs local people, they already have homes so no need for new housing.	Individual (5251)	National planning policy acknowledges the importance of ensuring housing numbers and employment opportunities are considered in tandem. The additional housing in association with the J27 proposal reflects a general increase in housing need in the area associated with the provision of more employment opportunities. There is no mechanism through planning to control where J27 workers reside. J27 employment could include Mid Devon workers who may wish/need to change the size of property, Mid Devon residents not currently on the housing ladder and new residents to the area.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Association with J27: weak/questionable link between J27 employment and need for 60 new homes in Sampford Peverell. Cannot be dictated that occupants of new housing will work at J27.	Burllescombe Parish Council (0067); Sampford Peverell and District Sustainable Villages (5825); CPRE Mid Devon (6212); individual (5011; 5346; 6282; 6286; 6291; 6298; 6366; 6372; 6388; 6417; 6720; 6766; ; 6786)	<p>National planning policy acknowledges the importance of ensuring housing numbers and employment opportunities are considered in tandem. EDGE Analytics were commissioned to assess what the additional housing requirements would be to meet the housing needs arising from the Junction 27 proposal.</p> <p>The selection criteria used for identifying additional sites were as follows: sites previously consulted on as part of the Local Plan Review Options consultation (January 2014) or received as a local plan representation; sites considered by the Strategic Housing Land Availability Assessment Panel; compliance with the Local Plan Review Distribution Strategy; and proximate to the development proposal at Junction 27.</p> <p>It is agreed that it cannot be dictated that occupants of the new housing will work at J27; however it was considered logical to include proximity to the proposed commercial allocation at J27 as a relevant consideration. It should also be noted that Sampford Peverell has more services and facilities than most villages in the district and has a regular bus service and is proximate to the mainline train station.</p>

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Alternative sites: proposed housing in wrong place.	Burlescombe Parish Council (0067); Sampford Peverell Parish Council (0071); individual (6696; 6697; 6766)	<p>The Higher Town site was considered as part of the 2014 options consultation. This consultation included a number of sites in Sampford Peverell which had been submitted by willing landowners. All these sites had been considered by the SHLAA panel. In response to this consultation there were over 1,200 representations received of which only five were with regard to the Higher Town site, two in support, three objections. Although the response was low, the site received more support than the other sites in Sampford Peverell. The Parish Council was consulted at that time and took the opportunity to respond: "Members of Sampford Peverell Parish Council are of the opinion that the Higher Town site is the best situated of those offered in terms of access for limited development". The Parish Council wished to see a low density development so as not to require infrastructure improvement, or significant expansion of the village primary school, the general store, the medical centre, or enhancement of transport provision.</p> <p>The Higher Town site was not included within the 2015 Local Plan as there was no need for the sites at that time to meet the then objectively assessed housing need. Since then a higher level of housing need has been calculated which has prompted MDDC to reconsider the Higher Town site.</p> <p>The Higher Town site is deemed deliverable and sustainable by the SHLAA assessment and is considered the most appropriate site to come forward of those previously consulted on. Also it had previously been supported by the Sampford Peverell Parish Council albeit for fewer dwellings.</p>

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Alternative sites: housing proposals elsewhere in Tiverton/Cullompton could cater for J27 workers. Potential for enhanced yields from sites already deemed deliverable should be investigated first.	Cllr Jenny Roach (0025); Gleeson Developments Ltd. c/o Vail Williams LLP (6685); individual (4830;5011; 5251; 6259; 6286; 6362; 6364; 6372; 6403; 6786)	Other sites were considered including sites in Tiverton. One was allocated 'Land at Blundells', another site at Hartnoll Farm was rejected by Members in favour of Higher Town Sampford Peverell. A significant amount of development is already programmed for Cullompton during this period. Increasing densities on other sites would have led to problems of overdevelopment and overly optimistic assumptions of delivery. In particular consideration was given to whether higher densities could have been achieved at 'Land at Blundells' (policy TIV16), however given issues relating to flood restrictions this was not deemed appropriate.
	Alternative sites: proximity of other villages to J27. Reasonable alternative sites not adequately assessed, e.g. Uffculme.	Messrs Persey C/O Jillings-Haynes Planning Ltd (4654); individual (6786)	Sites were considered at Uffculme but were not included as the sites were not deemed to be appropriate extensions to the village, had access difficulties and some were in Minerals Safeguarding Areas.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Alternative sites: more suitable and sustainable sites elsewhere in Sampford Peverell - e.g. at other end of village closer to M5, A361 and Tiverton Parkway; no explanation for why other sites rejected.	Individual (1365; 3729;3754; 5251; 5921; 6254; 6264;6265; 6282; 6285; 6286; 6298; 6310; 6320; 6322; 6323; 6336; 6338; 6339; 6349; 6362; 6364; 6366; 6367; 6373; 6387; 6402; 6404; 6406; 6408; 6413; 6415; 6433; 6700; 6701; 6702; 6710; 6710; 6725; 6762; 6786; 6792)	The Higher Town site was considered as part of the 2014 options consultation. This consultation included a number of sites in Sampford Peverell which had been submitted by willing landowners. All these sites had been considered by the SHLAA panel. In response to this consultation there were over 1,200 representations received of which only five were with regard to the Higher Town site, 2 in support, three objections. Although the response was low, the site received more support than the other sites in Sampford Peverell. The Parish Council was consulted at that time and took the opportunity to respond: "Members of Sampford Peverell Parish Council are of the opinion that the Higher Town site is the best situated of those offered in terms of access for limited development". The Higher Town site is deemed deliverable and sustainable by the SHLAA assessment and is considered the most appropriate site to come forward of those previously consulted on.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Alternative sites: Mountain Oak Farm (DT/sh/SHLAA 12/12/13); no explanation for removal from plans. Easier access to village facilities.	Individual (2742; 6321; 6382; 6408; 6415; 6710; 6710; ; 6786)	<p>A number of sites in Sampford Peverell were considered as part of the 2014 options consultation. These sites had been submitted by willing landowners. All these sites had been considered by the SHLAA panel. Although the response was low, the Higher Town site received more support than the other sites in Sampford Peverell. The Parish Council was consulted at that time and took the opportunity to respond: "Members of Sampford Peverell Parish Council are of the opinion that the Higher Town site is the best situated of those offered in terms of access for limited development". Neither the Higher Town site nor the Mountain Oak site were included within the 2015 Local Plan as there was no need for the sites at that time to meet the then objectively assessed housing need. Since then a higher level of housing need has been calculated which has prompted MDDC to seek additional sites. The Higher Town site is deemed deliverable and sustainable by the SHLAA assessment and is considered the most appropriate site to come forward of those previously consulted on.</p> <p>As set out in the 2015 Sustainability Appraisal although a smaller element of the site could be developed at Mountain Oak there is very little development in the vicinity of the site, as such there is greater potential for landscape and visual impact. The smaller site would also have similar impacts as the site assessed as part of the Sustainability Appraisal with regard to its poor spatial relationship with the village being divorced from the main built extent of Sampford Peverell. As such is it not viewed to be a reasonable alternative.</p>

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Alternative sites: former Parkway Hotel site (SP1) would be more suitable alternative brownfield site; could meet local affordable housing needs.	Sampford Peverell Parish Council (0071); individual (2502; 4830; 5346; 6309; 6323)	SP2 was already included in the Local Plan Review and its inclusion did not negate the need for an additional site to meet an increased level of housing need.
	Housing numbers: councillors unaware that a range of housing numbers was proposed by consultants rather than a precise figure.	Individual (6402; 6430; 6431; 6432; 6720)	The Local Plan is evidenced based and the associated housing is based on a mid-point which the demographic consultants have supported as being the most reasonable position for the Council to take. The supporting evidence base was available.
	Housing numbers: too many houses for village, conflicts with Policy S13	Sampford Peverell Parish Council (0071); individual (6364; 6387; 6403; 6404; 6696; 6697; 6701; 6702; 6724)	Given the range of facilities in the village, Sampford Peverell has relatively limited growth in recent years. It is not agreed that the allocations within the plan period up to 2033 conflicts with Policy S13, particularly given the range of facilities in the village and the proximity of the railway station.
	Design issues: no demand for 'executive' style housing in village	Individual (6254)	Policy S1 (g) and Policy S(b) places emphasis on the importance of housing mix. SP2 is intended to cater for a variety of housing needs.
	Deliverability of site: sloping site is known to have been unstable in the past	Individual (6375; 6376)	MDDC has not received any evidence that the site is undeliverable nor that it is unstable.
	Deliverability of affordable housing element: most workers at J27 will be on minimum wage so unable to afford these homes.	Individual (1365; 1588; 6345; 6404; 6408; 6786)	Policy S1 (g) and Policy S(b) places emphasis on the importance of housing mix. SP2 is intended to cater for a variety of housing needs. Importantly the proposal includes 30% affordable housing. As with any commercial venture development at J27 is likely to have a mix of employees including managerial and entrepreneurial positions as well as lower paid part time jobs.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Would lead to loss of quality (Grade 2) agricultural land.	Uplowman Parish Council (0069); CPRE Mid Devon (6212); individual (1588; 3754; 3729; 4830; 5921; 6259; 6282; 6285; 6291; 6300; 6310; 6320; 6323; 6336; 6337; 6339; 6342; 6345; 6347; 6348; 6349; 6355; 6366; 6367; 6368; 6375; 6376; 6387; 6391; 6392; 6402; 6403; 6404; 6406; 6408; 6410; 6428; 6430; 6433; 6698; 6701; 6702; 6710; 6720; 6722; 6723; 6725; 6726; 6742; 6761; 6762; 6763; 6792)	Objection noted. Site is on grade 2 agricultural land. 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).
	Environment/heritage impact: loss of hedgerow.	Sampford Peverell Parish Council (0071); individual (5858; 6254; 6320; 6323; 6354; 6355; 6366; 6375; 6376; 6387; 6403; 6404; 6406; 6408; 6425; 6428; 6695; 6696; 6697; 6701; 6702; 6762; 6763; 6786)	Some loss of hedgerow would be required to enable access; however careful design should be considered to minimise this impact including incorporating new hedgerow into the design of the development.
	Environment/heritage impact: potential artefacts/remains of archaeological value on site	Individual (6404; 6786)	The site does lie in an area of archaeological potential. The Historic Environment Record recording pre-historic activity, any application will need to be accompanied by archaeological investigation and appropriate mitigation.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Environment/heritage impact: increased air pollution	Individual (6368; 6695; 6722)	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. 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.
	Environment/heritage impact: increased light pollution	Individual (5011; 6372; 6403)	At application stage the proposal will need to comply with DM4 'Pollution', which covers light pollution.
	Environment/heritage impact: impact on local cemetery; overlooked, increased noise.	Individual (6355; 6786)	The proximity of the cemetery is acknowledged. The layout of the site and design would need to consider the impact on the surrounding area including the cemetery at the application stage.
	Environment/heritage impact: loss of green field site/rural landscape.	Individual (6364; 6404; 6406; 6408; 6684; 6725; 6746; 6762; 6763; 6786)	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 allocation is not in an area covered by a landscape designation. The landscape implications have been considered in the decision to allocate the site balancing the loss against other factors (see Sustainability Appraisal for site by site scoring).

