Public Document Pack

Mid Devon District Council

Cabinet

Monday, 21 November 2016 at 10.00 am
Phoenix Chambers, Phoenix House, Tiverton

Next ordinary meeting
Thursday, 1 December 2016 at 2.15 pm

Those attending are advised that this meeting will be recorded

Membership

Cllr C J Eginton	Leader
Cllr R J Chesterton	Deputy Leader and Planning and Economic Regeneration
Cllr K Busch	Environment
Cllr P H D Hare-Scott	Finance
Cllr C R Slade	Community Well Being
Cllr Mrs M E Squires	Working Environment and Support Services
Cllr R L Stanley	Housing

A G E N D A

Members are reminded of the need to make declarations of interest prior to any discussion which may take place

1. **Apologies**

   To receive any apologies for absence.

2. **Public Question Time**

   To receive any questions relating to items on the Agenda from members of the public and replies thereto.

3. **Minutes of the Previous Meeting** *(Pages 3 - 8)*

   To receive the minutes of the meeting of 27 October 2016 (attached)

4. **Local Plan Review** *(Pages 9 - 650)*

   Report of the Head of Planning and Regeneration requesting consideration of suggested modifications to the proposed submission local plan and to make appropriate recommendations to Council.

5. **Community Infrastructure Levy** *(Pages 651 - 674)*

Committee Administrator: Sally Gabriel
Tel: 01884 234229
Email: sgabriel@middevon.gov.uk
This document is available on the Council's Website at: www.middevon.gov.uk

Report of the Head of Planning and Regeneration requesting consideration of the Draft Community Infrastructure Levy and associated policies for recommendation to Council.

6. **Local Development Scheme** *(Pages 675 - 682)*

Report of the Head of Planning and Regeneration proposing a revised timetable for the review of the Local Plan in the Local Development Scheme for Mid Devon.

Stephen Walford
Chief Executive
Friday, 11 November 2016

Anyone wishing to film part or all of the proceedings may do so unless the press and public are excluded for that part of the meeting or there is good reason not to do so, as directed by the Chairman. Any filming must be done as unobtrusively as possible from a single fixed position without the use of any additional lighting; focusing only on those actively participating in the meeting and having regard also to the wishes of any member of the public present who may not wish to be filmed. As a matter of courtesy, anyone wishing to film proceedings is asked to advise the Chairman or the Member Services Officer in attendance so that all those present may be made aware that is happening.

Members of the public may also use other forms of social media to report on proceedings at this meeting.

Members of the public are welcome to attend the meeting and listen to discussion. Lift access the first floor of the building is available from the main ground floor entrance. Toilet facilities, with wheelchair access, are also available. There is time set aside at the beginning of the meeting to allow the public to ask questions.

An induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, or

If you would like a copy of the Agenda in another format (for example in large print) please contact Sally Gabriel on:
Tel: 01884 234229
E-Mail: sgabriel@middevon.gov.uk

Public Wi-Fi is available in all meeting rooms.

MID DEVON DISTRICT COUNCIL

MINUTES of a **MEETING** of the **CABINET** held on 27 October 2016 at 2.15 pm

Present Councillors	C J Eginton (Leader) R J Chesterton, K Busch, P H D Hare-Scott, C R Slade and Mrs M E Squires
Apologies Councillor(s)	R L Stanley
Also Present Councillor(s)	R F Radford
Also Present Officer(s):	Stephen Walford (Chief Executive), Andrew Jarrett (Director of Finance, Assets and Resources), John Bodley-Scott (Economic Development & Regeneration Manager), Lee Chester (Leisure Centre Manager) and Sally Gabriel (Member Services Manager)

80. **APOLOGIES**

Apologies were received from Cllr R L Stanley.

81. **PUBLIC QUESTION TIME (00-00-45)**

There were no members of the public present.

82. **MINUTES OF THE PREVIOUS MEETING (00-00-50)**

The minutes of the previous meeting held on 29 September 2016 were approved as a true record and signed by the Chairman.

83. **PUBLIC HEALTH PLAN (00-01-30)**

Arising from a * report from the Public Health and Professional Services Manager, the Community Policy Development Group had recommended that the Public Health Strategy Action Plan for 2016-2019 be approved by Council.

The Cabinet Member for the Working Environment and Support Services outlined the contents of the report stating that the new Public Health Strategy and Action Plan aligned with and directly supported a number of key themes in the Corporate Plan as follows:

- Priority 2 Homes: Aim 2 – Working with Private Landlords to improve housing conditions
- Priority 3: Aim 1 – Work with local communities to encourage them to support themselves

- Priority 3 Community: Aim 3 - Increase physical activity and promote health and wellbeing

Devon County Public Health provided the public health strategic leadership and technical support for public health action across the whole of Devon. They provide strategic oversight and the evidence base for local health priorities. Their consultants provide direct support and advice to the Mid Devon Public Health Officer and Public Health Services Manager. The following 4 priority areas had been developed within the plan as informed via consultation with local stakeholders:

- Prevention of cardiovascular disease and cancer
- Decent high quality housing
- Emotional/mental health and resilience
- Air quality

She highlighted various schemes that were taking place in Mid Devon.

Consideration was given to the main cause of death for under 75's, the health summary for Mid Devon and both local and national trends.

RECOMMENDED that the Public Health Strategy Action Plan for 2016-19 be approved.

(Proposed by Cllr Mrs M E Squires and seconded by Cllr C R Slade).

Note: * Report previously circulated, copy attached to minutes.

84. **EXE VALLEY LEISURE CENTRE EXTENSION (00-10-03)**

Arising from a * report from the Leisure Services Manager, the Community Policy Development Group had recommended that that the fitness facility development project at Exe Valley Leisure Centre be identified as a leisure priority, and that option 2 be approved as the preferred option.

The Cabinet Member for Community Well-Being outlined the contents of the report identifying the link to the Corporate Plan and explaining that the leisure centre was at full capacity and had the capability to expand; a feasibility study had been completed and 3 options had come forward. The Policy Development Group had recommended Option 2 which would supply 2 multipurpose rooms which would be opened to create 1 large multipurpose room but created a fitness suite split across 2 areas rather than a single space, he therefore requested that the spend to save project be approved.

Consideration was given to:

- The impact the development would have on performance figures
- Completion and operational dates and the impact on users
- Any loss of income whilst the internal works were taking place.

RESOLVED that the recommendation be approved.

(Proposed by Cllr C R Slade and seconded by Cllr Mrs M E Squires)

Note: * Report previously circulated, copy attached to minutes

85. **GRANT PAYMENTS TO EXTERNAL ORGANISATIONS 2016-17 (00-14-53)**

Arising from a * report from the Grants and Funding Officer, the Community Policy Development Group had made the following recommendations:

1. The Museum of Mid Devon Life and Tiverton Tourism Information Service be moved from the grants budget to a separate tourism budget;

2. Option 2, a commissioning approach to future grant allocations, should be adopted; and

3. Grants to be paid on an annual basis for the duration of the 2015-2020 Corporate Plan.

The Cabinet Member for Community Well-Being outlined the contents of the report stating that for many years the same organisations had received grant funding. In previous years cuts had been made in the allocation to groups in receipt of grants but it was felt that this was not the best approach and undertaking the process annually meant that the groups concerned struggled to plan strategically. It was proposed that a commissioning approach take place, this would involve starting afresh, with any organisation being able to put a case to the authority as to why they should be in receipt of funding.

It was further proposed that funding for the Museum of Mid Devon Life and the Tiverton Tourism Service would be moved from the grants budget to a separate tourism budget.

RESOLVED that the recommendations be approved.

(Proposed by Cllr C R Slade and seconded by Cllr R J Chesterton)

Note: *Report previously circulated, copy attached to the minutes.

86. **SPECIAL PURPOSE VEHICLE - PROPERTY (00-17-54)**

The Cabinet had before it a * report of the Director of Finance, Assets and Resources requesting approval to undertake more detailed research into the potential of forming a special purpose vehicle. He outlined the contents of the report stating that since the national public sector austerity programme was implemented back in 2010/11 all Councils had been striving to reduce operating costs or look for new activities to increase income in order to maintain ongoing service provision. In addition to the budget pressures there was a need to increase the number of housing units locally which was identified in the Corporate Plan. A significant number of Councils were now creating a special purpose vehicle in order to deliver a noticeable step change in housing and/or commercial delivery. Planned visits had been organised to consider the work taking place by other Councils in order to inform a further report to Cabinet in January.

Consideration was given to the benefits of setting up such a scheme, meeting the corporate priorities and unlocking stalled development sites.

It was therefore

RESOLVED that the formation of a property development special purpose vehicle be approved and that delegated authority be given to the Director of Finance, Assets & Resources in consultation with the Cabinet Member for Housing to explore the precise terms of reference, objectives and governance that will be required in order to facilitate an increased level of housing and commercial delivery within the District.

(Proposed by Cllr P H D Hare-Scott and seconded by Cllr R J Chesterton)

Note: *Report previously circulated, copy attached to minutes

87. **HALF YEAR INVESTMENT PERFORMANCE & REVIEW OF TREASURY MANAGEMENT STRATEGY 2016/17 (00-20-49)**

The Cabinet had before it a * report of the Director of Finance, Assets and Resources informing it of the treasury performance during the first six months of 2016/17 and requesting agreement on the ongoing deposit strategy for the remainder of 2016/17.

The Cabinet Member for Finance outlined the contents of the report stating that UK bank interest rates continued at historically low levels, however the investment in the CCLA (Churches, Charities and Local Authorities) had proved beneficial with a return of 4.54% in the first quarter and 4.33% in the second quarter.

Consideration was given to the need for continued investment and whether to increase the deposit level with the CCLA.

RESOLVED that the current policy as outlined in the report be approved.

(Proposed by Cllr P H D Hare-Scott and seconded by Cllr C R Slade)

Notes:

(i) Cllr C J Eginton declared a personal interest as a member of the Lloyds Banking Group pension scheme;

(ii) *Report previously circulated, copy attached to minutes.

88. **FINANCIAL MONITORING (00-24-00)**

The Cabinet had before it and **NOTED** a * report of the Director of Finance, Assets and Resources presenting financial monitoring information for the income and expenditure for the financial year 2016/17.

The Cabinet Member outlined the contents of the report stating that the General Fund showed a proposed deficit of £162k and he highlighted the most significant movements within the month:

- £220k savings as a result of the Shared Waste Agreement

- £83k deterioration in Leisure Services forecast, made up of both costs and income

Consideration was given to reduced planning income and the excellent rent collection rates.

Note: *Report previously circulated, copy attached to minutes.

89. **MEDIUM TERM FINANCIAL STRATEGY (00-26-04)**

The Cabinet had before it a * report of the Director of Finance, Assets and Resources producing an updated Medium Term Financial Plan (MTFP) which took into account the Council's key strategies (i.e. The Corporate Plan, Service Plans, Treasury Management Plan, Asset Management Plan, Work Force Plan and Capital Strategy) and demonstrated that it has the financial resources to deliver the Corporate Plan.

The Cabinet Member for Finance outlined the contents of the report stating that the main purpose of the MTFP was to show how the Council would strategically manage its finances over the next five years in order to support the delivery of the objectives detailed in the Corporate Plan. The plan also identified any gaps so strategic decisions could be made of levels of future funding. He highlighted the uncertainties identified in the report and voiced his concerns regarding the growth in inflation post Brexit.

RESOLVED that the updated Medium Term Financial Plan be approved and that the proposals for managing costs and revenues be endorsed.

(Proposed by Cllr P H D Hare-Scott and seconded by Cllr C R Slade)

Note: *Report previously circulated, copy attached to minutes.

90. **DRAFT 17/18 - GENERAL FUND AND CAPITAL PROGRAMME**

The Cabinet had before it and **NOTED** a * report of the Director of Finance, Assets and Resources considering options available in order for the Council to set a balanced budget for 2017/18 and to agree a future strategy for further budget reductions for 2018/19.

The Cabinet Member for Finance outlined the contents of the report stating that the initial aggregation of all service budgets currently indicated a General Fund budget gap of £419k. In order to balance the budget all departments will need to identify further savings.

Consideration was given to the contents of the following table.

Reconciliation of Major 2017/18 Budget Variances

Variances	**Amount £k**
External items outside of our control	
Reduced formula grant settlement	609
Decrease in Housing Benefit Grant	25

Pay award	100
Pension provision	35
Price inflation	50
New Apprenticeship Levy	40
Subtotal	**859**
Other changes	
New apprentices	20
DCC sharing of waste	(200)
Market Walk income	(20)
Increased income from CCLA investments	(38)
Increase in Collection Fund surplus	(45)
Contributions from town and parish councils	(8)
Increase Council tax income (£5 rise + new 200 properties)	(176)
Department of Work and Pensions rent	(45)
Additional election monies	(29)
Various additional fee income	(60)
Other net cost pressures (including reflection on 16/17 budget pressures	161
Draft budget gap for 2017/18	**419**

Discussion took place regarding possible inflationary pressures.

Note: *Report previously circulated, copy attached to minutes.

91. **CABINET MEMBER DECISION**

The Cabinet **NOTED** that the following decision had been made by the Cabinet Member for Environment:

1) To increase charges to our trade waste and recycling customers by 3% to accommodate the increased costs of labour, fuel and consumables and landfill gate fees. The charges will be rounded up to the nearest appropriate amount.

2) To increase the sales price of the 240 litre Garden Waste Collection Annual permit from £47 to £48.

3) To increase the sales price of the 140 litre Garden Waste Collection Annual permit from £35 to £36.

92. **NOTIFICATION OF KEY DECISIONS**

The Cabinet had before it, and **NOTED**, its rolling plan for November 2016.

Note: Plan previously circulated, copy attached to minutes.

(The meeting ended at 2.56 pm) **CHAIRMAN**

CABINET **AGENDA ITEM**
21 NOVEMBER 2016

REPORT OF THE HEAD OF PLANNING AND REGENERATION

MID DEVON LOCAL PLAN REVIEW 2013 – 2033 PROPOSED MODIFICATIONS

Cabinet Member Cllr Richard Chesterton
Responsible Officer Mrs Jenny Clifford, Head of Planning and Regeneration

Reason for Report: To consider suggested modifications to the proposed submission local plan and to make appropriate recommendations to Council.

RECOMMENDATIONS

That Cabinet make the following recommendations to Council:

1. **That delegated authority be given to the Head of Planning and Regeneration, in consultation with the Cabinet Member for Planning, to make minor changes both before and after consultation to the text and maps including updating factual information such as the latest commercial land survey results; and**

2. **That approval be given to publish the proposed modifications to the Local Plan for consultation and that delegated authority be given to the Head of Planning and Regeneration in consultation with the Cabinet Member for Planning for the plan's subsequent submission to the Planning Inspectorate for examination together with its supporting documentation.**

Relationship to Corporate Plan: The Local Plan is the prime mechanism for the Council to achieve the Corporate Plan 2016 to 2020 Economy, Homes, Community and Environment priorities.

Financial Implications: The financial implications for the preparation of the Local Plan are reflected in existing budgets.

Legal Implications: The review of the Local Plan will enable the Council to make sound decisions and more robustly defend appeals against those decisions. The work undertaken in connection with the emerging Local Plan Review is consistent with the 'duty to co-operate' as set out in the Localism Act 2011 and the Planning and Compulsory Purchase Act 2004.

Risk Assessment: The need to progress the plan towards adoption has become more pressing given the lack of a demonstrable five year housing supply which currently leaves the authority vulnerable to decisions being allowed on sites the Council does not consider suitable. The Government has set a target for Councils to submit a post National Planning Policy Framework (2012) local plan by the end of March 2017 or be at risk of intervention. The timescale for the submission of the Mid Devon Local Plan Review as set out in the latest Local Development Scheme seeks to meet this deadline.

1.0 BACKGROUND

1.1 Consultation on the Local Plan Review Proposed Submission document was held between 9 February 2015 and 27 April 2015. 971 submissions were received, consisting of 2,434 specific comments. At that time it was intended, that once these comments had been considered, the Local Plan would have been submitted under

delegated authority to the Planning Inspectorate later that year. However following that consultation the need for additional technical work was identified in order to ensure that the evidence base would be more robust prior to submission.

1.2 The need for additional technical evidence has resulted in a delay in submitting the plan. This external technical work has been reliant on statutory consultee involvement which has taken much longer than anticipated to complete. During this time the Council, at its meeting of 22 September 2016, also resolved to allocate land at Junction 27 of the M5 motorway for leisure, retail and tourism together with associated additional housing sites at Blundells Road, Tiverton and Higher Town, Sampford Peverell. This has resulted in the plan needing to be updated to incorporate these changes and to make the corresponding amendments such as the impact on overall housing and commercial land supply distribution for the district.

1.3 Since the spring 2015 consultation there have also been changes to national guidance and the supporting local plan evidence base which have led to the need for additional modifications.

1.4 This report identifies the main proposed changes to the plan resulting from the above, with reference to the full schedule of modifications appended to the report (**Appendix 2)** and seeks approval to undertake consultation on these local plan modifications.

2.0 Consultation Responses to the Local Plan Review Proposed Submission Document (Feb 2015 – April 2015)

2.1 The local plan consultation generated 2,434 specific comments. These comments are included in tabular form in **Appendix 1.** These tables set out the comments made, taking each of the plan areas in turn. The tables include the officers' recommended response to the comment and any recommended modifications to the plan arising. The individual submissions received can be viewed online using the search facility on the Local Plan Review page of the Mid Devon Website.

2.2 A summary of the comments received is set out below by thematic areas:

a) Development Strategy, Vision and Spatial Strategy

A variety of representations were made on this section of the plan with the majority that responded supporting this section. Those that did not support the overall strategy disagreed with the housing figures and the strategic site allocations. Other various recommendations were made for minor amendments to text such as reference to external strategies and additional goals as part of the vision.

b) Strategic Policies

Of the representations received, the majority supported the strategic policies in the plan. The policies that received most comments in the strategic policies section were S2 Amount and distribution of development and S11 Cullompton. For both, the majority of responses supported the policies. Of those that objected to S2, some suggested increasing the amount of development in the district overall although in contrast others felt that there was overprovision of housing in the proposed plan. In terms of the distribution of development a wide range of alternatives were suggested including greater development at Tiverton, Crediton and rural areas. Of those that objected to S11, most comments centred on the scale of development proposed at Cullompton and concerns over the impact on existing infrastructure, the environment and flooding.

c) Town allocations

Most representations in the town allocation section were focussed on sites in Tiverton and Cullompton. In Tiverton the two sites that received most representations were TIV10 Roundhill and the TIV14 Wynnards Mead contingency site. A large proportion of the comments for TIV10 formed signatures as part of a petition which noted parking, drainage, amenity and access as reasons for their objection to the site. Similarly for TIV14, most of the responses formed signatures as part of a replicated letter which argued issues on heritage and the impact on the local road network as reasons for objection. In Cullompton, most comments were on CU7-CU12 East Cullompton. There were various representations of support for the policy; however the majority of comments objected to the proposed allocation. Those that objected were concerned about the loss of agricultural land, potential flood risk, impact on infrastructure, school capacity and the environment.

d) Rural allocations

Of the representations made on rural allocations the vast majority of comments focussed on the village of Morchard Bishop. Almost all of the responses for Morchard Bishop formed signatures as part of replicated letter which set out its support for the proposed allocation stating that the site was sufficient to meet the needs of the village and for rejecting the previously considered option sites in the settlement. There were various other comments for the other rural allocations both supporting and objecting to various sites. The other site of note in terms of a higher number of representations received on rural allocations was CB1 Land off Church Lane, Cheriton Bishop. The majority of responses to this site objected, although there was some support. Those that objected identified their concerns over issues around traffic, parking, topography, village character and impact on neighbours.

e) Junction 27 M5

This site was not recommended for allocation in the Proposed Submission Local Plan, nevertheless it received a significant number of comments. Of those that responded the majority supported the decision not to include the site as an allocation in the Proposed Submission Local Plan. Those that objected to its exclusion cited the positive impact of the development to tourism and leisure and the position of the site having excellent infrastructure connections.

f) Development Management Policies

A wide range of responses were received for this section of the plan with many expressing support for the development management policies. A number of comments were received for DM5 'Parking' with some respondents putting forward alternative parking standards. Several comments were received for DM12 'Design of Housing' and DM13 'Dwelling Sizes' with some arguing that the policies did not reflect the Ministerial Statement of 25th March 2015. Policy DM24 'Protection of Local Green Space and recreational land/buildings' received the most responses with the majority recommending that Morchard Bishop OMO2 'Church Street', should be listed as Local Green Space. Other comments on this policy supported Local Green Space designations in Bradninch, Cheriton Fitzpaine, Morchard Bishop, Sandford and Bickleigh.

g) Policies Map

The majority of comments made on the policies maps section related to minor cartographic and formatting errors, for example, where a proposed allocation appears to extend across the garden of a private residential property. There were also errors identified in relation to the North West Cullompton allocation and the need for the Local Plan Review to reflect the recently adopted masterplan. It was also noted that the conservation area for Cheriton Bishop is incorrect.

h) Miscellaneous comments

A wide range of comments were received during the Local Plan Review consultation, some of which were not directly related to a policy but made general suggestions or comments on the Plan such as including additional context for Mid Devon District. Comments on the Local Plan Review evidence were also made on the Strategic Flood Risk Assessment (SFRA), Strategic Housing Market Area Assessment (SHMA) and the Sustainability Appraisal (SA). With regard to the SFRA, comments centred on the methodology of the study suggesting additional considerations to form part of the study. SHMA comments related to the discussion on S2 Amount and Distribution of Development and how the overall amount of development in the policy relates to objectively assessed housing need. A range of comments were received regarding the SA including general comments requesting additional text, suggestions for amendments to the methodology and changes to the specific scores provided to each policy in the SA analysis.

i) Community Infrastructure Levy

There was support for the residential CIL charge, but concerns over the provision of affordable housing and the differential rates used. The strategic sites CIL exemption was generally supported although some questioned the zero rates in urban extensions. It was suggested that a single, district wide charge should be applied. Other comments questioned how CIL might fund certain measures, for example, in relation to the historic environment or sporting facilities and a number of representations pointed out that the Council have not produced an instalments or exemptions policy. Furthermore, the Infrastructure Plan/Reg 123 list received a number of comments and several respondents put forward additional suggestions to be added to the list (CIL is considered in more detail within a separate report on this Cabinet agenda).

3.0 Changes to the Local Plan Review.

Changes arising as a result of consultation responses Proposed Submission Document (Feb 2015 – April 2015)

Development Strategy and Strategic Policies

Following consultation on the proposed submission version of the Local Plan, a number of minor amendments are proposed for the strategic policies. The main changes include an amendment to Policy S3 to support self-build and custom-build and additional supporting text for Policy S7 'Town Centres' to ensure that the focus on healthy town centres does not preclude retail, leisure and recreation uses within strategic site allocations such as East Cullompton.

Town Allocations

Tiverton

Policy TIV2 has been amended in response to comments from DCC to ensure the provision of a new *grade-separated* junction to the A361. In response to concerns raised by the Environment Agency, a new criterion has been added to Policy TIV3 requiring the provision of a strategic Sustainable Urban Drainage Scheme to deal with surface water from the development paying particular attention to runoff into Tidcombe Fen SSSI. Policy TIV6 Farleigh Meadows has also been updated in response to comments stating that the policy did not reflect the planning permission for the site. In response to the findings of the Historic Environment Appraisal, Policy TIV14 'Wynnards Mead' is proposed to be deleted.

Cullompton

In response to comments received, a number of amendments are proposed for policies CU1 – CU6. Policy CU2 has been updated in response to comments from DCC requesting contributions from development to the Town Centre Relief Road and bus service enhancements. In addition, Policy CU4 'North West Cullompton Community Facilities' criterion b) has been updated in accordance with comments provided by DCC requiring construction costs for 300 places of a 420 place primary school with provision for early years. A number of the Cullompton policies have been amended following the findings of the Historic Environment Appraisal which was prepared in response to comments received from Historic England. In addition, Policy CU9 'East Cullompton Environmental Protection and Green Infrastructure has been amended to address concerns from the EA requesting a *strategically designed, and phased* Sustainable Urban Drainage Scheme.

Crediton

A number of comments were received for Policy CRE2 'Red Hill Cross' and therefore, the policy has been amended to include improved access to the town centre for pedestrians and cyclists. As above, a number of policies have been amended following the preparation of a Historic Environment Appraisal, to ensure appropriate mitigation where necessary. These include, CRE2 'Red Hill Cross', CRE3 'Cromwells Meadow', CRE4 'The Woods Group', CRE7 'Stonewall Lane' and CRE10 'Land South of A377'. Additional supporting text has been added to policy CRE5 'Pedlerspool' following comments from the EA regarding the River Creedy.

Rural Allocations

Many of the rural allocations have been updated following the preparation of a Historic Environment Appraisal, which has been prepared in response to the representation from Historic England. A wide range of minor changes have been made to the rural allocations following the representations received. Policy BO1, Land adjacent to Hollywell, Bow has been revised to ensure the policy is flexible to respond to alternative highway options. A number of responses were received for CB1; Land off Church Lane and subsequently, the policy now includes provision of a landscape buffer, a design solution and has been reduced in site area to ensure that it is more in keeping with the existing pattern of development. Following comments from a representor that HE1 'Depot, Hemyock' is no longer immediately deliverable, this is now proposed to be deleted accordingly. Policy WI2 'Willand Industrial Estate' has been reinstated following representations addressing the Council's original reason for deletion. The remainder of the site is now deliverable with access to phase 2 having been secured.

Development Management Policies

A number of the development management policies have been amended in response to comments received to ensure greater clarity. Policies DM12 'Design of Housing' and DM13 'Dwelling Sizes' are now proposed to be combined following representations highlighting that the policies did not reflect the Ministerial Statement of 25th March. Following a number of comments received in relation to DM24 'Protection of Local Green Space and recreational land/buildings', additional Local Green Space designations are proposed for Millennium Green, Bampton and Millennium Green, Sandford.

Policies Maps

The majority of comments made on the policies maps section related to minor cartographic and formatting errors. Where appropriate, these have now been corrected.

Changes arising from the Council decision of 22 September 2016

3.1 At its meeting of 22 September 2016 Council resolved to allocate land at Junction 27 of the M5 for leisure, retail and tourism and associated additional housing sites at Blundells Road, Tiverton and Higher Town, Sampford Peverell. It is therefore not intended to replicate the contents of the report regarding the Junction 27 allocation considered at Cabinet on 15th September 2016 and Council 22nd September 2016.

3.2 This has resulted in amending and rewriting all the inter-related parts of the plan, policies and tables together with updating the Sustainability Appraisal, Habitat Regulations Assessment, Infrastructure Plan, and Heritage Impact Assessments.

3.3 A new policy J27 has been added, together with associated housing policies TIV16 Blundells School and SP2 Higher Town, Sampford Peverell. The plan's housing numbers and commercial floorspace calculations have also been amended accordingly. The role and benefits of the proposed allocation at J27 have been acknowledged throughout the document.

Modifications arising from changes in circumstances since February 2015

3.4 Since the pre-submission Local Plan was published for consultation in 2015 a number of issues have arisen which have necessitated changes to the Local Plan. These changes are referenced in full in the schedule of modifications. The main changes that have occurred relate to the following key areas:

a) Change in Government Guidance including the creation of National Space Standards, the Written Ministerial Statement on Wind Energy and the Housing and Planning Act 2016;
b) Updated evidence such as the publication of the Strategic Housing Market Assessment Final Report 2015; and
c) Devon County Council's latest highway advice regarding capacity at Junction 28 of the M5 Motorway.

4.0 Schedule of Local Plan Modifications

4.1 The changes set out above have been encapsulated within the schedule of proposed modifications included at **Appendix 2.** This list of proposed changes to the plan will ultimately form part of the submission to the Planning Inspectorate along with any supplementary modifications considered necessary following further consultation.

4.2 For clarity, policies affected by these proposed changes are listed below. The list also includes policies amended due to changes made by the Planning Policy Advisory Group (see section 8). The changes are to be found within the track-change version of the Local Plan Review at **Appendix 3.**

Policy Number	Policy	Policy Number	Policy
S1	Sustainable Development Priorities	CU17	Week Farm
S2	Amount and distribution of development	CU18	Venn Farm
S3	Meeting housing needs	CU19	Town Centre Relief Road
S4	Ensuring housing delivery	CU20	Cullompton Infrastructure
S5	Public open space	CU21	Land at Colebrook Contingency Site
S6	Employment	CRE1	Wellparks
S9	Environment	CRE2	Red Hill Cross
S10	Tiverton	CRE3	Cromwells Meadow
S11	Cullompton	CRE5	Pedlerspool
S12	Crediton	CRE6	Sports Field, Exhibition Road
S14	Countryside	CRE10	Land south of A377
TIV1	Eastern Urban Extension	CRE11	Crediton Infrastructure
TIV2	Eastern Urban Extension Transport Provision	BO1	Land adjacent to Hollywell, Bow
TIV3	Eastern Urban Extension Environmental Protection and Green Infrastructure.	CH1	Barton, Chawleigh
TIV6	Farleigh Meadows	CB1	Land off Church Lane, Cheriton Bishop
TIV9	Howden Court	HA1	Land Adjacent Fishers Way, Halberton
TIV11	Palmerston Park	HE1	Depot, Hemyock
TIV12	Phoenix Lane	NE1	Court Orchard
TIV13	Tidcombe Hall Contigency Site	WI2	Willand Industrial Estate
TIV14	Wynnards Mead Contingency Site	DM1	High Quality Design
TIV15	Tiverton Infrastructure	DM2	Renewable and low carbon energy
CU1	North West Cullompton	DM3	Transport and air quality
CU2	NW Cullompton Transport Provision	DM7	Traveller Sites
CU3	NW Cullompton Environmental Protection and Green Infrastructure	DM12	Design of Housing
CU4	NW Cullompton Community Facilities	DM13	Dwelling Sizes
CU5	NW Cullompton Carbon Reduction and Air Quality	DM14	Town centre development
CU6	NW Cullompton Phasing	DM15	Development outside town centres
CU7	East Cullompton	DM22	Tourism and leisure development
CU9	East Cullompton Environmental Protection and Green Infrastructure	DM24	Protection of Local Green Space and recreational land/buildings
CU10	East Cullompton Community Facilities	DM25	Development affecting heritage assets
CU11	East Cullompton Carbon Reduction and Air Quality	DM26	Green infrastructure in major development
CU12	East Cullompton Phasing	DM28	Other protected sites
CU13	Knowle Lane	TIV16(NEW)	Blundells School
CU14	Ware Park and Footlands	BA4(NEW)	School Close Bampton
CU15	Land at Exeter Road	SP2(NEW)	Higher Town Sampford Peverell
CU16	Cummings Nursery	UF1(NEW)	Land West of Uffculme
		J27(NEW)	Land at J27 of the M5 Motorway

5.0 The Sustainability Appraisal

5.1 The Local Plan Review has been subject to Sustainability Appraisal during its preparation. The appraisal is an iterative process informing the development of the Local Plan Review and has been published alongside each stage of consultation. The Sustainability Appraisal assesses the likely significant effects of the Local Plan, focussing on the environmental, economic and social impacts. The latest version of the Sustainability Appraisal has been updated to consider the latest available evidence including reasonable alternatives proposed through consultation responses. The Sustainability Appraisal concludes that the proposals set out in the Local Plan Review together with the schedule of modifications are the most appropriate given the reasonable alternatives available. The Sustainability Appraisal and other updated evidence produced in the process of the plan's preparation will be made available for comment during the Local Plan Review proposed modifications consultation.

6.0 Consultation

6.1 This report seeks to approve the local plan modifications for public consultation commencing in January 2017. This consultation will be solely on modifications to the plan made since February 2015 identified as tracked changes to the Local Plan **(Appendix 3)**.

6.2 It is proposed that the consultation will run over a six week period from 3th January 2017 until 14th February 2017 in accordance with the recently updated Statement of Community Involvement (October 2016).

6.3 The local plan consultation is proposed to be advertised in the press and online. Notifications will also be provided to approximately three thousand individuals and organisations currently on the local plan mailing list. This includes those who have previously made representations to the local plan, statutory consultees, local and neighbouring councils and other interested parties who have requested to be included on this list.

6.4 It is proposed that staff will be made available to service an exhibition at each of the following locations :

i) Crediton
ii) Cullompton
iii) Tiverton
iv) Sampford Peverell
v) Willand
vi) Uffculme

6.5 Any representations received will be submitted to the Secretary of State along with the Local Plan, other relevant documents and the previous representations received. An independent inspector will then hold an examination on the Local Plan which will take into account public and other opinion when judging whether the plan is sound.

6.6 In addition to the public consultation referred to above, the local planning authority also has a legal duty to cooperate with other neighbouring local planning authorities, Devon County Council and other public bodies to engage constructively, actively and on an ongoing basis with regard to plan preparation. This requirement was created in the Localism Act 2011 and amends the Planning and Compulsory Purchase Act 2004. Mid Devon District Council has been proactive in undertaking this duty. Meetings are continuing with duty to co-operate partners with regard to the plan and the proposed modifications. A duty to cooperate statement will be submitted alongside the plan to the Planning Inspectorate.

7.0 Delegated Authority

7.1 The tracked changes version of the plan attached as **Appendix 3** does not currently include the latest information on commercial floorspace completions. The annual commercial land monitoring for 2015/ 2016 will be completed prior to the plan being printed for consultation. This report seeks approval for delegated authority to update the plan prior to consultation to reflect this information when available together with other minor corrections.

7.2 The Government has stated that authorities who have not prepared a local plan by March 2017 are at risk of having Department for Communities and Local Government intervene. The risk to Mid Devon is likely to be low given that the plan is well advanced, Mid Devon District Council has a good track record of plan making and we expect more attention to be given to authorities without a plan in places in the South East with comparatively greater housing need. However it would be unwise to delay submission of the plan beyond March 2017 as there is still a risk of government intervention and the authority would become increasingly vulnerable owing to uncertainty over future housing land supply. It is therefore also recommended that delegated authority be given to the Cabinet Member for Planning and Regeneration and the Head of Planning and Regeneration to approve the plan for submission following any minor changes considered necessary arising from the consultation responses. This also includes all the accompanying documentation.

8.0 Planning Policy Advisory Group

8.1 At its meeting on 10 November 2016 members of the Planning Policy Advisory Group considered all paperwork accompanying this report. The group supported the recommendations in this report; however it raised a number of issues it wished to be addressed via changes to policies and supporting text. Such changes were made at the meeting and approved by the group. They are incorporated within the appendices to this report. In addition the group also requested that Cabinet give further consideration to the following issues detailed below:

<u>Additional housing sites required in connection with the proposed allocation at Junction 27.</u>

8.2 PPAG requested that officers give further consideration to whether there is a need to allocate land at Higher Town, Sampford Peverell(SP2). In particular members noted that the proposed allocation at Blundells Road, Tiverton (TIV16) was for 200 houses only; whereas the adopted local plan allocation in the Allocations and Infrastructure Development Plan Document under policy AL/TIV/9 was for 200 dwellings together with 7,000 square metres of employment floorspace. Members therefore wished to understand whether there is scope to increase the housing numbers since the employment floorspace is not proposed to be included in the new policy. If so, members wished consideration be given to the deletion of the proposed allocation at Higher Town, Sampford Peverell.

8.3 Officers have reviewed the Blundells Road proposed allocation. As set out policy proposes 200 dwellings on 6 hectares giving a residential density of approximately 33 dwellings per hectare. If this were to be increased to 260 dwellings the density would rise to approximately 43 dwellings per hectare. These assumptions are based on the full 6 hectares being suitable for residential development. The allocation as a whole includes land subject to flooding by the River Lowman and proposes land shaping to raise areas for development above flood zone 3 and the creation of

additional compensatory floodplain. Increasing the number of houses above that proposed would give less flexibility in the design of the flood mitigation measures and would be likely to position housing closer to areas that would remain subject to flooding. Residential use is considered 'more vulnerable' to flooding in comparison to commercial uses as defined in the NPPF Technical Guidance. A higher residential density may also lead to a less satisfactory residential environment and leave less land available for a sustainable urban drainage system. Importantly development of this 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. This will require land. In conclusion, Officers are of the view that they cannot recommend increasing housing numbers on the Blundells Road, Tiverton site. Accordingly it is considered that the proposed allocation at Sampford Peverell should remain.

