



Forward Planning,  
Mid Devon District Council,  
Phoenix House,  
Phoenix Lane,  
Tiverton  
EX16 6PP

11th April 2018

Dear Sirs

**OBJECTIONS TO THE LOCAL PLAN REVIEW  
AMENDMENTS TO THE STRATEGIC ASSESSMENT 2017– NEW POLICY J27  
OBJECTOR REFERENCE 4564**

**Previous Objections**

Representations had been prepared on the above but as a result of internal approvals these were not submitted by the due date of midnight 11 April 2018. Clarification has been sought from MDDC and we understand that the Inspector has the ability to consider a late objection.

Accordingly we write on behalf of our client Lowman Manufacturing Company Limited in relation to the lack of a suitable policy framework for the consideration of mixed use proposals on the Lowman Manufacturing site adjacent to Tiverton town centre and the disproportionately large commercial scheme proposed at Junction 27 that is likely to result in adverse impacts on the centre.

We have previously made representations on the local plan, including:

- detailed comments to the submission version of the local plan in a report in April 2015;
- in a letter dated 14 February 2017 relating to proposed changes (Policy J27); and
- a response to the Inspectors' Questions to the proposed Public Examination in a report dated August 2017.

## **Nature of Objection**

The advice on Strategic and Sustainability Assessments for Local Plan preparation states:

*'This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan.'*

The work done to date on the SA and the various amendments that are now proposed start on the premise that the disparate elements of the J27 scheme principally including retail (A1), hotels (C1), catering (A3, A4, A5) and recreations uses of circa 460,000 sqft (4,2750 sqm) are not capable of disaggregation and are locationally specific.

Notwithstanding concerns about this approach (for such a large regional facility) it is considered that insufficient attention has been paid to a suitable complementary policy framework for sites in and adjacent to established centres, which would be sequentially preferable in the first instance.

The J27 proposals appears to be given an unfair competitive advantage in being exempted from the normal planning tests simply on the basis that they are apparently incapable of disaggregation.

In particular the Council has failed to provide a complementary policy to address the adverse impacts that are likely to arise for other town centre and edge of centre sites, that might be capable of meeting an element of the wider demand for hotel and catering uses that underpin the tourist economy of the region as a whole. The concentration of activities in one location will have an adverse impact on the objectives of sustainability and undermine the well established principles of focusing travel generating uses in accessible locations that are already well served by public transport.

## **Amendment Sought**

The revised SA should recognise the adverse impact that is likely to arise from the concentration of commercial activities at J27 on existing and proposed town centre and edge of centre locations that could otherwise assist in underpinning the health of established centres.

The revised SA should consider the merit of a complementary policy framework that would support the development of sites within and adjacent to the town centre that could accommodate a range of commercial needs including retail (A1), catering (A3, A4, A5) and hotel uses (C1).

To date this analysis has not be completed as the proposed policy framework fails to mitigate the adverse impact that will likely arise from the J27 scheme.

The following policy amendment is sought for the Lowman Manufacturing Site adjacent to Tiverton Town centre.

**The Lowman site is allocated for a range of large format town centre uses up to 7,200 sqm GIA including convenience and comparison goods (Class A1), catering uses in Classes A3, 4, 5 and non residential uses (Hotel) in Class C1. Any development in Use Classes A1, 3, 4, 5 and C1 will be subject to a minimum floor space restriction to ensure that they are uses that cannot be accommodated on more central locations in the town centre. Any retail development will be subject to a limitation on the range of goods sold to prevent any adverse impact on the town centre. Any development will provide satisfactory pedestrian access to the adjacent town centre.**

Yours faithfully

Jonathan Langham  
Director