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Environment/heritage impact: character/setting of village.	Individual (4830; 6259; 6354; 6355; 6360; 6368; 6403; 6410; 6424; 6428; 6684; 6746; 6761; 6786)	<p>A Historic Environment Appraisal has been prepared which acknowledges that the Sampford Peverell Conservation Area is adjacent to the eastern boundary of the site, and that the Grand Western Canal Conservation Area lies some distance to the south. It also acknowledges the stone walling and the proximity of the Grade II listed former farmhouse. Also it recognises other important unlisted buildings (equivalent to heritage assets); these also abut the eastern boundary of the site. These buildings are modest in scale and traditional in appearance. Any new buildings in close proximity to them should be respectful in design to avoid an adverse effect on their setting and the setting of the conservation area. Green infrastructure is also included within the site partly in recognition of the setting of these buildings. A suggested modification has been proposed through this consultation to increase the extent of the Green Infrastructure to better respect the setting of these buildings. Mid Devon District Council is supportive to adjusting the extent of the Green Infrastructure and has included this as a potential further minor modification.</p> <p>The application will also 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.</p>

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Visual impact: prominent high point on edge of village, over bearing on neighbouring properties/village conservation area.	Individual (1365; 4830; 5011; 6254; 6264; 6265; 6282, 6291; 6309; 6310; 6320; 6338; 6341; 6342; 6354; 6355; 6361; 6367; 6372; 6387; 6388; 6402; 6403; 6408; 6424; 6425; 6428; 6431; 6684; 6695; 6701; 6702; 6724; 6725; 6762; 6763; 6786)	The higher parts of the site are proposed for green infrastructure and to be left undeveloped. The allocation is for low density development and there is sufficient land available on the Higher Town site to ensure that development need not be over bearing to neighbouring properties, or indeed have any unacceptable impact on the conservation areas.
	Visual impact: previous householder application on Turnpike recommended for rejection for being 'over bearing'; proposal will have greater impact	Individual (3729; 6408)	That a specific householder application for extensions being considered 'over-bearing' by officers is irrelevant to whether the Higher Town allocation is acceptable. The proposals and planning assessment are distinctly different. The allocation is for low density development and there is sufficient land available on the Higher Town site to ensure that development need not be over bearing in relation to its surroundings including nearby properties.
	Visual impact: houses on skyline, impact of views from canal and wider surrounding area (including conservation area). Landscaping of site will not be able to reduce prominence of site.	Sampford Peverell Parish Council (0071); individual (3729; 3754; 5251; 5858; 5921; 6285, 6291; 6300;6310; 6320; 6323; 6336; 6337; 6342; 6345; 6347; 6348; 6354; 6355; 6361; 6364; 6366; 6368; 6388; 6402; 6403; 6404; 6406; 6408; 6415; 6424; 6425; 6428; 6696; 6697; 6710; 6713; 6720; 6722; 6726; 6761; 6786; 6792)	Not agreed. Limiting development to the lower part of the site will limit the impact on the skyline and the development's prominence.
	Visual impact: density of housing restricts ability for tree planting etc. to mitigate impact.	Individual (6291)	The proposal is for a low density development with ample opportunities for tree planting.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Visual impact/site layout: proposed area for development cuts across contour lines.	Individual (6291; 6336; 6342; 6355; 6424; 6428; 6698; 6742)	The higher parts of the site are proposed for green infrastructure and to be left undeveloped. The area chosen for this was informed by the contour lines. A suggested modification has been proposed through this consultation to increase the extent of the Green Infrastructure. Mid Devon District Council is amenable to adjusting the extent of the Green Infrastructure and has included this as a potential further minor modification. This change will leave an even greater part of the site undeveloped.
	Construction impacts: increased noise pollution	Individual (6368)	Issues with respect to construction management will be considered in more detail at application stage which will include the requirement for a construction management plan.
	Construction impacts: traffic disruption	Individual (6723)	Issues with respect to construction management will be considered in more detail at application stage which will include the requirement for a construction management plan.
	Construction impacts: significant earth removal could affect neighbouring properties in conservation area.	Individual (6354; 6355)	Issues with respect to construction management will be considered in more detail at application stage which will include the requirement for a construction management plan.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Accessibility: lack of safe pedestrian access to site. No continuous footway; Turnpike road must be crossed at various places. SA contains incorrect information on current footpath provision.	Sampford Peverell Parish Council (0071); individual (1365; 1588; 3729; 3754; 4830; 5011; 5346; 5348; 5858; 5921; 6254; 6259; 6264; 6265; 6282; 6286; 6291; 6298; 6300; 6309; 6310; 6320; 6322; 6331; 6336; 6337; 6338; 6339; 6341; 6342; 6345; 6347; 6348; 6349; 6354; 6355; 6360; 6361; 6364; 6366; 6367; 6372; 6373; 6375; 6376; 6383; 6387; 6388; ; 6391; 6392; 6402; 6403; 6404; 6406; 6408; 6410; 6413; 6415; 6424; 6425; 6428; 6430; 6431; 6432; 6433; 6684; 6696; 6697; 6698; 6700; 6701; 6702; 6710; 6713; 6720; 6722; 6723; 6724; 6725; 6726; 6742; 6746; 6761; 6762; 6763; 6786; 6792)	<p>Within the village, pedestrian and cycle links are good, with access to the Grand Western Canal and the cycle path connecting the train station to Tiverton and Willand.</p> <p>It is recognised that there is a small break in the footpath in the village however the statement set out in the Sustainability Appraisal remains correct. The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists.</p> <p>The Council is proposing a further minor modification to policy SP2 to add the following criterion to ensure 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by the Highway Authority.</p>
	Accessibility: topography of site provides poor accessibility	Individual (3729; 4830; 6320; 6354; 6373; 6404; 6700)	The site layout will need to consider safe pedestrian, cycle and vehicular access to and within the site. An important aspect for consideration will be ensuring appropriate gradients for such routes appropriate for wheel chair access.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Accessibility: site on wrong side of village for access to major transport links (M5/A361/Tiverton Parkway); promotes car use.	Individual (6373; 6387; 6406; 6408; 6696; 6697; 6710; 6722; 6761; 6786)	Not agreed, the proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. The site is on a bus route with a frequent service. Tiverton Parkway rail station is within 2.1 km of the site.
	Accessibility: limited access to public transport	Individual (6373)	Sampford Peverell currently benefits from bus services to Halberton and Tiverton to the west and Willand, Cullompton and Exeter to the south. These services are regular by rural standards. Sampford Peverell is also proximate to Tiverton Parkway station which is on the mainline.
	Highways: safety concerns regarding access to primary school.	Individual (1588; 3754; 5251, 5346; 5348; 6259; 6310; 6320; 6322; 6336; 6337; 6338; 6347; 6348; 6354; 6355; 6360; 6366; 6368; 6373; 6402; 6415; 6424; 6428; 6698; 6702,6723; 6725; 6742; 6746; 6761; 6762; 6763; 6792)	The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. Devon County Council officers have stated that "It is technically feasible for an access to be formed on to Higher Town, exact details, levels will need to meet the current design standards set out in the Devon design guide and Manual for streets." The Council is proposing a further minor modification to policy SP2 to add the following criterion to ensure 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by the Highway Authority. The precise arrangements will be the subject of more detailed consideration at the planning application stage, which will need to include a transport assessment specifying the requirements for all modes of transport, including giving consideration to access to the school.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Highways: impact of additional traffic on village. Roads are narrow in several places and often congested. Several driveways with limited visibility.	Individual (5251; 5346; 5858; 5921; 6259; 6264; 6265; 6282; 6285; 6291; 6294; 6298; 6300; 6309; 6320; 6323; 6331; 6336; 6337; 6338; 6341; 6342; 6347; 6348;6354; 6355; 6360; 6361; 6362; 6366; 6368; 6373; 6375; 6391; 6402; 6403; 6404; 6410; 6428; 6431; 6432; 6433; 6684; 6695; 6698; 6702; 6710; 6720; 6725; 6726; 6742; 6761; 6762; 6763; 6792)	<p>The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. Devon County Council officers have stated that "It is technically feasible for an access to be formed on to higher town, exact details, levels will need to meet the current design standards set out in the Devon design guide and Manual for streets."</p> <p>The Council is proposing a further minor modification to policy SP2 to add the following criterion to ensure 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by the Highway Authority.</p> <p>The precise arrangements will be the subject of more detailed consideration at the planning application stage, which will need to include a transport assessment specifying the requirements for all modes of transport, including giving consideration to access to the school.</p>
	Highways: dangerous/unsatisfactory vehicular access to site	Individual (5011; 6264;6265; 6320; 6354; 6362; 6364; 6372; 6375; 6376; 6388; 6415; 6720; 6762; 6763)	Devon County Council does not object to the allocation on highway grounds and DCC officers have stated that "It is technically feasible for an access to be formed on to higher town, exact details, levels will need to meet the current design standards set out in the Devon design guide and Manual for streets."

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Highways: significant upgrades required to local highways infrastructure in order to cope with increased demand (including A361 slip road)	Individual (1365; 6366; 6724)	A planning application would need to be accompanied by a Transport Assessment to ensure full consideration of impact of the development on the transport network. The policy includes criterion b requiring that no development should occur until the completion of the improved access works to the A361. A361 slip improvements are proposed as part of future Local Transport Plan bids by DCC.
	Highways: impact of additional traffic on M5 Junction 27	Individual (6375; 6376)	A planning application would need to be accompanied by a Transport Assessment to ensure full consideration of impact of the development on the transport network.
	Sewerage/drainage: system is at capacity; only minor developments possible.	Individual (1365; 3754; 5011; 5348; 6264; 6265; 6310, 6341; 6361; 6364; 6368; 6372; 6388; 6392; 6410; 6424; 6720; 6723; 6761)	SWW has not raised any objections to the Local Plan modifications. Detailed arrangements with respect to foul and surface water drainage will be determined at planning application stage.
	Other infrastructure: additional surface run off will increase flood risk on road through Higher Town. Difficulty with implementing SUDS.	Individual (6391; 6406; 6725; 6761; 6786 )	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 proposal would need to comply with policy DM1 which sets requirements over SUDs and drainage. No objection to the allocation has been received by DCC (Lead Local Flood Authority).

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Other infrastructure: water supply to village unreliable/at capacity.	Individual (5348; 6310, 6341; 6361; 6375; 6376; 6377; 6388; 6424; 6713; 6723)	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.
	Other infrastructure: difficulty of directing water supply to such an elevated site	Individual (6254; 6323, 6341; 6368; 6410; 6695)	There is nothing to suggest the supplying water to this site will be particularly problematic such as to prevent its development.
	Other infrastructure: electricity supply to village unreliable/at capacity.	Individual (6377; 6424)	Western Power has not raised any objection to the inclusion of this site nor suggested difficulties with supply.
	Health care provision: NHS/GP services in village currently at/over capacity using temporary facility; 60 families will create additional demand.	Individual (4830; 5011; 5251; 5858;5921; 6282; 6294; 6347; 6348; 6361; 6362; 6364; 6372; 6375; 6376; 6402; 6723)	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.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Education provision: village primary school has very limited/no spare capacity (do not agree with 40 places figure); current residents have to send children elsewhere. No realistic scope for expansion of current site. Insufficient spare capacity at Uffculme School.	Sampford Peverell Parish Council (0071); individual (1588; 4830; 3754; 5011; 5251; 5346; 5858; 5921; 6264;6265; 6282; 6285; 6286; 6291; 6294; 6309; 6320; 6323; 6331; 6336; 6338; 6339; 6342; 6347; 6348; 6354; 6361; 6362; 6364; 6366; 6368; 6372; 6373; 6375; 6376; 6388; 6402; 6403; 6404; 6406; 6408;6410; 6424; 6431; 6433; 6684; 6710; 6720; 6723; 6724; 6726; 6746; 6761; 6786)	Devon County Council has stated that there is sufficient capacity in the Primary School to accommodate the needs arising from this development. This position has been re-iterated within DCC's representation to the proposed modifications consultation
	Education provision: risk to primary school playing fields; new classrooms could be built to cater for increased demand for places as result of development.	Individual (1365)	Devon County Council has stated that there is sufficient capacity in the Primary School to accommodate the needs arising from this development. This position has been re-iterated within DCC's representation to the proposed modifications consultation. There has been no suggestion that there would be any loss of school playing field to cater for increased demand for places as result of this development.
	Education provision: Sampford Peverell Primary school is forecast to have sufficient capacity to accommodate the development proposed	Devon County Council (0139)	The position of DCC as Education authority over education provision in connection with this site is noted.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	Impact on village amenities: policy does not comment on impact of local services (schools, shops) and infrastructure contributions required from developer.	Sampford Peverell and District Sustainable Villages (5825); individual (6286)	Devon County Council has stated that there is sufficient capacity in the Primary School to accommodate the needs arising from this development. This position has been re-iterated within DCC's representation to the proposed modifications consultation. More development generally in villages will help keep village shops and pubs viable. Developers will be required to pay Community Infrastructure Levy of which 15% will go directly to the local community.
	Impact on village amenities (general)	Individual (6430; 6696; 6697)	Devon County Council has stated that there is sufficient capacity in the Primary School to accommodate the needs arising from this development. This position has been re-iterated within DCC's representation to the proposed modifications consultation. More development generally in villages will help keep village shops and pubs viable. Developers will be required to pay Community Infrastructure Levy of which 15% will go directly to the local community.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
SP2 (mod) Higher Town, Sampford Peverell	The slip road improvements at the Sampford Peverell junction, A361, have been removed from the North Devon Link Road project and it is unlikely that the Junction 27 development site will provide a contribution towards these. As a result the policy wording which states that the site will 'come forward following the commencement of development of the M5 Junction 27 allocation' would seem unreasonable.	Devon County Council (0139)	<p>This comment would appear to relate more to the criterion with regard to A361 improvements rather than the commencement of J27. The latter is included in the policy in acknowledgement that the site is needed as a result of additional housing required as a result of the J27 development, and does not relate to traffic generation.</p> <p>Whilst DCC has raised questions regarding the funding of the A361 improvements in its representation, MDDC is not recommending a change at this time, but we understand more information will be available in the lead up to the examination as to whether the A361 improvements should be a pre-requisite for development of Higher Town.</p>
	Supports development; need to provide more affordable housing in the local area to keep area economically vibrant rather than a commuter zone.	Individual (6346)	Support noted.
	Support new development subject to serious consideration of infrastructure and village amenities; in particular capacity of school and road structure	Individual (6386)	<p>Comments noted. A planning application would need to be accompanied by a Transport Assessment to ensure full consideration of transport issues.</p> <p>Devon County Council has stated that there is sufficient capacity in the Primary School to accommodate the needs arising from this development. This position has been reiterated within DCC's representation to the proposed modifications consultation.</p>