North West Cullompton Phasing Policy CU6

8.4 This policy is proposed to be revised in order to align the phasing with that agreed in the adopted masterplan SPD for the site. Criterion f as amended reflects this as follows: 'occupation of no more than 500 dwellings before the opening of a through route linking Willand Road to Tiverton Road and the delivery of traffic management measures on Willand Road'. Some members of PPAG considered that this did not reflect previous discussion with the land promotors regarding road delivery at the time of masterplanning. Section 5.4 of the Masterplan explains the mechanism and timing of road infrastructure. This documentation was considered and agreed by Council at its meeting of February 2016. Policy CU6 does not propose to change what was previously agreed in the masterplan. Furthermore Officers consider that any proposed policy change requiring the road to be brought forward in advance of 500 houses being occupied would jeopardise its delivery.

Contact for any more information	Adrian Welsh, Forward Planning Team Leader 01884 234344 awelsh@middevon.gov.uk
Background Papers	Cabinet November and December 2014; Council January 2015; Council 27th April 2016; Cabinet 15th September 2016; Council 22nd September 2016; Local plan evidence base https://www.middevon.gov.uk/residents/planning-policy/local-plan-review-evidence-base/ https://www.middevon.gov.uk/residents/planning-policy/local-plan-review-site-specific-evidence-base/
File Reference	
Circulation of the Report	Councillor Richard Chesterton, Cabinet Member for Planning & Regeneration Management Team

Appendix 1

Development Strategy, Vision and Spatial Strategy

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

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

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

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

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

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

Development Strategy

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

This page is intentionally left blank

Tiverton Eastern Urban Extension Comments

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
TIV1 – TIV5 Eastern Urban Extension, Tiverton	Update the policy once the updated strategy for the provision of sport and recreation has been prepared, and bear in mind the limitations on the use of Section 106 including pooling.	Sport England (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore advisory. An investment strategy for sport and recreation facilities can be prepared after the plan's adoption, through the use of additional evidence to guide CIL or S106 expenditure and other resources. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making. A policy on the use of 106 Obligations is published on the Council`s website and makes specific reference to their use in the provision of open space and sports facilities, in addition to Policy S5 of the Local Plan. Furthermore, there is already an adopted masterplan for Tiverton EUE and any significant revision to the Local Plan policies for the site would create an unnecessary conflict between the two policy documents.
	Include reference to the need to meet the Active Design Principles.	Sport England (169)	The relevant principles are already generally reflected in the plan policies.
	Support the eastern boundary of the EUE as Manley Lane, to avoid impact on the Canal at Halberton, maintain separation between settlements and protect this historic boundary.	GW Canal Advisory Committee (194); Individual (5247)	Support noted.
	Support the provision of a green buffer between development and the canal, to avoid further urbanising of the canal. Would like to know future management and ownership of this area, and consider it may be best managed alongside the canal. Do not support its use for tennis courts, allotments and other unnatural uses.	GW Canal Advisory Committee (194)	Support noted. Green Infrastructure in Masterplan can be used for agriculture or recreation. Further details over GI use and management will arise from Are B masterplanning which is yet to be finalised.

	The green infrastructure area between TIV1 and the Canal should remain in agricultural use, and no additional public access provided.	Individual (398)	Designated as Green Infrastructure in Masterplan – can be used for agriculture or recreation. Further details over GI use and management will arise from Are B masterplanning which is yet to be finalised.
	The policy should provide further details on the allocation for an energy from waste plant (included within the adopted Devon Waste Plan) and related District Heating scheme.	Devon County Council (626)	Whilst the site is identified within the adopted Devon Waste Plan as a potential site for a energy and waste facility, to date no such proposals have come forward from a potential operator. The planning applications received deal with this issue by way of Section 106 provisions in order to safeguard the potential to link up with a district heating scheme in the event that an energy from waste proposal comes forward in the future.
	The new junction onto the A361 should be referred to as a "grade separated junction".	Devon County Council (626)	Agreed. Refer to A361 junction in policy as "a grade separated junction".
	Traffic calming works are no longer considered necessary on Tidcombe Lane.	Devon County Council (626)	The first phase of two phases of traffic calming has now been implemented. DCC as Highway Authority undertook public consultation on the proposed scheme which included gaining public opinion on whether the proposed calming scheme should be extended into Tidcombe Lane and if so, in what form. Tidcombe Lane traffic calming does not form part of the agreed phase 1. DCC advise traffic calming in Tidcombe Lane is not currently necessary.
	Contributions to bus services are likely to be required for a fixed period, such as 5 years, rather than until the services are self-supporting.	Devon County Council (626)	Agreed. An amendment has been made to the supporting text.
	The policies could refer to the Grand Western Canal as an asset to be protected.	Devon County Council (626)	Grand Western Canal is a designated heritage asset and a county wildlife site and the need to protect it is set out in para 3.23 of the Local Plan Review.

	Reference to facilities for recycling and libraries could be included.	Devon County Council (626)	The adopted Tiverton EUE masterplan makes provision for onsite community facilities which could fulfil a range of community uses. Financial contributions towards library provision can be considered as part of application Section 106 negotiation. Policy W5 of the Devon Waste Plan makes reference to additional waste, recycling and materials recovery facilities being required in close proximity to the source of recyclable waste. Tiverton Eastern Urban Extension Area B masterplanning is expected to resolve in more detail potential uses to be accommodated within the green infrastructure area. Such a suitable use might include a community composting facility.
	Amend the education reference to provision of a 420 place primary school with early years and a children centre funded by fair developer contributions.	Devon County Council (626)	Requirement for 420 place primary school and early years provision already required under Policy TIV4.
	All the land between West Manley Lane and the old railway line should be Green infrastructure, to protect the SSSI.	Individual (870, 1691, 2236, 2283)	Provision is made for the protection of the SSSI and the fields immediately adjacent to it are designated as green infrastructure. To further increase the amount of green infrastructure would create an unjustified conflict with the adopted masterplan.
	The development is already too large for traffic reasons and should not be made any larger.	Individual (870)	Comments noted. The Highways authority has no objection to development of this site subject to the necessary highways improvements.
	To avoid conflict with the outline of the allocation, Tidcombe Fen catchment should all be included in the Green Infrastructure area.	Environment Agency (943)	Policy TIV3 requires provision and management of 47 hectares of land for strategic green infrastructure on the western and southern edges of the urban extension, including management and funding arrangements for the protection and enhancement of Tidcombe Fen Site of Special Scientific Interest, its catchment and land west of Pool Anthony Bridge.

	Refer to SUDs as “strategic” and state that the necessary SUDS and linking pipes should be integrated with and provided in step with development.	Environment Agency (943)	The requirement for a strategic approach to Sustainable Urban Drainage is referred to in paragraph 3.25. An amendment to Policy TIV3 has been made to provide further detail on the requirements of SUDS for this site.
	The first paragraph of TIV3 would be improved by inclusion of the more detailed points found in paragraph 3.26.	Historic England (1170)	Adding the list of Heritage Assets to the policy provides unnecessary detail and Heritage Assets are referred to under clause (g). The text in paragraph 3.26 provides further details of the Assets.
	The transport policies are welcomed, but there is no reference to the M5. The cumulative impact of developments will need to be considered.	Highways England (1172)	Devon County Council has advised that modelling shows that the recent signalisation of the off-slips has unlocked sufficient capacity to accommodate the Tiverton EUE development but any additional development in the future is likely to require improvements to this junction. An addition has been made to the supporting text under Policy S10 to reflect this.
	Support the EUE as a sustainable method of meeting housing need, and would support a further extension into Hartnoll Farm, further to the east.	Dial Holdings c/o PCL Planning (2315)	Hartnoll Farm as a non-allocated site is considered elsewhere.
	Oppose development of this scale, which unnecessarily uses high grade agricultural land and impacts biodiversity, whereas brownfield land should be developed first, of which there is much within Mid Devon.	Individual (2575)	Mid Devon District has a limited number of brownfield sites and not sufficient to provide sufficient housing to meet the identified needs. In order to provide the housing numbers required some loss of agricultural land is inevitable. This site has an adopted masterplan and planning permission has already been approved (or with a resolution to approve) for 1030 dwellings.
	Nobody told us there are priority habitats on the Golf Course.	Tiverton Golf Club (2827)	Priority habitat data is surveyed and mapped by Natural England and landowners are not necessarily contacted.

	Waddeton Park owns a substantial proportion of the site and has recently secured permission for 330 dwellings on the site (subject to a s106). The junction to the A361 has planning permission and a further 700 dwellings is subject to a current application. However there is some doubt as to the remainder (Area B) will come forward due to multiple ownerships. Accordingly, the additional land at Hartnoll Farm should be allocated, as a further extension to the EUE. See more detailed summary under alternative development sites.	Waddeton Park (3815)	There is no evidence to suggest Area B will not come forward and representation 5772 indicates that survey work is progressing and the site could in fact deliver more than previously expected. Hartnoll Farm as a non-allocated site is considered elsewhere.
	Welcome the reduced target of 1520 dwellings, but concerned at the removal of the second access previously required in the AIDPD which seems based on poor transport evidence. Traffic calming itself will not sufficiently mitigate the development's impact on the school, and the design of the traffic calming is ongoing and may not be achieved, which is a concern.	Blundells School c/o GVA Grimley (4240)	Traffic calming and environmental enhancement is a key policy requirement of TIV2 (b) and TIV5 (c) & (h). Advice from DCC as Highway Authority to the LPA is that the second strategic access serving Tiverton Eastern Urban Extension (to the north of Blundells School) is not required until the figure of 2000 dwellings is reached.
	The plan should refer to the need for coordinated approach to masterplanning and delivery.	Blundells School c/o GVA Grimley (4240)	Policy TIV1 (j) requires compliance with the adopted masterplan and completion of a masterplanning exercise for Area B. Delivery timetable is set out in the approved Masterplan for Area A and a similar timetable will be set out in the Area B masterplan when completed.
	The transport mitigation should refer to the need to remove impacts on Blundells School.	Blundells School c/o GVA Grimley (4240)	The policy provisions TIV2 and TIV5 require traffic calming and environmental enhancements along Blundells Road and Tidcombe Lane. Both these schemes will help mitigate the impacts of traffic of Blundells School.
	Reference to potential development to the east of the EUE should be removed.	Blundells School c/o GVA Grimley (4240)	This is a general statement reflecting what may be required should an allocation ever come forward east of the current allocation. The statement does not promote a further allocation east of the current allocation.

	Paragraph 3.12 should be removed and policy TIV5 amended as they are too flexible. The plan should set out much clearer steps to be taken and full consideration of impacts.	Blundells School c/o GVA Grimley (4240)	Paragraph 3.12, while building in flexibility, clearly states any change will be based on evidence and the current policies and requirements will not be overturned lightly or without clear justification. TIV5 requires detailed justification if there is any proposed deviation from the policy requirements.
	Suggest inclusion of reference to tree planting and landscaping to mitigate impacts on neighbours.	Blundells School c/o GVA Grimley (4240)	Policy DM1 requires that new development must not have an unacceptably adverse effect on the privacy and amenity of the proposed or neighbouring properties and uses. Planting and landscaping details are normally considered at the detailed application stage.
	The adopted plan contains provision to ensure employment development comes forward in step with housing, to enable balanced sustainable development, which should be reinstated.	Blundells School c/o GVA Grimley (4240)	TIV5 sets out the requirements for the provision of infrastructure in step with housing or industrial development. This phasing has been refined in the detailed adopted masterplan following work on viability/phasing etc.
	The full A361 junction should be brought forward to 200 dwellings and the traffic calming earlier than this.	Blundells School c/o GVA Grimley (4240)	The adopted Masterplan for the Tiverton Urban Extension sets out the phasing programme for the highways infrastructure in Section 6.4. The adopted Masterplan phasing programme has been agreed and adopted following full public consultation and following the advice of Devon County Council as Highway Authority.
	Include additional policy requirements relating to flood protection at the Ailsa Brook.	Individual (5702)	The Environment Agency has requested amendments to Policy TIV3 which are set out in the suggested changes. The request for a strategic sustainable urban drainage scheme to deal with all surface water from the development and details of the arrangements for future maintenance should address the concerns over flood protection at Ailsa Brook.

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

This page is intentionally left blank

Cullompton North West UE (allocated)

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
CU1-6	Supports the principle of development.	Mr Emmett c/o PCL Planning (5844); PCL Planning(5672); Persimmon Homes South West c/o CLP Planning Ltd (3640); Growen Estates c/o Rocke Associates (5748); Waddeton Park Ltd (3815); Individual (4317, 5211, 5561)	Support noted.
	Support for the phasing of development and the early delivery of roads and school.	Individual (3588)	Support noted.
	Support Policy CU1 and its commitment to the provision of Community facilities, including provision being made for the spiritual needs of the communities and places of worship.	St Andrew's Church c/o Rev Hobbs (1179)	Support noted.
	Support the enlarged site.	Growen Estates c/o Rocke Associates (5748)	Support noted.
	The proposal will exacerbate existing traffic problems in the town.	Rull Hamlet Association (1796); Individual (5486, 5631, 5621, 5091, 5710, 3993, 5696, 5829, 1681, 2978)	The proposal includes provision for a "through route" from Tiverton Road to Willand Road. This will provide an alternative route for some traffic. The development will also make financial contributions to other highway improvement schemes: junction 28 M5 and the Town Centre Relief Road.
	Agree that the Tiverton Road to Willand Road link road is necessary, but does not consider that this is likely to be an attractive option for motorway bound traffic.	Individual (4052)	Noted.

	All development in the Cullompton area should contribute towards a town centre relief road which should be delivered urgently.	Individual (5211)	Provision is set out in Policy CU20 to allow developments in Cullompton to contribute to necessary infrastructure. Policy CU2 also amended to make requirements clearer.
	No further building should occur immediately north of Tiverton Road owing to existing traffic problems on Tiverton Road.	Individual (5091)	The North West Extension makes provision for a new road linking Willand Road and Tiverton Road. When complete this will remove some traffic from Tiverton Road. Whilst policy CU6 states that no more than 500 dwellings should be occupied before the opening of the road, it is expected that its delivery will be significantly earlier. Policy CU6 has been amended to accord with the adopted masterplan SPD for the site.
	No development should be allowed to begin at the Tiverton Road end of the site until link road completed as this would incur unacceptable levels of construction traffic in residential areas and adding to the issues in the High Street.	Individual (3588; 3993; 2160)	The North West Extension and its highway connection from Tiverton Road to Willand Road will provide an alternative route. Some development must take place prior to the completion of the link as its cost is provided by the development. Policy CU6 (e) restricts development to the occupation of no more than 500 dwellings before the opening of a “through route” linking Willand Road to Tiverton Road. The development will also provide financial contributions towards the Town Centre Relief Road and the M5 junction. The policy has been amended to accord with the adopted masterplan SPD for the site.

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

	The link road from Willand Road to Tiverton Road is essential and should be constructed as a priority.	Devon County Council (626); Individual (3588, 2160)	Policy CU6 (f) requires that no more than 500 dwellings are occupied before the through route is provided. This accords with the adopted masterplan SPD for the site and road delivery is expected significantly earlier than this. The masterplan's approach to highway infrastructure and it's timing incorporates input from DCC.
	Support reference in Policy CU2 to need to accommodate agricultural vehicles on the through road system.	Individual (3588)	While the support for the Policy as proposed in the consultation submission plan is noted there is no definition of "wider agricultural vehicles". It is therefore proposed to delete the word "wider" from policy CU2 as a proposed change. The reason for the change is: "wider agricultural vehicles" is ambiguous and is not defined. If the road is suitable for normal bus services it will be able to accommodate most agricultural vehicles.
	Consideration should be given in Policy CU2 to the provision of a car club scheme.	Individual (3588)	Policy CU2 requires the implementation of travel plans and other non-traditional transport measures which could provide for a car club scheme.
	NW relief road now appears to connect with Rull Lane not Willand Road.	Individual (5211)	The Local Plan Policy will not define the final detailed route of the road. The plan policy requires provision of a through route linking Tiverton Road to Willand Road. The NW Cullompton Masterplan (Adopted February 2016) clarifies the location of the north east access point of the NW relief road, with it being shown onto Willand Road.
	Cycle routes need to be properly integrated and consider potential for commuter routes to Exeter and Tiverton.	Individual (2160)	Policy CU2 requires provision of cycle routes at appropriate locations and links to and from the town centre.

	Motorway Junction already at capacity.	Individual (1681)	Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied.
	Safe cycle paths and pedestrian walkways needed from Stoneyford into Cullompton.	Individual (1681)	Policy CU2 already requires provision of cycle routes at appropriate locations and links to and from the town centre.
	Provision of the mainline railway station essential.	Individual (1681)	Policy CU20 identifies a site for a railway station at Cullompton.
	A relief road through the CCA fields is most important. (This may also lead to more suitable land being found to accommodate existing sports uses elsewhere).	Individual (1681)	Policy CU19 and CU20 set out the policies for the provision of the Town Centre Relief Road.

	No more large scale development should occur west of the M5 in Cullompton until major improvements are made to J28.	Rull Hamlet Association (1796)	Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied.

	Housing development at J27 would be preferable as development in Cullompton will worsen air quality and exacerbate transport issues, without feasible solutions proposed.	Hallam Land Management (4386)	North West Cullompton Extension is allocated in the Allocation and Infrastructure Local Plan (Part 2) 2010. Significant progress has been made towards its delivery since its allocation in 2010. A masterplan for the allocated area was adopted by the Council in February 2016 and planning applications for the site are anticipated in late 2016 / early 2017. Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied. Housing development at J27 would be in addition to North West Cullompton and not a replacement. The Air Quality Management Plan for Cullompton identifies the provision of a Town Centre Relief Road as a significant measure which will improve air quality in Cullompton. Policy CU20 identifies that CIL and 106 contributions and external funding sources will be used to deliver the Town Centre relief road for Cullompton.

	St George's View is unacceptable as a temporary access, especially as there is a large oak tree with a TPO along the route.	Individual (5395, 6058)	A consultation on the Masterplan for North West Cullompton took place in Sept/October 2015. The issue of a temporary access via St George`s View was one of the issues for consideration in that consultation. The final masterplan was adopted by the Council in February 2016 and includes provision for a vehicular access via St George`s view on a temporary basis.
	A road link from the new distributor road to the allotments behind the cemetery is needed to enable community recycling facilities. This may also need some additional green infrastructure land. This road link could provide access to the new St Andrew's football field.	Individual (5211)	The Masterplan identifies an access to the allotments to the north of the cemetery.
	Concerns regarding the phasing of buses and highway provision in Policy CU6.	Devon County Council (626)	The provisions in CU6 are set out in recognition of the need to provide essential infrastructure balanced against the viability of delivering development. Amendments to the policy align with the adopted masterplan with the latter providing a greater level of detail on phasing and infrastructure provision triggers.
	Point (f) should be amended to state 'opening of a through route linking Willand Road to Tiverton Road prior to occupation of development.'	Devon County Council (626)	As the through route is being funded and provided by the development it would be unrealistic to require its provision before the occupation of any development. This position has been subsequently agreed with DCC as part of the adopted masterplan work.

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

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

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

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

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

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

	Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. The site is within 400m of the proposed local centre, which is not the case for other land in the allocation. Site maximises non-car trips. Development in south also closest to town centre, than north, development on land to south could therefore maximise sustainable modes of transport reducing congestion in town centre.	Growen Estates c/o Rocke Associates Ltd (5748)	The Council's Landscape and Visual Appraisal of the strategic site options (2014) indicated that the most easterly part of Growen Farm has a particularly sensitive character and was least suitable for development. It has accordingly been designated as green infrastructure. The field to the west was considered more robustly separated from the landscape to the north and west by strong hedgerows and was more closely related to land to the south which was previously allocated, and was considered a more logical extension to the allocation. The capacity of J28 precludes a larger allocation of development land at Growen Farm. It is also worth noting that the furthest extent of whole Growen Farm site is no further from the town centre boundary as the furthest extent of the added land to the north (the Rull land), being about 1.5km. Whilst Growen Farm might be closer to the proposed local centre, the northern land would also be relatively close to the school and its associated facilities.

	Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. Full site has minimal visual impact, unlike revised allocation which proposed development on rising land. The plan fails to afford priority to development of land that is of gentle topography with minimal visual impact over that which is more sensitive owing to its slope and prominence. Land is level and well-drained – no physical constraints to development. More appropriate strategy would be to retain Green Infrastructure (GI) in central location and locate development on less sloping sites such as Growen Farm. Site would be accessible to GI as proposed in adopted plan and with community benefits. GI as proposed would preclude local centre in most optimal/viable location.	Growen Estates c/o Rocke Associates (5748)	Topographical considerations were taken into account in the allocation of the land. However the land allocated for the most part is adjacent to the existing settlement and the decision as to which areas were most appropriate to be allocated as Green Infrastructure (GI) was informed by the findings of the Council's Landscape and Visual Appraisal (2014). Whilst level, well-drained land can be equally ideal for sports facilities as it is development land, such as football or rugby pitches. The land identified for the local centre in the recently adopted masterplan was on previously allocated as GI and accordingly a change to the proposals map is proposed to set this out.
	The field immediately bordering the North and East of Rull Lane is included in the plan without the consent of the landowner, who wishes it to be shown as green infrastructure.	Rull Hamlet Association (1796)	The field immediately bordering the North and East of Rull Lane has not been identified for development at the landowners request. The Council has also been made aware of this as part of the masterplanning work. Land near the proposed local centre is proposed instead.
	A green open space should be provided between the town border (behind St George's View) and the new development.	Individual (5395)	This is not required. The relationship between dwellings in St George`s view and the development site can be addressed at the detailed planning application stage.

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

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

	The development will bring more crime.	Individual (2978)	There is no evidence to support this.
	The primary school should be built as a priority.	Individual (3588, 1681)	Policy CU6 has been amended to reflect the masterplan requirements. Transfer of land for the primary school is prior to commencement of the development, with school construction commencing in phase 1.
	Policy CU6 b – replace the word 'after' with 'as soon as'.	Individual (3588)	It may not be practical to deliver all serviced self-build plots as soon as the `through route` is operational. 60 self-build plots are to be provided and it is unlikely they could all be delivered as soon as the `through route` is operational.
	The construction of the link road needs to be a higher priority and the threshold for the trigger greatly reduced to as low as possible.	Individual (3588)	The policy threshold of no more than 500 dwellings being occupied prior to the through route being open (Policy CU6 (f)) aligns with the masterplan. Due to proposed funding arrangements for the road it is likely that it will be delivered significantly in advance of this. This has been agreed with DCC as part of Masterplanning work.
	Policy CU6 a to h pre-empts master planning work. A shorter and more flexible policy is suggested.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	The masterplan has now been completed and policy CU6 has been updated to reflect the latest phasing arrangements.
	CU6g: 'Prior to occupation' should be changed to 'prior to commencement' in order to give the local authority time to build the school before there is an influx of children.	Individual (3588)	Policy CU6g has been amended to reflect the masterplan requirements. Transfer of land for the primary school is prior to commencement of the development, with school construction commencing in phase 1.
	Concerns regard the phasing of buses and highway provision in Policy CU6.	Devon County Council (626)	Change proposed to update local plan to reflect the adopted Masterplan agreed with DCC including the phasing of development in line with local bus service improvements.

	Point f should be amended to state 'opening of a through route linking Willand Road to Tiverton Road prior to occupation of development.'	Devon County Council (626)	The policy threshold of no more than 500 dwellings being occupied prior to the through route being open (Policy CU6 (f)) aligns with the masterplan. Due to proposed funding arrangements for the road it is likely that it will be delivered significantly in advance of this. This has been agreed with DCC as part of Masterplanning work.
	Point e is ambiguous. Whilst it might not be possible to provide a bus service through the site at an early phase, there are likely to be other improvements required such as providing more attractive waiting facilities on exiting bus routes. In addition the provision of bus stops and waiting facilities should be delivered in phase with development and the through route. This point should therefore read 'implementation of bus infrastructure and service improvements in step with development'.	Devon County Council (626)	Change proposed to update local plan to reflect the adopted Masterplan agreed with DCC including the phasing of development.
	Policy CU6 criterion f does not indicate whether the development will be permitted to commence at Tiverton Road. If not, further traffic issues will be encountered at junction of Tiverton Road and High Street until the 300th dwelling has been occupied.	Individual (4052)	Development is likely to commence both at Willand Road and at Tiverton Road. It is accepted that some additional traffic disruption will occur on Tiverton Road until the "through route" is completed. Permitting limited development at both ends is likely.
	There is a Roman fort adjacent to this site and this adds to the heritage of the area and should be dealt with sensitively in Policy CU3f.	Individual (3588)	Policy CU3(f) already makes provision for protecting archaeological interests of the site.

	Loss of agricultural land.	Individual (5486, 5631, 5621, 5710, 2978, 6067)	Mid Devon District has a limited number of brownfield sites and not sufficient to provide sufficient housing to meet the identified needs. In order to provide the housing numbers required some loss of agricultural land is inevitable.
	Consideration needs to be given to hedgerows and trees, including any resulting TPOs.	Individual (6067)	These issues are considered in the Masterplan and will also be considered at the detailed planning application stage.
	Landscape aspects need to be considered.	Individual (2160)	These issues are considered in the Masterplan and will also be considered at the detailed planning application stage.
	The impacts on wildlife need to be considered sensitively.	Individual (2160, 6058, 2978)	These issues are considered in the Masterplan and will also be considered at the detailed planning application stage.
	Our views and outlook will be compromised and the impact on our house value has not been considered.	Individual (5486)	The amenities of existing properties will be carefully considered at the detailed planning stage. Property value is not a material planning consideration.
	Care needs to be taken in designing the new development to ensure the privacy of existing properties is not compromised and that appropriate type of development are built adjacent to existing properties in terms of use, style and open space.	Individual (2160)	This is acknowledged and will be addressed at the reserved matters or detailed application stage.

	A Historic Environmental Appraisal needs to reassess the likely impact which the development might have upon the Roman Fort on St Andrew's Hill and numerous listed buildings.	Historic England (1170)	The site has been reassessed by an historic environmental appraisal. The site adjoins a roman fort on St Andrew's Hill (a scheduled Ancient Monument). There are a number of grade II listed buildings within the cemetery and farmyards adjoining the site such as Growen Farmhouse and adjacent range of farm buildings, Little Rull and Paulsland Farmhouse. The site also lies in an area of high archaeological potential. This assessment concludes that any planning application for development must be supported by the results an appropriate level of archaeological works to allow the significance of the heritage asset to be understood along with the impact of any development upon it. It also concludes in general because the site includes large areas of green infrastructure and because it contains a number of mature hedges and trees which can be integrated with the layout the impact on the heritage assets and their settings is less than significant apart from perhaps the cemetery where much will depend on how the alignment of the road. Criterion f and g of CU3 address these issues.
	If a Historic Environmental Appraisal concludes that harm will result from this allocation, then the plan needs to set out ways in which this harm might be mitigated.	Historic England (1170)	The Historic Environmental Appraisal (HEA) has been undertaken as set out in the response to the comment above. The plan includes at Policy CU3 "Environmental Protection" the following environmental protection measures to be implemented which will provide the relevant mitigation measures for any harm identified in the HEA.

	If there still will be harm to historic assets following mitigation measures then justification needs to be provided (NPPF paras 133-134).	Historic England (1170)	The site has been assessed by an historic environmental appraisal, which is referred to above. This particular comment is a national policy requirement and is well understood. It is anticipated that mitigation measures will be successful. The local plan includes justification for the proposal as a whole. It is considered that the proposal brings significant benefits to the area which outweighs potential harm.
	The ELR states that there is insufficient demand to support substantial employment land provision as part of the north west urban extension. It advocates only 10,000 sqm.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	The adopted masterplan makes provision for 10,000 sqm of floorspace and policy CU1 has been amended accordingly.
	1,200 dwellings should be a minimum.	Growen Estates c/o Rocke Associates (5748)	Policy CU1 has been amended to 1350 dwellings. The adopted masterplan identifies the site as providing 1120 dwellings, but did not include all the land within the allocation area due to uncertainty over the availability of part of the site. This uncertainty has now been addressed and the remaining area will also need to be masterplanned within the context of the overall site. Following the masterplanning of the majority of the allocation site, the updated housing number is considered an appropriate number of dwellings for the site having regard to the topographical challenges, other identified constraints and the provision of infrastructure required.

	Too many dwellings being built on this site which will increase flood risk and traffic problems.	Individual (5710)	It is considered an appropriate number of dwellings for the site having regard to the topographical challenges, other identified constraints and the provision of infrastructure required. Traffic issues are being addressed via the proposed “through route” and proposed further improvements to the M5 junction.. Importantly any development will need to address drainage issues including implementation of sustainable urban drainage systems as set out in CU3.
	Policy CU1 b is unnecessary repetition of Policy S3.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	It does repeat the overriding requirement in S3 to make provision for self-build plots but it is site specific in terms of CU1.
	The need or demand for self-build does not appear to be objectively assessed, either districtwide or in Cullompton. This level of self-build provision presents problems with regard to conflict between hours of construction and the timing of deliveries which are imposed on larger developments. Generally self-builders tend to undertake construction in evenings and weekends. The self-build element is also likely to slow down delivery given the associated marketing period proposed for self-build plots of 12 months per plot.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	Paragraph 2.30 highlights that approximately 2000 people a year search for self-build plots in Mid Devon and the Council`s Citizen Panel Survey 2013 showed that 12% of respondents were considering building their own home. The government is committed to providing self-build.
	Low cost and self-build only a vague promise.	Individual (5631)	Policies are set out in the plan to make provision for self-build plots.

	The development should be conditional upon clear and transparent commitment to funding improvements to J28, addition of a new J28a and addition of new local road(s) to improve motorway crossings.	Individual (5867)	Improvements to the motorway junction by signalisation at the top of the south bound slip roads have taken place (August 2015) together with improvements to the north bound off slip and roundabout (carried out in 12/13). Recent DCC queue length monitoring following the completion of these works has identified congestion at junction 28 at the AM peak. NW Cullompton policies have been amended to require contributions towards capacity improvements at the junction and that they should be provided before any dwellings are occupied.
	The employment land element may not be delivered.	G L Hearn (3781)	Significant progress has been made on the masterplan for the site and there are strong indications that the site will be delivered.
	Sport and recreation evidence base should be completed and a strategy devised to be referred to in policies CU3 and CU4.	Sport England (169)	Noted. There is no specific requirement to follow Sport England methodology, which according to their website was only published in July 2014. The Council is content with its own published recent evidence which covers open space provision, and on which this policy is based.
	Generally prefer sports contributions to come from planning obligations rather than CIL, unless there is a specific project identified.	Sport England (169)	The published CIL charging schedule excludes the North West Extension and other strategic sites from the charging schedule. Contributions towards sport facilities will therefore come from 106 contributions rather than CIL on this site.
	Active Design should be a feature of the master planning work.	Sport England (169)	The relevant principles are already generally reflected in the plan policies.
	Sports provision must be found in the new development.	Mr & Mrs Broom (1681)	Provision is made within the policies for sport and leisure provision.

	Policy CU5's reference to implementing the Carbon Reductions and Low Emissions Strategy provided at the expense of all new development implies that the council has prioritised the strategy above other components e.g. affordable housing etc.	Persimmon Homes South West c/o CLP Planning Ltd (3640)	The term 'at the expense of' is proposed to be changed to 'funded by'.
	The development will worsen air quality in Cullompton.	Individual (2978)	Cullompton has an Air Quality Management Plan in place; part of that plan is the provision of the Town Centre Relief Road, funded in part by development. This development will provide contributions towards the cost of that road. The NW extension also completes a western route around the town centre.

Cullompton (allocated)

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
CU7-12 Cullompton Eastern Extension	Supports the allocation.	Pegasus Planning (3678); Mr Bazley c/o LSN Architects (2156); Mr Jenner c/o RHA (1796); St Andrew's Church c/o Rev Hobbs (1179); Individual (5258, 5361, 4022, 5265, 5360, 1680, 5290, 5292, 2314, 4201, 4174, 5313, 5314, 5316, 5318, 5321, 5345, 5347, 5350, 5337, 5351, 5328, 5365, 5367, 5371, 3700, 5632, 5700, 5085, 4357, 5801, 4120, 4042)	Support noted.
	Support acknowledgement of the impact on the AONB and master planning approach welcomed.	Blackdown Hills AONB c/o Mrs Turner (1195)	Support noted.
	Support policy CU8. The details with regard to contributions will be discussed at the Master Planning Stage.	Pegasus Planning (3678)	Support noted.
	Support the reopening of Cullompton Station.	Rail Future (5830)	Support noted.
	Support Policy CU10.	St Andrew's Church c/o Rev Hobbs (1179)	Support noted.
	CU12 criteria a, d and e are supported.	Pegasus Planning (3678)	Support noted.
	New motorway junction would negate the need to build the relief road across the CCA fields.	Individual (5299)	A new motorway junction in itself would not provide adequate traffic relief to Cullompton town centre. The Relief Road proposal is an important element of the air quality management proposals for Cullompton. The alignment of the Relief Road would seek to minimise the impact on existing facilities and flood risk.

	Any new junction should incorporate northern slip roads as well as southern.	Individual (5299)	A number of different highways solutions have been investigated. DCC consider that a southern slip roads option will achieve the necessary additional capacity in the road network to accommodate traffic from the new development proposals and address existing problems on the highway network. Improvement works, as identified by Devon County Council, to accommodate traffic from the development will be set out in the submission evidence.
	J28 has insufficient capacity to accommodate increased traffic flows.	Kentisbeare Parish Council (76); Individual (5338, 5665, 5631, 5629, 5625, 5624, 5615, 5613, 5759, 393, 3209, 5867, 5866, 5561, 5785, 5490, 5783, 5776, 5817, 5836, 5835, 5993, 1681, 5809, 5807, 5810, 5819, 5818, 5823, 5800, 5799, 5798, 5797)	Improvements to the motorway junction by signalisation at the top of the existing south bound slip roads were constructed in summer 2015. Further improvement work, as identified by Devon County Council, to accommodate traffic from the development will be set out in the submission evidence.
	Attention needs to be paid to infrastructure requirements. Including the impacts on the A373 in East Devon. Increased risk of accident on A373. Improvements should be made to the A373 Cullompton to Honiton to improve safety.	East Devon District Council (135); Broadhembury Parish Council (1483); Kentisbeare Parish Council (76); Individual (3588, 4688, 5490, 5705, 5798, 5800, 5805, 5810, 5811, 5820, 5819, 5823, 5835, 5993)	The Transport Assessment, which will accompany a planning application, will need to set out the transport impacts of the development and how these issues will be addressed.
	Routes for pedestrians and cyclists need to be included, with extra bridges over the motorway.	Bradninch Town Council (86); Individual (5757, 5631, 5629, 5626, 5705, 5785, 5835, 5993, 5805, 1681, 5811)	Improvement work, as identified by Devon County Council, to accommodate traffic from the development will be set out in the submission evidence.

	Additional public transport provision required (inc Railway Station).	Kentisbeare Parish Council (76), Bradninch Town Council (86); Individual (5623, 5613, 5490, 5770, 5766, 5846, 5847, 1681, 5810, 5799)	Policy CU20 identifies a site for a railway station and includes bus service enhancements and bus interchange. Policy CU8 lists more specific public transport requirements as a result of the East Cullompton proposal.
	Infrastructure needs to be in place first.	Kentisbeare Parish Council (76); Individual (5352, 5664, 5665, 5625, 5623, 5621, 3993, 5707, 5705, 5867, 5561, 5490, 5777, 5770, 5846, 5776, 5847, 5835, 5842, 1681, 5811, 5800, 5798, 5797)	A phasing strategy will be drawn up as part of the Masterplanning process as more information comes forward on the detailed requirements, viability and phasing deliverability. Examples of this in practice can be seen the adopted Tiverton Eastern Extension Masterplan and the North West Cullompton Extension Masterplan.
	The local roads would not be able to cope with this scale of development.	Kentisbeare Parish Council (76); Individual (5343, 5366, 5753, 5664, 5635, 5634, 5631, 5629, 5626, 5625, 5624, 5622, 5621, 5615, 5613, 5759, 3993, 5707, 5705, 3209, 5866, 5648, 2979, 5561, 5552, 2677, 5785, 5490, 3340, 5777, 5776, 5770, 4641, 5768, 5766, 5846, 5847, 5817, 5831, 5837, 5836, 5835, 5993, 5805, 5802, 5809, 5807, 5812, 5811, 5810, 5820, 5819, 5818, 5823, 854, 5800, 5799, 5798, 5797, 4688)	DCC Highways has been fully engaged in the development of this local plan proposal. Improvement works to accommodate traffic from the development will be set out in the submission evidence.
	Support development of the allocation subject to improved infrastructure in Cullompton, upgrading J28, re-opening of the train station and provision of the eastern relief road.	Bradninch Town Council (86); Individual (5623)	Support noted.

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

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

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

	Concern of increased flood risk as a result of the development and associated highways' improvements. Concerns raised also with regard to increased risk of flooding elsewhere such as at Kentisbeare, Kingsmill, and the area surrounding Upton Lakes. Concerns also raised over use of 2008 data.	Bradninch Town Council (86); Kentisbeare Parish Council (76); Upton Lakes and Lodges Ltd (5242); Harcourt Kerr (1090); Individual (3524, 5070, 5343, 5352, 5366, 5370, 5757, 5756, 5753, 5752, 5750, 5664, 5665, 5631, 5626, 5625, 5624, 5623, 5622, 5621, 5615, 5613, 3993, 5707, 3788, 5866, 5648, 2979, 5561, 5553, 5552, 5545, 5490, 5783, 5777, 5776, 5770, 5768, 5766, 5846, 5847, 5817, 5831, 5837, 5835, 5993, 5802, 5997, 5809, 5807, 5811, 5810, 5820, 5819, 5818, 5799, 5797, 5563, 4688)	All proposed sites in the emerging Local Plan were assessed as part of the 'Mid Devon Strategic Flood Risk Assessment'. This evidence was independently produced in consultation with the Environment Agency, South West Water and Devon County Council to help assess all potential sites within Mid Devon as part of the Local Plan Review and help guide development to areas of lowest flood risk. To ensure surface water run-off is not increased elsewhere from the development of the site, the Mid Devon Proposed Submission Local Plan requires the provision of an appropriate 'Sustainable Urban Drainage Scheme' and sewerage system to responsibly manage all surface water from the development. The initial strategic flood risk assessment work was based on data sources from 2008, which was the most up to date available data at the time. However the area has now been subject to detailed and rigorous flood modelling utilising updated data sets. This work has been done in close liaison with the Environment Agency. A catchment based assessment will be undertaken as part of the masterplan work as agreed with the Environment Agency.
	A road through the CCA fields will increase the flood risks.	Individual (5299)	A relief road solution is being developed in liaison with the Environment Agency and designed in such a manner so as to address flood risk issues and includes mitigation measures.
	Concerns regarding foul drainage, soil stabilisation and SUDS. Including comments regarding proximity to Upton Lakes.	Kentisbeare Parish Council (76); Upton Lakes and Lodges Ltd (5242); Individual (5750, 5997, 5811, 5799)	Policy CU9(f) emphasises the importance of these issues. Impacts on surrounding areas will be considered at masterplanning and application stages.

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

	We welcome recognition within paragraph 3.107 of the numerous small watercourses and requirement to retain them, and their floodplains, within areas of green infrastructure. Paragraph f would be more effective if it read as follows. Appropriate provision of a sewerage system to serve the development and a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance. We welcome the wordage within paragraphs b) and i) making reference to the requirement to retain the areas of floodplain as informal open space free to flood, and phasing of the necessary sustainable urban drainage features.	Environment Agency (943)	A change is proposed to policy CU9 f) in response to the comment made by the Environment Agency.
	The site allocation should be larger to accommodate increased sports' provision.	Individual (5211)	The site includes provision for sports provision which will be considered further at the master planning stage. This would need to consider other sports provision options that are coming forward in the Cullompton area. It should also be noted that the area proposed for extension to the allocation is constrained. The Neighbourhood Plan is currently considering additional sports opportunities for the area.
	The development should incorporate allotments and community orchards.	Individual (5211, 4317)	The proposal incorporates a significant amount of green infrastructure which potentially could be utilised for these uses. There is an opportunity for these to be considered as part of the master planning work.
	Housing mix on the site should reflect local circumstances and diversity.	Bradninch Town Council (86); Individual (5211)	Agreed that the housing mix should reflect these factors and this will be considered further at the master planning stage.

	The development should incorporate local facilities; a community hall, schools, GP surgery, allotments, local shops, etc.	Kentisbeare Parish Council (76); Individual 4317, 5625, 5615, 5759, 5561, 1681)	Policy CU10 details the community facilities to be provided as part of the development. This will include a new primary school(s), a shopping and community centre, a multi purpose community building, sporting and leisure facilities, etc. No requests have been received from the GP fundholding practice for additional GP surgery facilities.
	The site extends over our garden.	Individual (5370, 5818, 5563)	Site boundary to be amended to exclude outline over private garden.
	New play areas and parks needed.	Individual (5707)	The proposal will incorporate public open space. The precise nature of which will be established as part of the master planning work.
	Duplication of services not necessary and uneconomic.	Individual (5628)	A development of this scale would need a range of services on site to meet the needs of new residents.
	More explicit reference to care home provision needed.	Blue Cedar Homes Ltd (3787)	The proposed development will include provision for elderly care as referred to in paragraph 3.100. More detailed proposals will develop through the masterplanning work.
	Allocate one play area site with a variety of equipment, rather than lots of smaller ones with higher maintenance costs.	Individual (1681)	In principle, we agree with the broad approach suggested by the representor and our general policy approach is for a smaller number of larger play areas. The detailed siting of play areas will be established through the master planning work.
	Overhead power lines cross the proposed site. Overhead power lines should remain in-situ and development should not occur directly underneath them. This area could be used to form open space, nature conservation, landscaping or as a parking court. Guidelines are provided on appropriate ways to create high quality development near overhead power lines.	The National Grid c/o Mr Austin Entec (143)	The master planning process will take these comments on board and further liaison will be undertaken with the National Grid.

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

	Medical services already at capacity.	Bradninch Town Council (86); Individual (5343, 5370, 5753, 5664, 5665, 5635, 5634, 5628, 5626, 5624, 5621, 5615, 5613, 5759, 5705, 3209, 5866, 5648, 2979, 5561, 5490, 5783, 5777, 5776, 5770, 5768, 3524, 5776, 5846, 5847, 5836, 5993, 5805, 5809, 5807, 5812, 5810, 5820, 5818, 5823, 854, 5799, 5797, 5563)	No requests have been received from the GP fundholding practice for additional facilities. Indeed NHS England has stated that there is currently capacity within the two existing surgeries.
	Schools already at capacity.	Individual (5343, 5753, 5664, 5665, 5634, 5631, 5628, 5626, 5624, 5621, 5615, 5707, 3209, 5866, 5648, 2979, 5490, 5783, 3340, 5777, 5776, 5770, 5768, 3524, 5776, 5846, 5847, 5836, 5993, 5805, 5809, 5807, 5812, 5810, 5820, 5818, 5823, 854, 5799, 5797)	The proposal includes a new primary school and contributions towards an expansion of local secondary education facilities.
	Policing will be overstretched.	Individual (5664, 5621, 5615, 5613, 2979, 5770, 5766, 5846, 5847, 5805, 5807, 5810, 5797)	Contributions will be sought district wide to support policing as part of the Community Infrastructure Levy and is included in the Infrastructure Delivery Plan.
	There is insufficient existing supermarket provision and related car parking to accommodate further growth of the town.	Individual (5819)	The development will incorporate convenience shopping provision.
	Insufficient local employment opportunities.	Individual (5615, 5613, 3993, 5705, 5561, 5552, 5783, 5770, 5766, 5846, 5847, 5835, 5993, 1681, 5802, 5809, 5807, 5811, 5823, 5797)	Additional employment land is allocated in the plan for the Cullompton area.

	"The local community will be fragmented by a concentrated influx of people the south west could do without bringing crime, drugs and anti-social behaviour with them."	Individual (5705)	The proposals are to meet the objectively assessed needs for the area. Also, do not concur with the assumption that all people from outside the region are anti-social.
	The significance of the town centre relief road should be emphasised in Policy CU12.	Individual (4052)	The phasing of the town centre relief road will be a matter for negotiation at masterplanning stage.
	Highways infrastructure improvements needed prior to development.	Individual (3588)	The infrastructure works will be delivered at the earliest stage of the development that is practicable as it provides an essential part of the transport measures necessary for the site to be developed satisfactorily.
	There is insufficient flexibility in CU12.	Pegasus Planning (3678)	The elements of this policy are crucial for satisfactory and acceptable delivery of this proposal. There will be scope through the master planning work and planning application stage to refine the phasing arrangements.
	Self build element too high and should be referred to as self/custom build in policy CU12.	Pegasus Planning (3678)	Paragraph 2.30 highlights that approximately 2,000 people a year search for self-build plots in Mid Devon and the Council`s Citizen Panel Survey 2013 showed that 12% of respondents were considering building their own home. The government is committed to removing the main barriers which hold back many thousands of custom build projects every year. They want to increase the opportunity for more people (to build their own home) and make self/custom build a mainstream option for future home owners, not an exception for a privileged few. Custom build are not always built by self-builders it can be where a builder is contracted by a home owner to create a "custom built home".

	The rate of release of commercial development should be linked to either the rate of 1 hectare per 500 occupied dwellings, or phased to deliver a larger area of commercial at a suitable stage in development.	Pegasus Planning (3678)	The policy as worded is considered appropriate, however the masterplan will provide more detail with regard to commercial phasing.
	The phasing of strategic infrastructure should be based upon detailed technical assessments.	Pegasus Planning (3678)	The elements of this policy are crucial for satisfactory and acceptable delivery of this proposal and are informed by supporting evidence and the advice of statutory partners. There will be scope through the master planning work and planning application stage to refine the phasing arrangements.
	The proposals would compromise the beauty and tranquillity of the area.	Bradninch Town Council (86); Upton Lakes and Lodges Ltd (5242); Individual (5343, 5338, 5750, 5629, 5627, 5621, 5615, 5648, 5490, 3340, 5831, 5997, 5809, 5812, 5810, 5820, 854, 5797)	The local planning authority has a responsibility to find land to accommodate objectively assessed need within the district. Given the rural nature of Mid Devon there is only a limited supply of brownfield land available and so inevitably greenfield land has to be made available for development. Issues such as design and the impact of the development on local amenity will be carefully considered at the master planning and detailed planning application stages.
	Loss of privacy and light.	Individual (5338)	The amenities of existing properties will be carefully considered at the detailed planning stage.
	Loss of Agricultural Land.	Individual (5352, 5635, 5631, 5629, 5626, 5624, 5622, 5621, 5615, 5613, 5707, 2979, 5545, 2677, 5785, 5490, 5783, 5770, 5766, 5846, 5847, 5837, 5835, 5993, 5802, 5809, 5823, 5799, 5797)	The loss of agricultural land is regrettable, but given the rural nature of the district, there is insufficient brownfield land to meet the identified housing and employment needs of the area. The site does include Grade 1/2 agricultural land but is predominantly Grades 3a and 3b and there is a lack of alternative sites in the area which could bring about this level of benefits.

	Ecological concerns.	Upton Lakes and Lodges Ltd (5242); Individual (5370, 5750, 5664, 5665, 5622, 5615, 5613, 2979, 5490, 3340, 5817, 5831, 5997, 5818, 5823, 5797)	There are few areas of formal wildlife designations on the site, those that are present will be incorporated within the green infrastructure and left undeveloped. More detailed consideration of mitigation with respect to existing habitats will be addressed at the detailed planning application stage.
	Great Crested Newt impact assessment should be undertaken.	Upton Lakes and Lodges Ltd (5242); Individual (5997)	A full ecological assessment will be required at application stage.
	Our, adjacent parish, emerging Neighbourhood Plan emphasises its rural and tranquil characteristics along with dark skies. This should be respected.	Broadhembury Parish Council (1483)	The local planning authority has a responsibility to find land to accommodate objectively assessed need. Emerging neighbourhood plan policies in an adjoining district cannot reasonably outweigh proposals to provide for housing need in a neighbouring district. Any impact on neighbouring parishes will be considered very carefully at the master planning and planning application stages to seek to limit the impact on amenity.
	New development will not take account of local vernacular and will provide a negative impact on Cullompton as a historic market town.	Individual (5809)	The design elements of the new development will be a crucial part of the master planning work which will include public engagement.
	This number of housing not necessary in Cullompton.	Dial Holdings Ltd c/o Mr Seaton PCL Planning (2315); Individual (5624, 5622, 5621, 5613, 5705, 5648, 5807, 5812, 5811)	Cullompton is identified as a strategic location for Mid Devon growth during the plan period and (the opportunity to identify land for residential development) reflects that strategic approach.

	Too many houses for Cullompton in one development.	Broadhembury Parish Council (1483); Harcourt Kerr (1090); Hallam Land Management (4386); Kentisbeare Parish Council (76); Dial Holdings Ltd c/o Mr Seaton PCL Planning (2315); Individual (5352, 5366, 5628, 5627, 5626, 5621, 5613, 5759, 5648, 5561, 5552, 5545, 5785, 4641, 5768, 3524, 5836, 5835, 5993, 5802, 5809, 5807, 5811, 5820)	Cullompton is identified as a strategic location for Mid Devon growth during the plan period. The strategic direction of the plan has been informed by the previous 'issues and options' consultation. For a development to function effectively in this location there is a critical mass needed. A smaller scale development would not afford the opportunities to enhance local facilities and provide the necessary infrastructure.
	Too much emphasis placed on this development which may be delayed coming forward.	Waddeton Park c/o Mr Baker Bell Cornwell LLP (3815)	It should be noted that this development is scheduled for the later part of the plan period.
	Too many Gypsy and Traveller pitches.	Individual (5811)	The pitches proposed are to meet objectively assessed need.
	If J27 development does not occur, no need to pursue housing development east of Cullompton.	Individual (5756, 5561)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. Housing is required to meet the needs of the district. The proposed allocation at Junction 27 has further increased the housing need for the area in addition to those allocated at Cullompton.
	Concern that the amount of commercial floorspace seems low in comparison to housing. It needs to be a community with all necessary facilities and employment opportunities.	Individual (3588)	It is important that commercial development is in step with residential development. The employment land review has indicated that the plan needed to reduce the level of employment land to reach the appropriate balance.
	2,100 dwellings should be a minimum number of dwellings on this site. This would assist phasing arrangements and increase delivery rates.	Pegasus Planning c/o Ms Morrison (3678)	The plan refers to 2,600 dwellings, with 1,750 dwellings being provided during the plan period.

	The site allocation should be reduced to take account of loss of 'excellent quality' agricultural land and to reflect the flood plain.	Gallagher Estates Ltd c/o Ms Griffiths, Turley (5763)	Measures are built into the policies and supporting text to address flood risk and surface water drainage. All proposed sites in the emerging Local Plan were assessed as part of the 'Mid Devon Strategic Flood Risk Assessment'. This evidence was independently produced in consultation with the Environment Agency, South West Water and Devon County Council to help assess all potential sites within Mid Devon as part of the Local Plan Review and help guide development to areas of lowest flood risk. The site layout will ensure that there will be no development within any area of floodplain. To ensure surface water run-off is not increased elsewhere from the development of the site, the Mid Devon Proposed Submission Local Plan requires the provision of an appropriate 'Sustainable Urban Drainage Scheme' and sewerage system to responsibly manage all surface water from the development. The loss of agricultural land is regrettable. The site does include Grade 1/2 agricultural land but is predominantly Grades 3a and 3b and there is a lack of alternative sites in the area which could bring about this level of benefits.
	Further work needed relating to viability and deliverability of the allocation to demonstrate its deliverability during the plan period.	Gallagher Estates Ltd c/o Ms Griffiths, Turley (5763)	Viability work (Dixon Searle August 2016) has been undertaken which demonstrates that the overall assumptions which underpin the plan are sound with regard to viability. The specific viability and deliverability issues relating to this particular development will continue to be refined through the masterplanning work.
	Development not viable.	Harcourt Kerr (1090); Hallam Land Management (4386); Friends Life Ltd c/o GL Hearn (3781); Individual (5820)	The land is being actively pursued by developers who consider that a proposal is viable. MDDC is working closely with partners to consider delivery options and risks. The best available advice from statutory partners is that the proposals are deliverable within the plan period.

	Sceptical that low cost, or self build, elements will be delivered.	Individual (5631)	Paragraph 2.30 highlights that approximately 2,000 people a year search for self-build plots in Mid Devon and the Council`s Citizen Panel Survey 2013 showed that 12% of respondents were considering building their own home. The government is committed to removing the main barriers which hold back many thousands of self/custom build projects every year. They want to increase the opportunity for more people to build their own home and make custom build a mainstream option for future home owners, not an exception for a privileged few. Custom build are not always built by self-builders it can be where a builder is contracted by a home owner to create a "custom built home".
	Sceptical that school could be delivered.	Individual (5613, 5759, 5811)	DCC has specified that the school provision is needed and there is no indication that such provision will not come forward. Furthermore provision of the school will be a legal requirement through a s106 agreement.
	Scepticism over the delivery of the train station.	Individual (5802, 5811, 5797, 5621)	Given the increase in population proposed and local support it is reasonable to assume that reopening of the train station could be delivered during the twenty year plan period. The Council is working with partners to deliver a railway station in Cullompton as part of the Devon and Somerset metro project.

	The spatial strategy places too much emphasis on CU7 which is a site with significant risk.	MJ Gleeson C/O Bell Cornwell LLP (3775)	Cullompton is identified as a strategic location for Mid Devon growth during the plan period. The strategic direction of the plan has been informed by the previous 'issues and options' consultation. For a development to function effectively in this location there is a critical mass needed. A smaller scale development would not afford the opportunities to enhance local facilities and provide the necessary infrastructure. MDDC is working closely with partners to consider delivery options and risks. The best available advice from statutory partners is that the proposals are deliverable within the plan period.
	Criteria n should be amended to clarify proposed consultation arrangements and omit reference to two stages of consultation. Proposed change to wording: "alongside the statutory consultation to the SPD, the Master planning exercise will include significant formal consultation with the local community and other stakeholders'.	Pegasus Planning c/o Ms Morrison (3678)	MDDC's Statement of Community Involvement has specified a commitment to two stages of consultation. There is no reason why there should be a departure from this on such an important scheme.
	The reopening of Cullompton station is unlikely to be delivered within the next five years.	Devon County Council (626)	Given the increase in population proposed and local support it is reasonable to assume that reopening of the train station could be delivered during the twenty year plan period, but would agree that completion within the next 5 years less likely.
	Policy CU8 consists of unfunded transport aspirations.	Individual (5811)	Improvement works identified by Devon County Council to accommodate traffic from the proposed Eastern Cullompton Extension will be set out in the submission evidence.
	Sports provision must be found in the new development.	Individual (1681)	Policy CU10 states that contribution towards sports and leisure facilities will be required. The details of such provision will be established through the master planning work.

	New development should be designed in line with Active Design principles and a strategy should be devised for the delivery of sport and recreational land. Devise strategy for delivery of sport and recreational land and update policy CU9 and CU10 to reflect this.	Sport England c/o Mr Parsons (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore advisory. Policy CU9 refers to the proposed sport and recreational land requirements identified as part of this proposal. This will be further refined through masterplanning. The local community is currently considering options for further sports and recreational use in this area as part of the neighbourhood plan.
	Increase in air quality problems.	Individual (5626, 2979, 2677)	The development will facilitate the delivery of the town relief road an AQ mitigation measure which will remove traffic from the town centre AQMA.
	A route for a bypass is essential to remove traffic from the town centre.	Individual (5698)	The development will facilitate the delivery of the town relief road which will remove traffic from the town centre.
	Unsure as to the purpose or intention of e) offsite planting. Request confirmation of the basis for this requirement given that 40 ha of green infrastructure also required.	Pegasus Planning (3678)	Cullompton currently has an Air Quality Management Area. Offsite planting can play a part in capturing carbon and improving air quality. The provision of offsite planting therefore has a different role to the conventional green infrastructure also required.
	Growth at Willand a preferable option.	Hallam Land Management (4386)	Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan.

	Brownfield sites should be developed instead of this proposal.	Individual (5631, 5545, 5490, 5490, 5993)	Given the rural nature of Mid Devon there is only a limited supply of brownfield land available and so inevitably greenfield land has to be made available for development.
	Hartnoll Farm would be a more sensible location for more development.	Individual (5820)	The Hartnoll Farm proposal is not included in the plan. The Council has carefully considered all the options put forward in the January 2014 Local Plan Review consultation and has determined that the most sustainable option for development is to concentrate the majority of development at Cullompton.
	An enlarged Cranbrook development would be preferable.	Broadhembury Parish Council(1483); Individual (5820)	The proposals set out in the emerging local plan are to accommodate objectively assessed needs for the District, and follows consultation on strategic options for the plan area. Further development of housing sites in other districts would neither assist in meeting Mid Devon's needs effectively nor would it enable the area to harness the benefits of new development. Futhermore, it should be noted that Cranbrook is being expanded in any case to meet East Devon's objectively assessed needs.
	Development should be at J27 instead. Or in the case of Kentisbeare PC's representation J27 development preferable to enable a smaller allocation east of Cullompton.	Kentisbeare Parish Council (76); Hallam Land Management (4386); Individual (5759, 5648, 4641, 5835, 1681)	Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan.

	The development would be detached from Cullompton and its services, with the motorway as a barrier.	Bradninch Town Council (86); Broadhembury Parish Council (1483); Harcourt Kerr (1090); Individual (4317, 5631, 5629, 5628, 5622, 5613, 5552, 5785, 5490, 5835, 5805, 5802, 5800, 5798 5563)	The development will incorporate a variety of different services and facilities, which will allow an element of self-containment. Improvements to pedestrian/ cycle routes, public transport and provision of a new bridge over the motorway will enable improved access to the town centre.
	Residents will work in towns elsewhere (e.g. Exeter, Taunton, Bridgwater and Bristol).	Individual (5753, 5752, 5631, 5627, 5624, 5621, 5615, 5613, 393, 5561, 5823, 4688)	There is no mechanism in planning terms to restrict where people will work. The development is proposed alongside an increase in employment opportunities for the Cullompton area.
	The proposed development would have a negative impact on tourism.	Upton Lakes and Lodges Ltd (5242); Individual (5343, 5750, 5664, 5665, 5621, 5490, 5835, 5997, 4688)	There is no evidence that the proposals will adversely affect tourism. It is arguable that an increased level of local housing will increase local leisure spend.
	Protection and mitigation for the loss of enjoyment and amenity for holiday owners and protection for loss of income from Holiday let, decrease in value of accommodation or impact on tourism and hospitality businesses. Criterion g should include 'protect setting of Upton Lakes holiday lodges'.	Upton Lakes and Lodges Ltd (5242); Individual (3588, 5750, 5553, 5997)	There will be an impact on the area in terms of outlook. Mitigation with respect to the impact on amenity will be considered further as part of the master planning work. Impact upon property value is not a material planning consideration.
	Cross boundary issues need to be considered.	East Devon District Council (135); Individual (5811)	Continued liaison is undertaken with adjoining authorities through a range of informal and formal arrangements consistent with the 'duty to cooperate'. This liaison will be ongoing and form an important part of the master planning work.

	Insufficient detail to assess the proposal.	Individual (5665, 5552, 5490, 5993, 5811)	The level of information currently available is typical of development proposals included at the strategic local plan stage. More detailed aspects will be discussed as part of the master planning, and subsequent planning application, stages.
	Concern about how this will affect the respondent's house price. Also state that they did not move into the area to be told six years later that there might be new housing development occur in the locality.	Individual (5810)	These are not reasons which would carry weight in planning terms. As demonstrated by the respondents' move to the area, housing needs do need to be accommodated.
	Commuter patterns should be assessed, particularly to assess impact on employment sites in East Devon.	East Devon District Council (135)	Commuting patterns have been considered by EDGE Analytics. It is unclear what change to the plan is sought.
	Certain amount of rented housing could become poorly maintained by uncaring landlords.	Individual (5770, 5766, 5846, 5847)	Poor maintenance can occur irrespective of ownership. There are currently little planning controls that can overcome these concerns.
	The Local Plan should detail the specific design requirements relating to sustainability and physical access requirements rather than leave to building regulations.	Individual (5211)	More detailed design aspects will be addressed comprehensively at the master planning and planning application stages. Physical access arrangements are covered by building regulations legislation.
	The development should go up to the parish boundary as land within flood plain could then be used to increase GI leisure land.	Individual (5211)	The land beyond the boundary is countryside, has not been made available, partially in flood plain. The local community is currently considering options for further sports and recreational use as part of the neighbourhood plan.
	Contributions should be sought for off-site community facilities. s106 should be worded flexibly to ensure monies are spent.	Individual (5211)	Contributions for appropriate off site infrastructure will be sought as stated in Policy CU10. Contributions need to be fair and reasonably related to the development; too much flexibility would run the risk of falling foul of these stipulations.

	Respondent proposes that his land would be more suitable for development, than elements south of the A373. Concerns relate primarily to the proximity of residential development to a working farm.	Individual (3788)	The respondent recommends two options One for a smaller landswap, and one for a much larger alteration to include all of the respondent's farm. It is considered that development of this proposed alternative site would be more challenging to develop. If all of this land was included it would be less sustainable primarily due to its unusual shape with access only to the east of the site.

Town allocations

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

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

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

	Objection due to capacity of drainage/sewerage network/concern about flooding.	Individual (2484, 5255, 5260, 5419, 5420, 5421, 5422, 5423, 5424, 5291, 5300, 5262, 5303, 5304, 5322, 5323, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572, 5500, 5385, 5399, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans. The site is in Flood Zone 1, the area with the least probability of flooding. The application will be accompanied by a drainage strategy setting out the arrangements for the management of surface water. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.

	Objection due to capacity of parking, loss of parking/loss of garaging, additional congestion on roads, impact on road safety (particularly near play park).	Individual (2484, 5255, 5259, 5260, 5268, 5419, 5420, 5421, 5422, 5423, 5424, 3072, 5291, 5296, 5300, 5262, 5303, 5305, 5339, 5319, 5322, 5323, 5326, 5353, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572, 5500, 2469, 5385, 5399, 5384, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449)	This site is an existing allocation. Concern regarding the loss of the existing garages and the introduction of affordable dwellings which would give rise to an unacceptable increase in both on-street parking and visual impact was considered by the Inspector during the examination of the AIDPD. His conclusion was that development management policies provided sufficient control over such effects and that therefore the policy was sound. Furthermore the parking area is informal, and was only creating as a result of demolition of other garages given that they were not used. It was always intended that the site would be redeveloped. In addition, many of the garages fall considerably below the minimum sizes set in the Council's Parking Supplementary Planning Document, and would not be capable of, nor used for, parking a vehicle.

	Objection as limited/restricted access for emergency vehicles/waste lorries.	Individual (5255, 5259, 5264, 5419, 5420, 5421, 5422, 5423, 5424, 5291, 5300, 5262, 5305, 5319, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572, 5500, 5385, 5399, 5384, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449)	This is a matter which will be addressed at the design stage.
	Objection due to loss of light/privacy.	Individual (5259, 5300)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.

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

	Objection as would cause unacceptable loss of land to certain residents.	Individual (5419, 5420, 5421, 5422, 5423, 5424, 5425, 5426, 5428, 5429, 5430, 5431, 5432, 5433, 5434, 5435, 5436, 5437, 5438, 5439, 5440, 5441, 2679, 5442, 5443, 5444, 5445, 5446, 5447, 5448, 5449, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572)	A small proportion of the allocation overlapped the rear garden of 107 Cotteylands – this area is proposed to be removed from the allocation. The scheme is also required to ensure that the vehicular right of way which those along Lower Cotteylands have to the rear of their properties is maintained.

	Objection as would cause unacceptable loss of amenity and enjoyment of established rights.	Individual (5419, 5420, 5421, 5422, 5423, 5424, 5491, 5492, 5493, 5494, 1100, 5495, 5496, 2652, 5497, 5291, 5499, 5500, 5501, 5503, 5504, 5505, 5506, 5507, 5508, 5509, 5510, 5511, 5512, 5513, 5514, 5515, 5516, 5517, 5518, 5519, 5499, 5520, 5521, 2451, 2469, 5522, 5523, 5524, 5525, 5526, 5527, 5528, 5529, 5530, 5531, 5532, 5533, 5534, 5535, 5536, 5537, 5573, 5574, 5575, 5576, 5577, 5578, 5579, 5580, 5581, 5582, 3073, 5569, 5570, 5571, 5572)	Approximately 50% of the garages are empty, and are in a poor state of repair. Many of them are too small to be used for the storing of vehicles. Instead, the redevelopment of this site provides the opportunity to improve the quality of the immediate environment through sensitive redesign. Any rights of access to the rear of properties along Lower Cotteylands will be retained.
	Old garages need to be dealt with but those at 1-18 are used and should remain; replacement parking should be provided; or fewer but larger garages should be provided.	Individual (3072, 5296, 5300)	This can be considered at design stage.
	Objection as part of the site shows rear of properties in Lower Cotteylands being taken.	Individual (5262, 5326)	Noted. A small area of the allocation which overlapped a part of the rear garden at 107 Lower Cotteylands is proposed to be removed.
	Alternatively land in front of Cameron Close or at Palmerston Park should be developed instead.	Individual (5319, 5353)	A site at Palmerston Park is included within the plan for development. No land at Cameron Close has been made available for development.
TIV11 Palmerston Park	Criterion b should be extended to cover Priority Species and Habitats.	Environment Agency (943)	Agreed. Policy amended accordingly.
TIV12 Phoenix Lane	Supports policy.	Historic England (1170)	Support noted.
	When planning this site, the setting of listed Gotham House and Raymond Perry House, along with fine views from Fore Street should be preserved.	Tiverton Civic Society (1410)	This is addressed by the policy.

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

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

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

	Objects to inclusion of site.	Tiverton Civic Society (1410); Individual (5363, 5364, 5325, 5324, 5349, 5333, 5332, 5329, 5327, 5354, 5355, 5372, 5373, 5374, 5375, 5376, 5746, 5669, 5668, 5670, 5668, 5567, 5566, 5565, 5554, 1235, 5583, 5585, 5584, 5890, 5745, 5744, 5743, 5742, 5741, 5740, 5739, 5730, 5731, 5732, 5733, 5734, 5735, 5736, 5737, 5738, 5721, 5722, 5723, 5210, 5894, 5725, 5726, 5727, 5728, 5729, 5718, 5720, 5719, 5851, 5560, 5558, 5551, 5971, 5970, 5969, 5968, 5967, 5966, 5965, 5964, 5963, 5962, 5961, 5960, 5959, 5958, 5957, 5996, 5995, 5994, 5992, 5991, 5989, 5988, 5987, 5986, 5985, 5984, 5983, 5982, 5981, 5980, 5977, 5976, 5975, 5974, 5973, 5972, 5978, 5944, 5943, 5942, 5941, 5940, 5939, 5938, 5937, 5936, 5935, 5934, 5933, 5932, 5931, 5930, 5929, 5928, 5927, 5926, 5925, 5924, 5923, 5922, 5921, 5920, 5919, 5918, 5917, 5916, 5915, 5914, 5913, 5912, 5911, 5910, 5909, 5908, 5907, 5906, 5905, 5904, 5903, 5902, 6045, 5901, 5900, 5899, 5897, 5896, 6038, 6037, 6036, 6035, 6034, 6033, 6032, 6031, 6030, 6029, 6028, 6027, 6026, 6025, 6024, 6023, 6022, 6021, 6020, 6019, 6018, 6017, 6015, 6014, 6013, 6012, 6011, 6010, 6009,	The planning merits of objections are the important factor which would affect any planning proposal. Comments in relation to specific objections are set out below.

	Objects due to inadequacy of local road network to accommodate development (including during construction period and for emergency vehicles), poor access and/or negative impact on road safety/lack of footpath.	Tiverton Civic Society (1410); Individual (5349, 5333, 5329, 5327, 5374, 5376, 5221, 5670, 5566, 1235, 5583, 5585, 5738, 5718, 5720, 5719, 5560, 5558, 5551, 5220, 5969, 5965, 5961, 5959, 5936, 5896, 6012, 6000, 5541, 5540, 5357, 5398, 5396)	The highway authority has indicated that in principle the site can be developed, but the final numbers would be informed by detailed Transport Assessment. However, for other reasons stated above the allocation is proposed for deletion.
	Objects due to elevated position and adverse impact on landscape character/conflicts with the plan and underpinning Landscape Character Assessment.	Tiverton Civic Society (1410); Individual (5551, 5987)	Though on an elevated position, the site sites within a relatively enclosed fold in the landscape. Landscape and visual impact would have been considered during the design stage. However, for other reasons stated above the allocation is proposed for deletion.
	Objects due to negative impact on environment/wildlife/ecological importance of area or proposal takes no account of loss of biodiversity.	Tiverton Civic Society (1410); Individual (5364, 5325, 5332, 5327, 5372, 5373, 5746, 5221, 5564, 5614, 5583, 5890, 5744, 5740, 5558, 5551, 5220, 5971, 5969, 5965, 5958, 5957, 5996, 5995, 5994, 5992, 5991, 5990, 5989, 5988, 5987, 5985, 5982, 5972, 5940, 5939, 5938, 5936, 5934, 5932, 5929, 5928, 5922, 5920, 5919, 5917, 5916, 5915, 5914, 5913, 5910, 5909, 5907, 5903, 5896, 6038, 6036, 6030, 6029, 6028, 6027, 6024, 6018, 6013, 6012, 6007, 6006, 6005, 6004, 6002, 5999, 6016, 5450, 5788)	The site is not subject to any designation for the value of its biodiversity and/or effects to protect it. Nevertheless any planning application would need to be accompanied by a Phase I and potentially Phase 2 Habitat Survey and Tree Survey. These would identify whether the site is used by protected species and if so make recommendations for appropriate mitigation measures. Where a site would result in an unacceptable impact on protected species, planning permission would not be granted. However, for other reasons stated above the allocation is proposed for deletion.

	Objects due to negative impact on heritage assets/impact on setting of Gotham Farmhouse.	Tiverton Civic Society (1410); Individual (5364, 5329, 5327, 5746, 5221, 5745, 5743, 5742, 5741, 5740, 5739, 5738, 5721, 5723, 5210, 5220, 5964, 5959, 5958, 5957, 5976, 5944, 5940, 5939, 5938, 5937, 5936, 5934, 5933, 5932, 5929, 5928, 5927, 5923, 5922, 5921, 5920, 5919, 5917, 5915, 5914, 5913, 5910, 5909, 5907, 5906, 5903, 6045, 5901, 5900, 5897, 6036, 6032, 6024, 6017, 6013, 6012, 6005, 6004, 5398, 5396)	Following preparation of a Historic Environment Appraisal, as requested by Historic England, this has indicated that the developable area is much reduced once full consideration is given to the setting of various heritage assets and the significance of the re-rating of Gotham Farmhouse to grade II*. The site can no longer support the quantum of development required to be effective as a contingency allocation. It is therefore proposed for deletion.
	Objects as the surrounding fields are critical to the special interest of the listed building – much of what is important about the listed building depends on its setting, and development of these fields would cause substantial harm to significance of the heritage asset.	Individual (5221, 5936, 6012)	See above comment regarding assessment of setting.
	Objects as harm to listed building is contrary to Local Plan Review vision and environmental protection for heritage assets set out in policies S1, S9, S10, DM1, DM2 and especially DM25/contrary to NPPF.	Individual (5221, 5551, 5220, 5959, 5936, 6012)	See above comment regarding assessment of setting.
	Objects as Gotham with its thatched roof would be vulnerable to fire from bonfire/fireworks – or thatched property would be in danger from building so close.	Individual (5614, 5979)	Fear of damage to property is not a material planning consideration.
	Fields boundaries are minimum 200 years old and banks lining track are likely 500 years old – indicating ancient hedges.	Individual (5221, 5936, 6012)	Comments noted.