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
SP2 (mod) Higher Town, Sampford Peverell	Conditional support for policy. Suggest increasing allocation to no more than 110 units (in line with more standard densities) to ensure viability of site.	Mr G Cottrell & Family, Mr T Burns, Mrs Carol Pearce & Mrs Wendy Upham & Families c/o Harcourt Kerr(6790)	Support noted. Low density is required to respect the existing character of edge of village housing, the relationship with the conservation area and the setting of the listed building.
	Conditional support for policy. Remove dependence on J27 development and improved A361 access.	Mr G Cottrell & Family, Mr T Burns, Mrs Carol Pearce & Mrs Wendy Upham & Families c/o Harcourt Kerr(6790)	Support noted. Whilst DCC has raised questions regarding the funding of the A361 improvements in its representation, MDDC is not recommending a change at this time, but we understand more information will be available in the lead up to the examination as to whether the A361 improvements should be a pre-requisite for development of Higher Town.
	Welcome commitments to mitigate wildlife impacts including protection of hedgerows and provision of green infrastructure.	Woodland Trust(6207)	Support noted.
	Green infrastructure is a welcome addition; however the line of this should be redrawn to finish at the southern end of the conservation area. Include 'wildlife area' to mitigate loss of hedgerow.	Individual (6354; 6355; 6408; 6428; 6698; 6742)	The Council is sympathetic to this point and is happy to recommend an adjustment to the line of the green infrastructure to limit the impact of development with the setting of the listed building. The proposal for a wildlife area could be incorporated within the green infrastructure.
UF1 (mod) Land West of Uffculme, Uffculme	Allocation of land a direct result of MDDC putting the plan on hold for so called technical rewriting. Land extends into the floodplain.	Uffculme Parish Council (54); Individual (4407)	Not agreed. The proposed allocation of the site reflects an appeal decision granting outline planning permission for the site. The main issue in determination of the appeal was whether, having regard to the development plan, the National Planning Policy Framework, the housing land supply of the Council and the scale and location of the development, the appeal scheme would constitute a sustainable form of development.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
UF1 (mod) Land West of Uffculme, Uffculme	An expansion of Uffculme Primary School will be necessary to accommodate the development proposed as the school is currently forecast to be at capacity. Expansions of secondary provision at Uffculme will also need to provide capacity for the development proposed.	Devon County Council (139)	The proposed allocation reflects an appeal decision granting outline planning permission for the site. The decision states that the Education Authority provided confirmation that the primary school has capacity and the development would make a financial contribution to mitigate its effect upon the secondary school. A draft Section 106 agreement was submitted in advance of the Inquiry and its terms were discussed during proceedings. The deed includes obligations relating to education contributions which were justified on the basis that the secondary school is at capacity.
	Allocation of site sets precedent for further ribbon development along Uffculme Road.	Individual (4407)	The proposed allocation reflects an appeal decision granting outline planning permission for the site. Policy S13 of the Local Plan Review sets the criteria for development proposals within designated villages. Uffculme, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.
	Supports allocation but requests that the following sentence is deleted as the site should be subject to a straightforward development allocation: '...provides the criteria to be applied as a starting point, should any revised scheme be submitted'	Devon and Cornwall Housing Group c/o WYG (6358)	Affordable housing provision for the site was determined through an appeal decision granting outline planning permission for the site. Policy S3 requires that a target of 30% affordable housing is applied to the total number of dwellings depending on viability. Given that the policy sets a requirement of 35% affordable housing, it is considered appropriate to state that this is the criteria to be applied as a starting point should any revised scheme be submitted.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
UF1 (mod) Land West of Uffculme, Uffculme	Considers the 35% affordable housing requirement to be too low.	Individual (6677)	Affordable housing provision for the site was determined through an appeal decision granting outline planning permission for the site. The permission includes 21 affordable dwellings equating to 35%. This was considered to be policy compliant with the adopted Local Plan and responds to identified needs within the district.
	Queries site selection for associated additional housing need as a result of Junction 27. States that Land west of Uffculme (given its suitability and availability) would have a much stronger association. If proximity is the key factor in determining association, then reasonable alternatives have not been assessed.	Messrs Persey c/o Jillings Heynes Planning Ltd (4654)	The selection criteria used for identifying additional sites were as follows: sites previously consulted on as part of the Local Plan Review Options Consultation or received as a local plan representation, sites considered by the SHLAA panel, compliance with the Local Plan Distribution Strategy and proximate to the development proposal at Junction 27. Sites in Uffculme were considered but were not included as options as the sites were not deemed to be appropriate extensions to the village, had access difficulties and some were in Minerals Safeguarding Areas.
W12 (mod) Willand Industrial Estate, Willand	Amendment supported to include additional land for employment purposes.	Willand Parish Council (44)	Support noted.
	Supports proposed change that deletes text claiming that the land in control of Pallex, to the north of the Mid Devon Business Park, could not be allocated and therefore should not be allocated.	Rosebourne Properties c/o WYG	Support noted.
	Policy should be amended to refer to the approval of 15/01332/OUT rather than the submission of an application as currently drafted.	Rosebourne Properties c/o WYG	Agreed. A modification is proposed to state 'Access has now been secured to Phase 2 and an application for nearly 13,000 sqm of employment units has been approved.'

<b>Rural Areas: Non Modifications Comments</b>		
The following comments were made with respect to the elements of the plan which have been unchanged since the 2015 consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the responses to the 2015 Consultation.		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
RURAL	Paragraph 3.189 notes that only two rural sites are considered suitable for allocation for commercial development. In a town focussed plan there still needs to be a rural basis for employment. No real evidence to suggest why this is the case.	Harcourt Kerr (1090); Mr & Mrs D Disney C/O Harcourt Kerr; Blackmore & Wootton Families c/o Harcourt Kerr;
	The sustainability of development proposals in the rural areas should be judged on a case-by case basis through the planning balance exercise.	Gladman Developments (5040)
BR1 Hele Road, Bradninch	Concerned whether the bus stop in front of the field will stay where it is if the housing development takes place.	Individual (5256)
CB1 Land off Church Lane, Cheriton Bishop	Parking at the junction of Church Lane has worsened since the 2015 consultation so is currently adversely affected most of the time by overflow car parking.	Individuals (4634; 4672)
	Access to the site is likely to be just north of Glebelands entrance on the eastern side of the road so why widen Church Lane over the length of the site?	Individual (4672)
	Criterion c) will result in passing the problem further down the land and increased traffic associated with new housing on CB1.	Individual (4634)
	Paragraph 3.202 states the site gently undulates. Development of the site will be visible for quite some distance outside the village.	Individual (4634)
	There is a watercourse running along the northern boundary of the site. Due to the topography of CB1 and the gradient leading to this watercourse any development will lead to issues with flooding.	Individuals (4634; 4672; 5781; 6738)

CB1 Land off Church Lane, Cheriton Bishop	No increases in local services are being proposed for the development. No provision for local employment has ever been discussed.	Individual (5781)
	Any new development would have a negative effect on surrounding housing in terms of privacy.	Individual (5781; 6738)
	No local demand has been identified for the development.	Individual (5781)
	20 new houses would double the number of vehicles using the lane where it is already difficult for 2 vehicles to pass.	Individual (6363)
	Upgrades to the access route must also consider the surface run-off risk for pluvial flooding during heavy and prolonged rain.	Individual (6738)
CF1 Barnshill Close, Cheriton Fitzpaine	Fully supports policy. Proposal bridges the gap between Barnshill Close and the site of the new school.	Individual (4832)
	Proposed allocation would not bring any appreciable benefit to the wider village as a sustainable community. Site represents an investment in future open market housing provision whilst seemingly totally ignoring Government advice regarding retail property provision in rural communities.	Mr Skinner c/o Martin Lee Associates Ltd (5190)
	Requests that CF1 is amended to refer to the provision of 10 dwellings which would be a more efficient use of land.	Mrs A Hawkings and Mr D Parsons c/o WYG (6748)
CF2 Land adjacent School, Cheriton Fitzpaine	Proposed allocation would not bring any appreciable benefit to the wider village as a sustainable community. Site represents an investment in future open market housing provision whilst seemingly totally ignoring Government advice regarding retail property provision in rural communities.	Mr Skinner c/o Martin Lee Associates Ltd (5190)
CH1 Barton, Chawleigh	Policy should make specific provision for a Drainage Strategy and a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance.	Individual (6755)
SP1 Former Tiverton Parkway Hotel, Sampford Peverell	Supports allocation of the site. Ten new houses would increase number of dwellings in the village by 2%.	Sampford Peverell Parish Council (71); Individual (5346)

SP1 Former Tiverton Parkway Hotel, Sampford Peverell	Busy junction has limited visibility and is used by regular bus services which have to make a wide swing to get into and out of Whitnage Road.	Individual (6761)
	Any new houses will be completely out of keeping with the area, in a dangerous location and will exacerbate an existing problem.	Individual (6761)
	Site could make a very useful car park for people using the recreation ground who currently have no option other than to park on Whitnage Road.	Individual (6761)
TH1 South of Broadlands, Thorverton	Supports draft allocation but suggests that following pre-application discussions with Mid Devon District Council the site is suitable for accommodating 16 units.	The Church Commissioners c/o Deloitte Real Estate (1517)
WI1 Land east of M5, Willand	Considers site to be a disproportionate for the size of the village and is outside of the settlement limit.	Willand Parish Council (44)
	An outline application for up to 259 dwellings has been submitted and is currently pending determination. This demonstrates that the site is technically suitable and available for development and is sustainably located to accommodate new residential development.	Gallagher Estates Ltd c/o Turley
	Proposed allocation adds nothing to the Willand Community and will be a very poor environment to live in regardless of any attempts to screen noise.	Individual (6201)
	Criterion c) should be amended to read 'Mitigation of any wildlife impact, including protection of three adjacent veteran/notable trees on the development site boundary with the Woodland Trust's adjoining Meadow Park Wood – and the wood itself - by way of a tree planting buffer zone between residential curtilages and the wood boundary of at least 15 metres.'	Woodland Trust (6207)
WI2 Willand Industrial Estate	Suggests change title of site to Mid Devon Business Park to be consistent with all signage and marketing of the site.	Rosebourne Properties c/o WYG

WI2 Willand Industrial Estate	Employment allocation should be removed as Willand is overdeveloped with plenty of employment sites.	Individual (6414)
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<b>Rural Areas (non-allocated): Non Modifications Comments</b>		
The following comments were made with respect to the elements of the plan which have been unchanged since the 2015 consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the responses to the 2015 Consultation.		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
OBA1 Bourchier Close, Bampton	Site should be allocated for residential development for approximately 15 dwellings.	Summerfield Developments Ltd c/o Collier Planning
OCB1 Glebe, Cheriton Bishop	Preferable to CB1 as would also allow the problem of fast traffic through the village to be addressed.	Individual (5781)
OCB2 Land near the Church, Cheriton Bishop	Preferable to CB1 as would also allow the problem of fast traffic through the village to be addressed.	Individual (5781)
OCFNEW Land at White Cross	Alternative site suggested at Land beyond White Cross which would include the purchase adjacent land to the north known as Arthur's wood which would be gifted to the Parish.	Mr F J Skinner c/o Martin Lee Associates Ltd
OCO1 Land Adjacent Dulings Meadow, Coplestone.	Site would represent a logical extension to, and continuation of the recent pattern of growth to the east of the village.	Waddeton Park Ltd c/o PCL Planning (4675)
	Proposed number of houses and proposed site would be detrimental to the village.	Individual (4622)
OHANEW Halberton	Additional site suggested between the existing settlement limit to the north and a dwelling on the edge of the village to the south. Site would provide for a more logical and appropriate extension to the village in planning terms as an infill site.	Mettan Ware (1213)
OHE1 Land SW of Conigar Close, Hemyock	Suggests allocation of the site for residential development. Site has extant planning permission for residential development on land to the east of the site. Settlement limit should be amended accordingly.	Messrs Brooks & Nicholson c/o Greenslade Taylor Hunt (5767)