	Objects as area/valley very special and should be protected from development/is area of environmental importance.	Individual (5364, 5324, 5333, 5332, 5327, 5354, 5355, 5372, 5373. 5964, 5220, 5963, 5986, 5942, 5933, 5925, 6035, 6033)	The area is not part of any designation for its value or special qualities. However, for other reasons stated above the allocation is proposed for deletion.
	Objects due to overlooking/visual impact on adjacent properties/impact on privacy or is too close to adjacent properties.	Individual (5329, 5327, 5670, 5722, 5931, 6027)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. However, for other reasons stated above the allocation is proposed for deletion.
	Objects due to inadequate capacity of sewerage/drainage.	Individual (5329)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage. However, for other reasons stated above the allocation is proposed for deletion.
	Object due to flood risk/concern about surface water run-off.	Individual (5738, 5965, 5989, 5896, 5539)	The site is in Flood Zone 1, the area with the least probability of flooding. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage. However, for other reasons stated above the allocation is proposed for deletion.
	Objection as site contains former landfill and no proper plan to assess associated risks - contrary to NPPF.	Individual (5551)	Assessment of contamination and appropriate remediation is already covered by the policy. However, for other reasons stated above the allocation is proposed for deletion.

	Objects as site is steep and therefore expensive to develop (and/or subsequently developers will try to reduce affordable housing content).	Individual (5558, 5964, 5923)	The Historic Environment Appraisal has indicated that many areas of the site form the setting of heritage assets and should not be developed. However, some of the remaining areas are some of the steepest parts of the site. These could be difficult to develop. These considerations, along with other factors mentioned above have resulted in the proposal to delete the allocation.
	Objects to scoring of the site in the Sustainability Appraisal, original scores and rescoring too high; disputes scores for impact on heritage assets, loss of agricultural land, risk of contamination, surface water run-off, economic benefits, retail benefits, meeting housing needs, proximity to bus services/lack of footpath, school capacity.	Individual (5551)	This representation has been addressed in the Sustainability Appraisal update.
	Objects as housing not needed/already over-provision within the plan/sufficient building going on elsewhere.	Individual (5375, 5551, 5971, 5967, 5966, 5989, 5982, 5974)	Not agreed. The plan allocates sufficient housing to meet the objectively assessed need, along with a buffer to ensure adequate flexibility. The site is now proposed for deletion. However, sufficient flexibility is retained through a degree of over-allocation, windfall provision and the retention of the other two contingency sites.
	Objects to loss of green fields/loss of agricultural land (grade 3)/use brownfield first; encroachment on countryside/outside settlement limit.	Individual (5669, 5667, 1235, 5614, 5584, 5743, 5551, 5971, 5989, 5944, 5926, 5911, 5998, 5543)	These factors are considered when selecting sites, and along with other issues are weighed against the requirement to meet the objectively assessed housing need. However, for other reasons stated above the allocation is proposed for deletion.
	Objects as spoils/destroys views/area/valley/Tiverton/Devon.	Individual (5668, 5566, 5985, 5974, 5973, 5943, 5941, 5921, 5907, 5902, 6045, 5901, 5897, 6034, 6031, 6028, 6018, 6015, 6014, 6003, 6000, 5998, 1331, 5538, 5398, 5396)	Not agreed. The area is not subject to any designation for the special qualities of the landscape. Such issues would be considered at design stage. However, for other reasons stated above the allocation is proposed for deletion.

	Questions whether fire station in Wellbrook Street will be moved.	Individual (5719)	There are no proposals within the Local Plan Review for relocation of the fire station.
	Objects as house purchased based on beautiful/peaceful surroundings.	Individual (5960)	Loss of property value and loss of view are not a material planning considerations.
	Objects due to likely negative impact on tourism.	Individual (5996)	No evidence is put forward stating why there would be a negative impact. However, for other reasons stated above the allocation is proposed for deletion.
	Objects as not a suitable site for housing (no reasons given).	Individual (5935)	Following the additional work undertaken within the Historic Environment Appraisal, it has indicated that a large part of the site is unsuitable for development. Accordingly the site is proposed to be deleted.
	Objects as site is too large for location/too large an area for number of houses.	Individual (5930, 5899, 6007)	The capacity of the site was assessed through the SHLAA process. A lower capacity was assumed given the need to protect the settings of a number of heritage assets. However, following further work as set out above the site is now proposed for deletion.
	Other land should be developed instead (suggests by Link Road or M5 corridor).	Individual (5924, 5897, 6011)	Land north of the Link Road in Tiverton is not available for development. Land east of the M5 at Cullompton has been included within the Local Plan Review for mixed development.
	Objects as site is in contempt of Green Belt ideals.	Individual (5907)	Mid Devon does not have any Green Belt designations.
	Objects as development is for short-term financial gain of landowner.	Individual (5897)	This is not a material planning consideration.
	No capacity within the local schools.	Individual (5357)	Devon County Council has confirmed that there will need to be an expansion of primary and secondary school provision for Tiverton in order to accommodate the development proposed. For primary provision, a new school is being delivered on the Eastern Urban Extension. Land is also safeguarded in the plan for secondary expansion.

	Under-used local hospital.	Individual (5357)	Housing growth provides wider population base which could benefit under-used facility.
TIV15 Tiverton Infrastructure	Policy should be amended to include enhanced library service provision, enhanced recycling centre provision and reference to the Energy from Waste Facility allocated in the Devon Waste Plan and associated district heating network.	Devon County Council (626)	A proposed amendment to the policy is proposed to include enhanced library service provision (consistent with Infrastructure Plan). Reference to Energy from Waste facility is already included in supporting text, so no change is proposed. The recycling centre provision is not specific to Tiverton, as it is intended to cover a much wider area including Cullompton and Willand. It is already specified as a strategic item in the Infrastructure Plan for the district, and would be misleading to include it here given the specific 'town' focus of this policy.
	Blundells School will continue to liaise with the Council, County Highways and developers to agree a traffic calming solution on Blundell's Road – but no evidence to suggest this can mitigate impact of EUE.	Blundell's School c/o GVA Grimley (4240)	Continued close working welcomed.
	Requests completion of sport and recreation evidence base and devise strategy for delivery of sport and recreation land and buildings; amend policy accordingly.	Sport England (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore merely advisory.
	Infrastructure is poor - lack of parking in and around the town, poor access for emergency vehicles in some locations, dying high street, school oversubscribed, hospital undersubscribed.	Individual (5357)	Surveying of Council-owned car parks in Tiverton indicates significant capacity exists. Access for emergency vehicles is considered at the planning application stage. The plan has a town centre first policy and includes a proposal for town centre regeneration. Measures to increase the capacity of schools are provided whilst the additional population base could have benefits to under-used facilities.
CU1-CU6 North West Cullompton	See separate table.		

CU7-CU12 East Cullompton	See separate table.		
CU13 Knowle Lane	Welcomes reference to the requirement to retain areas of floodplain as informal open space and the phasing of the necessary sustainable urban drainage features.	Environment Agency (943)	Support noted.
	Supports commitments in NW Cullompton allocation (and geographically related CU13 site) for the provision of community facilities.	Diocese of Exeter (6081)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	No reference is made to the sports fields used by the rugby club within the policy/review does not protect this land.	Individual (5232, 5238)	Whilst land used by the rugby club has been put forward for development, national and local policy seek to protect playing pitches, and will only justify their loss in limited circumstances. As a result the Council has not allocated this land for development.
	Given total size of Knowle Lane allocations, a Multi-Use Games Area (MUGA) and tennis court should now be provided near to community centre and allotments within the Green Infrastructure.	Individual (5211)	These requests can be handled at design stage, as it would be too prescriptive to include in policy. Reserved matters permission has now been granted on this site which includes a locally equipped area of play.
	Policy needs to include requirement for a link road with no frontage development between Knowle Land and Tiverton Road to reduce impact on Langlands Road.	Individual (4052)	The highway authority states that this would not be in accordance with Manual for Streets.
CU14 Ware Park & Footlands	Supports commitments in NW Cullompton allocation (and geographically related CU14 site) for the provision of community facilities.	Diocese of Exeter (6081)	Support noted.
	Given total size of Knowle Lane allocations, a MUGA and tennis court should now be provided near to community centre and allotments within the Green Infrastructure.	Individual (5211)	These requests can be handled at design stage, as it would be too prescriptive to include in policy. Such discussions are already underway as part of the reserved matters application currently pending consideration.

	Further land is for sale which could be Knowle Lane phase 4; therefore important to substantially improve sports provision and local road network.	Individual (5211)	The policy requires access to the site to come via the adjoining CU13 allocation. However, the supporting text acknowledges that if this is not possible then Knowle Lane, providing it is widened, could be used as the access point. The site will provide contributions towards public open space in accordance with Policy S5. Some of the contribution could be used to fund additional sports provision.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	No reference is made to the sports fields used by the rugby club within the policy/review does not protect this land.	Individual (5238)	Whilst land used by the rugby club has been put forward for development, national and local policy seek to protect playing pitches, and will only justify their loss in limited circumstances. As a result the Council has not allocated this land for development.
	Developments contributing towards motorway improvements and local road network, but not in themselves being adequate to bring about the changes should not be permitted until all contributions have been secured.	Individual (5867)	The highway authority is satisfied with the proposed policy which stipulates that no development should come forward until improvements to the M5 and the forthcoming road through the NW Cullompton allocation are complete.

	Objection to allocation as sustainability appraisal scoring for site is less than CU21 Colebrook and therefore this site should be contingency instead, with CU21 as full allocation.	Mr Christian & Mr Force c/o Genesis Town Planning (3780)	The scoring of this site is not dissimilar to that for CU21. CU21 scores marginally higher in terms of economic and housing benefits solely because of its larger size. There is also a marginally higher score in category C 'mitigating impact of climate change' because part of that site contains floodplain and is within the Critical Drainage Area where more stringent measures to mitigate flood risk would be required compared with other sites. However, CU14 is almost exclusively Flood Zone 1 and therefore is sequentially preferable. Furthermore, this is a relatively small site providing for 38 dwellings. Being of this size it would unlikely provide the required boost to land supply needed should commitments or completions fall below a level at which the provisions in Policy S4 be enacted.
	Objection to allocation as there is uncertainty of delivery given access is via adjacent (yet to be built out) allocation with potential for ransoming, potential for archaeological remains; can only deliver after road improvements carried out elsewhere – should therefore be deleted.	Gallagher Estates Ltd c/o Turley (5763)	This site is programmed in for later in the plan period to reflect the fact that the adjacent site will need to be partially built out first and for M5 junction improvements to have taken place. A condition of the planning permission on adjacent site will be for access road to be completed up to boundary in early phase of development. Site commencement within the middle of the plan trajectory is compliant with the NPPF which requires the plan to be deliverable within the plan period. No justification therefore for deletion.
CU15 Exeter Road	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Halsall Construction Ltd (5864); Individual (2160)	Support noted.
	Concern over width of road and access – road widening may be required.	Individual (5211)	An application to develop part of this site now received permission. Devon County Council has stated that the access is to the required width with adequate visibility.

	States is satisfied that Swalcliffe House does not need to be knocked down to accommodate access road.	Individual (2155)	Comment noted. Overall site total reduced to reflect likelihood that lower number of properties to be achieved on the Swalcliffe land.
CU16 Cummings Nursery	Welcomes reference to retaining floodplain as green infrastructure.	Environment Agency (943)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	Has concerns about the sustainability of the allocation, particularly in relation to how residents will access the town centre without use of cars.	Mid Devon CPRE (486)	Improvement works to the motorway junction will address connectivity for pedestrians.
	Criterion (f) to be added and supporting text amended to make reference to consideration being given to the inclusion of a section of road to form part of the town centre relief road.	Individual (4052)	Not agreed. This site has reserved matters permission for 100 dwellings.
	Objects to housing in this location – first the vitality of the high street needs to be restored and consideration given to building a ring road.	Individual (5352)	The Local Plan Review includes proposals for a town centre relief road. Once built, this road will divert traffic away from the high street. This is anticipated to have a positive impact on the vitality of the high street.
CU17 Week Farm	Welcomes reference to retaining floodplain as green infrastructure and retaining buffer to west of site.	Environment Agency (943)	Support noted.
	Supports allocation – will deliver M5 improvements and access to Honiton Road, and supports Council's flexible approach to employment uses.	Mr P Bazeley c/o LSN Architects (2156)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	Allocation should include space for retail outlets of similar size to Aldi.	Individual (5211)	Retail Study indicates there is very little need for further convenience goods floorspace within Cullompton up to 2026. The East Cullompton allocation however does include a 2ha site for a shopping and community centre, in order to provide a local shopping offer, but not something which would compete with High Street provision.

	Developments contributing towards motorway improvements and local road network, but not in themselves being adequate to bring about the changes should not be permitted until all contributions have been secured.	Individual (5867)	The policy stipulates that no development should take place until improvement works to the M5 junction are completed. The signalisation works were undertaken in 2015.
	Delivery of main employment allocations constrained by a number of factors. Development of the site is unable to commence until completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway. There is also a requirement for the provision of an additional point of access to the A373 linking the site, along with the wider Kingsmill employment area, to Honiton Road. There are three landowners.	Friends Life Ltd c/o GL Hearne (3781)	The signalisation works were undertaken in 2015. The Council's SCLAA panel believe the site to be deliverable, and no evidence is put forward by the objector to the contrary.
CU18 Venn Farm	All areas within floodplain to be protected as green infrastructure; welcomes wording retaining floodplain as GI.	Environment Agency (943)	Support noted.
	Considers policy to be sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.
	Supports expansion of Kingsmill Industrial Estate but does not think enough land has been allocated to last until 2033.	Individual (5211)	Support noted. The local plan evidence suggests that enough land has been allocated within the plan.
	Allocation should be extended to incorporate adjacent 8 hectares; new housing growth will benefit from additional employment, Cullompton is strategically placed on M5 and larger site will help support the infrastructure costs of the site (i.e. land needed for flood zone, habitats, link road).	Mr P Bazley c/o LSN Architects (2156)	The Local Plan Review allocates sufficient provision, in excess of this figure in order to provide flexibility. Additional sites are therefore not necessary. Furthermore, given the capacity issues associated with J28 of the M5, any further allocations in Cullompton would need to be delayed until after provision of the significant highway infrastructure works associated with East Cullompton. Other allocated employment sites in the plan are not dependent on the same level of infrastructure provision.

	This area has a history of flooding.	Individual (5631)	The Strategic Flood Risk Assessment notes that 41% of the site is within Flood Zone 2, and 1% is Flood Zone 3a. However, a Flood Risk Assessment accompanied an application on this site the recommendations of which had the support of the Environment Agency. There are a number of pre-commencement and other conditions attached to the permission including provision of drainage strategy, no raising of ground levels in flood zones, requirements about finished floor levels and no development in the green infrastructure/flood zone areas.
	Developments contributing towards motorway improvements and local road network, but not in themselves being adequate to bring about the changes should not be permitted until all contributions have been secured.	Individual (5867)	The policy stipulates that no development should take place until signalisation works to the M5 junction are completed. These works were undertaken in 2015 and the policy has been amended to reflect this. A condition that the development should not be occupied prior to completion of these works was included as part of the recent planning permission.
	Delivery of main employment allocations constrained by a number of factors. Development of the site is unable to commence until completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway. The SCLAA notes that further development east of the motorway could require further investment in junction improvements (beyond the planned improvements to Junction 28). There is also a requirement for the provision of suitable vehicular access which directs development traffic via Saunders Way so as not to increase the use of Kingsmill Road. The SA identifies that the availability of a suitable access is unknown.	Friends Life Ltd c/o GL Hearn (3781)	Signalisation of the slip roads was undertaken in 2015. Planning permission was granted on this site in 2015 and Highways England was satisfied that no further J28 improvements were necessary to enable development of the site. The arrangements for the site access are set out as part of the permission.

CU19 Town Centre Relief Road	Policy should include protection of priority wetland habitat and species.	Environment Agency (943)	Protection is already provided by Policy DM28 'Other protected sites'.
	Welcomes reference to requirement for Flood Risk Assessment and requirement to consider closing the road at times of flooding.	Environment Agency (943)	Support noted.
	Delivery of relief road is a priority.	Kentisbeare Parish Council (76); Individual (5211, 5633, 5630, 5698, 2160, 5085, 2046)	Comments noted.
	Supports relief road through CCA fields – area unsuitable for sports given wet conditions/proximity of motorway.	Individual (1681)	Comments noted.
	Supports the idea of relief road on the eastern side of the motorway once J28a built; would remove need to develop CCA fields/open up options for travel restrictions through High Street.	Individual (5299, 5302, 5085, 3588)	Comments noted. However the area of search still includes the CCA fields as set out in the policies map. Options for travel restrictions through the high street could be considered at the planning application stage.
	Supports extension of 'area for relief road' given it opens up access options for East Cullompton.	Individual (3700)	Support noted.
	Supports requirement for replacement provision of open space and sports facilities – should be done in advance of works being undertaken.	Individual (2160)	Support noted and agree with comments regarding timing of any replacement sports provision. Amendment inserted into supporting text to clarify this point.
	All development should contribute towards the road.	Individual (5211)	At present all residential development in Cullompton resulting in additional traffic generation is required to make S106 payments to mitigate their impact on air quality. The delivery of the relief road is the principal mechanism which air quality payments will fund.
	Road should be progressed before major housing development takes place.	Individual (5211, 5633, 5630, 5698, 2160, 5085, 3579)	Whilst it would be desirable to have the road completed before the houses were constructed, cash flow is important to development, which will need to build and sell houses in order to make money available to fund the road.

	Bridge over M5 a long term aspiration requiring various consents – relief road should be built earlier, with M5 connecting at later stage.	Individual (5211)	The design and location of the bridge over the M5 will affect the route of the Town Centre Relief Road. Therefore the design of both schemes will need to be considered together, including consideration of phasing.
	Road should run from Station Road beside Tesco, through CCA fields linking to Meadow Lane.	Individual (5211)	The final route of the proposed road is not set at this stage, hence why a large 'area of search' has been included within the plan.
	Requests traffic-free pedestrian/wheelchair accessible cycle path from town centre relief road connecting to Last Bridge and Duke Street (associated area on map should be extended).	Individual (5211)	The detailed arrangements for non-vehicular traffic movements will be developed at a later stage. This representation has also identified that it would be appropriate to extend the area identified for town centre relief road to incorporate land to the south to allow consideration of Duke Street bridge as part of the transport solutions.
	Objects to relief road through the CCA fields or adjacent to railway line.	Cullompton Rangers FC (2800)	Objection noted. The impact on open space and sports provision will be considered during the assessment of route options for the road.
	Requests CCA fields be designated as Local Green Space. Consider that it meets criteria in that it is relatively close to the community it serves, is demonstrably special and has beauty, recreational value, tranquillity and richness of wildlife.	Cullompton Community Association (989)	Not agreed. The area noted is part of an area identified as the potential location for the 'Town Centre Relief Road' as such it would undermine policy CU19 of the Local Plan Review. Furthermore the scale of the identified area is viewed as an 'extensive tract of land' which is inconsistent with National Policy.
	Any road through the CCA fields will increase risk of flooding; road will act as barrier to rainfall.	Individual (5299)	A Flood Risk Assessment is currently being undertaken for the proposed road. The Environment Agency will need to be satisfied that there is no negative impact on flood risk as a result of the proposed route.
	Write policy to remove bias towards route through CCA fields – preference for route on east of motorway as reduces flood implications and could go via Cummings Nursery allocation.	Individual (4052)	The route is not finalised. The supporting text states that it could be located on either side of the motorway, with a wide area of search identified accordingly.

	Concern over impact on existing residents from noise/pollution/safety of relief road on east side of motorway.	Individual (5664)	These issues will be considered in detail at the planning application stage.
	If relief road on west side then further investigation needed.	Individual (5664)	Agreed. Further design work, including flood modelling and road design need to be undertaken prior to a public consultation exercise and subsequent planning application can be progressed.
	Plans for relief road on Cullompton side, and second motorway junction do not deal with traffic problems at centre.	Individual (5629)	Not agreed. The Town Centre Relief Road will provide an alternative route for vehicular traffic, removing the need for many of these to travel through the high street.
	Bus station should be allocated by Tesco within land safeguarded for relief road.	Individual (5211)	The highway authority states that there is no need for a full bus station; however a suitable hub should be given consideration. Policy CU20 'Cullompton Infrastructure' sets out an aspiration for a bus interchange could be provided in combination with the re-opened railway station.
	Welcomes alternative route which avoids the High Street, but concerned that new route potentially through development area will still be congested (if similar to route by rugby club).	Individual (5837)	Road will be designed as a distributor road to minimise congestion issues.
	Concern over road safety given road will run directly outside main school and sports centre.	Individual (5837)	Road safety is a critical issue which will be considered at design stage.
CU20 Cullompton Infrastructure	Requests additional criterion stating 'provision of works to reduce flood risk'.	Environment Agency (943); Individual (3588)	Agreed. Cullompton is a Critical Drainage Area which requires measures to reduce flood risk (over and above those expected elsewhere). An amendment to the policy is proposed.
	Requests completion of sport and recreation evidence base and devise strategy for delivery of sport and recreation land and buildings; amend policy accordingly.	Sport England (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore merely advisory. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making.

	Transport evidence base lagging behind Local Plan. Cumulative impact of development in the town and the wider district needs to be assessed; further work needs to be undertaken before a new motorway junction can be confirmed as deliverable.	Highways England (1172)	Since this representation was made, ongoing discussions have been undertaken with Devon County Council and Highways England to refine the transport proposals in the area.
	Development will result in large increase in traffic and negative impact on local road network/questions capacity of local road network to accommodate additional growth/questions adequacy of plan to tackle traffic issues.	Individual (5621, 5615, 5611, 5697, 5696, 5867, 5561, 5552)	Since this representation was made, ongoing discussions have been undertaken with Devon County Council and Highways England to refine the transport proposals in the area.
	Traffic data relied upon is from 2001 and is out of date.	Individual (5811)	The evidence was based on the best available information at the time. The evidence base is regularly updated to reflect new information as it becomes available.
	Town centre relief road is a priority.	Individual (5698, 1681, 5811, 2046)	Comments noted.
	Supports development of relief road on east side of the motorway.	Individual (5302)	Comments noted, though further work will need to be undertaken to determine whether the road will be on the west or east side of the motorway.
	Objects to provision of relief road through floodplain and associated dispersion of flood waters.	Individual (4522)	Comments noted, though further work will need to be undertaken to determine whether the road will be on the west or east side of the motorway. Devon County Council has commissioned additional work to demonstrate that there are options that are acceptable in flood and transport terms. The Council has been working closely with the Environment Agency over highway infrastructure improvements to reduce flood risk. The evidence base will be updated to reflect this work.
	Supports new motorway junction.	Individual (5630, 5698)	Comments noted.

	Policies do not make explicit reference to proposed new motorway junction and/or should be amended to make provision clear.	Individual (5867, 5811)	The Council recognises that there is further work required on highway options – this has subsequently been commissioned. This further work is required to clarify the highway/motorway issues and will form an update to the evidence base.
	New motorway junction should be delivered within next 3 years.	Individual (5630)	The phasing of the delivery of the road infrastructure will be determined during a detailed masterplanning stage, and is not currently set.
	Partial motorway junction will be inadequate to accommodate additional traffic generation.	Individual (5613)	The Council recognises that there is further work required on highway options – this has subsequently been commissioned. This further work is required to clarify the highway/motorway issues.
	Lack of clarity over impact of proposals on A373, and nature of improvements, if any.	Individual (5811)	The highway authority has not raised any objections regarding the A373. The transport assessments would need to consider the impacts on this road and any mitigation measures necessary.
	Supports the potential reopening of the railway station in order to provide people with sustainable/alternative travel choices.	Highways England (1172); Railfuture (5830); Individual (4522, 1681)	Support noted.
	Designated area for railway station is most appropriate on technical grounds due to straight track and good road access.	Railfuture (5830); Individual (5302)	Comments noted.
	Pleased with safeguarding of land for railway station but unclear over implications for motorway services.	Individual (5211)	Further work is about to be commissioned by the Devon Metro Group with regards to infrastructure, availability of rolling stock and timetabling of potential services. Only once complete will more information on the deliverability, site requirements and potential timescale for reopening be available. The potential for impact on the motorway services will be considered as part of the feasibility work.

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

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

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

	Objects to exclusion of 16.8ha site as a full allocation within the plan / objects to inclusion of 4.8 ha as contingency site only. Minimum of 400 dwellings should be allocated with site area of 21.6ha – new allocation required as contribution to additional housing requirement (criticises annual target). Failure to allocate site ignores findings of Council's Sustainability Appraisal and SHLAA assessment and the promoter's highways and flood reports (provided with representation). Sites CU14 and CU15 should be made contingency sites instead (as both score less). Without making requested changes considers plan to run risk of being found unsound.	Mr Christian & Mr Force c/o Genesis Town Planning (3780)	The Council has proposed to amend the annual housing target in the plan to reflect the final SHMA report. The scoring of the site is not dissimilar to that for CU14 and CU15, however those sites are almost exclusively flood zone 1 so are sequentially preferable. Furthermore, transport modelling undertaken by the highway authority indicates that significant mitigation to the M5 junction would need to be undertaken before any further development takes place. The site is of a scale that is significant enough to affect the cumulative impact on infrastructure and require additional works to the M5 junction which this site alone cannot mitigate. An amendment is proposed to the text to clarify that the site can only come forward if it can be demonstrated that it does not result in a significant adverse impact on the capacity of Junction 28 and also to clarify that it is the completion of the NW Cullompton through route, rather than the Town Centre Relief Road, which sets a limitation on the earliest point that the site could come forward. It is not agreed that CU14 and CU15 are preferable contingency options as they do not have the quantum of development to be effective as a contingency.
	Accompanying appraisal (submitted with rep) states landscape impact is same as other allocated large sites in Cullompton, i.e. negative impact.	Mr Christian & Mr Force c/o Genesis Town Planning (3780)	Submission of landscape impact noted. Generally reaches same scoring conclusions but assumes greater impact with regard to NW Cullompton and less for Exeter Road allocation.
	Previous stage of Local Plan Review indicated site could accommodate 300 dwellings or more – allocation of this size along with extension to NW Cullompton could deliver large portion of houses needed in order to have deliverable distribution strategy.	Waddeton Park Ltd (3815)	As per above, any additional development over that proposed within the adopted Local Plan requires significant transport improvements to the M5 junction. An additional 300 dwellings alone would be insufficient to cover the cost of the additional mitigation measures required.

	If site comes forward then two pitches should be provided for rugby club as part of green infrastructure.	Individual (5211)	Specifying this in the policy is unduly prescriptive. Policy S5 'Public open space' sets the requirements for open space and related provision. There is sufficient flexibility within the policy to allow the development of part of the site for the rugby club should an agreement be obtained between the landowners/ developers and the sports club.
	Land swap should be done between this site and NW Cullompton so rugby club gets four more pitches, with agreement that if ever sold original landowner benefits.	Individual (5211)	Specifying this in the policy is unduly prescriptive. Policy S5 'Public open space' sets the requirements for open space and related provision. There is sufficient flexibility within the policy to allow the development of part of the site for the rugby club should an agreement be obtained between the landowners/ developers and the sports club.
	There is the possibility of relocating the rifle club from the town centre to this location and providing a proper shooting range.	Individual (5211)	There are no plans to relocate the rifle club within the Local Plan Review. Any such proposal for the club's relocation could be covered by development management policies.
CRE1 Wellparks	Welcomes wording within para 3.158 that makes reference to surface water management and SUDs.	Environment Agency (943)	Support noted.
	Considers policy unsound - proposed allocation subsumes grade II listed farm complex and alters setting. Disputes assessment in recent planning application and states Historic Environment Appraisal needs to reassess the likely impact which the development will have on the Conservation Area (and presumably listed building?), if concludes there is harm, provide mitigation and if still harm justify allocation.	Historic England (1170)	Historic Environment Appraisal undertaken. This notes that there is scope for harm, but mitigation was proposed as part of recent planning permission. Reserved matters application includes requirement for Heritage Asset Setting Protection Statement which needed to consider setting, hedges and provide detailed cross sections.

	Policy makes no mention of pedestrian access to the site; add e) 'provision of good pedestrian access to all local and town facilities, including those lying to the south of the A377, especially the bus stops and train station'.	Crediton Town Council (678); Crediton Neighbourhood Plan Steering Group (1734)	Agreed. Amendment to policy proposed, to ensure provision mirrors that within recent planning permission.
	Land at Wellparks is more suitable than Cromwells Meadow.	Individual (5380)	Both sites have previously been accepted by an Inspector as suitable locations for development.
CRE2 **Red Hill Cross**	Welcomes paragraph c), recommends inclusion of a paragraph specifying need for dual use footway from Red Hill Cross to Exhibition Road to the town centre – alternatively amend 3.161 to 'for safety and convenience of pedestrians and cyclists, an all purpose path needs to be constructed from Exhibition Road to the Town Centre'.	Crediton Town Council (678); Sustainable Crediton (2689); Crediton Neighbourhood Plan Steering Group (1734)	Devon County Highways is in discussions with the developers of the Pedlerspool site regarding pedestrian and cycle network improvements. This site could also contribute to such improvements. The policy and supporting text have been amended to make reference to improved access to the town centre and for contributions to be paid for wide network improvements. Specific schemes are not mentioned as this could make the policy unnecessarily inflexible.
	Policy currently unsound - no work in evidence base to assess impact on Shobrooke Park; appraisal needed, if concludes harm set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134.	Historic England (1170)	A Historic Environment Appraisal has been prepared. The appraisal notes the possibility for harm given site can be viewed from Shobrooke Park. However, it notes that mitigation can be achieved via landscaping buffer as was provided in now expired planning permission. The supporting text has been amended accordingly.
	Objection as new houses at this site and Pedlerspool is too much for this area.	Individual (2534)	Site assessment has indicated that the allocation can be accommodated without an unacceptable impact on local infrastructure.

	Objection - landscape setting of Crediton is going to be compromised – Red Hill Cross is visually destructive, and will change character of Crediton.	Individual (366)	This is an existing allocation which is proposed to be rolled forward into the Local Plan Review. The Inspector who oversaw the examination of the AIDPD stated that though there was potential for visual intrusion, he noted that the policy required sensitive design and concluded that there was no evident reason why an acceptable scheme could not be achieved. The same criteria remain in the policy and therefore no change is proposed.
CRE3 Cromwells Meadow	Requests dual use footpath (as part of CRE2) but which could also serve CRE3/alternatively amend 3.162 to state 'An all purpose path for safe access by cyclists and pedestrians needs to be constructed'.	Crediton Town Council (678); Sustainable Crediton (2689); Crediton Neighbourhood Plan Steering Group (1734)	An amendment is proposed to Policy CRE2 and CRE5 regarding improvements to the pedestrian and cycle network.
	Policy currently unsound - no work in evidence base to assess impact on Shobrooke Park; appraisal needed, if concludes harm set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134.	Historic England (1170)	Historic Environment Appraisal has been prepared. The appraisal states that there is less scope for harm than the CRE2 allocation given the backdrop of existing development. Mitigation in the form of landscaping along eastern boundary will address this issue.

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

	Objects to use of Willow Walk as through road – do not wish it to change; existing problem of boy racers on industrial estate, opening up road would create another race track.	Individual (5417)	The highways authority has stated that an acceptable access can be achieved. Planning application will need to be accompanied by Transport Assessment which will comprehensively set out the relevant transport issues on the site and demonstrate that the impact of the proposal is acceptable.
	Objects to use of Cromwells Meadow as through road, road is narrow, with few passing places, and cars parked on blind bends.	Individual (5380)	The highways authority has stated that an acceptable access can be achieved. Planning application will need to be accompanied by Transport Assessment which will comprehensively set out the relevant transport issues on the site and demonstrate that the impact of the proposal is acceptable.
	States SFRA concludes list of flood risk issues which need to be addressed at planning application stage – but requests they be addressed in advance.	Individual (5336)	The purpose of the SFRA is to direct development to the areas of lowest flood risk. 97% of the site is within Flood Zone 1, the area of lowest flood risk. The detailed site-specific Flood Risk Assessment can only be undertaken at planning application stage, which will inform, and be informed by the proposed design solution for the site.
	States Environment Agency has not approved the site.	Individual (5336)	The Environment Agency has not objected to the allocation of this site.
	Building on site would negatively affect our property outlook and value.	Individual (5389)	Loss of view and/or property value are not material planning considerations.
CRE4 Woods Group	Supports policy.	Historic England (1170)	Support noted.
	Supports building on brownfield sites first, such as this site, before greenfield sites.	Individual (366)	Support noted.
CRE5 Pedlerspool	As set out in evidence report, new primary school required in Crediton. Policy should be amended to include provision for this new school.	Devon County Council (626)	Agreed. The school would provide a degree of employment on the site and is proposed to be included instead of the extra care scheme. A modification to the policy is proposed accordingly.

	Extra care units generally provided at minimum size of 50 – there may be a knock on effect in terms of land required to provide an extra facility.	Devon County Council (626)	As per the request above it is no longer proposed to include an extra care scheme within this site.
	Rewrite para 3.171 to state that watercourse is along eastern not southern boundary.	Environment Agency (943)	Agreed. Paragraph re-written to clearly set out that it is the River Creedy which flows to the east of the site, and the requirements which will need to be taken account of within the site-specific Flood Risk Assessment which will accompany the planning application.
	Supports proposal to relocate the rugby club from present site to Pedlerspool, as will provide opportunity to deliver state of the art pitches and facilities to meet the needs of the club and the community now and into the future.	Crediton Rugby Football Club (4341)	Support noted.
	Supports allocation of site, is in single ownership, is fairly unconstrained and can be brought quickly and easily; can deliver a substantial portion of Crediton's growth, has been tested at Examination, and can deliver housing with commercial and leisure uses within easy access of the town centre.	MJ Gleeson c/o Bell Cornwell LLP (3775)	Support noted.

	Supports policy but requests policy be revised to state 200 dwellings is a minimum and that the affordable housing of 28% is a maximum and is subject to viability.	MJ Gleeson c/o Bell Cornwell LLP (3775)	Not agreed. The dwelling numbers within any policy are a target, and different numbers may be achieved and justified following more detailed design work undertaken during the preparation of a planning application. It would be inappropriate with the information currently available to state the dwelling number as a minimum, as the site requires a significant quantity of mitigation planting and landscaping given its proximity to the registered historic park of Creedy, the provision of which could be undermined by the proposed policy change. Viability evidence has also indicated that 28% affordable housing is achievable for sites within the towns. This figure is also a target, and is subject to viability whether it is stated or not, in accordance with paragraph 173 of the NPPF. No specific circumstances are set out to justify why the policy wording should be amended. No change is proposed as a result.

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

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

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

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

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

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

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

	Objects on landscape grounds, encroachment on Creedy Valley, unspoilt area of characteristic Mid Devon landscape; is contrary to principles established by Natural England in implementing European Landscape Convention 2000; conflicts with Mid Devon's Landscape Character Assessment and invalidates all stated landscape-scale policies; contradicts PPS7, PPG15 and Devon Structure Plan landscape policies.	Individual (1673)	The AIDPD inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary. Note that PPS7, PPG15 and the Devon Structure Plan have been revoked and have no weight when determining current planning proposals.
	Objects to allocation as would destroy context of Creedy Park within the landscape, removing open views of aspects of the part; would result in loss of linking open landscape between Creedy and Shobrooke Parks.	Individual (1673)	The AIDPD inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary.
	Objects as development could impact on protected species (white-clawed crayfish, otter, native trees, barn owls, buzzards, bats, winter feeding birds). No Environment Impact Assessment has been carried out, no acknowledgement of features of nature conservation in policy; failure to address species protected by habitat regulations infringes UK and EU law.	Individual (1673)	Assessment of the impact on protected species would be undertaken as part of the determination of the planning application. The site is not subject to any ecological designations. The planning application will be accompanied by habitat surveys. If protected species are identified then mitigation measures will need to be proposed. If the impact on those species is considered unacceptable then planning permission will not be granted.