OHENEW Land off Culmstock Road, Hemyock	Planning application for 40 dwellings and associated infrastructure supported by the Parish Council and is being referred to planning committee for determination shortly. Site would comprise a logical extension to the village.	Waddeton Park Ltd c/o PCL Planning
ONENEW Land to the east of the new estate, Newton St Cyres (Site A)	Site has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate
ONENEW Land to the east of the new estate, Newton St Cyres (Site B)	Site has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate
OSP2 Land off Whitnage Road, Sampford Peverell	Site preferable to SP2. Accessibility would not be an issue as site has pedestrian footpath access right through centre of the village.	Individual (6282)
	Site preferable to SP2 as would be closer to the centre than Higher Town and therefore more inclusive for new residents.	Individual (6282)
	Site much more suitable for the scale of development identified as is closer to J27 such that cycling and walking are likely to be more realistic choices.	Individual (6786)
OSP3 Land at Mountain Oak Farm	Preferable to SP2 as it has direct access onto the main road through the village, has obvious scope for SUDs, closer to J27 so walking and cycling opportunities are more realistic, there is a continuous footpath between the site and the village, lower grade agricultural land and there is scope to provide public open space.	Individuals (6786; 6282;6321; 6408; 6415; 6710; 6713)
	Site is closer to the proposed allocation at J27 so any traffic generated would not have to travel through the village in order to get to work.	Individual (6321; 6710)
	No analysis has been given for exclusion of site over SP2. Site was considered deliverable during the 2013 SHLAA and could be a reasonable alternative to Higher Town.	Individual (2742;6713)
	No objection to the site. Would not object to removal of part of boundary hedge required for the visibility splay of the road.	Individual (6405)
	Enquires why Higher Town had been selected over land at Mountain Oak Farm. This site is closer to the M5 and railways station and provides a safe footway to the school, church and shop.	Individual (5251)
	There is already access onto the road in Lower Town. Site access could be upgraded to provide more than the suggested 25 houses.	Individual (6415)

OSPNEW Canal Field, Sampford Peverell	Proposes land for affordable housing. The site has many great benefits for the village and its existing and future residents as well as businesses.	Individual (6224; 6394)
OSPNEW Land at the rear of Chains Road	Site put forward to meet additional housing requirement instead of SP2. Site is flat and would provide safe access to facilities in the village.	Individual (6402)
OTH2 Land to the north east of Silver Street, Thorverton	Site has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate
OUF5 Land off Ashleigh Road	Objects to development as it is outside of the settlement limit, the site is very steep, increase in traffic, and would result in loss of agricultural land.	Individual (4298; 6422; 6423)
OW11 Quicks Farm, Willand	Supports exclusion from plan.	Individual (4362)

## Development Management Policies

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
DM1 High Quality Design	Reference to SUDs is completely inadequate. Still no reference to longstanding problem of filling of sewers or surface water management plans in Mid Devon.	Individual (6409)	The reference to SUDs was proposed in accordance with advice from the Environment Agency and reflects the need for a hierarchical approach. It is therefore considered that the supporting text as drafted is appropriate. The provision and function of SUDs in the context of individual sites will be considered in more detail as part of the planning application process.
DM2 Renewable and Low Carbon Energy	Paragraph 4.6 should the word ' <i>land</i> ' be inserted between 'of' and 'suitable' or similar?	Willand Parish Council (44)	An amendment is proposed to better reflect the Written Ministerial Statement (June 2015). The supporting text is proposed to be amended to state ' <i>...development to only be granted if the development site is in an area identified suitable for wind energy development in Local or Neighbourhood Plans.</i> '
	Supports amendment to policy.	CBRE Devon (6212)	Support noted.
DM5 Parking	Welcomes inclusion of 1.7 spaces per dwelling but queries what this information is based on.	Individual (3622)	The inclusion of 1.7 parking spaces has been calculated using data from the 2011 census which provides information on car ownership. The methodology for calculating the provision is based on guidance set out in DCLG Residential Car Parking Research (May 2007). In order to calculate the overall parking provision, the impact of allocating one space per dwelling was considered, factoring in data on local car ownership. Allocating one space per dwelling generated a level of under-provision from households with two or more cars. In addition, one visitor space is required per 10 dwellings, which has been factored into the methodology.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
DM5 Parking	No reference about size of parking spaces/garages.	Individual (3622)	Paragraph 4.19a 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. However, it does state that where garages or car ports are provided they should be at least 6m long by 3m wide (single garage) or 6m long by 6m wide (double garages). In addition, the principles within the Parking SPD require that the design of all forms of parking, including the size of spaces, should be in accordance with Devon County Council's Standing Advice.
DM7 Traveller Sites	Deletion of criteria a) and b) welcomed.	A R Yarwood c/o National Federation of Gypsy Liaison Groups (6689)	Support noted.
DM12 Housing Standards	Paragraph 4.41. There is no longer a criterion g)	Willand Parish Council (44)	Comments noted. An amendment is proposed to change criterion 'g' to 'd' in paragraph 4.41.
	Supports simplification to the wording of DM12.	Home Builders Federation (149); Lightwood Land c/o Pegasus Group (6686)	Support noted.
	Supports alignment with the national space standards.	Lightwood Land c/o Pegasus Group (6686)	Support noted.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
DM12 Housing Standards	Objects to introduction of nationally described space standards. Council should fully justify the inclusion of this optional standard. Whilst the Council has proved the introduction does not adversely affect viability, there is no published evidence which shows the Council's need for adopting the standard, and nor is this demonstrated in the Local Plan.	Home Builders Federation (149); Gallagher Estates Ltd c/o Turley; South West HARP Planning Consortium c/o Tetlow King Planning	The inclusion of Nationally Described Space Standards in DM12 was proposed to aid clarity. The standards were originally set out in DM13 which is now proposed to be deleted. 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 sizes and the 2016 viability assessment update assumes 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.
DM13 Dwelling Sizes	Supports deletion of DM13.	Lightwood Land c/o Pegasus Group (6686)	Support noted.
DM26 Green Infrastructure in Major Development	Concerned that the caveat that the Council may seek offsite contributions for green infrastructure will weaken the Council's ability to ensure that GI is provided where it is most needed. Additional clarification should be provided on how contributions are used and circumstances on which on-site provision could be unfavourable.	Natural England (6242); Woodland Trust (6207)	The amendment guides development to look towards off-site contribution where on-site provision is deemed inappropriate/unfavourable. It is considered that the policy wording is appropriate to enable flexibility and to strengthen the policy with reference to off-site contributions. Information on how contributions are used will depend on the individual circumstances of planning applications and therefore, it is not considered that an amendment to the policy is required.
DM27 Protected Landscapes	Supports amendments made to paragraph 4.94.	Blackdown Hills AONB Partnership (1195)	Support noted.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
DM27 Protected Landscapes	Suggests that ' <i>within the setting of</i> ' be substituted for ' <i>or adjoining</i> ' to reflect the fact that the special character of protected landscapes could potentially be affected by development at a distance from the boundary of the designation.	Natural England (6242)	Agreed. An amendment is proposed to paragraph 4.94 to state 'Where major developments are proposed within <del>or adjoining</del> protected landscapes <i>or within the setting of or adjoining the protected landscapes</i> or National Parks.'

Development Management Policies : Non Modifications Comments			
The following comments were made with respect to the elements of the plan which have been unchanged since the 2015 consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the responses to the 2015 Consultation.			
Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	
DM1 High Quality Design	Support DM1.	Sport England (6288)	
	Residential streets with no pavements and houses without front gardens or yards are threatening to the elderly, partially hearing, partial sighted guide dogs and those with dementia.	Individual (5211)	
DM3 Transport and Air Quality	Fails to consider Junction 27 as being an area at risk of becoming polluted. Local Plan has ignored imminent considerable extra load on the local road network.	Individual (5266)	
	States that the inclusion of Gypsy and Traveller sites in exclusion from the Special Area of Conservation is unacceptable. Neither housing nor recreational caravan sites are specifically excluded, so there is no justification for discriminating against Gypsies.	A R Yarwood c/o National Federation of Gypsy Liaison Groups (6689)	
DM4 Pollution	Fails to consider Junction 27 as being an area at risk of becoming polluted. Local Plan has ignored imminent considerable extra load on the local road network.	Individual (5266)	

DM4 Pollution	Use of the word 'unacceptable' seems to allow absolute discretion in the hands of decision-makers.	Individual (6677)
	Paragraph 4.17 could be more explicit on the need for consideration of risks to controlled waters. It states that remediation may be required in relation to human health, and then discussed WFD drivers. However, most controlled water remediation for developments is done without reference to river basin plans.	Environment Agency (6734)
DM7 Traveller Sites	Suggests the addition of ' <i>and their dependents</i> ' to criterion e).	A R Yarwood c/o National Federation of Gypsy Liaison Groups (6689)
DM12 Housing Standards	Every new home in Mid Devon should have a minimum of two solar panels fitted as a compulsory measure.	Individual (6201)
	MDDC does not appear to be requiring multiple bin storage at the front of houses for residents. This means bins are being stored on the pavement permanently or have to be dragged through the house. This is also a major problem with small unit starter homes and flats that do not have adequate and convenient bin storage. Local Plan does not have a policy on bin storage.	Individual (5211)
	Objects to introduction of higher optional Part M4 (2) accessible/adaptable home standards. Council should fully justify the inclusion of this optional standard. Whilst the Council has proved the introduction does not adversely affect viability, there is no published evidence which shows the Council's need for adopting the standard, and nor is this demonstrated in the Local Plan.	Home Builders Federation (149); Gallagher Estates Ltd c/o Turley; South West HARP Planning Consortium c/o Tetlow King Planning
DM14 Town Centre Development	Policy is too prescriptive on allowable uses and the flexibility to react to changes.	Harcourt Kerr (1090)
	Policy aims to protect specified town centre shopping. The proposed allocation at Junction 27 cuts across efforts at promoting town centre growth.	Individual (5366; 5824)
DM15 Development Outside Town Centres	Policy protects against cumulative adverse impacts on town centre health. Proposed allocation at J27 cuts across proposed town centre expansions at Tiverton and Cullompton.	Individual (5266)
DM23 Community Facilities	Policy should specify exactly what is meant by 'local services' and community facilities' to prevent misinterpretation.	NHS Property Services (6760)

DM23 Community Facilities	Restrictive policies that prevent the loss or change of use of 'community facilities' and include healthcare facilities within this definition can prevent or delay required investment in alternative facilities and work against the Council's aim of providing essential services for the community.	NHS Property Services (6760)
DM24 Protection of Local Green Space and Recreational Land/Buildings	Water Meadows along Millennium Way should be included in the Local Plan for green space.	Cullompton Town Council (90)
	Proposes that Guerneys Field, Church Street, Morchard Bishop is designated as Local Green Space.	Individual (366)
	Proposes that St Gatien Garden, Church Street, Morchard Bishop is designated as Local Green Space.	Individual (4093)
DM26 Green Infrastructure in Major Development	Consideration should be given to the scope of the policy and whether provision of GI should be limited to major development only. Clarification on the definition of major should be provided.	Natural England (6242)
	Recommends inserting the following to paragraph 4.88: 'Green infrastructure functions can coexist in one place, so the land coverage does not have to be extensive in every case, <i>although developments should recognise that floodplain cannot necessarily provide year-round amenity access</i> '.	Environment Agency (6734)
	Suggests that ' <i>developments incorporating green infrastructure will be required to submit management and maintenance details for the proposed green infrastructure</i> ' is included.	Environment Agency (6734)
DM27 Protected Landscapes	Suggests removal of 'where possible' in Criterion a) to reflect the NPPF which states that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes.	Natural England (6242)
DM28 Other Protected Sites	Policy does not appear to meet the requirements of the NPPF. It does not include criteria which set out how differing tiers of designated wildlife/geodiversity sites will be judged, the mitigation hierarchy as set out in the NPPF is not reflected fully in the policy and the policy refers to ancient trees rather than aged or veteran trees.	Natural England (6242)
	Recommends the following wording for DM28 'Development which would result in the loss of Ancient Woodland or Ancient Trees will not be permitted other than in wholly exceptional circumstances.'	Woodland Trust (6207)

## Policy Map

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
CUMAP	Cemetery extension should be removed as Green Infrastructure on Cullompton map, reference to CU1-CU6 NW Cullompton allocation.	Individual (3622)	Amendment is not necessary given area is identified as green infrastructure.
SPMAP	Green Infrastructure line is a welcome addition; however the line of this should be redrawn to finish at the southern end of the conservation area.	Individual (6354; 6355; 6408; 6428; 6698; 6742)	The Council is sympathetic to this point and is happy to recommend an adjustment to the line of the green infrastructure to limit the impact of development with the setting of the listed building.
	The settlement limit should be returned to its original position [removing SP2 allocation] if J27 or west-facing slip roads to the A361 never take place.	Individual (6428)	Amendment is not necessary given the criterion in the policy which reflect the individuals comments.
UFMAP	Identifies the amendment to the Uffculme policies map which identifies UF1 Land West of Uffculme as an allocation following the 2016 appeal decision. States that the change now means that the 'Waste Management Facility' is now not show, despite is proximity to the village.	Uffculme Parish Council (54)	Recognition of the identification of UF1 is noted. The deletion of the 'Waste Management Facility' on the map as noted in the published Schedule of Minor Modifications (2016) is in response to the 2015 Devon County Council representation which stated that the facility should be omitted from the policies map as it is no longer in the Devon Waste Plan.
UFMAP	Settlement boundary should be extended to include area identified as UF1 Land as West of Uffculme.	Devon and Cornwall Housing Group c/o WYG (WYG)	Agreed, amendment to the policies map is proposed.

<b>Policy Map: Non Modification Comments</b>		
The following comments were made with respect to elements of the plan which have been unchanged since the 2015 Consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the response to the 2015 Consultation.		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
MAP	The illustration of Mineral Consultation Areas on the Policies Map is welcomed. However MDDC should be advised that, upon anticipated adoption of Devon Minerals Plan in February 2017 a new set of Mineral Consultation Area boundaries will be published and will subsequently need to be included in Mid Devon's Policies Map.	Devon County Council (139)
CUMAP	The identified area of green infrastructure to the west of policy CU17 allocation should also be included within the overall CU7 (East Cullompton) allocation so that this land too can benefit from an overall Masterplanning approach to this eastern side of Cullompton.	Messrs Furness, Cann & Family c/o Iain Bath Planning (4216)
CREMAP	Suggest a change to the proposals map to include enlarged CRE5 site	Gleeson Developments Ltd. c/o Vail Williams LLP (6685)
BOMAP	Suggestion to move settlement boundary to allow individual to develop in garden.	Individual (6326)
CBMAP	No details are provided in the form submitted by representation which identifies Cheriton Bishop Policies Map as the part of the plan the individual wishes to comment on. Representation finds the plan legally compliant, sound and has complied with the duty to cooperate.	Individual (6674)
HEMAP	Suggest amendment to settlement boundary to reflect the inclusion of the representors suggested site.	Messrs Brooks and Nicholson c/o Greenslade Taylor Hunt (5767)
TIVMAP	Questions the mixed use development south of West Manley Lane argue it should remain as GI.	Individual (870)
TIVMAP	Request amendment to map and key to include site for 'school relocation/expansion and community arts facility'. References attachment to illustrate the amendment however no attachment was submitted with representation.	Tiverton High School and Tiverton Community Arts Theatre c/o NPS South West Ltd (6389)

<b>Miscellaneous : Non Modification Comments</b>		
The following comments were made with respect to elements of the plan which have been unchanged since the 2015 Consultation. These comments will be considered at the discretion of the Inspector. The Council's position with respect to many of these issues has been set out in the response to the 2015 Consultation.		
<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>
Miscellaneous	Respondent did not specify reference to a policy in the Local Plan Review but identified that the plan is legally compliant, sound and/or compliant with the duty to co-operate.	Individual (5082; 6668; 6669; 6675)
	Respondent did not specify reference to a policy in the Local Plan Review but made representation to be notified of submission of Plan for examination, the recommendations made by the Inspector and/or the adoption of the Plan.	Hemyock Parish Council (53); Individual (5082; 6675)
	Representation was made noting that Devon Gardens Trust does not wish to comment.	Devon Gardens Trust (980)
	Representation was made to note that the Plan is consistent with national policy. No other representation was made.	Individual (2677)
	Representation quotes the Department of Transport's Cycling and Walking Strategy (2016) 'cycling and walking should become safer, and, importantly, be perceived to be safe. In short walking and cycling should be easy, normal and enjoyable'. Individual argues that whilst the Local Plan includes walking and cycling plans, these are not sufficiently close to government expectations.	Individual (2803)
	Representation questions the process of consultation undertaken by Mid Devon District Council.	Individual (4331)
	Reference to Cullompton Neighbourhood Plan and the relationship with the Local Plan Review.	Individual (5211)
	Object that the Local Plan Review does not include the latest Environment Agency Report. [considered reference is made to J28 although this is not explicit in comment made]	Individual (5808)

Miscellaneous	New lighting or existing lighting on estates should be kept as a minimum and carefully directed downwards to preserve dark skies.	Individual (6201)
	Objects to dates of exhibition dates and times.	Individual (6262)

### Sustainability Appraisal Proposed Modifications (March 2017)

Following the consultation on the Local Plan Review (2013-2033) Proposed Submission (incorporating proposed modifications) (January 2017) a number of comments were made on the Sustainability Appraisal. The comments in the table below are considered to update the Local Plan Review: Proposed Submission Sustainability Appraisal (2015) and the Local Plan Review: Proposed Submission Sustainability Appraisal (incorporating proposed modifications) Sustainability Appraisal Update (2017).

Policy	Comment	Comments made by (customer ID in brackets)	Impact on the Sustainability Appraisal
Sustainability Appraisal Tiverton (TIV16 Blundells School)	Potential impact on the SSSI should be assessed as part of the sustainability appraisal.	Natural England (6242)	It is agreed the Sustainability Appraisal Update supporting text for objective A) pre-mitigation should include reference to the SSSI to state <i>'The site falls within the Tidcombe Fen SSSI impact risk zone'</i> . Post-mitigation should reference the following <i>'The impact on SSSI's is recognised in DM28 Other Protected Sites which provides mitigation'</i> . The pre-mitigation score should be amended to recognise the potential impact which would consider the overall score to be +1/? given there are other positive impacts considered on the site. The post-mitigation score remaining the same given the mitigation already proposed in DM28.
Sustainability Appraisal Junction 27	Objective A. Does not reflect most recent findings of the HRA.	Friends Life Ltd C/O GL Hearn (3781); Natural England (6242)	It is agreed that reference to the impact on the Culm Grasslands SAC in relation to the Local Plan Review Proposed Submission (incorporating modifications) Sustainability Appraisal Update should be updated to reflect the most recent findings of the HRA which conclude that <i>'The J27 site allocation, alone or in combination with the Local Plan proposals, will not have an adverse effect on the integrity of the Culm Grasslands SAC'</i> . In objective A) pre-mitigation of the Sustainability Appraisal Update for Land at Junction 27 should be amended as follows <i>'Further information regarding traffic assessments and any</i>

			<p>consequential air quality assessment on the effects on this SAC <del>will have to be</del> has been undertaken <i>which has</i> ruled out any <i>adverse effect on the integrity of the Culm Grasslands SAC</i>. Given the scale of development, impact on landscape, <i>and</i> biodiversity <del>and potential impact on the Culm Grasslands SAC</del>, overall a <del>significant</del> negative impact is considered <del>although this remains uncertain.</del> The impact is considered to score a -2 with this update. The post mitigation effect remains the same as the policy included a criterion to ensure mitigation measures if there was an impact on the SAC. Other references to the Culm Grasslands SAC are also considered to be updated to reflect the recent findings of the HRA but do not amend any other scoring of the Sustainability Appraisal.</p>
Sustainability Appraisal Junction 27	Objective D. Most recent Ministry of Agriculture, Fisheries and Food (MAFF) Agricultural Land Classification Survey (1995) confirms that the entire allocation site comprises Grade 3b agricultural land.	Friends Life Ltd C/O GL Hearn (3781)	<p>It is agreed that the most recent MAFF Agricultural Land Classification Survey (1995) provides greater detail of the Agricultural Land Classification for the Junction 27 proposed allocation however some small areas within the site allocation are classed as Grade 3a. An amendment to the supporting text is proposed as follows 'The majority of the site is Grade 3b moderate quality land with a small sections of the site <del>to the west of the M5 grade 4 poor quality land</del> <i>Grade 3a good quality agricultural land</i>. The amendment to the text does not affect the scoring of the site in the Sustainability Appraisal.</p>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. States that 2017 Sustainability Appraisal does not mention the site is adjacent to a Grade II listed property.	Individual (6408; 6786)	<p>The Sustainability Appraisal references the listed building in the post-mitigation recommendation as such the impact on the listed building has been recognised and no changes to the scores are proposed however it is agreed that a change in the pre-mitigation commentary would be beneficial to state the following '<i>There is a listed building adjacent to the North East of the site</i>'.</p>