	Objections as development of site likely to worsen air quality within the town.	Individual (2534)	Any planning application on the site will need to undertake an air quality assessment as part of their submission. Planning permission will be withheld if there is an unacceptable impact on air quality. The opening of the Link Road should have had a beneficial impact on development on the east side of Crediton, and has effectively 'unlocked' this site.
	Objection as developing site ruins pleasant approach to town/visually superb piece of land.	Individual (5294)	The AIDPD inspector considered visual and landscape impact. He concluded that the policy provided sufficient protection to the setting of the wider area, including the sloping ground to the south, given the area is not subject to any protective landscape designation. Furthermore planting required and the associated Green Infrastructure would help integrate the development into the landscape together with appropriate layout. The relevant parts of the policy from the AIDPD are carried forward, and therefore no change is considered necessary.
	Objection as wrong place for housing or industry.	Individual (5294)	The proposed site has previously been considered acceptable for mixed use development. No change proposed. The site does not include any industrial uses. The proposed site now includes housing and a school.
	Objections as insufficient capacity within local and wider road network to accommodate development (cites poor capacity of new road by leisure centre, overused country land surrounding site, dangerous road to Tiverton).	Sandford Parish Council (64); Individual (2534, 1673)	The highways authority state that the Transport Assessment will determine if any junctions will have capacity issues and will put forward mitigation. No mitigation is expected beyond that which is set out within the policy.
	Objection as gypsy pitches should be located elsewhere in more isolated position.	Individual (2534)	The suitability of the site for gypsy pitches was accepted by the previous Inspector. Guidance states gypsy pitches should be within or adjacent to settlements to ensure better access to education and healthcare.

	Objection to loss of agricultural land/need land for food production.	Individual (2534, 1673)	The loss of agricultural land has been considered in the Sustainability Appraisal which accompanies the plan.
	Objection to loss of greenfield sites – use brownfield first.	Individual (2534)	Given the rural nature of Mid Devon there is only a limited supply of brownfield land available and so inevitably greenfield land has to be made available for development. The plan includes a number of brownfield allocations where such land is available and deliverable.
	Objection – land to south of town should be considered – given most movements head to Exeter / or simply consider other unspecified parts of Crediton.	Individual (2534, 5294)	The Council can only allocate land which is available, suitable and deliverable. Land to the south of the QE academy school, and adjoining Exeter Road was assessed by the Council. However, limitations on access meant that the Council's SHLAA panel considered the sites not to be deliverable.
	Objection – no public transport on north side of town, local bus service to be cut soon, better bus services to other parts of town.	Individual (2534)	The highway authority would seek improvements to bus provision as part of the planning permission.
	Objection to site – however it is suitable for sports pitches if necessary.	Individual (5294)	The site is proposed for a mixed use of housing and community facilities. The redevelopment of the site will enable the rugby club to move to new facilities which are better suited to their needs.
CRE6 Sports fields, Exhibition Road	Supports proposal to relocate the rugby club from present site to Pedlerspool, as will provide opportunity to deliver state of the art pitches and facilities to meet the needs of the club and the community now and into the future.	Crediton Rugby Football Club (4341)	Support noted.

	Supports relocation of rugby club if proposal can demonstrate meeting E4 of national playing fields policy (i.e. replacement provision is made of equal or better quality); however, concern that evidence base for open space and play area strategy does not follow Sport England methodology and cannot support 'surplus' comments that would allow sport and recreation land to be lost without adequate replacement. Requests detailed assessment be carried out.	Sport England (169)	The policy reflects national policy and Sport England guidance in requiring replacement provision to be made first. Only once provision is made on CRE5 would this site be able to be redeveloped.
	Exhibition road is flat and ideal for an all purpose path to include cyclists to go to Haywards School, QE and the town centre, possibly via a cut through Crediton dairy.	Sustainable Crediton (2689)	Land is available to provide a link along Exhibition Road through to Pedlerspool. An amendment to the policy has been proposed accordingly. Other land proposed by the representor is unlikely to be deliverable given land ownership constraints.
	There is a risk to relying on delivery of a site seeking to redevelop a playing field which does not have a confirmed replacement location and for which the necessary approvals are not yet in place.	Origin3 (5765)	A replacement location is identified in CRE5 Pedlerspool. The replacement location is supported by the rugby club. A planning application, which includes the replacement provision, is currently being prepared.
	Removing sports facilities and sending them elsewhere is removing green areas from the town – which should be retained in view of poor air quality. This cannot be beneficial to the town – the NPPF is trying to create Healthy Communities.	Mid Devon CPRE (486); Individual (366)	The relocation of the sports facilities will allow the club to improve the quality of its provision through delivery of modern premises. The impact on air quality will be assessed as part of any planning application, though with the opening of the Link Road (a precursor for allowing this site to come forward), is anticipated to have positively impacted on air quality on the east side of Crediton.
	Objects to allocation as would result in loss of sports/community facility in area; queried where rugby club would go.	Individual (5216, 5417)	A replacement location is identified in CRE5 Pedlerspool. The replacement location is supported by the rugby club.

	Objects due to impact on road safety.	Individual (5417)	No justification regarding road safety is provided. The highway authority is satisfied with the proposed allocation. The planning application will be accompanied by a Transport Assessment which will comprehensively assess the transport impacts of developing the site.
	Objects to allocation on flooding/drainage grounds.	Individual (5216)	The site is within Flood Zone 1, the area with least risk of flooding. National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated.
CRE7 Stonewall Lane	Point d) noted and e) welcomed. Requests that the issue of lack of footway on west side of Jockey Hill from Deep Lane running south for 50 yards is addressed as part of the development, so pedestrians not forced to cross at the brow of the hill to access Alexandra Road.	Crediton Town Council (678); Crediton Neighbourhood Plan Steering Group (1734)	The highway authority has noted that land availability and topography may be an issue but such considerations could be taken on board at application stage.
	Strongly supports allocation as will allow Queen Elizabeth's to sell land and invest in substantial sports facilities for the school and community.	Queen Elizabeth's (5386)	Support noted.
	Excellent opportunity to provide for pedestrians, cyclists, school students and wheel chair users. The issue of how to turn into Deep Lane needs to be considered.	Sustainable Crediton (2689)	Noted. These issues can be considered at application stage.

	Contributions must be directly related to developed and fairly and reasonably related in scale and kind. Given potential for cumulative highway improvements resulting from development of Stonewall Lane and Pedlerspool, criterion d should be amended to reflect this.	MJ Gleeson c/o Bell Cornwell LLP (3775)	The CIL regulations and the NPPF state set out the criteria against which planning obligations must be agreed. There is no need to repeat these requirements in local policy. However, the supporting text to CRE7 has been amended to include reference to the need to cumulatively assess impact of the site along with Pedlerspool, in order to mirror the provision set out in CRE5.
	Plan indicates road at Stonewall Lane can't be widened but it could be upgraded to help traffic flows.	Sandford Parish Council (64)	Policy requires realignment of Stonewall Lane through the site to increase the width. Further to the east where the road cannot be widened it is proposed to be upgraded through the inclusion of passing places.
CRE8 **Barn Park**	Footpath improvements are needed between Barnfield and Landscore (Tinpot Lane) to enable a good pedestrian route from the development to the Western Road campus / improved pedestrian access is needed between QE, Barnfield and QE Western Road.	Crediton Town Council (678); Crediton Neighbourhood Planning Steering Group (1734); Sustainable Crediton (2689)	Can be looked at as part of a package of improvements at design stage.
CRE9 **Alexandra Close**	Concerned about location of access, need for adequate visibility.	Individual (5344)	The highway authority has stated that an adequate access is achievable.
	Concern about capacity of foul and surface water drainage to accommodate flows from development.	Individual (5344)	This will be assessed at planning application stage. The development will need to fund an assessment of capacity and improvement works if required. Any development will have to comply with Policy DM1 which sets provisions regarding drainage and SUDs.
	Concern about how many and what type of dwellings to be built, quality, when commenced, and effect on adjoining property values.	Individual (5344)	The allocation is for 15 dwellings. The type, quality and design of these will be determined at application stage. Effect on property value is not a material planning consideration.

CRE10 Land south of A377	Policy would be sounder if it referred to the need to ensure that ground and floor levels are set at sufficiently high enough level to cater for flood risk from the River Yeo.	Environment Agency (943)	Noted. Amendment to supporting text referencing latest flood data and implications for redevelopment has been agreed with the Environment Agency and inserted into the text.
	Policy should also refer to the land south of the Tesco store on Joseph Locke Way which also had outline planning permission.	Crediton Town Council (678)	This site was not put forward as part of our call for sites to be considered for development. However, it is within the settlement limit and therefore could still come forward for commercial development in future, subject to meeting other standard policy considerations.
	Considers policy unsound - proposed allocation subsumes grade II listed farm complex and alters setting. Historic Environment Appraisal needed to assess the likely impact which the development will have on the listed buildings at Wellparks and Downe House Park and Garden. If concludes there is harm, provide mitigation and if still harm justify allocation as per NPPF paragraphs 133 and 134.	Historic England (1170)	The Council has undertaken a Historic Environment Appraisal (HEA) to examine the potential for harm to arise as a result of development allocations. The site is on the opposite side of the road from the Wellparks farm complex, but could be competitive with it and the setting of the Downes Estate. Accordingly an amendment to the policy is proposed to require appropriate landscaping and sensitive design and materials given its proximity to local heritage assets.

	Supports the principle of the allocation but objects to settlement limit as should be extended to fully cover the land within planning permission (ref 09/00244/MOUT); land is unquestionably suitable for a development allocation given planning history, established adjoining uses and accessible location.	Tesco Stores Limited C/O Burnett Planning (4323)	Area immediately to the east of CRE10 allocation was within the original 06/02670 and 09/00244 applications, however no development was proposed upon it as it formed part of the landscape buffer screening part of the site from views from the A377. The area to the south east contains the swales which are part of the sustainable urban drainage to address flood risk, and are not appropriate for development. The small area to the south of the allocation up to the edge of the swale is partly covered by a recent consent sought by Mole Avon. This is the only amendment to the settlement limit considered appropriate. Nevertheless the Environment Agency have advised that following updated modelling on the flows of the Rivers Yeo and Creedy there is increased flood risk to parts of the site covered by previous outline consents. Amendments to the supporting text are proposed alongside the change in to the settlement limit setting out the impact of the latest flood modelling and the subsequent scope for development.
	Policy should refer to mixed use development including commercial and residential uses, given wider site has accommodated mixed uses and is consistent with strategy for Crediton to improve access to housing within the town, expand employment opportunities and quantity and quality of retail (plus noting environmental constraints which limit opportunities for housing elsewhere).	Tesco Stores Limited C/O Burnett Planning (4323)	Area requested for inclusion is entirely within Flood Zone 2, and is partly within Flood Zone 3. Residential development is classed as 'most vulnerable' and should be directed towards areas of lowest flood risk. Furthermore, locating residential development within an area of predominantly commercial uses raises concerns about the quality of the environment being created for future residents.
	Reference to commercial development should include flexibility to accommodate full range of commercial uses as set out elsewhere at paragraph 2.12.	Tesco Stores Limited C/O Burnett Planning (4323)	The policy already refers to 'other suitable commercial uses'. No change is required.

CRE11 Crediton infrastructure	The policy would be more effective if 'provision of works to reduce flood risk' were included in the list.	Environment Agency (943)	Agreed. Amendment proposed.
	In support of community infrastructure suggests amending i) to 'community and activity facilities, including provision for children/youth and elderly people through a new [unified] cultural hub.	Crediton Town Council (678); Crediton Neighbourhood Planning Steering Group (1734); Crediton Town Team (5821); Individual (5394)	This would be covered by the scope of the term 'community facilities'. No change to the policy necessary.
	Under a) should be 'enhanced pedestrian and cycle facilities to serve developments and enable journeys to school and Exeter'.	Sustainable Crediton (2689)	Not agreed. Request adds unnecessary detail into policy.
	Policy mentions infrastructure, including 'potential highway improvements', which needs to be more specific and further work undertaken to the transport evidence base in order to be able to provide more detailed requirements in line with Circular 02/13, paragraph 18.	Highways England (1172)	Specific highway improvements will be derived from the Transport Assessments undertaken when preparing the planning applications on allocations. Furthermore development allocations in Crediton are unlikely to impact on the Strategic Road Network given the distance between the town and the nearest part of the network, and the relatively low level of development proposed in Crediton.
	Policy should include new primary school requirement – the need for which is set out in the DCC Community Infrastructure Report.	Devon County Council (626)	This is a generic policy which sets out the overarching infrastructure requirements for each town. The specific requirement for a new school has been added to Policy CRE5 and it is unnecessary to stipulate it here.
	Requests completion of sport and recreation evidence base and devise strategy for delivery of sport and recreation land and buildings; amend policy accordingly.	Sport England (169)	There is no specific requirement within national policy to follow sport England guidance, which is therefore merely advisory. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making.

	Concerned about infrastructure required to support housing and employment provisions of plan. Includes roads, public transport, sewerage and water supply and schools. CIL and deepening budget cuts means not enough money for infrastructure – coherent strategy required.	Sandford Parish Council (64)	Infrastructure requirements have been considered as part of the allocation process. S106 or CIL is likely to make significant contributions towards infrastructure; however some money will need to be sought from external funding sources.
	Concern about capacity of schools to accommodate housing growth.	Individual (5417)	Devon County Council has undertaken an assessment of school capacity taking account of the proposed growth of the town. Contributions from development will need to be sought. A new primary school is proposed to be included on the Pedlerspool allocation.

Non-allocated town sites

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
OTIV2 Hartnoll Farm	Supports exclusion on basis of loss of grade 1 agricultural land.	Halberton Parish Council (58); Individual (2480, 2283, 4022, 2314, 4165, 3379, 4059, 2575, 3954, 2694, 4443)	Support noted.
	Supports exclusion as concerned about impact of additional traffic (over and above that anticipated from EUE); concern route through Halberton likely the preferred option for many driving to train station.	Halberton Parish Council (58); Individual (5252, 2283, 4022, 2314, 4165, 3379, 4059, 3954, 2694, 870)	Support noted.
	Supports exclusion of site due to negative impact on canal - is crucial to preserving setting of the historic Grand Western Canal an amenity which acts as green lung and recreational space for Tiverton EUE/ construction would destroy character on which country park relies to serve purpose; would destroy rural views from tow path; canal also county wildlife site and Local Nature Reserve; concern that allotments/tennis courts/car parks are not natural green buffers, not the view expected from canal.	Halberton Parish Council (58); Grand Western Canal Joint Advisory Committee (194); Individual (5247, 4022, 2314, 3379, 3954, 2694, 4443)	Support noted.
	Supports exclusion of site as preserves distinct separate identities of Tiverton and Halberton and rural space between/site is outside settlement limits of both/loss of green area of separation between settlements.	Halberton Parish Council (58); Grand Western Canal Joint Advisory Committee (194); Individual (5247, 2480, 5252, 2283, 4022, 2314, 4165, 3379, 2694, 4443)	Support noted.
	Supports exclusion of site/decision not to extend boundary further east (no reasons given).	Tiverton Civic Society (5648)	Support noted.

	Supports exclusion of site and requests references to further development East of EUE (at paragraph 3.9) be removed.	Blundell's School (4240)	Support noted.
	Supports exclusion of Hartnoll Farm as Manley Lane, the furthest extent of Tiverton EUE is historic boundary in landscape of Tiverton (town council and previously borough) and rural parish of Halberton – division has long history and should be respected.	Individual (5247, 4022)	Support noted.
	Supports exclusion due to specific concerns about additional traffic impact in Halberton, which has little scope for road widening or re-routing, road surface is being currently destoyed (high repair costs and potential liabilities).	Individual (2283)	Support noted.
	Supports exclusion due to pollution – air quality and noise.	Individual (2283, 2575)	Support noted.
	Supports exclusion as traffic will potentially cause structural damage to houses on high street – represents a practical obstacle which should baulk any further development.	Individual (2283)	Support noted.
	Supports exclusion of site due to lack of capacity of local public services.	Individual (2283)	Support noted.
	Supports exclusion of site due to unsustainable loading on to existing utilities, including draingage and sewerage, electric, telephone facilities and other infrastructure.	Individual (2283, 4059)	Support noted.
	Supports exclusion of site as would inflict years of disruption and travel chaos on local residents.	Individual (2283)	Support noted.
	Supports exclusion as would have negative impact on tourism (including companies which make use of the canal).	Individual (2283, 4165, 3379, 3954, 4443)	Support noted.

	Supports exclusion of site as the pets of new residents could affect day to day cleanliness of towpath (dogs) and affect birdlife (cats).	Individual (2283)	Support noted.
	Supports exclusion of the site as development would increase risk of flooding (could impact on flooding Halberton by mill stream)/doubts sufficiency of EUE attenuation ponds and concerned given previous breaching of canal.	Individual (2283, 4022)	Support noted.
	Supports exclusion of site as would negatively impact Tiverton town centre, being further away from residents / concerns over car use and sustainability from distance to town centre services.	Individual (4022, 2314)	Support noted.
	Supports exclusion as would negatively impact on SSSI, potentially through surface water run off.	Individual (2314, 4615, 3379, 4059, 3954, 2694)	Support noted.
	Supports exclusion as site is visible from south and west and development would have an adverse visual impact on the character and appearance of the area.	Individual (4615, 3379, 3954, 2694)	Support noted.
	Supports exclusion as site would require additional feeder road which would be prohibitively expensive / feeder road would negatively impact on residents of Gornhay Orchard.	Individual (3379, 3954)	Support noted.
	Supports exclusion – brownfield sites should be considered first/bring unoccupied or derelict buildings back into use.	Individual (2575)	Support noted.
	Supports exclusion as development of the site would result in loss of local biodiversity.	Individual (2575)	Support noted.

	Supports exclusion – there are better sites available such as north of Gornhay Cross which is closer to the town centre, away from Knightshayes and not in flood plain.	Individual (3954)	Support noted.
	Objects to exclusion – Council should abandon plan and put forward revision based on Option 1 from consultation of January 2014. The would include allocation of Hartnoll Farm, plus either contingency and additional village sites (Waddeton rep) or Exeter Hill (Dial Holdings rep).	Waddeton Park Ltd (3815); Dial Holdings Ltd c/o PCL Planning (2315)	The Council has carefully considered all the options put forward in the January 2014 Local Plan Review consultation and has determined that the most sustainable option for development is to concentrate the majority of development at Cullompton.
	Objects to exclusion – site could provide substantial proportion of Tiverton and district's housing need. New junction designed to accommodate up to 2000 dwellings.	Waddeton Park Ltd (3815)	Sufficient land has been allocated elsewhere in the District to meet the housing needs of Mid Devon. While it may be possible for the proposed grade separated junction onto the A361 to accommodate up to 2000 dwellings the full allocation of this site would take the number of new dwellings on Tiverton Eastern Urban Extension and Hartnoll Farm (if allocated) would far exceed this limit.
	Objects to exclusion – no ecological, archaeological, surface water, geotechnical and transport constraints to developments (providing junction is in place); site is in one ownership.	Waddeton Park Ltd (3815)	There are transport constraints on the development - see above. The canal is a heritage asset which has a setting that would require protection, whilst the site lies in an area of archaeological potential for prehistoric activity and would require archaeological investigation. Habitat surveys have also indicated that the site comprises a range of habitat types, including hedgerows which are of the greatest value as they are mature, well connected and species-rich. Majority of the site is also Grade 1 agricultural land, the loss of which cannot be mitigated.

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

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

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

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

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

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

	Transport note supplied – concludes that transport impacts are not likely to be significant in terms of net change in traffic on the network or network capacity. Location of site also offers excellent opportunities for trip savings through sustainable travel opportunities such as walking, cycling and public transport, or linked trips with the town centre.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	Comments noted.
	Flood risk statement supplied – concludes that Council's Strategic Flood Risk Assessment takes no account of recent flood defences on River Lowman and overstates flood risk. Updated flood and hydraulic model indicates a 1 in 100 year flood risk (less than previous model). By applying a sequential approach to redevelopment of the site, it can safely be redeveloped by siting new buildings outside Flood Zone 3 whilst preserving current flood storage function on-site.	Lowman Manufacturing Company Ltd c/o Heynes Planning (4564)	The EA disagree with the estimate of flood flows on the River Lowman, which they consider to be too 'idealistic'. As a result they do not accept that only a small proportion of the site is Flood Zone 3. The EA's map indicates the whole of the site is within the zone 3, the area of greatest flood risk, the sequentially least preferable area for development. The SFRA indicates that the site may well lie within the functional floodplain, where 'more vulnerable' (e.g. hotels) and 'less vulnerable' (commercial development) is not permitted.
OTIVNEW Land north of Gornhay Cross	There are areas better suited to development, i.e. north of Gornhay Cross, which is closer to Tiverton, has better transport links, and is close to A361. Is not near Knightshayes and not in flood plain.	Individual (3954)	This land has been definitively confirmed as unavailable for development.
OTIVNEW Land at Seven Crosses Hill	Site put forward of 7.69ha; provides logical sustainable expansion of Tiverton, in light of uncertainty with Tiverton Eastern Urban Extension masterplanning. Site enclosed by established boundary planting, with scope to reinforce boundary trees/hedges to maintain 'soft' green edge to this part of town. No viability issues, no significant on or off-site abnormal development costs, and can contribute to land supply.	XL Planning & Design Ltd (5098)	Appraisal of the site notes that it is unsuitable and likely undeliverable given there are a number of constraints such as very steep topography, archaeological potential, landscape impacts and difficulty gaining highways access.

OCU2 **Growen Farm**	Supports the enlarged NW Cullompton site area incorporating part of Growen Farm but objects to the current site configuration. The current configuration is sub-optimal and unlikely to deliver policy requirements. The current allocation includes: land that is not available, land within floodplain, areas that are too steep for residential development, and land that is required for other uses (such as school development).	Growen Estates c/o Rocke Associates (5748)	The land identified is a broad allocation. The policies recognise that there are constraints associated with the allocation in certain areas and identifies within the policies the issues of flood plains, educational and community needs, Policies CU3 and CU4 specifically. Comprehensive masterplanning is required by CU1 and will set out in greater detail the proposed development of the site. One field in the northern part of the site has been confirmed as only available for Green Infrastructure, not development, and a modification is proposed to the proposals map to show this.
	Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. Need to allocate more land as housing requirement in plan is a minimum, and likely to increase as a result of new SHMA and need to boost significantly additional housing.	Growen Estates c/o Rocke Associates Ltd (5748)	The housing requirement in the Local Plan Review has been updated to reflect the latest SHMA figures. The sites allocated in the Proposed Submission Local Plan are considered to be preferable than developing the whole area of land at Growen Farm given the landscape impact.
	Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. The site is within 400m of the proposed local centre, which is not the case for other land in the allocation. Site maximises non-car trips. Development in south also closest to town centre, than north, development on land to south could therefore maximise sustainable modes of transport reducing congestion in town centre.	Growen Estates c/o Rocke Associates Ltd (5748)	The Council's Landscape and Visual Appraisal of the strategic site options (2014) indicated that the most easterly part of Growen Farm has a particularly sensitive character and was least suitable for development. It has accordingly been designated as green infrastructure. The field to the west was considered more robustly separated from the landscape to the north and west by strong hedgerows and was more closely related to land to the south which was previously allocated, and was considered a more logical extension to the allocation.

	Supports inclusion of Growen Farm within the NW Cullompton site but objects to partial allocation. Full site has minimal visual impact, unlike revised allocation which proposed development on rising land. The plan fails to afford priority to development of land that is of gentle topography with minimal visual impact over that which is more sensitive owing to its slope and prominence. Land is level and well-drained – no physical constraints to development. More appropriate strategy would be to retain Green Infrastructure (GI) in central location and locate development on less sloping sites such as Growen Farm. Site would be accessible to GI as proposed in adopted plan and with community benefits. GI as proposed would preclude local centre in most optimal/viable location.	Growen Estates c/o Rocke Associates (5748)	Topographical considerations were taken into account in the allocation of the land. However the land allocated for the most part is adjacent to the existing settlement and the decision as to which areas were most appropriate to be allocated as Green Infrastructure (GI) was informed by the findings of the Council's Landscape and Visual Appraisal (2014). Whilst level, well-drained land can be equally ideal for sports facilities as it is development land, such as football or rugby pitches. The land identified for the local centre in the recently adopted masterplan was on previously allocated as GI and accordingly a change to the proposals map is proposed to set this out.
OCU16 Cullompton Rugby Club	Supports exclusion – site required for rugby club which is well used by the community, and does not wish to see it lost for sports use, which would reduce opportunities for a successful/expanding club.	Dramatic Improvement (5235); Individual (5232, 5248, 5246, 5250)	Support noted.

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

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

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

Village allocations

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

Quarry), Bampton	Further development must not exacerbate surface water run-off; inclusion of SUDs and sewage improvements.	Individual (2075)	National planning policy requires that development should not increase flooding elsewhere, including setting out that there is no increase in the volume of surface water or the rate of surface water run-off. The scheme which has consent includes a Sustainable Urban Drainage system. Any revision to the proposal would need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Bampton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.
	Viability of employment development uncertain – Bampton as a place for employment as tested by market and planning system is poor.	Harcourt Kerr (1090)	The existing employment units on the site are all occupied, whilst the units remaining to be built have permission. Permission has recently been granted for variation of conditions which demonstrates the commercial interest in the site. Tenants are lined up for all the units yet to be built.
BA3 Ashleigh Park, Bampton	Development must not exacerbate surface water flooding.	Individual (2075)	National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Bampton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.

BO1 **Land adjacent Hollywell,** **Bow**	Site allocation not supported, as considers that site unlikely to be developed for some time.	Bow Parish Council (47)	The landowner's submission indicated that the site is immediately available for development. Understand that the parish council's concern about deliverability of the site is founded on the likelihood that the landowner would not wish to see the property demolished to achieve the access. Therefore policy wording amended following discussions with Devon County Council to state alternative access options will be considered providing they are to the satisfaction of the highway authority.
BO2 **West of Godfreys Gardens, Bow**	Supports allocation.	Bow Parish Council (47)	Support noted.
BR1 **Hele Road,** **Bradninch**	Access is on dangerous bend/poor visibility and access is shared which could reduce capacity; concern about volume of traffic along Hele Road and use of dated traffic data.	Bradninch Town Council (86); Individual (5256, 5840)	The highway authority has confirmed that a suitable access can be achieved to the north of the site.
	No need for further housing in Bradninch, given recent affordable housing development.	Bradninch Town Council (86); Individual (5256)	The plan sets out to meet the district's housing need across the period 2013-33. A central part of the strategy involves the provision of a limited number of small development allocations in villages which have availability of essential services/facilities.
	Site unlikely to be deliverable given sloping/wet nature of land, third party land ownership, avoidance of main sewer and low number of units proposed.	Individual (5213)	The site has been assessed by a panel of housing industry experts (the SHLAA panel) who have confirmed that they believe the site to be deliverable.
	Concern about parking, which is at a premium locally.	Individual (5840)	Comments noted. Any new development will need to meet the minimum standards for parking provision as set out in Policy DM5 'Parking'.

	This is a site designated by the Town Council in the plan for a car park.	Individual (559)	A number of possible locations for car parks (including this site) were included as options during the preparation of the Allocations and Infrastructure DPD in 2007. However, it was noted that these would only be included in the final version if it was clear they could be implemented. None were eventually allocated for these reasons. The Parish Plan (having been prepared in 2010) erroneously states that these sites were allocated as car parks in the adopted plan.
	Bus stop may need to be re-sited, though options for doing so are problematic.	Individual (5840)	Options for the relocation of the bus stop will be considered at the planning application stage.
CH1 **Barton, Chawleigh**	Proposed allocation has potential to harm setting of Grade 1 church and conservation area; historic appraisal needed to reassess impact, if harm concluded set out mitigation, if harm still present justify allocation.	Historic England (1170)	A Historic Environment Appraisal has been prepared which notes the possibility for harm given that the development area is potentially in the line of sight from the conservation area and the Grade 1 St James church. However, it states that mitigation can be achieved by high quality design together with a landscape buffer on the east side of the site. An amendment is proposed to include a design solution which respects the setting of the conservation area and listed buildings.
CB1 **Land off Church Lane,** **Cheriton Bishop**	Supports proposals but requests reduction in area and inclusion of landscaping along northern boundary.	Cheriton Bishop Parish Council (42)	Agreed. Minor modification proposed to reduce the allocation from 30 to 20 dwellings and on a plot of 1.4ha applying a boundary which more closely aligns with the existing pattern of built development. Policy also now includes provision of landscape buffer along the northern boundary to protect the privacy of adjoining residents given topography of site. This modification is not considered to make any changes to the SA score based on the framework provided within the SA however it is considered beneficial for the reasons above.

	Removal of hedge along frontage for footpath provision/road widening unacceptable on traffic/environmental grounds; footpath should instead be provided on inside of hedge.	Cheriton Bishop Parish Council (42); Individual (4489, 4672, 4316)	Highway authority has confirmed that widening of the road is essential for two vehicles to pass. The supporting text has been amended to state that a design solution which provides the footpath on the inside of replacement planting will be looked upon favourably at planning application stage.
	Requests proposal takes account of permitted affordable housing in village, including those within Teignbridge District Council jurisdiction.	Cheriton Bishop Parish Council (42); Individual (5298, 5320, 5330, 4361, 5661, 4672, 4252, 4210, 5781, 4634, 4083, 4296, 4220)	Of the villages listed in proposed policy S13, Cheriton Bishop has had the lowest level of completions since 2006 (9, the highest being 97). Even with the inclusion of the committed scheme in Teignbridge, for 18 dwellings, and the figures for Dartmoor area (2 complete, 1 permitted), the total quantum of development is still in keeping with the level that has taken place and is proposed throughout the other designated villages.
	Supports proposals, seems preferable to others given integration with existing built form and central village location.	Individual (4489)	Support noted.
	Approves of affordable housing in village but not on this site.	Individual (5661, 4168)	Comment noted.

	Objects as development would result in increased traffic along Church Lane/concern about road width (including construction traffic); there are existing issues of road safety (including for pedestrians) and parking problems (which will be exacerbated by Government limitations on parking provision).	Individual (5269, 4163, 5359, 4122, 5320, 5330, 4326, 4361, 5661, 4499, 4672, 4252, 4168, 4167, 4630, 5781, 4634, 4083, 5356, 4220)	The highway authority states that the development will significantly increase traffic along Church Lane and the widening of the road is essential to cater for this increase. A transport assessment will determine what mitigation, if any, will be needed to its junction with the main road in terms of capacity. There is only one accident recorded as "slight" on the road between Glebelands and junction with Church Lane, according to the reported personal injury accident records, which is not considered to be of material consideration of traffic on Church lane. Any other safety concerns can be addressed through section 106 agreements should they be identified agreed and considered necessary. The increase in traffic and the accident record are not considered to be of such a level as to warrant a recommendation that the allocation be removed from the plan. The development will need to provide a minimum level of parking provision in accordance with Policy DM5 'Parking'. Mid Devon now uses minimum parking standards, rather than the previous maximum standards in place under the pre-NPPF planning system. The developer will be able to provide more spaces than the policy if desired.
	Objects as unacceptable impact on privacy of neighbouring dwellings/overlooking/loss of light; plan does not show all adjoining properties giving false impression of impact.	Individual (5269, 4163, 5359, 4122, 5320, 4326, 4361, 4168, 4630, 5781, 4634)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy. However, a landscape buffer is now to be provided along the northern boundary given the difference in topography. The base map has also been updated to show the two new properties now constructed immediately to the north of the site.

	Objects due to loss of view.	Individual (4122, 4361)	Loss of view is not a material consideration in planning.
	Objects as land is steeply, not gently sloping.	Individual (4163, 5320, 5330, 4361, 4499, 4630, 5781, 4634, 4083)	There are variations in the steepness of the slope across different parts of the site, but these are not considered to be prohibitive to delivery.
	Objects as steep land likely to be prohibitively expensive to develop.	Individual (4252)	A panel of housing industry experts (the SHLAA panel) has stated that they believe the site to be financially viable and therefore deliverable.
	Objects to scale of development/questioned density of site, and would result in unacceptable impact on character of village.	Individual (4163, 5359, 5320, 4326, 4361, 5661, 4672, 4167, 4630, 4210, 4316, 5781, 4634, 4083, 4296, 4220)	The site is located between modern housing on its northern and southern boundaries, and no impact is considered likely on the conservation area further to the north. However, to ensure the site fits in with the existing pattern of built development the site size has been reduced and the number of dwellings dropped accordingly.
	Objects as most homes will be large/executive and unaffordable for local residents.	Individual (4163, 5298, 5320, 4168, 4630, 4210, 4296)	The size and mix of dwelling types will be determined at planning application stage. The policy requires 30% of the dwellings to be affordable housing.
	Objects as no need for further housing in village.	Individual (5359, 4326, 4167)	The plan sets out to meet the district's objectively assessed housing need across the period 2013-33. A central part of the strategy involves the provision of a limited number of small development allocations in villages which have the availability of essential services/facilities.
	Objects as no local facilities for young people, such as cinemas/swimming pools; lack of associated investment in facilities.	Individual (5359, 4326, 5661, 4168)	Cheriton Bishop is a village which has the minimum level of essential services/facilities set out in policy S13. As a result it is a suitable location for a small amount of development. New development can assist the viability of those services/facilities currently within the village.

	Objects as no consideration for impact on schools, doctors.	Individual (5320, 5781)	Assessment of school capacity forms part of the evidence base. Devon County Council report confirmed that both the village primary school and the secondary school, QE Academy in Crediton, have capacity to accommodate the additional pupils arising from development. Data provided by NHS England indicates there is patient capacity at the GP surgery in Cheriton Bishop.
	Objects as waste water and sewerage would not be able to cope with additional demand.	Individual (5781)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.
	Objects as local economy not big enough to justify development/forces village to become a satellite of Exeter.	Individual (4361, 4168, 5781)	Objection noted. Cheriton Bishop is a village which has the minimum level of essential services/facilities set out in policy S13. As a result it is a suitable location for a limited level of development meeting local needs.
	Objects to loss of countryside/agricultural land.	Individual (5298, 5359, 4326, 4499, 4672, 4630, 4634, 4083)	Objection noted. Site is on grade 3 agricultural land which is good/moderate, the loss of which has been considered in the decision to allocate the site balancing the loss against other factors (see Sustainability Appraisal for site by site scoring).

	Objects due to impact on landscape in area of outstanding natural beauty; unacceptable visual impact.	Individual (4499, 4672, 4083)	The site is not in an area designated for landscape beauty. The site is however on the fringes of Dartmoor National Park, but sits between two areas of modern housing. The site sits slightly lower in the landform than the housing to the south and offers little/no views of the national park. It is considered that there will not be an unacceptable impact on the park as a result. Dartmoor National Park Authority has not objected to the proposed allocation. Further design considerations can be taken into account at planning application stage.
	Objects as linking the two parts of the village will blur the distinctions between the very different characters.	Individual (4630, 4634)	The site is situated between two areas of modern housing, with the older part of the village beginning further to the north. Furthermore, the results of the Historic Environment Appraisal state that there are no anticipated impacts on heritage as the listed Old Rectory and the Conservation Area are located some distance to the north.
	Objects due to impact on flooding; plan only mentions one adjoining watercourse when there are two.	Individual (4499, 4630, 5781, 4634)	The Council's Strategic Flood Risk Assessment mapping indicates the presence of only one unnamed watercourse flowing along the south east of the site. However, it does note that surface water presents a risk to site on the northern and southern boundaries. National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated.
	Objects as no safe cycling routes to larger settlements.	Individual (5359, 4326)	No comment.

	Objects as permission has previously been turned down on this location.	Individual (5359, 4326)	The new Local Plan Review sets the development strategy and policy framework within which future applications will be determined. The Local Plan Review indicates that the site is suitable for development. Furthermore, each planning application is considered on its own merit.
	Objects as suitable sites nearer to Exeter/Okehampton should be considered.	Individual (5359, 4326)	The site will contribute towards meeting the housing needs of Mid Devon, rather than other districts.
	Objection as would negatively impact on adjoining property prices.	Individual (4252)	Property value is a not a material planning consideration.
	Properties not selling in village indicating no demand.	Individual (4083)	The plan aims to meet the housing needs identified in SHMA Final Report. Some of this need will be for housing in rural areas. Development of the site, which will contribute just under 0.5% towards the overall target, will help to meet that need.
CF1 Barnshill Close, Cheriton Fitzpaine	Support allocation given site falls within context of existing built development and limited visual impact.	Rosebourne Homes c/o WYG (1594); Individual (4614, 4035)	Support noted.
	Supports allocation given close proximity of services including school, bus stops, shop within walking distance.	Rosebourne Homes c/o WYG (1594)	Support noted.
	Supports Local Plan proposals for the village.	Individual (4273)	Support noted.
	Supports small amount of affordable housing, with off-site contribution remaining in village.	Individual (4305, 4306)	Support noted.
	Objects/raises concern over capacity of roads to accommodate additional traffic; negative impact on road safety.	Individual (4305, 4306, 5862, 4204, 4660)	The highways authority state that a statement would be required at application stage and any mitigation measures addressed.

	Objects due negative impact on landscape character.	Individual (4204)	The site is not located within an area designated for landscape value. It sits between existing development to the west and east and can be accommodated within the built pattern of development without adversely affecting the landscape.
	Objects as infilling will ruin character of historic linear settlement.	Individual (4204)	A Historic Environment Appraisal has been prepared which acknowledges that the site forms a significant location in terms of the entry to the more historic core of the village. However, it notes that good design is likely to mean minimal impact to the setting of the listed buildings and conservation area. The application will need to comply with Policy DM1 'High Quality Design' which requires development proposals to make a positive contribution to local character including any heritage or biodiversity assets and the setting of heritage assets.
	Objects as site in elevated position which will overlook/overshadow adjacent properties and/or school.	Individual (4660)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.
	Objects as off-site affordable housing contribution may benefit another location rather than local community.	Individual (4204)	Comments noted, however, following a successful legal challenge against a High Court ruling, government policy now permits off site contributions in rural areas for sites of 6-10 dwellings. The money received will be used to deliver affordable housing in Mid Devon.
	Objects as will affect privacy of adjoining properties.	Individual (4660)	Loss of light, overlooking and privacy will be considered at the design stage when determining the planning application. The application will need to comply with Policy DM12 'Design of housing' and generally applied standards for privacy.

	Objects as will negatively affect house prices of adjoining properties.	Individual (4660)	Property value is not a material consideration in planning.
	Objection/concern about capacity of sewerage/mains water.	Individual (4305, 4660)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.
	Objection about capacity of health service.	Individual (4660)	NHS England and the local Clinical Commissioning Groups are statutory consultees on the Local Plan. Neither has written in to object to the proposed allocation, which is small in scale and unlikely to have a significant impact on patient numbers.
	Objection/concern over low level of public transport provision.	Individual (4305, 4306, 4204, 4660)	Highways authority states that development necessary to support current service.
	Concern that primary school does not have capacity/absence of discussion of impact on secondary places in Crediton.	Individual (4305, 4306, 5862, 4204, 4660)	Assessment of school capacity forms part of the evidence base. Devon County Council confirmed that both the village primary school and the secondary school, QE Academy in Crediton, have capacity to accommodate the additional pupils arising from development.

	Concern over development causing surface water flooding.	Individual (4305, 4306, 4660)	National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. Specific flood mitigation measures will be considered at the planning application stage. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Objection as houses not selling in village, indicates no need for housing.	Individual (4660)	The plan aims to meet the housing needs identified in SHMA Final Report. Development of the site will help to meet that need.
	Objects to new housing in the village (no reasons given).	Individual (4241)	No comment.
	Should follow best practice re energy and ecology sustainability and protection of biodiversity.	Individual (5862)	Improvements to the energy efficiency of buildings and sustainable design are now predominantly addressed through building regulations rather than planning.
CF2 Land adjacent school, Cheriton Fitzpaine	Supports development as extends village in controlled/organic manner, unifies village envelope and is sustainable.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as will help support local facilities and school.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as will provide affordable housing.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as is not at risk of flooding (flood zone 1).	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports allocation as will create minimal visual intrusion in landscape.	Mr Yeandle c/o Trevor J. Spurway (5331)	Support noted.
	Supports small amount of affordable housing, with off-site contribution remaining in village.	Individual (4305, 4306)	Support noted.
	Supports development as will allow young people to remain in village.	Individual (5231, 5311)	Support noted.

	Supports Local Plan proposals for the village.	Individual (4273)	Support noted.
	Objects to inclusion of site and states is less preferable to OCF2 Landboat Farm. Raises concern about scoring between the sites within the Sustainability Appraisal in relation to natural and built environment, flooding, economic growth, community health/wellbeing, infrastructure. States land within the settlement limit should not be taken into account when scoring sites.	Garside Planning Services (3645)	Responses to specific comments are set out below, whilst those in relation to the Sustainability Appraisal scoring (i.e. how most comments in this rep were discussed) are set out in the sustainability appraisal update.
	Objects to inclusion of site and states could impact on potential to expand school in future.	Garside Planning Services (3645)	Devon County Council as education authority has raised no objection regarding the proposed allocation. Further undeveloped land remains on the north and west sides of the school which could be used for future expansion.
	Objects to site and states that potential for landscape and visual impact is greater than OCF2 particularly at western end of the site which would be visible from public highway; development of this site would break the skyline.	Garside Planning Services (3645)	The school site is on moderately higher ground than the objection site. However, within the context of the local landscape, both are relatively contained, with higher ground to north of proposed allocation and to south of objection site, with few opportunities for views in from long distances. The school site is visible from the public highway, but there is existing development along the south side of the road and buildings to the east and the school to the west. These buildings screen much of the site from views and provide a degree of mitigation to any visual impact. Presence of dwellings on south side of highway means that skyline when viewed (from very limited viewpoints to south) is unlikely to be significantly altered.
	No current access to site, construction of which would have negative impact on visual amenity, as opposed to OCF2 which has existing access.	Garside Planning Services (3645)	There is a long site frontage on which to accommodate the appropriate visibility splays in a manner which minimises visual impact. This can be considered at design stage.

	Objects/raises concern over capacity of roads to accommodate additional traffic.	Individual (4305, 4306, 5862, 4204, 4660)	The highway authority states that a statement would be required at application stage and any mitigation measures addressed.
	Objects due to negative impact on landscape character/views.	Individual (4204, 4035)	Within the context of the local landscape, the site is relatively contained, with higher ground to north of proposed allocation and few opportunities for views in from long distances. The school site is visible from the public highway, but there is existing development along the south side of the road and buildings to the east and the school to the west. These buildings screen much of the site from views and provide a degree of mitigation to any visual impact. Presence of dwellings on south side of highway means that skyline when viewed (from very limited viewpoints to south) is unlikely to be significantly altered.
	Objects as infilling will ruin character of historic linear settlement.	Individual (4204)	A Historic Environment Appraisal has been undertaken which states that the site is well away from the main village/conservation area and therefore, there are no heritage assets immediately affected.
	Objects as site would overpower/overlook the school, negatively impacting on school children through pollution, noise, security issues.	Individual (4614, 4035, 4660)	Overlooking, noise and pollution will all be considered at design stage – any proposal will need to comply with the relevant development management policies on these issues.
	Objects due to loss of grade 3 agricultural land.	Individual (4035)	Objection noted. Site is on grade 3 agricultural land which is good/moderate, the loss of which has been considered in the decision to allocate the site balancing the loss against other factors (see Sustainability Appraisal for site by site scoring).

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

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

CL2 **Hunter's Hill, Culmstock**	Support reference to landscape and design and setting of AONB in policy.	Blackdown Hills AONB Partnership (1195)	Support noted.
HA1 **Land adjacent Fisher's Way, Halberton**	Supports allocation given not within conservation area.	Halberton Parish Council (58); Individual (4447)	Support noted.
	Site is less suitable for farming than OHA1, is adjacent recent affordable housing development and has access in place.	Halberton Parish Council (58)	Support noted.
	Site is less preferable to 'The Pethers' which is not within an area of archaeological potential, not at risk of flooding from groundwater or Grand Western Canal, and has better access to road network.	Garside Planning Services (3645)	Not agreed that objection site has better access, as proposed allocation has existing access (objection site does not). The objection site falls within the same zone for the breach of the Grand Western Canal as the proposed allocation and though generally it has the same risk of groundwater flooding, it does encroach into an area at high risk of groundwater flooding. The Devon County Council Archaeology Team has confirmed that the scale and situation of the proposed allocation will not impact on any known heritage assets and state that they would not need to be consulted should an application come forward. This part of the policy is proposed to be deleted. Therefore both sites score equally for impact on built/historic environment. The proposed allocation is also the preferred site of the parish council.
HE1 **Depot, Hemyock**	Supports allocation given within settlement and agrees with assessed impact on AONB.	Blackdown Hills AONB Partnership (1195)	Support noted.
	Family member resident on site, wishes to see it developed, but not in near future.	Individual (4376)	Reps 4376 and 5767 (see below) raise significant issues with the potential deliverability of the site. Given it is within the settlement limit, it is proposed to remove the allocation from the plan, and should it become available it can come forward as a windfall site.

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

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

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

	Objection as likely to cause further flooding from surface water run-off.	Mid Devon CPRE (486); Individual (5699)	National planning policy requires that development should not increase flooding elsewhere. Specifically there should be no increase in the volume of surface water or rate of surface water run-off. The planning application will be accompanied by a Flood Risk Assessment and associated drainage strategy which will set out how flood risk will be mitigated. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Objection as no capacity within sewerage network/would require disruptive improvement works.	Individual (366, 5699)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.
	Objection as public transport is inadequate resultant reliance on private car.	Individual (366, 5699)	Comments noted.
	Objection as insufficient capacity at school and doctors.	Individual (5699)	Assessment of school capacity forms part of the evidence base. Devon County Council report confirmed that both the village primary school and the secondary school, Chulmleigh Community School, have capacity to accommodate the additional pupils arising from development. NHS England, a statutory consultee, has not raised any objection to the allocation.
	Objection as properties should be built in more accessible location, young people would prefer to live closer to a town or city.	Individual (5699)	Comments noted. Morchard Bishop along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development.

	Objection as building houses does not achieve goal of reducing carbon emissions.	Individual (5699)	Achieving sustainable development requires balancing social, economic and environmental factors. The plan aims to meet the housing needs identified in SHMA Final Report. Rising standards in building regulations will set increased energy efficiency targets, whilst the majority of development is focused in the main towns where options for the use of sustainable forms of transport are greater.
	Objection as increased traffic/noise could be detrimental to show quality animals on adjacent land.	Individual (5699)	The Council's Environmental Health section did not raise any initial concerns regarding the impact on air quality through the assessment of the site within the SHLAA process. However, at application stage the proposal will need to comply with Policy DM3 'Transport and air quality' and DM4 'Pollution', which cover noise and air quality and development will not be permitted if there is an unacceptable negative impact arising.
SP1 Former Tiverton Parkway Hotel, Sampford Peverell	Policy should include provision for chain link fence to prevent cricket balls carrying into site.	Halberton and Sampford Peverell Cricket Club (5403)	Fencing and other appropriate landscaping features will be considered at the planning application stage.
	Objection to allocation as insufficient evidence to confirm whether site is viable to deliver a GP surgery on back of small development – considered unsound (not justified).	Taylor Wimpey UK c/o WYG Planning (1708)	The verdict of the SHLAA panel was the site was deliverable. The supporting text acknowledges that viability may well be an important factor and that a reduced affordable housing provision would be considered if justified. No evidence has been provided by the objector to justify their claim. The size of the new surgery is likely to be modest, in that it only needs to replace the existing small surgery currently within the village.

	Objection to allocation – landowners have not implemented previous permissions nor have they brought the site forward for residential development.	Taylor Wimpey UK c/o WYG Planning (1708)	A focus on existing care provision has resulted in the landowner no longer wishing to proceed with delivering a care home in this location. Residential development would not have had policy support being outside the settlement limit in the adopted plan. Only through a review of the Local Plan is the site able to be proposed for residential development.
	Potential for flooding from groundwater sources a fundamental weakness of allocation.	Taylor Wimpey UK c/o WYG Planning (1708)	The EA's 'Areas Susceptible to Groundwater Flooding' Map breaks the likelihood of groundwater flooding into four categories. This site is in the lowest category having the least probability of groundwater flooding i.e. <25%. It is in the same category as the objector's preferred site. There was an error in the supporting text in paragraph 3.224 which stated that the chance of groundwater emergence was 20-25%, when actually the figure was 0-25%. As a result the text is proposed to be amended.
SA1 Fanny's Lane, Sandford	Supports allocation but considers it possible for site to accommodate more than 8 dwellings without adversely impacting on conservation area or setting of church.	Summerfield Developments (SW) Ltd c/o WYG Planning (3773)	Support noted. The total allocation is for 27 dwellings, of which 19 have now been completed, leaving 8 dwellings proposed on the remaining site area. The Historic Environment Appraisal raises major concerns about Park House; a grade II listed building as it would be surrounded on all sides by housing, with none of its park land remaining. The policy provides mitigation in the form of a buffer strip of planting or open space to protect the setting of the listed Park house and Sandford Conservation Area and through a criterion requiring careful design and landscaping to protect views towards Sandford and the historic core around St Swithun's Church. These constraints act against an increase in the proposed dwelling numbers.

	Quantity of development has implications for traffic and sewerage.	Sustainable Crediton (2689)	Highways authority state that a statement would be required at application stage and any traffic mitigation measures addressed. South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans.
	Historic environment appraisal required to assess impact of development on listed church and conservation area, if concludes harm to set out mitigation, and if harm remains need to justify public benefits.	Historic England (1170)	A Historic Environment Appraisal has been prepared which raises major concerns about Park House; a grade II listed building as it would be surrounded on all sides by housing with none of its park land remaining. However, the policy provides mitigation in the form of a buffer strip of planting or open space to protect the setting of the listed Park House and Sandford Conservation area and through a criterion requiring careful design and landscaping to protect views towards Sandford and the historic core around St Swithun's Church.
SI1 Land at Old Butterleigh Road, Silverton	Supports proposed allocation.	Silverton Parish Council (94); Residents of Hederman Close (4927)	Support noted.
	Any further development should be limited to infill.	Residents of Hederman Close (4927)	Silverton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development. The two sites proposed for Silverton are small scale (some of the smallest of all the village allocations) and one is a redevelopment of existing buildings.

	Plan should set out how the financial contribution for affordable housing will be worked out and that it accords with national guidance.	Pemberton Hutton Developments c/o Jillings Hutton (5786)	There is existing guidance within the Council's adopted "Meeting Housing Needs" SPD. The SPD will be reviewed upon adoption of the Local Plan Review to link it to the latest suite of policies.
	Objection as land and road have flooding issues (potentially associated with springs in vicinity); access must be retained to streams on boundary for maintenance; purchasers may struggle to gain insurance.	Silverton Local History Society (5274); Individual (5297, 5335, 5334, 25, 4005)	A detailed Flood Risk Assessment will need to accompany the planning application. This will assess the flood risk from any a variety of sources, including surface water and groundwater flooding. It will need to demonstrate that the development is safe, flood resistant and set out mitigation measures within a drainage strategy for ensuring there is no increase in the volume or likelihood of flooding arising from the development.
	Objection as access is via narrow road, with lack of pavement; more housing would exacerbate parking problems and reduce road safety.	Silverton Local History Society (5274); Individual (5297, 5335, 5334, 25, 5272, 4005)	The highway authority state that the road would need to be widened with the inclusion of frontage works to provide defensible space for pedestrians. The development will need to comply with Policy DM5 'Parking' in providing sufficient parking spaces in order to provide for the number of cars likely to arise from the development.
	Objection as development would lead to loss of old Devon hedge and/or destroy historically important part of village.	Silverton Local History Society (5274); Individual (5335, 5272)	The results of the Historic Environment Appraisal conclude that there are no anticipated heritage impacts associated with this site.
	Concern that proposed grass verge will be of no benefit, and will be eroded by farm vehicles.	Individual (4005)	The highway authority states that the road widening and frontage works are required to service the development. Farm vehicles should be accommodated within the resultant design.

	Trees within site need to be replaced, for wildlife reasons and they provide screening between adjacent properties.	Individual (5297)	The trees on site are not currently protected, though could be incorporated into the final design. However the impact on biodiversity will considered at the design stage through the submission of a wildlife survey. The development will need to comply with Policy DM12 to that there is no unacceptable impact on the privacy of adjoining properties.
	If site is to be provided then number of properties should be reduced to ensure sufficient on-site parking and turning space for delivery vehicles.	Individual (25)	The proposed dwelling numbers are in line with the density standards applied to all village allocations (i.e. 20-25 per hectare). Parking provision will need to be provided in line with the standards specified in Policy DM5 'Parking'. Turning space will be considered at design stage.
	Wildlife, including badgers make use of the site.	Individual (5297)	The impact on biodiversity will be considered at the design stage through the submission of a wildlife survey. The development will not be permitted if the survey indicates there will be an impact on such species which cannot be mitigated.
	Site has previously been refused planning permission.	Individual (5335, 5334)	The new Local Plan Review sets the development strategy and policy framework within which future applications will be determined. The Local Plan Review indicates that the site is suitable for development, with the policies in the plan setting the framework against which a future planning application on the site will be assessed.

	Concern about capacity of sewage works and associated disruption resulting from improvement works.	Individual (4005)	South West Water has indicated that there is capacity within the period of their current 5 year business plan (until 2020) to accommodate the increased demand on sewage treatment and potable water. Some localised improvements may be required to the sewerage networks/water distribution systems which will be established once they are approached by developers on specific sites. Capacity issues post-2020 will be reviewed in their subsequent business plans. The impact of transport will be considered at planning application stage and mitigation measures put forward.
SI2 The Garage, Silverton	Supports proposed allocation.	Silverton Parish Council (94); Residents of Hederman Close (4927)	Support noted.
	Any further development should be limited to infill.	Residents of Hederman Close (4927)	Silverton, along with other villages defined in Policy S13 provides a level of services/facilities and is therefore suitable for a limited level of development. The two sites proposed for Silverton are small scale (some of the smallest of all the village allocations) and one is a redevelopment of existing buildings.
	Supports allocation as could enhance approach to village if designed to complement adjacent dwellings.	Individual (4005)	Support noted. The policy contains a criterion which requires the design and layout to respect the character of the conservation area.
	Supports allocation of the site as it has good access previously used by lorries associated with previous use.	Individual (4005)	Support noted.
TH1 South of Broadlands,	Supports allocation of site.	Thorverton Parish Council (49); The Church Commissioners c/o Deloitte Real Estate (1517)	Support noted.

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

	Supports policy AL/WI/2 (previous allocation in AIDPD).	Halsall Construction Ltd (5864)	Only part of the previous allocation is retained in the Local Plan Review (i.e. it forms the most southerly part of WI1). However, the previous site was allocated as an exception site, which does not need to be allocated, nor be within the settlement limit, in order to come forward.
	Supports proposals for limited housing development in Willand.	Individual (5257, 4362)	Support noted.
	Objects as considers site to have flooding/drainage issues; requests early consultation with relevant agencies.	Willand Parish Council (44)	The site is within Flood Zone 1, the land with the least probability of flooding. Being in excess of 1 hectare, the planning application will need to be accompanied by a flood risk assessment and drainage strategy. The assessment will set out the impact of the development on flooding, and measures to mitigate that impact. There should be no increase in flooding as a result of the development. Proposals would also need to comply with policy DM1 which sets requirements over SUDs and drainage.
	Objects as considers land at Mid Devon Business Park a more suitable site.	Neal Jillings for Devonshire Homes Ltd (1050)	Land at Mid Devon Business Park is allocated for employment use. Land at the business park is an unsuitable location for housing, being surrounded on three sides by existing and forthcoming employment development. This decision was backed up by the Council's decision to refuse planning permission for a housing scheme on the site from the objector.
	Objects to affordable housing in Willand.	Individual (5258)	There is an objectively assessed need for affordable housing across Mid Devon. Willand, as a settlement with a range of services and facilities is an appropriate location for such development.

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

	Site is on a regular bus route.	Willand Parish Council (44)	Comments noted.
WI2 Willand Industrial Estate	Mid Devon Business Park is allocated for industrial use and should remain allocated as such – objects to any change to put housing on site.	Willand Parish Council (44); Individual (4446)	Support for allocation noted.
	Proposed deletion of remainder of phase 1 commercial is premature, removal of phase 2 is understood, though the site may be used to relocate a nearby business.	Willand Parish Council (44)	Phase 2 and the remaining undeveloped parts of Phase 1 are now proposed to be reinstated and the allocation enlarged accordingly. The Council's original reasons for deletion have been addressed as the remainder of the site is now deliverable, with access to Phase 2 having been secured. The viability of delivering employment units in this location, which was another of the Council's concerns, is addressed by the representor's marketing report which demonstrates demand for a range of employment unit sizes in this location and by the submission of a planning application for approx. 13,000sqm employment covering the entirety of phase 2.
	Objects to deletion of employment land 'phase 2'; the land is available and deliverable with access rights now secured.	Pallex SW Ltd c/o WYG Planning (5769)	Phase 2 and the remaining undeveloped parts of Phase 1 are now proposed to be reinstated and the allocation enlarged accordingly. The Council's original reasons for deletion have been addressed as the remainder of the site is now deliverable, with access to Phase 2 having been secured. The viability of delivering employment units in this location, which was another of the Council's concerns, is addressed by the representor's marketing report which demonstrates demand for a range of employment units sizes in this location and by the submission of a planning application for approx. 13,000sqm employment covering the entirety of phase 2.

	States there is demand for employment uses in this location (marketing report enclosed) and that issues affecting Phase 1 more to do with viability/price paid at height of market, rather than lack of demand.	Pallex SW Ltd c/o WYG Planning (5769)	Comments noted and marketing data supplied supports decision to reinstate allocation.
	Phase 2 to be subject to planning application shortly for relocation of Pallex SW Ltd (circa 50,000 sq ft floorspace) and range of smaller units (less than 10,000sq ft); Ecology Habitat Assessment accompanies representation.	Pallex SW Ltd c/o WYG Planning (5769)	Comments noted and application supports decision to reinstate allocation.
	Viability of employment site is poor, has delivered low output for commercial use with none since 2009.	Harcourt Kerr (1090)	Not agreed. Statement that there is lack of demand or poor viability for employment contrary to Alder King marketing report which accompanies rep from Pallex SW Ltd c/o WYG Planning (5769). Planning application for 13,000 sqm on phase 2 and recent permission for extension of neighbouring industrial estate (Pencarrie units) also indicates that employment development is viable in this location.
	Site not viable for employment development and should be allocated for residential development for up to 97 dwellings as per refused planning application.	Neal Jillings for Devonshire Homes Ltd (1050)	Not agreed. Statement that there is lack of demand or poor viability for employment contrary to Alder King marketing report which accompanies rep from Pallex SW Ltd c/o WYG Planning (5769). Planning application for 13,000 sqm on phase 2 and recent consent for extension of neighbouring industrial estate (Pencarrie units) also indicates that employment development is viable in this location. This is an unsuitable location for housing, being surrounded on three sides by existing and forthcoming employment development. This decision was backed up by the Council's decision to refuse planning permission for a housing scheme on the site from the objector.

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

Village sites (non-allocated)

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
OBA1 Bourchier Close, Bampton (previously AL/BA/2)	Supports exclusion of site given re-classification of Bampton as a village.	Individual (2781, 5308, 2075, 2840)	Support noted.
	Supports exclusion as no need for housing given other recent developments in Bampton/no demand for office space in Bampton/existing commercial space elsewhere in village.	Individual (5562, 2840)	Support noted.
	Supports exclusion of the site as would extend village envelope into open countryside.	Individual (2482, 5840)	Comments noted.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Comments noted.
	Supports exclusion due to traffic impact on local road network, poor access/inadequate visibility, lack of or capacity of public transport, lack of footpaths/streetlights, implications for safety, lack of parking in village centre.	Individual (5308, 5309, 5562, 2075)	Comments noted.
	Supports exclusion as site not supported by local councillors at time of allocation in 2009/10.	Individual (2075)	Comments noted.
	Supports exclusion as will alter historic/popular landscape/is close to historic castle.	Individual (2075)	Comments noted.
	Concerns about flooding/capacity of sewage system, with history of floods noted.	Individual (5308, 5562, 2075)	Comments noted.
	Concerns about capacity of schools/doctors.	Individual (5308, 5309, 5562)	Comments noted.
	Concerns re lack of employment opportunities/leisure facilities for the young.	Individual (5309)	Comments noted.
	Supports exclusion on sustainability due to negative impact on climate change from residents having to drive to 'strategically placed workplaces'.	Individual (2075)	Comments noted.

	Objects to de-allocation of site as application has come forward demonstrating deliverability; site is sustainable, given level of facilities/services in Bampton.	Summerfield Developments Ltd c/o WYG (3773)	The plan proposes 4 allocations within Bampton, more than any other village. Of these two are brownfield redevelopments, whereas Bourchier Close would result in the loss of grade 3 agricultural land. The site is also elevated and visually prominent, and would be more intrusive than other sites proposed to be allocated.
	Objects – housing requirement in plan too low, site should be carried forward into new plan to given Bampton's role and function in the district.	Summerfield Developments Ltd c/o WYG (3773)	The Council is proposing to amend the overall housing need figures to reflect the SHMA Final Report. There is sufficient housing supply within the plan, including an element of flexibility, and no requirement therefore to allocate additional sites.
OBA2 South Molton Road, Bampton	Objects to exclusion of site which is deliverable and sustainable, with good access and can provide local highway improvements/road safety benefits.	Colin Rowland c/o J Anning Land Planning Services (4925)	The plan allocates 4 sites within Bampton, more than any other village defined under S13. Further sites are not required.
	Site is in flood zone 1, in area of least risk of flooding; can be provided with a surface water drainage strategy based on SUDs principle; site can be connected to foul sewer network on B3227.	Colin Rowland c/o J Anning Land Planning Services (4925)	Comments noted.
	Strongly opposed to any building in/around Bampton.	Individual (5261)	Comments noted.
OBA3 Land at Ball Hill, Bampton	Strongly opposed to any building in/around Bampton.	Individual (5261)	Comments noted.
OBA4 School Close, Bampton (previously AL/BA/1)	Supports deletion of allocation but recommends settlement limit be amended to bring it back to existing hedge boundary.	Mr D. Stephenson c/o Jillings Hutton (5845)	An amendment is proposed to include the remaining part of the allocation OBA4 School Close, Bampton (previously Al/BA/1) to be consistent with the approach taken elsewhere in the plan that all permitted but unimplemented existing allocations be rolled forward into the Local Plan Review.

OBO2 East Langford Farm, Bow	Objects to exclusion of site, is preferable to BO1 'Land adj Hollywell'.	Bow Parish Council (47)	Comments noted, however the shape and location of the site represents an unusual and illogical extension to the built environment. The proposed allocations can be much more easily be assimilated within the existing pattern of the built environment.
	Site is suitable for development – is not known to flood, is unlikely to be archaeological interest and landscape impact can be mitigated.	Mr and Mrs G&D Jackman c/o Stephens Scown LLP (979)	Comments noted, however the shape and location of the site represents an unusual and illogical extension to the built environment. The proposed allocations can be much more easily be assimilated within the existing pattern of the built environment.
	Traffic issues can be overcome via use of alternative access off Station Road, along with implementation of traffic calming scheme.	Mr and Mrs G&D Jackman c/o Stephens Scown LLP (979)	The highways authority note that a transport solution may be achievable, but this will not overcome the reasons why other sites have been preferred as set out above.
OBO3 Land adj Jackman Car Park, Bow	Site should be included within settlement limit and infill permitted.	Individual (5254)	Site is not required.
OBO4 South of Iter Cross (Commercial)	Objects to de-allocation of employment site.	Bow Parish Council (47)	This site has been allocated since 2010 and has not come forward for development. Policies on rural employment development are now more permissive, so the site does not need to remain allocated in order to come forward.
OBO5 South West of Junction Road (commercial)	Objects to de-allocation of employment site.	Bow Parish Council (47)	This site has been allocated since 2010 and has not come forward for development. Policies on rural employment development are now more permissive, so the site does not need to remain allocated in order to come forward.
OCB1 Glebe, Cheriton Bishop	Site is better suited to new development than proposed allocation.	Individual (5269, 4672, 4630)	This is used as public open space, the loss of which is not preferable.
	Developing this site would allow opportunity to address issues of road safety associated with main C30 road; site has better access on to road.	Individual (4163, 5320, 4630)	Site has access on to the main road. However, for the reason set out above it is not preferred.

	Developing this site would have less impact on existing residents.	Individual (5320, 4630)	No clear reason why the impact of this site on existing residents is any different from proposed allocation or that those impacts are unacceptable.
OCB3 Land adj Woodleigh Hall, Cheriton Bishop	Site is better suited to new development than proposed allocation.	Individual (5269)	Not agreed. This site is isolated from the main body of the settlement. The proposed allocation can be assimilated within the existing pattern of the built environment.
OCB4 Land east of Hill View	Developing this site would allow opportunity to address issues of road safety associated with main C30 road; site has better access on to road.	Individual (5320, 4163, 5320, 4361, 4499, 4672, 4630)	Site has access on to the main road. Though this option could have been selected (being adjacent to existing development), the proposed allocation is in closer proximity to local facilities, such as the school, and could reduce walking times and reliance on private car.
	Developing this site would have less impact on existing residents.	Individual (5320, 4361 4499, 4630)	No clear reason why the impact of this site on existing residents is any different from proposed allocation or that those impacts are unacceptable.
	Site is better suited to new development than proposed allocation.	Individual (5320, 5269, 4361, 4499, 4672, 4630)	Not agreed. Please see comments above.
	Site is closer to pub and post office than proposed allocation and a footpath could be provided through the field to Church Lane.	Individual (4361)	Comments noted, however the proposed allocation is nearer the school, and proposed footpath is not in control of that site owner so no guarantee it can be delivered.
OCF1 Glebe, Cheriton Fitzpaine	Supports exclusion of the site/satisfied with Local Plan proposals for the village.	Individual (4273)	Support noted.
OCF2 Landboat Farm,	Supports exclusion of the site/satisfied with Local Plan proposals for the village.	Individual (4273)	Support noted.

Cheriton Fitzpaine	Objects to exclusion of site and states is preferable to CF2 Land adj school. Raises concern about scoring between the sites within the Sustainability Appraisal in relation to natural and built environment, flooding, economic growth, community health/wellbeing, infrastructure. States land within the settlement limit should not be taken into account when scoring sites.	Garside Planning Services (3645)	Responses to specific comments are set out below.
	States that landscape impact has been overstated, with visual impact likely to be less than school site (CF2).	Garside Planning Services (3645)	The school site is on moderately higher ground that the objection site. However, within the context of the local landscape, both are relatively contained, with higher ground to north of proposed allocation and to south of objection site, with few opportunities for views in from long distances. The school site is visible from the public highway, but there is existing development along the south side of the road and buildings to the east and the school to the west. These buildings screen much of the site from views and provide a degree of mitigation to any visual impact. Presence of dwellings on south side of highway means that skyline when viewed (from very limited viewpoints to south) is unlikely to be significantly altered.
	Site could create physical link between adjacent housing.	Garside Planning Services (3645)	These comments are acknowledged and not disputed. It would lead to a considerable length of linear frontage development on the south side of the entrance to the village, whereas the proposed allocation would result in a more balanced design encompassing both sides of the street.
	Questions 'loss of open space' associated with site, with area in question never fulfilling function as is private land; redevelopment could provide accessible public area.	Garside Planning Services (3645)	The land was previously designated as being 'important land for sport and recreation'.

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

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

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

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

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

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

	If sheltered housing instead provided on site MO1 'Greenaway', then 'Tatepath Farm' could be location for cross-subsidised affordable housing allocation.	Mr & Mrs Jeffrey c/o Stephen Hargreaves (5833)	No change is proposed to MO1, so a further allocation is not required.
OMO2 Church Street, Morchard Bishop (Gurneys)	Supports exclusion as would result in increase in traffic on narrow lanes (including construction traffic); access is poor; public transport is limited.	Morchard Bishop Parish Council (89); Mid Devon CPRE (486); Individual (5208, 5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358	Comments noted.
	Supports exclusion as Greenaway site (MO1) is more than sufficient to meet needs/site not required as Greenaway not yet developed.	Morchard Bishop Parish Council (89); Individual (5263, 4117, 5295, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 5597, 5598, 5600, 5592, 5593, 5596, 6063, 4212, 4215, 5586, 5587, 5588, 5589, 5358)	Comments noted.
	Supports exclusion – house sales and lettings regularly come up in the village indicates on-going supply.	Mid Devon CPRE (486)	Comments noted.
	Supports exclusion – development in the rural areas should be as a result of windfalls only, in order to protect agricultural land/countryside.	Mid Devon CPRE (486)	Comments noted.
	25 properties too many.	Morchard Bishop Parish Council (89)	Comments noted.

	Concern over capacity of sewerage and drainage/impact on flooding of development.	Morchard Bishop Parish Council (89); Mid Devon CPRE (486); Individual (5208, 5295, 5263, 4117, 3971, 5642, 5641, 4093, 5604, 5605, 5607, 5608, 5609, 4476, 5603, 4475, 5599, 4101, 4363, 5594, 4105, 5597, 5598, 5600, 5592, 5593, 5595, 5596, 6063, 4215, 4212, 5586, 5587, 5588, 5589, 5358)	Comments noted.
	Development of site would be detrimental to character of village and/or adjoining listed buildings/archaeological interest.	Morchard Bishop Parish Council (89); Mid Devon CPRE (486); Individual (5208, 4106, 4081, 5234, 5263, 4117, 5295, 3971, 4082, 4416, 4459, 5642, 5641, 4093, 5604, 5605, 5606, 5607, 5608, 4474, 4473, 5609, 5602, 4476, 4108, 4111, 4112, 5603, 4460, 4152, 4110, 4481, 4475, 5599, 4105, 5597, 5598, 5600, 4471, 4472, 5592, 5593, 4077, 4074, 5595, 5596, 5601, 6063, 4215, 4212, 4681, 4682, 4075, 5590, 5591, 5586, 5587, 5588, 5589, 5358, 4356)	Comments noted.
	Supports exclusion – development would have a detrimental effect on the public right of way bisecting the site.	Mid Devon CPRE (486)	Comments noted.
	Supports exclusion as site is outside settlement limit which should be used to guide development.	Mid Devon CPRE (486)	Comments noted.