## Sustainability Appraisal Summary

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Sustainability Appraisal Methodology	Argues that the Sustainability Appraisal scoring system is unfair (pre-mitigation), with some sustainability objectives assessed using a three point scale, others a four point or six point.	Individual (6408; 6786)	For all sustainability objectives a six point scoring system was used -3 to +3. The Appraisal guidance was introduced following representations made to the Sustainability Appraisal Options Report in 2014 to ensure as much consistency as possible on frequent comparable observations with regard to assessing allocation options. As noted in the paragraph preceding the appraisal guidance table in some cases the scoring can differ from the guidance due to site specific context.
Sustainability Appraisal Methodology	Argues inadequate guidance is provided to inform the magnitude of any post-mitigation score.	Individual (6786)	The Appraisal guidance was introduced following representations made to the Sustainability Appraisal Options Report in 2014 to ensure as much consistency as possible on frequent comparable observations with regard to assessing allocation options. With regard to mitigation measures, opportunities for mitigation can vary from site to site even if the pre-mitigation impact is the same; therefore there was less scope to identify frequent comparable observations for mitigation.
Sustainability Appraisal Methodology	The sustainability appraisal does not give sufficient weight or consideration to environmental issues in general and flooding in particular.	Individual (6409)	Environmental issues are considered in objective A) Protection of the natural environment, objective C) Mitigating the effects of climate change and objective D) Safeguarding and minimising resource use. The weight ascertained to each objective is identified through a scoring system with a range from +3 to -3 which highlights the scale of any potential impact. The table on p.2 of the Sustainability Appraisal Update (2017) repeats how the scoring system has been used.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Methodology	The Sustainability Appraisal fails to consider the viability and deliverability of schemes.	Gleeson Developments Ltd. c/o Vail Williams LLP (6685)	The Sustainability Appraisal considers reasonable alternatives. Where sites were considered unviable or deliverable by the Strategic Housing Land Availability Assessment panel, they were not considered to be reasonable alternatives.
Sustainability Appraisal Methodology	There is little evidence that any mitigation measures under Annex 3 will give rise to reductions in carbon emissions. Indeed mitigation measures do not make a change to the score, so why is mitigation put forwards.	Sustainable Crediton (6716)	Mitigation is noted in a number of cases which do not make a significant impact to the score but can help ensure the impact is not increased and has been included for information. In a number of cases in Annex 3 mitigation does make a change to the score.
Sustainability Appraisal (S2 Amount and distribution of development)	The revised Sustainability Appraisal does not test the implication of a 35% increase in commercial floorspace distributed to J27 in the Rural Areas policy without any accompanying housing allocation in terms of a sustainable development strategy. Nor does it appraise the implications of a regional scale development proposal for impacts beyond the district. There is no assessment of reasonable alternatives.	Rocke associates Ltd (6269)	Not agreed. The Sustainability Appraisal Update appraises a higher growth scenario for commercial development which includes the J27 option as part of S2 Amount and Distribution of Development. Junction 27 allocation has also been appraised with updates to reflect new information including a retail impact assessment which included an assessment of 14 towns and city centres including those outside of Mid Devon District.
Sustainability Appraisal (S2 Amount and distribution of development)	Disagree that all growth scenarios can score zero for impact C.	Sustainable Crediton (6716)	It is recognised that within each approach that there will be some positive and negative impacts in contributing to this objective depending on each individual proposal with each alternative considered in the context of other policies such as sustainable design. On balance a neutral effect for growth scenarios was considered with more meaningful comparisons considered for the distribution of growth in the context of this objective.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Sustainability Appraisal (S2 Amount and distribution of development)	Alternative option S2: Distribution of development – Tiverton and Crediton Focussed. Disagree this will reduced the need to travel which by developing in Crediton as no new jobs or services with new businesses are in the plan, realistically many will find employment in Exeter.	Sustainable Crediton (6716)	Not agreed. The general principle of guiding housing development to existing built up areas with existing facilities and services are available is seen to be a sustainable option reducing the need to travel. The plan also allocates approximately 10,000sqm of commercial floorspace in Crediton.
Sustainability Appraisal (S2 Amount and distribution of development)	For consideration of Crediton there is no evidence in any reports that the new link road has had any positive effect on reducing poor air quality.	Sustainable Crediton (6716)	Not agreed, reports on the 'Local air quality management' page on the Mid Devon District Council website ( <a href="https://www.middevon.gov.uk/residents/environment/air-quality/local-air-quality-management/">https://www.middevon.gov.uk/residents/environment/air-quality/local-air-quality-management/</a> ) including the 2016 Air Quality Annual Status Report demonstrates that the construction of the new road has shown a good reduction of levels in the Crediton target area.
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Strongly agree with revisions to Sustainability Appraisal Addendum (2017) for objectives B, C and E.	Individual (5551)	Support noted.
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Objective A. Should have a -2 score as it is visible from a number of viewpoints.	Individual (5551)	The site pre-mitigation scores -2 recognising that the site is visible from a number of viewpoints.
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Objective D. Should have a -2 score, reasons were established in previous rep parts 4 and 6.	Individual (5551)	This comment was responded to in Annex 2 of the Sustainability Appraisal Update.
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Objective F. Argue retail does not mean provision of houses in which possible shoppers may live. Proposal should score 0 for 'supporting retail'.	Individual (5551)	This comment was responded to in Annex 2 of the Sustainability Appraisal Update.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Objective G. Should have a +1 score. Argue amendment to text following previous consultation with removal of word 'significant' should result in a reduced score.	Individual (5551)	This comment was responded to in Annex 2 of the Sustainability Appraisal Update. The amendment with the removal of the word 'significant' was made following previous representations made where it was agreed that the word 'significant' in the commentary was misleading. Nevertheless consistent with other sites appraised of a scale of 20-99 dwellings are considered to have a positive impact in meeting housing needs.
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Objective I. Should have a -2 score. Argue most people will use Bakers' Hill to join the link road which is a narrow country lane.	Individual (5551)	The site pre-mitigation scores -2.
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Reduced area site. Agree that it would no longer support the quantum of development required to be effective as a contingency allocation.	Individual (5551)	Support noted.
Sustainability Appraisal Tiverton (TIV14 Wynnards Mead)	Reduced area site. Objective C. Argue amendment to supporting text to change it is <i>certain</i> that building 29 houses will lead to increased surface water runoff.	Individual (5551)	Not agreed, opportunities for sustainable urban drainage enable mitigation.
Sustainability Appraisal Tiverton (TIV1-TIV5 Tiverton Eastern Urban Extension)	Text in the SA should take into account the recently agreed mitigation solution regarding new development near Tidcombe Fen and agreed buffer zone around Tidcombe Fen. Application 14/0881/MOUT.	Natural England (6242)	This 2015 Sustainability Appraisal did take into account the impact on Tidcombe Fen. Environmental protection and enhancement is included in the policy. The suggestion provided adds unnecessary detail to policy and therefore not agreed.
Sustainability Appraisal Tiverton (TIV16 Blundells School)	Potential impact on the SSSI should be assessed as part of the sustainability appraisal.	Natural England (6242)	An update to the Sustainability Appraisal is provided to ensure consideration on the SSSI is recognised in the Sustainability Appraisal. Nevertheless, please note the impact of development on SSSI's is recognised in DM28.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Tiverton (OTIV2 Hartnoll Farm)	Support Sustainability Appraisal conclusions with regard to OTIV2 Hartnoll Farm.	Individual (6670; 6683)	Support noted.
Sustainability Appraisal Tiverton (OTIVNEW1 Seven Crosses Hill)	Objective A. Argue score should be -2 as mitigation measures would be inadequate to address landscape and visual impact.	Individual (5551)	Not agreed as set out in the mitigation commentary in Annex 3 of the Sustainability Appraisal Update.
Sustainability Appraisal Tiverton (OTIVNEW1 Seven Crosses Hill)	Objective B. Should have a -1 score until archaeological investigation is carried out.	Individual (5551)	Not agreed, consistent with other appraisals a neutral score is provided post-mitigation as archaeological investigation and mitigation will be provided for. However it is recognised until the archaeological investigation is carried out there is an element of uncertainty.
Sustainability Appraisal Tiverton (OTIVNEW1 Seven Crosses Hill)	Objective C. Should remain as a -1 score as no flood risk assessment has been carried out.	Individual (5551)	The site is located in flood zone 1 the lowest level of flood risk. A Flood Risk Assessment would be required to determine the impact of the ordinary watercourse on site however it is likely the impact can be mitigated as such a neutral effect is considered although this is recognised that there is an element of uncertainty until this assessment is carried out.
Sustainability Appraisal Tiverton (OTIVNEW1 Seven Crosses Hill)	Objective D. Should have scored a -2. Reasons set out in previous submission in relation on Wynnards Mead at Parts 4 and 6.	Individual (5551)	This comment was responded to in Annex 2 of the Sustainability Appraisal Update.
Sustainability Appraisal Tiverton (OTIVNEW1 Seven Crosses Hill)	Objective F. Argue retail does not mean provision of houses in which possible shoppers may live. Proposal should score 0 for 'supporting retail'.	Individual (5551)	This comment was responded to in Annex 2 of the Sustainability Appraisal Update as part of the respondent's previous comments on Wynnards Mead.
Sustainability Appraisal Tiverton (OTIVNEW1 Seven Crosses Hill)	Objective I. Should have scored -2 as seven crosses road is narrow and steep and significant excavation work would be required.	Individual (5551)	The site pre-mitigation scores -2.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Sustainability Appraisal Cullompton	Ware Park and Exeter Road should be considered as contingency sites as Colebrook scores higher in the SA.	Mr Force & Mr Christian C/O Genesis Town Planning (3780)	This comment was responded to in Annex 1 of the Sustainability Appraisal update as part of the respondent's previous comments.
Sustainability Appraisal Cullompton	Mentions that the Sustainability Appraisal highlights increased risk of flooding as a consequence to climate change (SA paras 2.32, 2.59, 2.60) and mentions 2012 regional flooding but uses out of date material to assess flood risk.	Individual (5561; 5648; 6690)	Comment refers to data used as part of the Strategic Flood Risk Assessment (SFRA). The best available data was used consistent with the standard approach used by other authorities in England. In terms of the 2012 data, the EA indicated that there was insufficient river data available to make an assessment. Whilst the Met office announced that 2012 'was the wettest in 100 years' there is no direct correlation between the return period of a prolonged period of wet weather and the return period of individual instances of flooding from rivers. For this reason, the local records should not be considered as the best available representation of 1 in 100 year and 1 in 1000 year outlines. At the time of the preparation of the 2014 Mid Devon SFRA the best available modelling data was the generalised mapping product held by the EA. This was supplemented by more recent information where appropriate and relevant. The SFRA was produced by specialist consultants JBA in collaboration with the EA and DCC. However the Cullompton 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.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Cullompton	No clear plan to dealing with increased congestion in Cullompton Town centre resulting from the increased scale of the scheme.	Individual (6791)	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. 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. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips.
Sustainability Appraisal Cullompton (CU1-CU6 North West Cullompton)	Objective I, no clear plan for dealing with transport while building 500 rather than 300 dwellings NW of Cullompton.	Individual (6791)	Amendments to the policy align with the adopted masterplan with the latter provided a greater level of detail on phasing and infrastructure provision triggers.
Sustainability Appraisal Cullompton (CU7-CU12 East Cullompton)	Objective C. Disagree with neutral score for mitigating the effects of climate change.	Individual (5648;6690)	As set out in the mitigation commentary of the Sustainability Appraisal a number of the mitigation measures results in the improved score for this objective.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
	Objective A. Disagree with -1 score. Believe development at East Cullompton is damaging to key views from the Blackdown Hills.	Individual (5648; 6690)	As noted in the pre-mitigation commentary of the Sustainability Appraisal although the Blackdown Hills AONB is visible from limited locations in the AONB it is difficult to readily perceive the site owing to distance, vegetation and landform. This is recognised in policy CU7 supporting text and has been responded to positively by the Blackdown Hills AONB partnership. Nevertheless CU9 still includes recognition of the need to protect the setting of the Blackdown Hills AONB. Therefore it is believed that the overall score for this objective should remain as a post-mitigation score of -1.
	Objective A. The impact of the increased size of the development east of Cullompton on views from the Blackdown Hills AONB does not appear to have been considered.	Individual (6791)	The development East of Cullompton has not been increased in the Local Plan Review.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
	Objective C. Drainage assessment seems to be based on the 2008 data and doesn't acknowledge the increased risk of flooding in reference to the events of 2012.	Individual (6791)	Comment refers to data used as part of the Strategic Flood Risk Assessment (SFRA). The best available data was used consistent with the standard approach used by other authorities in England. In terms of the 2012 data, the EA indicated that there was insufficient river data available to make an assessment. Whilst the Met office announced that 2012 'was the wettest in 100 years' there is no direct correlation between the return period of a prolonged period of wet weather and the return period of individual instances of flooding from rivers. For this reason, the local records should not be considered as the best available representation of 1 in 100 year and 1 in 1000 year outlines. At the time of the preparation of the 2014 Mid Devon SFRA the best available modelling data was the generalised mapping product held by the EA. This was supplemented by more recent information where appropriate and relevant. The SFRA was produced by specialist consultants JBA in collaboration with the EA and DCC. However the Cullompton 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.
	Objective I. Disagree with +2 score.	Individual (5648; 6690)	As noted in the commentary of the sustainability appraisal, development of this site would deliver the necessary infrastructure which may also benefit the wider community, as such for this objective a positive score was concluded.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
	Objective I. No clear plan for improving, or financing the situation at J28 of the M5.	Individual (6791)	As set out in the Local Plan text, options include improvement to the existing junction or in the form of more extensive junction improvement works involving a second overbridge. Mid Devon District Council have been working closely with Devon County Council and transport consultants who have prepared a scheme which includes a relief road and a new bridge over the motorway with south facing slips. The scheme is likely to require both private and public funding. The recent announcement with regard to the Garden Village proposal may assist in leveraging additional public funding.
Sustainability Appraisal Crediton	Argue that on p.6 of the Sustainability Appraisal Addendum that large scale development (> 100 dwellings) have negative impact pre mitigation. Yet developments post mitigation for CRE1, 3, 5 and 6 either have a neutral or positive score for post mitigation with no mitigation provided.	Sustainable Crediton (6716)	Comment refers to the appraisal guidance notes in the Sustainability Appraisal for allocations. The impact the respondent is referring to is when potential impact to groundwater is identified. The sites referred to by the respondent do not have any impact to groundwater identified.
	p.173 states that the word 'can' in 'the construction of new homes and catering for a greater population can increase carbon emissions' should be replaced with 'highly likely'.	Sustainable Crediton (6716)	Not agreed, change in text is not necessary.
Sustainability Appraisal Crediton (CRE3 Cromwells Meadow)	Sustainability appraisal supports this allocation for a greater number of dwellings on site.	Persimmon Homes South West (6121)	The Sustainability Appraisal supports the inclusion of this site as a proposed allocation in the Local Plan Review which is proposed for 35 dwellings.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Junction 27	Spatial impact. Will not meet the housing needs across the district but rather will provide benefits in terms of employment generation, diversifying the employment opportunities, providing active recreation opportunities and expanding the range of tourism facilities.	Friends Life Ltd C/O GL Hearn (3781)	This is reflected in the Sustainability Appraisal Update (2017).
Sustainability Appraisal Junction 27	Objective A. Disagree that development will alter the rural quality of the entrance into Mid Devon from the M5 as there is already development in the vicinity.	Friends Life Ltd C/O GL Hearn (3781)	Not agreed, it is recognised that there is already some development in the vicinity however given the scale of the development it is considered that there will be an impact on the rural character of the area.
Sustainability Appraisal Junction 27	Objective A. Disagree to reference to findings of Landscape and Visual Appraisal (2014) as the site is far smaller than the site previously assessed.	Friends Life Ltd C/O GL Hearn (3781)	Not agreed, the elements that have been noted in the appraisal are relevant to the reduced area.
Sustainability Appraisal Junction 27	Objective A. Does not reflect most recent findings of the HRA.	Friends Life Ltd C/O GL Hearn (3781); Natural England (6242)	Agreed, an updated to the Sustainability Appraisal is proposed to reflect the most recent findings of the HRA.
Sustainability Appraisal Junction 27	Objective B. Additional evidence provided in Appendix F of representation with an update from the Devon County Council Historic Environment Service with regard to pre-historic and Roman activity.	Friends Life Ltd C/O GL Hearn (3781)	Although the additional evidence refers to states that desk-based assessments have been undertaken, the Devon County Council Historic Environment Service indicate that a programme of archaeological work would be required prior to the construction of any development of the proposal site and that this could include a full area excavation in advance of groundworks or the monitoring and recording of groundworks. As such, no change to the Sustainability Appraisal text or scoring is required.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Junction 27	Objective B. Should consider that 71ha is sufficiently large to accommodate any necessary mitigation to off-set impacts on heritage assets.	Friends Life Ltd C/O GL Hearn (3781)	The post-mitigation score identifies a neutral effect following mitigation.
Sustainability Appraisal Junction 27	Objective C. Disagree with the score as argue it is likely to score very poorly due to the travel demands that it will generate.	Rocke associates Ltd (6269)	As set out in the mitigation commentary of the Sustainability Appraisal there are a number of mitigation measures that improve the scoring for this site. The proposal promotes an electric car hub and provision of transport improvement to ensure appropriate accessibility for all modes including pedestrian and cycling links across the motorway to Tiverton Parkway Railway Station.
Sustainability Appraisal Junction 27	Objective D. Most recent Ministry of Agriculture, Fisheries and Food (MAFF) Agricultural Land Classification Survey (1995) confirms that the entire allocation site comprises Grade 3b agricultural land.	Friends Life Ltd C/O GL Hearn (3781)	Agree that there is more recent data which distinguishes between Grade 3a and 3b agricultural land. The majority of the site is identified on Grade 3b, however it should be noted that the survey also identifies a small proportion of the site as Grade 3a. A change to the supporting text is of the sustainability appraisal is proposed.
Sustainability Appraisal Junction 27	Sustainability Appraisal does not reflect social factors e.g. people in this area choose to live in a rural environment.	Individual (5318)	The Sustainability Appraisal does include consideration of community health and well-being.
Sustainability Appraisal Junction 27	Sustainability Appraisal does not reflect environmental factor. It is mainly accessible by car and large area of agricultural land developed which will increase flood risk.	Individual (5318)	The Sustainability Appraisal does include consideration of the natural environment, climate change and resource use.
Sustainability Appraisal Junction 27	Sustainability Appraisal does not reflect economic factor which most income will leave the area and will not benefit the majority of the community.	Individual (5318)	The Sustainability Appraisal does include consideration of promoting the economic growth and employment.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Junction 27	Objective F. Disagree with conclusion as ignores the implications of future investment not being made in those centres. SA does not allow for conflict of the retail floorspace with the town centre first principle.	Rocke associates Ltd (6269)	The reasons for the conclusions are set out in the Sustainability Appraisal commentary. Respondent's disagreement is noted.