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

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

	Supports exclusion as site is close to floodplains/negative impact on sewerage.	Individual (4280, 4176)	Comments noted.
	Supports exclusion of site as likely to result in negative traffic impact, junction is poor with restricted vision, no pavement.	Individual (4280, 4339, 4329, 4176)	Comments noted.
	Supports exclusion as top part of site only 120m from high voltage power lines.	Individual (4176)	Comments noted.
	Supports exclusion as site is outside settlement limit.	Individual (4176)	Comments noted.
	Supports exclusion as less than 2 miles from Exmoor and would comprise their 'dark sky' status.	Individual (4176)	Comments noted.
	Supports exclusion as site is used by bats.	Individual (4176)	Comments noted.
OSP1 Higher Town, Sampford Peverell	Objects to exclusion of site, as one small allocation in the village is inadequate to meet needs of current and future generations.	Individual (3838)	Comments noted. On 22nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development.
	Site is suitable as site is self-contained area for development.	Individual (3838)	Comments noted. On 22nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development.
	Site is suitable and has a number of access options.	Individual (3838)	Comments noted. On 22nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development.
	Site is suitable and could include affordable housing and/or self-build, plus retail outlet.	Individual (3838)	Comments noted. On 22nd September, Mid Devon District Council resolved to allocate land at Higher Town for residential development. This allocation will be subject to 30% affordable housing and 5% self-build.
OSP5 Morrells Farm, Sampford Peverell (SHLAA sites, not Options site)	Site is centrally located and preferable to proposed allocation. Could accommodate 50 dwellings without adverse landscape or conservation area impact. Would remove farmyard use from centre of village and deliver affordable housing.	Taylor Wimpey UK c/o WYG Planning (1708)	Not agreed. The SHLAA assessment identified the potential for impacting on the grade II listed Morrells Farmhouse and a detrimental impact on the setting, significance, character and appearance of the conservation area.

OSI3 East of Hederman Close, Silverton	Supports exclusion of site, as has substantial number of objections previously, and any development in village should be small scale to protect character.	Residents of Hederman Close, Silverton (4927)	Comments noted.
OTHNEW Land north east of Silver Street, Thorverton	Additional land submitted which has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate (1517)	Appraisal of the site has indicated that the principal constraints would be the loss of grade 2 agricultural land and school capacity.
OTHNEW Land to the west of Lynch Close and Cleaves Close, Thorverton	Additional land submitted which has no significant constraints and is immediately available and deliverable.	The Church Commissioners c/o Deloitte Real Estate (1517)	Appraisal of the site has indicated that the principal constraints would be the loss of grade 1 agricultural land, school capacity and the impact on the adjoining grade II listed building.
OUF1 Land adj Poynings, Uffculme	Supports exclusion as only wishes to see infilling within and no extension of existing settlement limits.	Uffculme Parish Council (54)	Comments noted.
	Considers there to be traffic impacts, landscape and visual impacts from elevated position along rural lane.	Uffculme Parish Council (54)	Comments noted.
OUF2 Land adj Sunnydene, Uffculme	Supports exclusion as only wishes to see infilling within and no extension of existing settlement limits (though acknowledges proposal is relatively minor development which could normally be accommodated).	Uffculme Parish Council (54)	Comments noted.
	Sites lies within Waste Consultation Zone with poor access/visibility.	Uffculme Parish Council (54)	Comments noted.
	Objects to exclusion of site stating it can be accommodated with low visual impact, improved access point, and control of construction traffic along Clay Lane.	Individual (5378)	The access road to the site is a single carriageway lane, extending some distance from the centre of the village. Visibility is less than ideal along certain sections of the lane. The site is also on the rural fringe of the settlement, where the built environment is very low density. This combination of factors has indicated to the Council not to allocate this site.

OUF3 **Land west of Uffculme, Uffculme**	Supports exclusion as only wishes to see infilling within and no extension of existing settlement limits.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Supports exclusion as site has greatest potential for impact on Uffculme; would extend village in linear fashion along B3440, with inspectors previously supporting no extension beyond 'Harvesters'.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Supports exclusion due to negative traffic impact on local road network given high speeds along Uffculme Road, requirement for road widening, narrowness of Bridwell Avenue.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Is within Halberton parish which would benefit from CIL, though Uffculme infrastructure would have to support site.	Uffculme Parish Council (54)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Supports exclusion as is grade 1 agricultural land.	Individual (5310)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Supports exclusion as is flood zone 2.	Individual (5310)	Comments noted. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Objects to exclusion; Uffculme has a range of facilities, comparable with other S13 settlements but has no allocation; questions absence of assessment of the relative sustainability of settlements identified.	Messrs Persey and Harding c/o Jillings Hutton (4654)	Noted. The Council has considered potential allocations at Uffculme though for site-specific reasons they have not been preferred for development. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.

	Objects to exclusion and disputes LPA claim that allocation would lead to long walking distances to school; states that a secondary school pupil in Uffculme would have a choice whether to walk to school.	Messrs Persey and Harding c/o Jillings Hutton (4654)	The nearest edge of the site lies over 1km from the secondary school and almost 1.5km to the primary school. The IHT Guidelines for 'acceptable' walking distances state that for education up to 500m is the preferred distance and up to 1km is an acceptable distance. Both schools lie beyond these distances. Being out of the acceptable range it is more likely that trips from the development to the schools will be undertaken in a car, not less likely as stated within the representation. The rep dismisses bus travel to schools, however in the case of Uffculme Secondary; this is the most popular mode of transport, accounting for about 50% in 2014. However, following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	Objects to exclusion and disputes weight given to appeal decision (on previously refused scheme on part of site).	Messrs Persey and Harding c/o Jillings Hutton (4654)	Objection noted. Following a recent appeal decision, outline planning permission has been granted for up to 60 dwellings. The site is proposed to be allocated accordingly.
	States principle of development not a concern for Devon County Council who advise on use of archaeological condition/highways conditions.	Messrs Persey and Harding c/o Jillings Hutton (4654)	The condition requested refers to archaeological considerations. This has been reflected in the post-mitigation score. The score for objective B considers various elements related to the built and historic environment including but not limited to archaeology. However, the site has since been granted permission on appeal and is now proposed to be allocated.
	States principle of development not a concern for Environment Agency who raised no objection to planning application.	Messrs Persey and Harding c/o Jillings Hutton (4654)	Comments noted. The site has since been granted permission on appeal and is proposed to be allocated accordingly.
OUF4 **Land off Chapel Hill**	Site is 'landlocked' and unavailable.	Uffculme Parish Council (54)	Comments noted.

OUF5 Land off Ashley Road, Uffculme	Supports exclusion of site as only wishes to see infilling within and no extension of existing settlement limits.	Uffculme Parish Council (54)	Comments noted.
	Site is within Waste and Minerals Consultation Zones.	Uffculme Parish Council (54)	Comments noted – site lies within the Minerals Safeguarding Area for sand and gravel in the draft Minerals Plan.
	Land is elevated and development would result in overlooking.	Uffculme Parish Council (54)	Comments noted.
	Concern over access and highway issues.	Uffculme Parish Council (54)	Comments noted.
	Objects to exclusion as is adjacent to approved scheme, from which it has adequate highways access.	Individual (3840, 5806)	Objection noted, however site is within Minerals Safeguarding Area and is elevated in comparison with adjoining properties which could be overlooked.
	Objects to exclusion as would have no visual impact being set back from the main road.	Individual (3840, 5806)	As above.
OWI1 Quicks Farm, Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.
OWI2 Dean Hill Road, Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.
OWI3 Lloyd Maunder Way, Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.
OWI4 Lloyd Maunder (commercial), Willand	Supports exclusion of all sites previously considered for Willand and objects to their reintroduction which would have negative impact on local area.	Individual (5258, 4174, 5316, 5342, 5351, 5367, 5371, 5610, 5700, 5673, 4251, 4289, 5401, 4357, 5801, 4311)	Comments noted.

OWI5 Land adjacent to B3181, Willand (previously AL/WI/2)	Objects to exclusion of site as is allocated for affordable housing, has good access and good drainage.	Individual (2322)	Objection noted, however site has been allocated for 5 years but only remaining allocated part has come forward. Adjacent allocation will provide affordable housing for the village at a rate of 30%.

This page is intentionally left blank

Junction 27

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
OJ27	Insufficient provision has been made for Tourism and Leisure developments, particularly having regard to the conclusions of the Mid Devon Tourism Study, strand 5 & strand 6 and Mid Devon Economic Strategy. Plan not positively prepared because it fails to address the findings of the Mid Devon Tourism Study 2014.	GL Hearn (3781)	The Plan sets out a positive policy on tourism DM22 supporting proposals within or adjacent to defined settlements. This reflects the strategy of the plan which is positive about tourism and leisure facilities. Additionally it permits proposals elsewhere which justify a countryside location and subject to normal environmental and traffic issues. The supporting text of policy DM22 identifies proposals of various size, only differing on the level of supporting evidence required to support the larger schemes. This is a positively prepared policy which does not limit, as an allocation might, tourism enterprises to any specific location. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014.

	J27 proposal should be included in local plan. ** Many mention Westwood/Eden commercial proposal by name, some refer to housing proposal)*	GL Hearn (3781); Harcourt Kerr (1090); Petroc (3528); Culm Valley in Business Executive Committee (3618); Richard Thorne Consulting (5773); Taste of the West (5828); Individual (5218, 5666, 5663, 5658, 5657, 5656, 5655, 5654, 5653, 5652, 5651, 5650, 5649, 5645, 5644, 5643, 5640, 5758, 5676, 5659, 5880, 5885, 5886, 5947, 5946, 5945, 5887, 6044, 6043, 6042, 5484, 5483, 5482, 5481, 5480, 5479, 5478, 5477, 5476, 5475, 5474, 5473, 5472, 5471, 5470, 5469, 5468, 5467, 5466, 5465, 5464, 5463, 5462, 5461, 5460, 5459, 5458, 5457, 5456, 5455, 5454, 5453, 5452, 5451, 5416, 5415, 5414, 5413, 5412, 5411, 5410, 5409, 1681, 5820, 6059, 6064, 6060, 6061)	Noted. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.

	Commercial [*and housing*] development should be allocated at J27 [*and north of Willand representation (4386)*].	G L Hearn (3781); Hallam Land Management (4386)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. The Council's proposed J27 allocation unlike the option proposal, no longer includes B8 storage/distribution/logistics.

	J27 is a better option for development than east of Cullompton, better road and rail links, more certainty over delivery. J27 excellent links to motorway system and North Devon. J27 has Tiverton Parkway railway station, close by.	G L Hearn (3781); Hallam Land Management (4386); Harcourt Kerr (1090); Culm Valley In Business Group c/o Templar Strategies (3618); Individual (5561, 5835, 5820, 3748, 5759, 5648, 4641, 5886)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. Any significant development at Junction 27 will require improvements to the motorway junction to enhance capacity. However, the scale of such improvements is considered less with the absence of housing from the Council's proposed allocation.
	An allocation should be made at J27 to provide additional/alternative employment land, [*and housing land (representation 4386)*] removes uncertainty for growth. Not all allocated land can be delivered. (TIV 1 to TIV6 and CU1 to CU7 and CU13, CU17, CU18)	G L Hearn (3781); Harcourt Kerr (1090); Hallam Land Management (4386)	The Council is confident in the deliverability of its allocations as supported by the plan's evidence base including findings of the SHLAA panel, masterplanning activity, commercial interest and planning applications.
	An insufficient level of employment land has been provided to significantly increase local employment provision and reduce the high levels of out commuting. (Policy S1, S2, S6.)	G L Hearn (3781)	Not accepted. The Local Plan evidence base supports the Council's position on the level of allocations included in the plan. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 to fulfil a primary purpose of leisure and tourism with enabling retail. The Council understands that the promoters (represented by 3781) are no longer pursuing a warehousing/logistics employment element.

	J27 has attributes like no other, is one of the very few locations that can deliver a viable commercial/*(and housing, [representation 4386])* development.	G L Hearn (3781); Harcourt Kerr (1090); Hallam Land Management (4386)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014. Strand 5 refers to a tourist proposal aimed at catching passing tourists through the provision of a major tourist facility. Housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan.
	J27 is a location where business wants to be, "Swallow Court" is a good example.	Harcourt Kerr (1090)	Noted. The Council is now seeking to make an allocation at Junction 27, albeit focused on tourism and leisure.
	Land is available and deliverable.	Harcourt Kerr (1090); Hallam Land Management (4386)	Noted. The Council has undertaken further investigation and considers this has now been demonstrated.
	There is already a wide range of development at J27, offices, service station, restaurant, public house, caravan park.	Harcourt Kerr (1090)	Noted.
	Previous Inspectors have commented positively about J27.	Harcourt Kerr (1090)	The Planning Inspector in the 2004/5 local plan examination concluded the Council should consider an allocation at J27. The Council was directed by the Secretary of State not to include land at J27 in 2005. Since then, there have been significant changes in national planning policy and the proposed allocation.

	J27 Provides choice about delivery options.	G L Hearn (3781); Harcourt Kerr (1090); Hallam Land Management (4386)	Noted. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
	Would be an opportunity for Mid Devon. An exciting opportunity for the area.	Culm Valley in Business Executive Committee (3618); Richard Thorne Consulting (5773); Taste of the West (5828); Individual (5218, 5663, 5658, 5657, 5656, 5655, 5653, 5652, 5651, 5649, 5645, 5644, 5758, 5886, 6044, 6043, 5481, 5480, 5472, 5470, 5458, 5454, 5414, 6060)	Noted. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
	Westwood/ Eden provides local attraction for local families/and tourists.	G L Hearn (3781); Richard Thorne Consulting (5773); Petroc (3528); Individual (5218, 5663, 5656, 5646, 5645, 5758, 5880, 6043, 5484, 5480, 5479, 5478, 5473, 5471, 5468, 5461, 5457, 5454, 5451, 5414)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific.
	Westwood/Eden provides opportunity to take advantage of the influx of tourists to the area.	G L Hearn (3781); Culm Valley in Business Executive Committee (3618); Taste of the West (5828); Individual (5654, 5649, 5646, 5643, 5758, 5659, 5880, 5885, 5886, 5484, 5483, 5477, 5473, 5471, 5469, 5467, 5464, 5463, 5461, 5454, 5414, 5412, 5409)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014. Strand 5 refers to a tourist proposal aimed at catching passing tourists through the provision of a major tourist facility.

	In keeping with character of area, West Country known for surfing and food.	Taste of the West (5828); Individual (5644)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation policy makes reference to a surf facility and agronomy which could include a focus on local food production.
	Would claw back trade to Mid Devon.	Individual (5663, 5480, 5467)	The Council's retail consultant NLP acknowledges that the proposed allocation may result in the clawing back of some of the existing out-of-district comparison retail expenditure.
	There is a need for something special in Mid Devon. Put Mid Devon on the map.	Richard Thorne Consulting (5773); Taste of the West (5828); Individual (5657, 5646, 5645, 5886, 5469, 5456, 5454, 6059)	Noted. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
	Surf park will bring new people to the area.	Individual (5655, 5643)	This is accepted.
	Will provide retail opportunities.	Individual (5468)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres.
	South west in need of new investment.	Individual (5652)	Comment noted. This is recognised within the plan's strategy which promotes a prosperous rural economy.
	Council should support opportunity for jobs/ economic benefit and investment. Will benefit the economy.	G L Hearn (3781); Richard Thorne Consulting (5773); Taste of the West (5828); Petroc (3528); Individual (5640, 5484, 5483, 5479, 5654, 5946, 6043, 5483, 5473, 5454, 5478, 5464, 5463, 5457, 5456, 5452, 5451, 5415, 5414, 5409, 1681, 6059, 6064)	Comment noted. This is recognised within the plan's strategy which promotes a prosperous rural economy.

	Provides local employment opportunities. Would remove need to travel for work. Would enable young people to stay in the area.	G L Hearn (3781); Petroc (3528);Taste of the West (5828); Individual (5218, 5646, 5640; 5758, 5880, 5885, 5886, 6043, 5887, 5478, 5477, 5476, 5474, 5468, 5462, 5461, 5457, 5454, 5416, 5415, 1681)	Development as proposed by the Council at J27 would provide job opportunities.
	This individual suggests an allocation of a 60 acre site for "Heritage Transport Museum Showground" at J27.	Individual (3700)	The proposed allocation at Junction 27, whilst including a travel hub, it is not envisaged for a 60 acre site for "Heritage Transport Museum Showground". The plan already allows for suitable tourism proposals to come forward under policy DM22.
	Land at J27 lower grade than the land proposed east of Cullompton.	Individual (5631, 1681)	Agricultural Land Classifications concluded that J28 had the least area classified as the best and most versatile land (BMV) i.e. Grade 1, 2 and 3a as compared to other strategic options. Junction 27 proposed allocation land is a mix of 3a and 3b.
	J27 obvious place for development.	Individual (3788)	Comment noted. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
	J27 development should be viewed positively.	G L Hearn (3781); Richard Thorne Consulting (5773); Culm Valley in Business Executive Committee (3618); Petroc (3528); Taste of the West (5828); Hallam Land Management (4386); Individual (5464)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.

	Eden involvement provides vision and ability to position Mid Devon as a centre of educational excellence in subjects such as environmental sciences, agri-tech and food technology.	Petroc (3528); Taste of the West (5828)	It is to be noted that the Council is proposing a land allocation at Junction 27, which is capable of being provided by a range of developers rather than being project specific. The proposed policy makes reference to education space within the agronomy facility.
	Gateway location to Devon and Cornwall, with good road and rail links – need to start to leverage these aspects for benefit and betterment of the area.	Culm Valley in Business Executive Committee (3618)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014. Strand 5 refers to a tourist proposal aimed at catching passing tourists through the provision of a major tourist facility. The site is located near a major road junction for traffic entering Devon and the West Country.
	Council should have vision.	Individual (5459)	The Local Plan incorporates a vision for the plan area.
	Exeter and Taunton don`t want J27 to go ahead, they want revenue from Mid Devon.	Individual (1681)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres (including Exeter and Taunton) is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. Potential impact of the proposed allocation on Exeter and Taunton, together with retailing in other local authority areas has been the subject of Duty to Cooperate meetings. The Council considers it has fulfilled its Duty to Cooperate obligations.
	Would help local towns by bringing people into the area.	Individual (5415, 5412)	It would be logical to conclude that the proposed allocation at Junction 27 would be likely to bring visitors into the area. The wording of the proposed allocation makes reference to enhancing transport provision including transport connections to Tiverton and Cullompton.

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

	J27 and land north of Willand has; • Good public transport links • Cycle path linking to station, Tiverton, Willand and Uffculme runs through site . • Has existing road infrastructure capacity and capable of being improved. • Attractive location in market terms • Close to Uffculme Secondary school and services in Willand. • Retention	Hallam Land Management (4386)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. The Council acknowledges the good transport links at Junction 27 within the context of its proposed tourism/leisure allocation including reference to a travel hub and proposes accessibility for all modes including paths for pedestrian and cycle links.
	Sustainability Appraisal Fails to adequately assess J27, is inconsistent in its weightings, fails to have regard to the sustainability credentials of J27.	Hallam Land Management (4386)	The approach of the Sustainability Appraisal to the sustainability credentials of J27 in the context of the options assessment is considered appropriate; however, the Council's approach to development at J27 has now changed with the decision to make a different and smaller allocation. The Sustainability Appraisal update will form part of the Council's documentation available at major modifications consultation stage.

	Suggest half of Cullompton housing allocation be sited at/near J27 of M5, area has • More efficient M5 motorway access • Railway station • Footbridge over M5 and railway • Cycle paths • Good access to Cullompton • Access to A38 and A361 • J27 lower grade land • No flooding issues	Kentisbeare Parish Council (76)	For a development to function effectively in this location there is a critical mass needed. A smaller scale development would not afford the opportunities to enhance local facilities and provide the necessary infrastructure.
	J27 is a better option for development than Hartnoll Farm, accessible to A361 and M5, close to Tiverton Parkway, easy to commute to Exeter/Taunton for employment.	Individual (3954)	No land at J27 or Hartnoll Farm is allocated for residential development. While J27 is close to the M5 and Tiverton Parkway, Hartnoll Farm is closer to the facilities provided by Tiverton. Neither site was considered preferable for a proposed allocation for residential development.
	Westwood Eden proposals would not adversely affect any adjoining centres or put any planned investments at risk.	GL Hearn (3781)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. NLP has also advised the Council that the allocation as proposed would not adversely affect any planned investment for town or city centres within the retail study area.

	Westwood/Eden proposals would generate approximately 2200 FTE jobs.	GL Hearn (3781)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. Analysis of job creation has now taken place with regards to the Council's proposed allocation resulting in an expectation of 1186 FTE jobs.
	The inclusion of the suggested Westwood/Eden allocation and suggested policy would make the plan sound.	GL Hearn (3781)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. It is considered that the plan would be sound with or without an allocation at Junction 27 in the form proposed by the Council.

	Plan does not meet requirements of Paragraph 28 of NPPF in failing to have regard to the Mid Devon Tourism study.	GL Hearn (3781)	The Plan sets out a positive policy on tourism DM22 supporting proposals within or adjacent to defined settlements. This reflects the strategy of the plan which is positive about tourism and leisure facilities. Additionally it permits proposals elsewhere which justify a countryside location and subject to normal environmental and traffic issues. The supporting text of policy DM22 identifies proposals of various sizes, only differing on the level of supporting evidence required to support the larger schemes. This is a positively prepared policy which does not limit, as an allocation might, tourism enterprises to any specific location. On 22nd September, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014.

	Opposed to development at/near J27, support its exclusion from the plan.	Uffculme Parish Council (54); Willand Parish Council (44); Individual (5240, 5251, 5253, 5257, 5258, 4193, 5361, 3486, 5265, 5360, 5271, 3609, 1680, 4837, 5290, 5292, 5293, 4372, 5301, 4201, 4174, 5307, 5310, 4354, 5313, 5314, 4284, 5316, 5317, 5318, 5321, 5342, 5345, 5346, 5347, 5348, 5337, 5351, 5328, 5717, 5365, 5367, 5369, 5371, 5000, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 3978, 5660, 5667, 5636, 5632, 2804, 5619, 4446, 643, 5618, 5620, 5610, 4362, 4590, 5888, 5706, 5704, 5703, 5700, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 5889, 4625, 5673, 3943, 5555, 5557, 1252, 4251, 3674, 4331, 4219, 5549, 5787, 5852; 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5784, 5782, 4407, 5775, 4662, 5778, 4289, 5408, 5407, 5401, 5771, 5764, 5834, 5286, 5825, 5839, 5839, 5804, 3614, 4357, 5816, 5822, 5007, 5801, 5824, 4311, 5393, 5392, 5391, 5387, 5390, 5034, 5381, 5388, 5382, 3842, 5383)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The rationale for which is set out within the report considered by Council on that date.

	Welcome lack of retail/leisure development at J27 Believe retail/leisure development at J27 could have a negative impact upon vitality and viability of Exeter.	Exeter City Council (141)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The rationale for which is set out within the report considered by Council on that date. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres (including Exeter) is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. Potential impact of the proposed allocation on Exeter, together with retailing in other local authority areas has been the subject of Duty to Cooperate meetings. The Council considers it has fulfilled its Duty to Cooperate obligations. There is no equivalent offer in Exeter and accordingly, impact is not considered to be significant.

	Support plan proposals for development at main towns Cullompton, Tiverton etc. Development at Cullompton more appropriate supported by local council.	Uffculme Parish Council (54); Individual (5360, 1680, 4284, 5313, 5317, 5318, 5342, 5345, 4120, 5265, 5290, 5314, 5347, 5348, 5337, 5351, 5328, 5367, 5371, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5667, 5636, 5619, 4446, 643, 5618, 5620, 5610, 4590, 5888, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 5889, 4625, 5673, 4251, 3674, 4219, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5784, 4407, 5775, 4662, 4289, 5408, 5407, 5401, 5825, 5804, 3614, 4357, 5816, 5822, 5007, 5801, 5824, 4311, 5393, 5392, 5387, 5034, 5381, 5382)	Support noted. Housing is not being pursued at Junction 27. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4th September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs & pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.

	J27 proposal incompatible with MDDC policy of concentrating housing and employment allocation at or near existing centres of population.	Uffculme Parish Council (54); Individual (2512, 5230, 4042, 5361, 3486, 5360, 5270, 3609, 5290, 5293, 4201, 5307, 4284, 5345, 5350, 5365, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5660, 5787, 5782, 4407, 5778, 5825, 5804, 3614, 5816, 5824)	Comments noted. The Council's proposed allocation at Junction 27 does not include housing or traditional B class employment uses.
	Adverse economic impact on existing local towns, villages and businesses.	Uffculme Parish Council (54); Willand Parish Council (44); Individual (2512, 5230, 5233, 4120, 4042, 5251, 4193, 5361, 3486, 5360, 5270, 4837, 5290, 5292, 5301, 4201, 5307, 4354, 5314, 4284, 5345, 5346, 5347, 5348, 5350, 5337, 5717, 5365, 5369, 5000, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5667, 4446, 643, 5618, 5620, 5700, 4625, 4251, 3674, 5549, 5787, 5782, 4407, 5775, 4662, 5778, 5408, 5764, 5825, 5804, 3614, 5816, 5822, 5007, 4311, 5392, 5391, 5387, 5390, 3842, 5383)	The Council's retail consultant NLP advises that there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. NLP has also advised the Council that the allocation as proposed would not adversely affect any planned investment for town or city centres within the retail study area.

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

	Loss of open countryside/greenfield site. Devon "Gateway" should remain undeveloped.	Uffculme Parish Council (54); Individual (2512, 5230, 5233, 4120, 4042, 5253, 5361, 3486, 5271, 4837, 5290, 5292, 5301, 4201, 5307, 5310, 5313, 5314, 4284, 5318, 5321, 5345, 5346, 5347, 5348, 5350, 5365, 5369, 5000, 3978, 5660, 4590, 5888, 5674, 5889, 4625, 5555, 5557, 3674, 4219, 5418, 4407, 5775, 5764, 5834, 5839, 5804, 5393, 5391, 5390)	Mid Devon is a rural district with a limited supply of deliverable and available previously developed land. The balance of brownfield and greenfield allocations in the Local Plan is considered appropriate. The Council's proposed allocation at Junction 27 provides an opportunity to utilise the potential of the site as a unique leisure destination at the gateway to Devon and Cornwall in accordance with recommendations of the tourism strategy. The proposed Junction 27 allocation site is not wholly greenfield as it already accommodates a roadside service area including a hotel and has planning permission for an expansion of roadside facilities.
	Loss of valuable agricultural land.	Individual (2512, 5230, 4042, 4201, 5361, 5360, 4837, 4284, 5317, 5667, 2804, 5703, 5782, 5408, 5824, 5392, 5387, 5390, 5388)	Junction 27 proposed allocation land is a mix of 3a and 3b. As defined by national policy, only part is therefore best and most versatile agricultural land.
	Objections by Parish and Town Councils, Exeter City, Taunton Deane, North Devon and East Devon Councils.	Individual (2512, 5230, 4120, 5361, 3486, 4201, 5317, 5350, 5717, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5619, 643, 5706 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5889, 4625, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5782, 5825, 5804, 3614, 3614, 5816, 5393, 5387)	Potential for development on land at Junction 27 has been the subject of Duty to Cooperate meetings. The Council considers it has fulfilled its Duty to Cooperate obligations. Major modifications consultation allows parish and town Councils, together with other authorities the opportunity to make representation on the Council's proposed allocation.

	Not needed/wanted by local population. Not supported by local people.	Uffculme Parish Council (54); Individual (2512, 5361, 5230, 5253, 4193, 5360, 4372, 4201, 5314, 5316, 5747, 5711, 5716, 5712, 5713, 5714, 5715, 2318, 5636, 5619, 4590, 5706, 5604, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 4625, 5555, 5557, 4331, 5549, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5825, 5804, 3614, 5816, 5387)	
	Unsuitable location as access would be by road. J27 and local roads can't accommodate Increase in traffic. Existing infrastructure can`t accommodate proposal.	Uffculme Parish Council (54); Willand Parish Council (44); Individual (5233, 4120, 4042, 5361, 5253, 3486, 5360, 5270, 4837, 5290, 5292, 2512, 5230, 4837, 5292, 5301, 5307, 5310, 5313, 5318, 5321, 5345, 5346, 5347, 5348, 5350, 5337, 5365, 5369, 5660, 643, 5618, 5620, 5782, 4407, 5775, 5408, 5401, 5764, 3614, 3614, 4311, 5392, 5387, 5390, 5034, 5381, 5382, 5383)	On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is recognised that such a proposal would have a transport impact. The Highways Authorities (DCC and HE) consider that there are technical mitigation measures that could be undertaken to address such impacts. The precise scale and nature of such improvements will be the subject of more detailed analysis as any scheme progresses through the various planning stages.

	Jobs claim 4000 is not justified.	Individual (5233, 5391)	The latest assumptions which were used to inform the Council's decision of 22nd September 2016 were that there would be 1,186 full time equivalent jobs.
	No evidence to support job creation.	Individual (5307, 5350, 5888, 3614, 5392)	As part of the representations made, seeking the allocation of the land for development, the promoters have provided a breakdown of where in the proposed development jobs will be created. Since this representation was received, a more refined estimated job creation figure has become available. Please see the cabinet report dated 15th September 2016.
	Would not create the kind of skilled jobs, careers, training opportunities and apprenticeships for the young of the area.	Individual (5782, 5387)	The proposed allocation could provide a variety of both skilled and unskilled jobs which could provide opportunities for apprenticeships.
	Employment on the J27 site will detract from other areas where there is a need for job creation.	Individual (5313, 5321, 5632)	The proposal widens the opportunities in the area and it is not considered that this will compromise the ability for other areas in the plan to realise growth and prosperity.
	Loss of trees (ancient Oaks particularly).	Individual (4042, 5360, 3978, 4590, 4219)	Tree protection and landscaping would be considered at the masterplan/ planning application stage.
	Loss of wildlife.	Individual (3486, 4837, 4201, 3978, 4446)	Biodiversity would be addressed at the masterplan/planning application stage. A fauna and flora survey would be required to ensure any biodiversity issues were addressed as part of any planning application.
	"Gateway to Devon" should not be a service station, warehouses etc. with bolted on tourist zones, & shops.	Individual (4042, 5361, 5360, 5290, 5292, 5293, 5301, 5764, 5839)	The Council's proposed allocation at Junction 27 provides an opportunity to utilise the potential of the site as a unique leisure destination at the gateway to Devon and Cornwall in accordance with recommendations of the tourism strategy. Planning permission has been previously granted for roadside service facilities (not implemented).
	Devon is known for its countryside. Best Countryside experience is the countryside itself.	Individual (4042, 5253, 4193, 5360, 1680, 5301, 4354, 4407, 4662, 5764, 5834, 5839, 5392)	Comments noted.

	Poorly thought out development, more suited to city suburb.	Individual (4042, 4193, 3486, 5290, 4201, 4354, 5675, 4625 5834, 5839, 5383)	Comments noted. The Council's retail consultants have concluded that there are no sequentially preferable alternative sites that could accommodate the development proposed.
	J27 while an important location should be left undeveloped until a more appropriate proposal comes forward may be 10 to 20 years away.	Individual (4193)	It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. The inclusion of a policy can provide the local authority with greater control over the nature of development that could come forward on the site given that a speculative application could be submitted at any stage.
	No certainty Westwood will be constructed, will be viable in long term, could turn into something else.	Uffculme Parish Council (54); Individual (4193, 3614)	It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. It is considered that with the retail enabling development the allocation could be brought forward as proposed. The proposed allocation policy is clear as to the type of development which would be deemed acceptable by the local planning authority.
	Unsustainable development.	Uffculme Parish Council (54); Individual (3486, 5360, 1680, 5307, 5636, 5618, 5549)	The National Planning Policy Framework acknowledges that sustainability relates to environmental, social and economic factors. These factors should not be considered in isolation. The proposed allocation could bring about increased prosperity for the area and would reduce trip lengths from Mid Devon residents seeking these uses elsewhere. The proposed allocation also aims to catch passing tourists travelling on the motorway and rail network who would be travelling anyway and thus combining trips.
	Retail development is not required.	Willand Parish Council (44); Individual (3486, 5290, 5317, 5717, 5418, 5392, 5388)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres.

	The public can already access retail and other services at most other junctions and local towns. Tourism already catered for by existing towns.	Individual (5360, 5717, 5365, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5619, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 4625, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5825, 5804, 5816, 5392, 4382, 5314, 4625)	Not agreed that most other junctions and local towns provide the offer that is proposed in the allocation. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres and provide a different retail offer. A tourism venture of the scale proposed does not currently exist in Mid Devon.
	Flooding risk locally and Culm Valley from rain water run-off.	Individual (5270, 4446)	Strategic flood risk assessment does not identify the area at particular risk from flood. The site is in Flood Zone 1. National planning policy requires that development should not increase flooding elsewhere, including setting out that there is no increase in the volume of surface water or the rate of surface water run-off. Policy DM1 (f) requires appropriate drainage provision including sustainable urban drainage schemes.
	Development at J27 would have an unacceptable landscape impact.	Individual (1680, 4837, 5290, 5292, 5889)	A landscape assessment has been undertaken to inform the plan however, a more detailed landscape and visual impact assessment will need to be submitted at planning application stage. Development of this site would inevitably have an impact on the landscape. Masterplanning of the site would need to ensure that any development would need to achieve high levels of design which could achieve an iconic gateway to Mid Devon whilst also incorporating appropriate mitigation where necessary.

	There are empty industrial estates and buildings in the locality, no need for further sites.	Willand Parish Council (44); Individual (5290, 5717, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5619, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5889, 4625, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 4407, 5825, 5804, 5816)	The Council's proposed allocation at Junction 27 does not include traditional B class employment uses. It is not considered that use of existing buildings could accommodate a retail and tourism offer as ambitious as that set out in the proposed allocation.
	Extra houses would be needed to meet the need of the people in the additional jobs created. Not allocated for in Local Plan.	Uffculme Parish Council (54); Willand Parish Council (44); Individual (5290, 4251, 4219, 5775, 5839, 3614, 5392)	On 22nd September 2016, Mid Devon District Council resolved to propose additional residential allocations to meet the additional housing requirement resulting from the decision to allocate land at Junction 27 for mixed use leisure, tourism and associated retail. The level of which reflected evidence provided by the Council's demographic consultants.
	Exeter and Taunton are easily accessible by Car, Bus, Train, provide excellent shopping and entertainment, no need for more at J27.	Individual (5290)	The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Designer outlet retailing is proposed with controls in order to reduce impact on town centres.
	Scale out of keeping with rural area and current buildings.	Individual (4201, 5316, 5317, 4662)	Comments noted.
	Leisure facilities should be in local towns for use by residents and tourists.	Individual (4284)	A tourism venture of the scale proposed does not currently exist in Mid Devon and it is not envisaged that a leisure and tourism offer as ambitious as that set out in the proposed allocation would be likely to come forward in the local towns.

	Would lead to the coalescence of Willand, Uffculme and Sampford Peverell.	Individual (4284)	The proposed allocation would not join Willand to Uffculme or Sampford Peverell. The larger site area, previously considered at options consultation which incorporated housing, could potentially lead to some coalescence of nearby settlements.
	Will not benefit local people wealth created will be for non-locals.	Individual (5317, 5555, 5549)	Some local people would be likely to be employed on the site.
	People travel to Exeter and Taunton for work out of choice so they can live in a rural area.	Individual (5317)	It is accepted some people make that choice.
	Noise/ air pollution from facilities proposed and increased activity. Light pollution from facilities and events.	Individual (5346, 5348, 5775)	Policy DM4 requires potential noise and light pollution to be addressed by a pollution impact statement and mitigated where necessary.
	Not near any major emergency service centres.	Individual (5348)	The site is well connected to the strategic road network.
	Land availability uncertain, not all landowners are willing to sell their land.	Individual (5667, 3978, 4446, 643, 4590)	Developers and their agents have indicated land is available for development. The Council has approached land owners in the area and is satisfied that there is willingness from landowners for a development of this nature to come forward. Whilst one landowner is not currently prepared to release his land for development, there is still sufficient land available for a scheme to come forward.
	Alternative sites are available for the uses proposed.	Uffculme Parish Council (54); Willand Parish Council (44); Individual (3614)	The sequential site analysis has concluded no sequentially preferable alternative sites that could accommodate the development proposed.
	Theme/surf park would become an eyesore in time. Scheme has potential to become a white elephant.	Individual (4590, 4219, 5549, 4662)	Development of the site would need to achieve a high quality of design and comply with design policies in the plan.
	Amending proposal to smaller scheme/ adding Eden does not alter the fundamental objections raised.	Individual (5675, 4625, 4662, 3614)	Comments noted.
	Development opportunities exist along M5 from J23 to J30 with spare capacity.	Individual (5674, 5889, 4625)	Development opportunities do exist at junctions along the M5.