Sustainability Appraisal Rural Areas (Bampton)	Sustainability Appraisal has not assessed a new settlement tier for Bampton which should sit between the towns and the villages.	Summerfield Developments Ltd. c/o Collier Planning (6691)	Following the National Planning Policy Guidance it is considered that this additional tier is not required to assess the likely significant effects of the Local Plan.
Sustainability Appraisal Rural Areas (Lapford)	Notes in Appendix 2 of the Sustainability Appraisal there are two proposed development for Lapford, question regarding the status of these sites.	Individual (6266)	The sites are assessed as reasonable alternatives, they are proposed as allocated sites in the Local Plan Review.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Sustainability Appraisal Rural Areas (Sampford Peverell)	Argues only proposed allocations are considered in the Sustainability Appraisal and does not mention any other alternatives or give reasons why SP2 was selected.	Mr Force & Mr Christian C/O Genesis Town Planning (3780); Individual (3754; 6786; 6310; 6338; 6339; 6373;6402; 6713; 6433; 5858; 6404; 6786)	The Sustainability Appraisal identifies and considers reasonable alternatives to identify the likely significant effects of the available options. This is an iterative process in which the majority of the 2015 Sustainability Appraisal is still relevant, where new information has been provided this has been updated in the 2017 Sustainability Appraisal Update. The Sustainability Appraisal helps to inform the preferred approach along with a number of other material considerations. Reasons for previously rejecting the other alternative sites are set out in the 2015 Sustainability Appraisal. New information on SP2, Sampford Peverell Higher Town was provided, as such this has been updated in the Sustainability Appraisal Update in 2017. The option is preferred with a change in context with the J27 option proposed to be allocated as part of the Local Plan Review and new information removing the uncertainty previously attached to objective I) delivering the necessary infrastructure, along with the proposal for landscaping and design which helps to mitigate the potential impact on landscape and built environment.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell)	2015 appraisal considered but dropped in favour of elsewhere in the village.	Individual (6432;6433)	The Sustainability Appraisal is an iterative process. New information on SP2, Sampford Peverell Higher Town was provided, as such this has been updated in the Sustainability Appraisal Update in 2017. The option is preferred with a change in context with the J27 option proposed to be allocated as part of the Local Plan Review and new information removing the uncertainty previously attached to objective I) delivering the necessary infrastructure, along with the proposal for landscaping and design which helps to mitigate the potential impact on landscape and built environment.
Sustainability Appraisal Rural Areas (Sampford Peverell)	A comparison of Mountain Oak should be made with 60 houses.	Individual (6713)	As set out in the 2015 Sustainability Appraisal although a smaller element of the site could be developed there is very little development in the vicinity of the site, as such there is greater potential for landscape and visual impact. The smaller site would also have similar impacts as the site assessed as part of the Sustainability Appraisal with regard to its poor spatial relationship with the village being divorced from the main built extent of Sampford Peverell. As such as it not viewed to be a reasonable alternative.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	2015 Sustainability Appraisal stated 'residents of all ages would need to cross a dangerous road twice to reach the main village'.	Individual (3754; 6310; 6402)	The 2015 Sustainability Appraisal does not set out the detail suggested in the representation made.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Adds up the scores of sites in Sampford Peverell to compare and concludes Higher Town is the least favourable site.	Individual (6406)	The Sustainability Appraisal is used to identify and respond to significant effects on various objectives. As noted in the Sustainability Appraisal the reason for not providing the total scores is because this can lead to 'artificial certainty' in determining the effect of a policy or proposal where the impacts of issues can be complex. This is endorsed by the Planning Advisory Service.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Argues that the green infrastructure is inadequate.	Individual (6428)	The comment is made in reference to the Sustainability Appraisal however the representation is made on policy SP2. The Council is sympathetic to this point and is happy to recommend an adjustment to the line of the green infrastructure to limit the impact of development with the setting of the listed building.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	In the commentary of the SA it states that 'there is a footpath on Turnpike from the south east corner of the site which leads into the village' this is misleading as the footpath ends before the main part of the village.	Individual (6373; 6404; 6786)	It is recognised that there is a small break in the footpath in the village however the statement set out in the Sustainability Appraisal remains correct.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	The 2013 Strategic Housing Land Availability Assessment report identifies very limited capacity to expand the primary school, yet the sustainability appraisal makes no mention of this.	Individual (6726)	The Sustainability Appraisal 2017 notes that there is existing capacity in the local schools to accommodate development from this site.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Argues that the high quality design and landscaping which respects the character and setting of the area under-represents the impact that any development of the site will have on the surrounding area.	Individual (6428)	The comment refers to the commentary made in the pre-mitigation section of the plan. The impact the development could have without mitigation is noted as a negative effect. High quality and landscaping are both considered as part of mitigation, however the commentary also notes other policies in the plan, requirement in the policy for mitigation of wildlife impact and the provision of 2 hectares of Green Infrastructure.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A. Sustainability Appraisal refers to protection of hedgerows but does not explain how this is possible when 'substantial loss of hedgerow' is recognised as being necessary to create a safe access.	Individual (6404)	The Sustainability Appraisal refers to criterion in the policy proposed which also has supporting text which notes that some loss of hedgerow would be required to enable access, however careful design should be considered to minimise this impact including incorporating new hedgerow into the design of development.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A. Refers to amended text in which 2015 sustainability appraisal refers to substantial loss of hedgerows whereas the 2017 version refers to some loss of hedgerow.	Individual (6408)	The 2017 update still recognises that a substantial length of hedgerow would need to be removed.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A. Argues that a substantial length of hedgerow is required to be removed.	Individual (6428)	Noted, the 2017 update still recognises that a substantial length of hedgerow would need to be removed.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A. Argues that the substantial loss of hedgerow and earth removal should have a different impact on the scoring under objective A.	Individual (6786; 6406)	The commentary both pre and post mitigation of the sustainability appraisal explains the reasoning for the scoring under objective A.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A. Uses the 2014/15 Sustainability Appraisal. Notes that the score was -2 with commentary stating 'the overall rise above Turnpike is significant'. Respondent adds additional commentary to support this statement.	Individual (6406)	The 2017 update still recognises this impact in the commentary and the score remains as -2 pre-mitigation.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A. Argues impacts on the landscape would be greater given it an elevated point of Sampford Peverell. Argues should be scored a -3 as it is highly visible and has no existing development forming a backdrop.	Individual (6786)	The 2017 update recognises this impact in the pre-mitigation commentary.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A and B. Should score negatively similar to Mountain Oak Farm as it is considered to be divorced from the village. Although also argue that Mountain Oak should score more positively.	Individual (6786)	Not agreed, the Sustainability Appraisal recognises the context of each site as set out in the commentary with both sites scoring negatively pre-mitigation.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective A. Uses the 2014/15 Sustainability Appraisal. Notes that the character of the area is agricultural and divorced from the village and therefore would have a significant negative effect.	Individual (6406)	The 2017 update still recognises this impact in the commentary and scoring.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. Uses the 2014/15 Sustainability Appraisal. Notes that the site is adjacent to Sampford Peverell Conservation Area.	Individual (6406)	The 2017 update still recognises this impact in the commentary and scoring.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. No mention of visibility of site from Grand Western Canal Conservation Area, despite its proximity.	Individual (6404; 6408; 6786)	The Sustainability Appraisal Update uses available evidence to appraise the reasonable alternatives. A Historic Environment Appraisal was undertaken by Mid Devon Conservation Officers in which the Grand Western Canal Conservation Area was noted to lie some distance to the south. The Historic Environment Appraisal did not identify any significant impact to the Grand Western Canal Conservation Area.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. No mention of the Turnpike road in the Historic Environment Appraisal or subsequently in the Sustainability Appraisal.	Individual (6408)	The Sustainability Appraisal Update uses available evidence to appraise the reasonable alternatives. A Historic Environment Appraisal was undertaken by Mid Devon Conservation Officers in which the Turnpike road was not recognised as a designated or undesignated heritage asset as part of that appraisal. As such this has not been reflected in the Sustainability Appraisal.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. States that 2017 SA does not mention the site is adjacent to a Grade II listed property.	Individual (6408; 6786)	The Sustainability Appraisal references the listed building in the post-mitigation recommendation as such the impact on the listed building has been recognised however it is agreed that a change in the pre-mitigation commentary would be beneficial. A change to the Sustainability Appraisal text is proposed.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. Uncertainty in archaeology mitigation is newly expressed in Jan 2017. Despite which a neutral score is still given to the site.	Individual (6404)	The impact on archaeology is expressed in both the 2015 Sustainability Appraisal and the 2017 update.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. Argues the Green Infrastructure line should be moved south of its current position to the point where the village conservation area's boundary with SP2 turns east to mitigate impact on unlisted buildings, garden of listed building and historic buildings within conservation area.	Individual (6408)	The Council is sympathetic to this point and is happy to recommend an adjustment to the line of the green infrastructure to limit the impact of development with the setting of the listed building.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective B. No mention of poor relationship of this site to the remainder of the village.	Individual (6404)	Not agreed. The physical relationship and proximity to the existing village is positive.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective C. Uses the 2014/15 Sustainability Appraisal. 'Could' should be revised to 'would' in commentary 'the site could contribute to surface water run-off'	Individual (6406)	Not agreed, opportunities for sustainable urban drainage enable mitigation.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective C. Flood risk from the canal and Wimbleball Reservoir are mentioned as issues when both are not possible due to elevation and proximity.	Individual (6404)	Both are identified as potential risks in the Strategic Flood Risk Assessment, as such these are noted in the commentary for context, however it is recognised that the impact of these risk are limited as such they did not amend the impact score.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective C. No mention that car usage will be essential to achieve safe access to the village centre.	Individual (6404)	Not agreed, the proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective C. Argue site is on the 'wrong' side of the village to access facilities and employment therefore it will increase the use of the car.	Individual (6408)	Not agreed, the proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective C. Reservations with regard to the scope for Sustainable Urban Drainage given its elevated topography. However take no issue with commentary or scoring.	Individual (6786)	The SFRA (2014) undertook detailed site summary tables which recognised that the topography of the site may be too steep to allow for 'above ground' detention features however there is opportunity for all other Sustainable Urban Drainage types identified in the SFRA.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective D. Take no issue with commentary or scoring.	Individual (6786)	Comment noted.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective D. Agree with Grade 2 agricultural land classification, a negative effect but no mention that this is wasteful land use, 60 houses on 6ha on what is considered 'best and most versatile agricultural land'.	Individual (6404; 6406; 6408)	The SHLAA panel recommend low density due to the character of the area and potential landscape impact.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective D. Grade 2 agricultural land is identified in sustainability appraisal but development of this site is not justified when there may be land of lower quality elsewhere.	Individual (6428)	Given the rural nature of the district, there is insufficient brownfield land to meet the identified housing and employment needs of the area. In order to provide the housing number required some loss of agricultural land is required.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective E. Take no issue with commentary or scoring.	Individual (6786)	Comment noted.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective F. Take no issue with commentary or scoring.	Individual (6786)	Comment noted.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective G. No reason to fundamentally disagree with commentary and scoring.	Individual (6786)	Comment noted.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective G. Notes positive effect of 60 houses but to the benefit of J27, it is questionable in relation to village housing needs.	Individual (6404)	The Local Plan aims to meet the housing needs identified for the District.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective G. Questions if low density will provide 'affordable housing'	Individual (6408)	The policy requires the provision of 30% affordable housing. The definition of affordable housing is provided in the glossary and follows that of national policy.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective H. No mention to the site in an unsafe environment and remote location.	Individual (6404; 6408)	Not agreed, the proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council. The physical relationship and proximity to the existing village is positive.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective H. No mention of impact on existing services.	Individual (6404)	The commentary of objective H) recognises Sampford Peverell as a designated village under policy S13 which has the three essential services identified and is considered appropriate for a limited level of development.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective H. No mention of community opposition.	Individual (6404)	Comment noted.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective H. Should score a slight negative impact given the absence of a continuous footpath.		It is recognised that there is a small break in the footpath in the village however the statement set out in the Sustainability Appraisal remains correct. The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. Access is achievable is not evidenced.	Individual (6404; 6408; 6428)	Devon County Council officers have stated that <i>"It is technically feasible for an access to be formed on to higher town, exact details, levels will need to meet the current design standards set out in the Devon design guide and Manual for streets."</i>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. Should mention safe pedestrian access requirement and provision, put in policy to provide mitigation.	Individual (6408)	The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. Question positive score of access to Canal and a network of cycle paths and good pavements given there is no safe access from SP2 to the main part of the village.	Individual (6408)	The Sustainability Appraisal does not provide a positive score for this objective but recognises that within the village, pedestrian and cycle links are good with access to the Grand Western Canal and the cycle path connecting the train station to Tiverton and Willand. The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists from the new site. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. No mention of safe footpath route serving school as there is not one.	Individual (6404)	The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists from the new site. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. Question change in wording in 2017 sustainability appraisal which states that 'there is existing capacity in the local schools to accommodate development from this individual site' whereas the 2015 sustainability appraisal states that 'the primary school is on a constrained site but is forecast to have some limited spare capacity to support future housing development however has very limited capacity to expand'.	Individual (6408)	Although the 2015 appraisal recognises there is limited spare capacity it was confirmed that there is existing capacity in the local schools to accommodate development from this individual site by Devon County Council. This position has been confirmed with Devon County Council more recently in 2016.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. No mention made on how improvements to A361 will reduce the negative impacts in the village.	Individual (6404)	The improvement to the A361 was originally suggested by Devon County Council which relates to affected traffic on the A361 and J27 of the motorway.
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. Dispute 2015 DCC community Infrastructure Report, is up to date.	Individual (6404)	Although the 2015 appraisal recognises there is limited spare capacity it was confirmed that there is existing capacity in the local schools to accommodate development from this individual site by Devon County Council. This position has been confirmed with Devon County Council more recently in 2016.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (Sampford Peverell, SP2 Higher Town)	Objective I. Notes that Turnpike is a dangerous road for pedestrians should be mentioned.	Individual (6406; 6408; 6354; 6355; 6373; 6404; 6786)	In reassessing the site, the comment previously made in the 2015 Sustainability Appraisal did not accurately reflect the context of the site with only some parts of Turnpike considered to be dangerous which predominantly relates to the area to the far West of Turnpike. The proposal will provide the opportunity to ensure safe access to the village centre for pedestrians and cyclists. The provision of safe pedestrian access will be required at the planning application stage through development management policies including DM1, High Quality Design. However the Council is proposing an additional criterion to policy SP2 for clarity 'improved access to the village for pedestrians and cyclists'. This proposed change is supported by Devon County Council.
Sustainability Appraisal Rural Areas (Sampford Peverell, OSP2 Land of Whitnage Road)	If development area was brought back to the north and west of Mount Pleasant, and the more exposed eastern field excluded the proposed allocation would not then adjoin the Canal Conservation Area and any housing would be screened by existing buildings.	Individual (6786)	Reasons for not preferring this option is set out in the 2015 Sustainability Appraisal. The reappraisal of this site with the changes suggested would not result in a sufficiently distinct alternative.
Sustainability Appraisal Rural Areas (Sampford Peverell, OSP2 Land of Whitnage Road)	Noise from the A361 could be mitigated.	Individual (6786)	Reasons for not preferring this option is set out in the 2015 Sustainability Appraisal.
Sustainability Appraisal Rural Areas (OSP3 Sampford Peverell, Land off Mountain Oak Farm)	Objective A should score a neutral score as argue it is not divorced from the village. Tree planting could filter views from the Canal Conservation area.	Individual (6786)	It is considered that the site is separated from the village however the ability for mitigation has been recognised in the mitigation commentary and score.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Sustainability Appraisal Rural Areas (OSP3 Sampford Peverell, Land off Mountain Oak Farm)	Objective D, site is only grade 3 land and less than 20ha therefore should score more positively.	Individual (6786)	The negative score is considered due to the combination of grade 3 land and contaminated land.
Sustainability Appraisal Rural Areas (OSP3 Sampford Peverell, Land off Mountain Oak Farm)	Objective D. Unclear where area of contaminated land is within the site. Respondent argues a score of -1 with a '?' for contaminated land.	Individual (6786)	0.9ha of land is identified in the SHLAA appraisal 2013 for this proposed allocation.
Sustainability Appraisal Rural Areas (OSP3 Sampford Peverell, Land off Mountain Oak Farm)	Agree with scores for objectives B and D.	Individual (6786)	Supported noted
Sustainability Appraisal Rural Areas (OSP5 Sampford Peverell, Morrells Farm)	Given this is for fewer houses than SP2 allocation, do not understand the comments under the commentary and mitigation under objective I in terms of the impact on Halberton.	Individual (6786)	This commentary is based on advice from the SHLAA appraisal.
Sustainability Appraisal Rural Areas (OMO2 Church Street, Morchard Bishop)	Objective I. 'Access Achievable from Rectory Gardens, but third party land may be required'. Owner of third party land, wish it to be placed on record that land will not be sold.	Individual (4081)	Comment noted, site is not preferred.

## Historic Environment Appraisal (HEA)

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Historic Environment Appraisal (Appraisal for SP2 Higher Town, Sampford Peverell)	HEA identifies a heritage asset to be the Canal Conservation Area but states 'it lies some distance to the south'. This implies that the Canal Conservation Area is an unknown, undetermined distance away which suggests that the site is so far away that there could be no possible impact and as a result no mitigation would be necessary. This is plainly wrong. The CA lies within 50m of the allocated site and the land is approximately 8m higher. Housing would have an adverse effect/impact on the CA.	Individual (6786; 6408)	The distance 'to the south' is variable. The wording draws the distinction between the Canal Conservation Area and the immediately adjacent boundary of the Sampford Peverell Conservation Area. The Canal Conservation Area is screened to a large extent by the housing on the south side of Turnpike Road. The impact would not be significant and would be considered as part of any subsequent planning application for the site which would need to comply with Policy DM1 'High Quality Design'.
	The hillside allocated for 60 houses provides an attractive rural setting for the Canal Conservation Area when seen from a number of public vantage-points. Any housing would breach the skyline in such public views.	Individual (6786)	The distance 'to the south' is variable. The wording draws the distinction between the Canal Conservation Area and the immediately adjacent boundary of the Sampford Peverell Conservation Area. The Canal Conservation Area is screened to a large extent by the housing on the south side of Turnpike Road. The impact would not be significant and would be considered as part of any subsequent planning application for the site which would need to comply with Policy DM1 'High Quality Design'.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Historic Environment Appraisal (Appraisal for SP2 Higher Town, Sampford Peverell)	HEA fails to consider the impact of development at SP2 on views into and out of the Canal Conservation Area.	Individual (6408)	The distance 'to the south' is variable. The wording draws the distinction between the Canal Conservation Area and the immediately adjacent boundary of the Sampford Peverell Conservation Area. The Canal Conservation Area is screened to a large extent by the housing on the south side of Turnpike Road. The impact would not be significant and would be considered as part of any subsequent planning application for the site which would need to comply with Policy DM1 'High Quality Design'.
	The status of the historic buildings at the corner of the village conservation area bordering the SP2 allocation has not been fairly appraised.	Individual (6408)	The Grade II listed status of 42 Higher Town is acknowledged. The important unlisted buildings 44 and 46 Higher Town are also acknowledged. Both lots of buildings are described and mitigation considered.

### Equalities Impact Assessment (EQIA)

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
EqIA	Key element appears to be the provision of safe cycleways and provision or widening of footpaths to provide safe access to local services including shops, pubs and school. Assessment for SP2 Higher Town in this report appears to be unaware of the lack of safe access from the Higher Town site to the village centre and its facilities by footpath.	Individual (6404)	The purpose of the Equalities Impact Assessment is to eliminate discrimination and promote equality. Each policy in the plan has been assessed in terms of equality and impact on specific protected characteristics. Access to local services and to the village centre is considered throughout the evidence base for the Local Plan Review and it is not considered that any changes to the EQIA are required as a result.

### Gypsy and Traveller Accommodation Assessment (GTAA)

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
GTAA	Definition of Gypsies and Travellers significantly different from that contained within Annex 1 of the Planning Policy for Traveller Sites. This reduces the scope of the definition and consequently the likely number of pitches required over the plan period. GTAA has not been reassessed in light of this revised definition.	Individual (6685)	Comments noted. The GTAA shortly predated the publication of the governments revised Planning Policy for Traveller Sites (PPTS). However, the Council's consultants have advised that the 2015 GTAA remains a robust assessment of need for accommodation for travelling people. Officers have reviewed the implications of the PPTS and it is considered that whilst it would be possible to reduce the assessed need by 9% on the basis that 9% of responses to the GTAA survey indicated that they had ceased to travel permanently, it was appropriate to adhere to the 35 pitch target. This is set out in more detail in the Housing Topic Paper which accompanies the submission documents.

## Strategic Flood Risk Assessment

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Strategic Flood Risk Assessment (SFRA)	SFRA uses out of date data from 2008 rather than more up to date data such as 2012.	Kentisbeare Parish Council (76); Upton Lakes and Lodges Ltd (5997); Individual (4496; 5561; 5811; 6288; 6335; 6409)	The best available data was used consistent with the standard approach used by other authorities in England. In terms of the 2012 data, the EA indicated that there was insufficient river data available to make an assessment. Whilst the Met office announced that 2012 'was the wettest in 100 years' there is no direct correlation between the return period of a prolonged period of wet weather and the return period of individual instances of flooding from rivers. For this reason, the local records should not be considered as the best available representation of 1 in 100 year and 1 in 1000 year outlines. At the time of the preparation of the 2014 Mid Devon SFRA the best available modelling data was the generalised mapping product held by the EA. This was supplemented by more recent information where appropriate and relevant. The SFRA was produced by specialist consultants JBA in collaboration with the EA and DCC. However the Cullompton 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.
	No Catchment Based Assessment.	Kentisbeare Parish Council (76); Individual (5561; 6409)	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 approach is not required as part of a SFRA, however will be undertaken as part of the masterplan work for the proposed allocation at East Cullompton as agreed with the Environment Agency.

Policy/para	Summary of main comments	Comments made by (customer ID in brackets)	Response
Strategic Flood Risk Assessment (SFRA)	An up to date survey should be undertaken to take into account Flood Zone 2 and 3. Comment references infrastructure proposed in these flood zones.	Individual (6288)	The SFRA does take account of Flood Zone 2 and 3 and the flood risk vulnerability classification.
	Does not have current specific SFRA or any process where current real data is going to be obtained.	Individual (3559)	The best available data was used consistent with the standard approach used by other authorities in England. In terms of the 2012 data, the EA indicated that there was insufficient river data available to make an assessment. Whilst the Met office announced that 2012 'was the wettest in 100 years' there is no direct correlation between the return period of a prolonged period of wet weather and the return period of individual instances of flooding from rivers. For this reason, the local records should not be considered as the best available representation of 1 in 100 year and 1 in 1000 year outlines. At the time of the preparation of the 2014 Mid Devon SFRA the best available modelling data was the generalised mapping product held by the EA. This was supplemented by more recent information where appropriate and relevant. The SFRA was produced by specialist consultants JBA in collaboration with the EA and DCC. However the Cullompton 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.

<b>Policy/para</b>	<b>Summary of main comments</b>	<b>Comments made by (customer ID in brackets)</b>	<b>Response</b>
Strategic Flood Risk Assessment (SFRA)	Options do not follow the advice and guidance presented in the SFRA report	Upton Lakes and Lodges Ltd (5997); Individual (4496;6409)	The purpose of a SFRA is to provide evidence to enable the Sequential and Exception Test to be carried out and to identify requirements for site specific flood risk assessments. The SGRA has helped inform planning decisions as part of the Local Plan Review.
	SFRA report not give any real consideration Sustainable Urban Drainage Systems in the South East envelope of this proposed catchment near Upton Lakes.	Upton Lakes and Lodges Ltd (5997); Individual (4496)	The SFRA provided site summaries with information including the ability of the different types SUDs to be provided on-site. The information provided is general to the site as a whole and does not provide the detail suggested in the representation which would be considered at a later stage in the planning process.
	SFRA disregards the functional floodplain either side of the M5.	Upton Lakes and Lodges Ltd (5997); Individual (4496)	Not agreed the SFRA provided evidence to enable the Sequential and Exception Test to be carried out which included the consideration of the functional floodplain either side of the M5.