	Developers concede leisure elements would be loss making, subsidised by warehousing.	Individual (4625)	The retail elements of the proposal are necessary to enable the tourism and leisure uses to come forward. The proposed allocation does not include land for warehousing.
	Willand has insufficient infrastructure to accept further development to the north and J27.	Willand Parish Council (44)	It is recognised that such a proposal would have a transport impact. The Highways Authorities (DCC and HE) consider that there are technical mitigation measures that could be undertaken to address such impacts. The precise scale and nature of such improvements will be the subject of more detailed analysis as any scheme progresses through the various planning stages.
	Willand is opposed to any expansion of the Village including to the north and J27.	Willand Parish Council (44)	Comments noted.
	Facilities already provided in nearby towns.	Willand Parish Council (44)	There are facilities provided in nearby town but not of the nature of those proposed in the allocation.
	J27 proposals would need a huge car park.	Individual (4219)	The proposed allocation would indeed require car parking provision.
	J27 proposals inappropriate in both scale and nature for the site.	Individual (5782)	Comments noted.
	Tiverton Parkway can only be accessed by rail from Taunton and Exeter where most of the facilities planned for J27 are available.	Individual (4407)	Tiverton Parkway is accessible form many other stations north and south of the station. There are facilities provided in Taunton and Exeter but not a surf park or retail outlet centre.
	Developers do not have Mid Devon interests at heart.	Individual (4662)	It is to be noted that the Council is proposing a land allocation at Junction 27, which is capable of being provided by a range of developers rather than being project specific.
	No requirement for Surf Lake, Beaches are only a few miles away. Surf park already permitted only 70 miles away.	Individual (4284, 5365, 4219, 5390, 3842, 3614)	Comments noted.
	Mid Devon has low unemployment and does not need extra jobs, workers at J27 would have to commute in.	Willand Parish Council (44); Individual (5390, 5388, 5383)	The proposal has the potential to play an important role in ensuring future prosperity of the district and reduce the proportion of out commuting. In retail terms, there is a regional need.

Development Management Policies

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

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
DM3 Transport and air quality	Policy is very relevant to Mid Devon which is reliant on private vehicles.	Uffculme Parish Council (54)	Comment noted.
	Support this policy.	Willand Parish Council (44)	Support noted.
	Suggested wording for policy to relate to a diagram of strategic transport routes/major transport routes.	Mid Devon CPRE (486); Individual (366)	Policy does not relate to a diagram to avoid becoming dated. The impact on the routes requested would be considered through a Transport Assessment.
	Policy could also refer to Transport Statements – which are less detailed than Transport Assessments.	Devon County Council (626)	Agree, a modification is proposed in the supporting text to set out that in some cases a transport statement may be acceptable in lieu of a transport assessment.
	Policy could also refer to safe access to the transport network.	Devon County Council (626)	Agree, a modification is proposed to DM3 to reflect the comment.
DM4 Pollution	How is the stated accordance with WFD (Water Framework Directive) and RBMP (River Basin Management Plan) carried through from the SA to the policy?	Environment Agency (943)	The policy requires applications to be accompanied by a pollution impact assessment and mitigation scheme where necessary where there is a risk to negatively impacting the quality of water. To ensure applications are in accordance with the WFD and RBMP the supporting text refers to the above to ensure they are considered when determining applications.
	Support this policy.	Willand Parish Council (44)	Support noted.
DM5 Parking	Suggestion to endorse housing to be built in rectangle layout with car parking in the square.	Individual (5211)	The policy does not preclude this type of parking. However the suggestion may not be appropriate in all cases and therefore a more flexible approach is preferred.
	Car parking spaces provided too far away will lead to parking on pavements.	Individual (5211)	Comment is noted. The preference of the provision of parking in close proximity to the property it services is noted in para 4.21 with reference to the Mid Devon Parking SPD principles.

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

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

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

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

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

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

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

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

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

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

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

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Does not reflect Ministerial statement 25th March 2015. Any modified version of these policies should be assessed by the Council in terms of the impact and effect of such policies in the local area on: need, viability, affordability and timing.	Home Builders Federation (149)	The policy reflects the optional technical standards for new dwellings referred to in the ministerial statement 25th March 2015. MDDC has previously included housing standards in our adopted Local Plan supported by evidence and agreed by an Inspector. Furthermore the MDDC 2014 viability assessment for the Local Plan Review includes assumptions about dwelling size. On this basis the need, viability and timing is justified. For clarity it is proposed that DM12 and DM13 are combined. The criteria set out in DM13 are proposed to be deleted as these are repetitive of the Nationally Described Space Standard, instead reference to the space standard is proposed in the policy.
DM14 Town centre development	Minimum A1 retail use at ground floor level within the primary shopping frontage should be 70% in Crediton.	Crediton Town Council (678); Crediton Neighbourhood Plan (1734)	Following changes to permitted development rights it is proposed that the policy is amended to ensure primary shopping frontages at ground floor levels will not fall below 85% of A1-A3 uses. The percentage reflects the average primary shopping frontage make up within town centres in Mid Devon since 2009. There is further opportunity through the Crediton Neighbourhood Plan to develop a policy to reflect 70% A1 shop frontage if this is a specific issue considered by the Neighbourhood Planning group for Crediton Town Centre. Evidence setting out the need for a 70% A1 use in the Crediton primary shopping frontage along with an article 4 direction to remove the new permitted development rights that allow flexibility between A1-A3 will be required to enable this.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Support this policy.	Uffculme Parish Council (54); Individual (4662)	Support noted.
	DM14 (and DM16) when coupled with DM15 does not suggest sufficient flexibility. Vitality of the town centres is achieved by concentrating on footfall, aiming for higher quality and avoiding the trap of mono-use for the sake of it. The policies generally need to chime so as not to exclude the market demand for larger retail floor-plates and reflect emerging shopping habits. There should be no worry about over-demand/under supply as the market will self-adjust and policies should be flexible enough to cope.	Harcourt Kerr (1090)	DM14 sets out a wide range of permissible uses in town centres, seeking to diversify customer choice while protecting and enhancing the viability of the town centre, its historic character and accessibility. The policy is flexible enough to respond to rapid change; coupled with DM15 the policies apply a sequential approach to retail development in towns.
	Should Bampton be removed from the list as it is no longer a town.	Willand Parish Council (44)	Remove Bampton from this policy.
DM15 Development outside town centres	Support this policy.	Uffculme Parish Council (54)	Support noted.
	DM14 (and DM16) when coupled with DM15 does not suggest sufficient flexibility. Vitality of the town centres is achieved by concentrating on footfall, aiming for higher quality and avoiding the trap of mono-use for the sake of it. The policies generally need to chime so as not to exclude the market demand for larger retail floor-plates and reflect emerging shopping habits. There should be no worry about over-demand/under supply as the market will self-adjust and policies should be flexible enough to cope.	Harcourt Kerr (1090)	DM15 applies a sequential approach to retail development in towns. This is to ensure the vitality and viability of town centres are not harmed by out-of-centre development in accordance with National policy. DM14 sets out a wide range of permissible uses in town centres, seeking to diversify customer choice while protecting and enhancing the viability of the town centre, its historic character and accessibility. The policy is flexible enough to respond to rapid change.
	Should Bampton be removed from the list as it is no longer a town.	Willand Parish Council (44)	Remove Bampton from this policy.

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

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

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

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

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

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

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

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Request Morchard Bishop, St Gatiens Garden Church Street to be designated as Local Green Space.	Individual (4093)	No map of the Local Green Space has been provided and it is not clear what area this request is referring to on OS maps. Furthermore the representation does not set out how the site meets the three requirements of the NPPF to be designated as a Local Green Space therefore no change is proposed.
	Request Morchard Bishop, the sports and recreational field Wood Lane to be designated as Local Green Space.	Individual (4093)	Policy DM24 already affords protection for this site from development as it is a sports and recreational field, therefore the proposed change is considered unnecessary.
	Request Sandford Millennium Green to be designated as Local Green Space.	Bampton Society (1319); Mid Devon CPRE (486)	Include Sandford Millennium Green as Local Green Space. The green space is in reasonably close proximity to the community. It is demonstrably special to the local community in conformity with the purposes of a Millenium Green, it is local in character and is not an extensive tract of land.
	Recommend land east of junction with Manley Lane, and to Manley Bridge should be designated as a Green Buffer Zone – Tiverton.	Tiverton Civic Society (1410)	The area suggested by the comment is an extensive tract of land and therefore is not in conformity with the NPPF.
	Safeguard existing play spaces, green areas and sports pitches – General.	Individual (5211)	The policy is in conformity with the comment made.
	Support this policy.	Willand Parish Council (44)	Support noted.
	Evidence base does not follow Sport England methodology.	Sport England (169)	The policy and evidence base is in line with the NPPF and guidance. The Sport England Methodology would provide further detail regarding provision for sport however it is not required for the purposes of developing Local Plan Review policies.
DM25 Development	Support this policy.	Willand Parish Council (44); Pegasus Planning (3678)	Support noted.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
affecting heritage assets	Only provides some assistance to those making decisions. Should replace policy with suggested wording in representation.	Historic England (1170)	This policy is a replica of that which forms part of Local Plan Part 3 'Development management policies' which was re-written by the inspector and adopted in 2013. In line with National guidance, in drafting policies undue repetition has been avoided by using criteria which sets out principles that are common to the different types of heritage assets. As such the full replacement policy by Historic England is not recommended; however aspects of the suggested policy have been incorporated and are proposed as a modification to criterion b) of the policy.
	The setting study areas surrounding Knightshayes or Killerton should be shown on the Council's Public Access system and referred to in the supporting text.	National Trust (170)	This information is available on the Council's website. Weblinks can change over time and links can be broken. It is proposed that the weblink will be removed and replaced with reference to websites rather than the links provided e.g. 'available on the Mid Devon District Council website'. Currently, constraint information is not shown on the Council's Public Access planning application system.
	If heritage assets cannot be preserved in situ, they should be preserved in record.	Devon County Council (626)	Reference to the potential for 'preservation by record' is noted in the supporting text para 4.79.
DM26 Green infrastructure in major development	Can this policy be used as a vehicle to help deliver objectives of the WFD and measured from the RBMP? Greater clarity needed.	Environment Agency (943)	As set out in the supporting text applicants are encouraged to explore opportunities for wider environmental measures which may include the objectives of the WFD and RBMP. However the purpose of this planning policy is to manage development rather than deliver the objectives of other directives and frameworks.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Emphasise the importance of protecting and enhancing existing biodiversity in criterion a).	Environment Agency (943)	S9 covers the comment request. Also criterion a) already notes 'a net gain in biodiversity. The purpose of DM26 is to manage the provision of GI in major development proposals.
	Disagree with wording '…the Council will balance the benefits of the development against the objectives of this policy.' Suggested wording '…the Council will look to the development to provide or contribute towards off-site green infrastructure.'	Environment Agency (943)	The existing wording is considered appropriate in the policy to enable flexibility. However it is noted that there is scope in policy to be strengthened with reference to off-site contributions as suggested in the comment. A modification is therefore proposed.
	Support this policy.	Willand Parish Council (44); The Woodland Trust (3625)	Support noted.
	Suggestion to provide a Trees and Woodland SPD.	The Woodland Trust (3625)	Suggestion is in relation to a SPD rather than requiring an amendment to the Local Plan Review.
	Green infrastructure should protect and enhance the heritage assets of the district.	Historic England (1170)	It is agreed that green infrastructure in some cases can serve the purpose of protecting or enhancing heritage assets. For clarity reference to this is suggested as a modification to the supporting text.
	Support this policy however object to policy S5.	Pegasus Planning (3678)	Support noted. Comments regarding S5 are discussed within that section.
	Could improve policy by specifically mentioning allotment provision.	Devon County Council (626)	The supporting text refers to policy S5 which sets out the provision of allotments as part of public open space.
DM27 Protected landscapes	Paragraph 4.94 should be amended to be consistent with national policy as 'or adjoining' applies equally to AONBs. Suggested wording 'where major developments are proposed within or adjoining the protected landscapes'.	Blackdown Hills AONB Partnership (1195)	It is noted that 'or adjoining' in the context of para 4.94 applies to AONB's. A change to the supporting text is therefore proposed. The wording suggested by the respondent has not been incorporated as this would imply that major developments within national parks would be considered by the Mid Devon District Council, whereas National Parks are the Local Planning Authority for their area.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Support this policy.	Willand Parish Council (44); Blackdown Hills AONB Partnership (1195); Exmoor National Park Authority (115)	Support noted.
	Consideration should also be given to light pollution to minimise impacts on the Dark Sky Reserve status of Exmoor National Park.	Exmoor National Park Authority (115)	A modification to the supporting text is proposed under para 4.94 to consider light pollution.
	Final paragraph of policy should be amended for clarity that development in National Parks will not be covered by Mid Devon Local Plan.	Exmoor National Park Authority (115)	Paragraph 4.90 already states that a small area of the district incorporates a very small part of Dartmoor National Park in Cheriton Bishop parish, for which Dartmoor National Park Authority is the Local Planning Authority. For Exmoor, no area within the district falls within the National Park. Para 4.94 already distinguishes consideration is for *adjoining* major development in respect of National Park's, therefore no change is proposed in response to this comment.
DM28 Other protected sites	Should include compensatory measures in policy.	Environment Agency (943)	Agreed that compensatory measures may be considered in some cases. An amendment is proposed to criterion c) with additional supporting text to set out the context for the use of compensatory measures.
	Support this policy.	Willand Parish Council (44)	Support noted.
	Ancient woodland and ancient trees should have absolute protection. It is not possible to mitigate.	The Woodland Trust (3625)	Para 4.97 acknowledges the issue of mitigation with regard to ancient woodland and trees. The policy has been developed to be strict but flexible to respond to a range of potential future proposals. Development which would lead to any loss of ancient woodland or trees, the benefits would have to clearly outweigh the loss.

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Mid Devon's landscape is receiving relatively little protection within this Local Plan Review.	Mid Devon CPRE (486)	Disagree with statement. The Local Plan includes S9 a strategic policy which aims to preserve and enhance the distinctive qualities of Mid Devon's. Greater detail is also provided in DM27 and DM28.
DM29 Enforcement	Support intentions to publish a Local Enforcement Plan.	Uffculme Parish Council (54)	Support noted.
	Support this policy.	Willand Parish Council (44)	Support noted.

This page is intentionally left blank

Policies Map

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
Policies Map Tiverton	The allocation for an energy recovery facility under Policy W6 of the Devon Waste Plan should be indicated within the Eastern Urban Expansion.	Devon County Council (626)	Whilst the site is identified within the adopted Devon Waste Plan as a potential site for a energy and waste facility, to date no such proposals have come forward from a potential operator. The policies map does not set out the exact location of the facility.
	Part of TIV10 Roundhill allocation that overlaps rear gardens at Lower Cotteylands.	Individual (5262, 5326)	It is proposed to remove the small area that overlaps the rear gardens of Lower Cotteylands from the allocations map.
	Part of TIV9 allocation that overlaps small area at the side of 17 Arnold Crescent.	Individual (5870)	It is proposed to remove the small area that overlaps the side of 17 Arnold Crescent from the allocations map.
Policies Map Cullompton	Amend allocation CU1-CU6 to reflect land north of Rull Lane as Green Infrastructure rather than proposed mixed use development.	Rull Hamlet Association (1796); Individual (1901)	The adopted NW Cullompton masterplan has taken this amendment into account and this will be reflected in revised allocation maps along with any other masterplan amendments.
	Disagree with site configuration for North West Cullompton i.e. Growen land should not have the majority of it designated as Green Infrastructure. Configuration as proposed would preclude local centre in most optimal/viable location.	Growen Estates c/o Rocke Associates Ltd (5748)	As noted in the response for CU1-CU6 North West Cullompton, the decision as to which areas were most appropriate to be allocated as Green Infrastructure (GI) was informed by the findings of the Council's Landscape and Visual Appraisal (2014). Following the allocation process, masterplanning of the site gives the opportunity to adjust the balance between the areas identified for GI and development. This approach has been applied during the recent masterplanning of the existing NW Cullompton allocation which resulted in such places. The land identified for the centre in the recently adopted masterplan was previously allocated as GI and accordingly a change to the proposals map is proposed to set this out.

	Green Infrastructure should be to the north of Rull Lane. NW Cullompton.	Individual (1901)	Agreed comment corresponds with a comment made by Rull Hamlet Association (1796) discussed in the NW Cullompton summary. Policies map to be amended to reflect this.
	Proposed development east of Cullompton [CU7-CU12], outline goes across private garden believe this is in error.	Individual (5563, 5370, 5818)	Change to policies map to exclude outline over private garden.
Policies Map Crediton	Area of CRE5 should be amended on map and Green Infrastructure determined only through masterplanning.	MJ Gleeson c/o Bell Cornwell LLP (3775)	As noted in the summary response for CRE5 Pedlerspool, the GI annotation mirrors that as set out when the site was allocated within the AIDPD, and therefore has been considered appropriate by an Inspector. The policy notes that the location of the GI reflects the sensitivities of the location, with the upper slopes to the west and south of the site more visually prominent and adjacent to Creedy Park, the historic locally listed park and garden. The need for planting on the eastern side is justified in criterion d). Heritage and landscape constraints have informed the GI annotation, not just ecological as indicated by the objector. Therefore no change to the policies map is proposed.

	Settlement limit boundary should be amended to include land identified for development in application site specified [in relation to CRE10].	Tesco Stores Limited C/O Burnett Planning (4323)	Area immediately to the east of CRE10 allocation was within the original 06/02670 and 09/00244 applications, however no development was proposed upon it as it formed part of the landscape buffer screening part of the site from views from the A377. The area to the south east contains the swales which are part of the sustainable urban drainage to address flood risk, and are not appropriate for development. The settlement limit needs to be amended to incorporate the entire site that has received planning permission (14/02044/MFUL). At present the southern part of the site extends beyond the settlement limit for Crediton.
Policies Map Bampton	Settlement boundary should be amended to reflect deletion of AL/BA/1.	Individual c/o Jillings Hutton (5845)	An amendment is proposed to include the remaining part of the allocation OBA4 School Close, Bampton (previously Al/BA/1) to be consistent with the approach taken elsewhere in the plan that all permitted but unimplemented existing allocations be rolled forward into the Local Plan Review.
Policies Map Bradninch	Recently developed affordable housing on Millway is not shown on the policies map.	Bradninch Town Council (86); Individual (773, 5843)	Policies map to be updated to show recently developed affordable housing on Millway. This was not previously shown due to a time lag between the completed housing and OS mapping updates.
	Believe wildlife site should be extended.	Individual (773)	The county wildlife site is not a designation by the Local Plan Review. Any updates to the County Wildlife site layer will be updated in subsequent policies maps.
	Priority Habitats in Bradninch appear to be random.	Individual (773)	The priority habitats layer is not a designation by the Local Plan Review. This is a layer compiled and provided to us by Natural England. Any updates to the priority habitats layer will be updated in subsequent policies maps.

	Believe River Culm flood plain should be a habitat area.	Individual (773)	Habitat areas layer is not a designation proposed by the Local Plan Review. This is a layer compiled and provided to us by Natural England. Any updates to habitat areas will be updated in subsequent policies maps.
	Policies map should extend to Hele.	Individual (773)	Hele is not classed as a village in Policy S13 and does not have other planning designations to display such as conservation areas.
Policies Map Cheriton Bishop	Area of land to the north of 'The Old Rectory' and 'Brackenwood' is shown as within the Conservation Area boundary, however the 1991 Conservation Area shows this site to be outside. The settlement limit is therefore also incorrect.	Individual (4489)	Amend conservation area boundary on policies map to the 1991 Conservation Area boundary. The settlement boundary differs from the conservation area boundary therefore no change is required to the settlement boundary.
Policies Map Newton St Cyres	Would like settlement limit extended to allow infill in Half Moon Village.	Newton St Cyres Parish Council (46)	Not agreed, 'Half Moon Village' is some distance from the main Newton St Cyres village which provides the principle amenities and school. Furthermore existing development at 'Half Moon Village' is very dispersed and therefore there is no obvious settlement boundary.
Policies Map Thorverton	Support Thorverton Local Green Space but suggest amendment to boundary to reflect the boundary of the Green's deeds.	Individual (5215)	Amend boundary of Thorverton Local Green Space to follow suggested boundary as set out in this comment.
Policies Map Uffculme	The Waste Management Facility should be omitted as it is no longer in the Devon Waste Plan.	Devon County Council (626)	Remove waste management facility from policies map.
Policies Map General	PRoWs should be shown on the policies map.	Individual (773)	PRoW will still be considered when looking at a planning application, however to ensure maps are as clear as possible to demonstrate policies such as development allocations they have not been included on the policies map.
	Reference to 'Minerals Consultation Zone' should be amended to 'Minerals Consultation Area'.	Devon County Council (626)	Policies map to be amended to reflect comment.

Miscellaneous comments

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
	Recommend that the Plan takes a holistic approach to the water environment e.g. ensure water resources and efficiency are considered.	Environment Agency (943)	No change. Policy S1 considers the conservation of natural resources; S9 also required the efficient use and conservation of water.
	Recommend policies take a catchment based approach.	Environment Agency (943)	The catchment based approach provides a useful model for collaborative working which will be particularly useful with respect to masterplanning work for larger sites. A Catchment based assessment will be undertaken as part of the masterplan work for east Cullompton as agreed with the Environment Agency.
	Production of a Green Infrastructure Strategy will form an important Supplementary Planning Document.	Environment Agency (943)	No change. Comment requests a new SPD rather requires a change to the Local Plan Review.
	The Environment Agency has recently delineated default Source Protection Zones, development proposals will need to address risks to controlled waters.	Environment Agency (943)	No change. Source protection zones will be considered at the planning application stage. Policies such as and DM4 will ensure risks to controlled waters are addressed.
	Local/public authorities have obligations under the Public Sector Equality Duty (PSED) in the Equality Act 2010 to consider the effect of policies and decisions on people sharing particular protected characteristics.	Equality and Human Rights Commission (2389)	Comment provided was a statement by respondent which requires no change to Local Plan Review policies. An Equality Impact Assessment has been undertaken as part of the evidence base.
	Note that proposals do not affect the current or (future) operation of the mainline network in Great Britain.	Office of Rail Regulation (3677)	Noted.

	The vital role that telecommunications play in both the economic and social fabric of communities merit the inclusion of a policy which refers specifically to telecommunications development. Draft telecommunications policy has been recommended.	Mobile Operators Association c/o Mono Consultants Ltd (1516)	S1 in combination with DM policies and the NPPF provide sufficient guidance for telecommunications development.
	Would like to see the promotion of a cycle/access routes e.g. link between Tiverton and Exeter, routes around Tiverton and Cullompton.	Individual (3972, 5211)	S1 supports the comment made. The aspirations of the comment are in part beyond the scope of Mid Devon however policies in the proposed Local Plan Review do not preclude development proposals which provide the routes suggested.
	Oppose to any further development on green field sites in Mid Devon.	Individual (3694)	Local Plans are key to the delivery of sustainable development, seeking opportunities to achieve each of the economic, social and environmental dimensions of sustainable development. In the case of Mid Devon the increase in housing need is greater than which can be provided by only brownfield land, as such to meet housing need, development on green field sites is required. Appropriate previously developed land is allocated in the Local Plan.
	How the Council oversees and retains strong influence over large housing developments e.g. wish to see statement of intent about level of direct provision of housing by the council.	Individual (5302)	Comment refers to the role of a different department in Mid Devon District Council rather than requiring a change to the Local Plan Review.
	General concerns over provision of services, facilities and infrastructure in Mid Devon.	Individual (5306)	The Local Plan Review aims to protect our town centres, infrastructure including community facilities is guided by need and existing services and facilities are protected.

	Would like to self-build.	Individual (3729)	The Local Plan Review is supportive of self-build development. The Council maintains a Self-Build Register which contains details of anyone who has registered their interest in developing a self-build property in Mid Devon. The information will be used to understand the demand for self-build housing in Mid Devon, informing policies to improve the supply of land for custom build housing.
	Concerns over the priority habitat layer.	Individual (2827)	The priority habitat layer is a National layer provided by Natural England. Any updates to the layer provided by Natural England will be reflected in subsequent maps.
	Policies should apply best practice in terms of ecology and sustainable energy.	Individual (5864)	The Local Plan Review recognises the importance of ecology and sustainable energy in a number of policies such as S1 and S9. Also note that following the government's housing standards review, improvements in the energy efficiency in buildings now primarily fall within the field of building control rather than planning.
	Local Plans should cover minerals planning.	Individual (4552)	Devon County Council is the responsible body for minerals planning. The Local Plan Review takes into account important minerals conservation areas through the proposal maps. It also notes the Devon County Council's Waste and Minerals Plan in the supporting text.
	The Local Plan is legally compliant, sound and has complied with the duty to co-operate.	Individual (5865, 373)	Noted.
	The Local Plan is legally compliant and sound.	Individual (5871)	Noted.
	The Local Plan is not legally compliant, sound and has not complied with the duty to co-operate.	Individual (5624)	The respondent submitted both a written submission and an online survey. The survey sets out the comment but without further information.

	Include sites identified for car parking in Bradninch. Sites were previously identified for car parking but have now disappeared from the Plan.	Bradninch Town Council (86); Individual (773)	A number of possible locations for car parks were included as options during the preparation of the Allocations and Infrastructure DPD in 2007. However, it was noted that these would only be included in the final version if it was clear they could be implemented. None were eventually allocated for these reasons. The Parish Plan (having been prepared in 2010) erroneously states that these sites were allocated as car parks in the adopted plan. Sites for small parking areas within Bradninch are still possible without allocating.
	Would like to see other disused stations and lines reinstated/protected e.g. old Tiverton Junction station at Willand.	Railfuture (5830)	Without significant further work on costings, feasibility and funding, the inclusion of reopening Willand Station and in particular a new line to Tiverton in the Local Plan could not be supported as it would be premature. These proposals do not currently form part of the metro scheme although the Council is commissioning a timetable study which includes consideration of the role of the Willand loop.
	Support a proposal to provide a new cultural hub for Crediton.	Crediton Town Team (5821)	Cultural facilities are supported by S12 for Crediton and would not need to be allocated in order to come forward.
	Extend wildlife site at Charwell.	Bradninch Town Council (86)	Wildlife sites are not designated by the Local Plan Review. Any future updates to the wildlife sites layer will be amended in subsequent proposal maps.
	Further clarification on reasoning for designation of priority habitats required.	Bradninch Town Council (86)	A priority habitat is not a designation made by the Local Plan Review. Any future updates to the priority habitats layer will be amended in subsequent proposal maps.
	Replace key diagram with previous key diagram in Core Strategy.	Mid Devon CPRE (486); Individual (366)	The Core Strategy key diagram is out of date in comparison to the key diagram in the Local Plan Review. Amendments to the diagram have been made to future proof its use.

	Definition of community facilities should be in glossary.	Devon and Cornwall Police c/o WYG (5762)	Add definition of community facilities in glossary.

This page is intentionally left blank

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
Residential CIL charge			
CIL	The infrastructure costs associated with strategic sites is significant and the scale of onsite delivery renders the use of a Section 106 Legal Agreement more appropriate to secure the associated infrastructure. We consider appropriate phasing and infrastructure delivery will overcome short-term viability issues to ensure that the site (East Cullompton) is deliverable over the longer term. The sites delivery should be managed through a Section 106 Agreement rather than CIL and support the zero rate for strategic sites.	Pegasus Planning (3678)	This comment is noted and supports the provisions for the Strategic Sites as proposed.
CIL	The evidence contained with the Viability Assessment (2014) supports the Council`s Draft Charging Schedule and that the CIL rate for strategic sites should be set at a nil-rate.	Pegasus Planning (3678)	The support for the charging schedule as published is noted.
CIL	There is concern that there is an insufficient provision of affordable housing being delivered over the proposed plan period. It is suggested that the Local Plan should be adapted to reflect this and that either a higher affordable housing target or an increased housing target is required in the Local Plan. As it stands we support for the CIL Charging Schedule particularly through the use of affordable housing thresholds as a way of differentiating between CIL rates and recognising that extra care can fall within the C2 Use Class.	South West HARP Planning Consortium (1581)	Representation has some contradictions. Supports CIL charge as things stand but suggest a higher housing or affordable housing target ought to be promoted. The overall housing target is proposed to be increased to 7,860, which would yield 110 affordable dwellings per year at 28%. The SHMA forecasts a need of 124 affordable dwellings per year; the local plan has been changed to reflect this. It is highly likely that the Council and its housing association partners will be able to provide at least 20 additional affordable dwellings per year through non-planning actions such as investment from the HCA, exceptions sites and delivery on council owned land. Analysis by the Joseph Rowntree Foundation indicates that s106 did not provide 100% of the affordable housing completions in any of the last 10 years The local plan sets targets of 28% in the urban areas on sites of 11 houses or more and 30% in the rural areas on sites of 6 or more. The affordable housing targets are based on viability evidence. Increasing the Affordable Housing target would make some sites unviable and so reduce the delivery of affordable homes overall. As things stand the representation expresses support for the CIL charging Schedule while promoting an increased housing target overall.

CIL	The £100 per sq. m rate is counter intuitive with respect to NPPG guidance in that planning obligations are changed to facilitate and encourage greater delivery of housing from small scale developers.	Devonshire Homes Ltd (1050	All new developments are required to contribute to the provision of necessary infrastructure in the locality. Without the provision of such infrastructure new development would not be able to take place. Contributions to infrastructure are normally made via Section 106 Obligations or by a Community Infrastructure Levy. Objector refers to Paragraph 12 of NPPG section on planning obligations in their rep - this no longer exists. Paragraph 031 Reference ID: 23b-031-20160519 now states, in a rural area where the lower 5-unit or less threshold is applied, affordable housing and tariff style contributions should be sought from developments of between 6 and 10-units in the form of cash payments which are commuted until after completion of units within the development.
CIL	Differential rates should not be used as a means to deliver policy objectives. The proposed CIL rate in Mid Devon seeks to recover under different means; a zero sum game that actively acts against what the NPPG and the Government seek.	Devonshire Homes Ltd (1050)	The differential rates are based on the variation in residential land values identified by Dixon Searle in their viability report. While land values can vary on a site to site basis, Figure 10, page 67 of the Dixon Searle report clearly shows the general range of residential land values and patterns. Generally residential land values are likely to be higher in the areas outside Tiverton, Crediton and Cullompton. The differential rates are therefore justified between urban and rural areas based on the viability evidence provided. The Dixon Searle report states at Paragraph 3.2.6 " *The higher values and typical scheme types coming forward away from Tiverton, Cullompton and Crediton are likely to drive improved viability in the rural areas / smaller settlements and our view is that this could support some - - - - - - - newly introduced CIL differentiation for all areas outside these 3 main settlements;"* The differential in land values between urban and rural areas has been largely maintained in the latest viability assessment (August 16)
CIL	The rate of £40 per sq. m for dwellings incorporated in Zone 2 (Dwellings in Tiverton, Cullompton and Crediton) is supported; however it was felt that the extent of this rate required further clarification.	Bell Cornwell LLP (3775)	CHANGE It is recognised that Zone 2 (iii) Tiverton, Cullompton and Crediton could be more clearly defined. Adding some additional text to the charging schedule, to identify the areas of Crediton, Tiverton and Cullompton as identified for Zone 2 (iii) should resolve the issue. SUGGESTED CHANGE – under **Definitions of Charging Zones** in the charging schedule, add, "Zone 2 (iii) is land within the defined settlement limits of Cullompton, Tiverton and Crediton but excludes land in Zone 1."

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

CIL	i - It was felt that the use of a disaggregated approach towards the Charging Schedule is inappropriate and that it should be abandoned and replaced with a single, District-wide charge. ii - Clarity is required with regard to whether and what the requirements for the strategic allocations will be ensuring land assembly and delivery in a comprehensive way. Iii - The zero rates in the urban extensions is not justified in the absence of any certainty that the necessary site and strategic infrastructure will be provided.	Bell Cornwell LLP (3775) Individual (5236)	i - The differential rates are based on the variation in residential land values identified by Dixon Searle in their viability report. While land values can vary on a site to site basis, Figure 10, page 67 of the Dixon Searle report clearly shows the general range of residential land values and patterns. Generally residential land values are likely to be higher in the areas outside Tiverton, Crediton and Cullompton. The differential rates are therefore justified between urban and rural areas based on the viability evidence provided. The Dixon Searle report states at Paragraph 3.2.6 " *The higher values and typical scheme types coming forward away from Tiverton, Cullompton and Crediton are likely to drive improved viability in the rural areas / smaller settlements and our view is that this could support some - - - - - - - newly introduced CIL differentiation for all areas outside these 3 main settlements;"* The differential in land values between urban and rural areas has been largely maintained in the latest viability assessment (August 16) ii - Each of the three Strategic areas are subject to prior application Masterplanning, involving all statutory consultees and the local community. Those Masterplans (will or have) clearly set out the infrastructure requirements and the delivery timetable of the strategic sites. Policies in the Local Plan Review set out the principle infrastructure and policy requirements including a public masterplanning exercise for all three strategic sites which set out the principle infrastructure and policy requirements. Two of the Masterplans have already been prepared. Tiverton Eastern Area Extension Masterplan is approved and adopted. Cullompton North West Extension Masterplan approved and adopted. On the third strategic site Cullompton East, Masterplanning has not commenced. However policies CU7, CU8, CU9, CU10, CU1, and CU12 set out the principle infrastructure and policy requirements. The rate for the Strategic Sites is set at zero as infrastructure provision and/or financial contributions will be provided/collected by Section 106 Planning Obligations. The Tiverton Eastern Extension Masterplan and Cullompton North West Masterplan, show infrastructure provision on these strategic sites is best provided by 106 Obligations Tiverton Eastern Urban Extension that the infrastructure

Other CIL charge comments			
CIL	Whilst the CIL document is a 'living document' that should be kept under review, it was felt that there is a need for a more formal mechanism for review to be put into place.	Bell Cornwell LLP (3775)	An annual index-linked adjustment to rates is set out in CIL Regulation 40 (as amended). This will involve the use of the 'All-in Tender Price Index', published by the Building Cost Information Service (BCIS). The adjustment to charge rates will be applied from 1st January each year, using the index figure published by the BCIS for the previous 1st November. The Council will have a duty to keep its adopted levy rates under review to ensure that they remain appropriate over time. The Council will need to consider both the planning policy context within which the levy operates as well as wider economic and market-related changes over time, which may indicate the need to adjust rates to ensure that they do not adversely impact on the overall viability of development across the District. If evidence emerges to indicate that the adopted charge rates are no longer appropriate, the Council will commence the process of a formal review of the Charging Schedule. This will involve the same evidence requirements, consultation opportunities and examination that were required to introduce the initial Charging Schedule.
CIL	To follow the detailed logic of the Local Plan Review it was felt that the new CIL Charging formula is not likely to very quickly fulfil the desirable aims in expanding community aspirations in infrastructure, leisure and sport.	Individual (3700)	It is recognised that the modest CIL rates imposed on development in Mid Devon will take time to make any significant contribution to the infrastructure requirements outside of the provisions identified in the strategic sites.
CIL	The finances secured through CIL should benefit the site from which it originally came from.	Individual (3943)	CIL can be spent District Wide and is not site specific this accords with the provisions set out in National Policy and CIL Guidance. Some or more than was collected from the site may be spent in the locality. 15% or CIL funds collected (or 25% where there is an adopted Neighbourhood Plan, Neighbourhood Development Order or Right to Build Order) is paid directly to the Parish or Town Council. Explanatory Notes about CIL will be provided to accompany the charging schedule.

CIL	The Local Plan should be in place prior to the CIL being adopted. The Council need to have a clear understanding of the level of residential development to be brought forward in the plan period when preparing the charging schedule as this will directly influence the scale of CIL that will be generated.	Gladman Developments (5312)	Infrastructure needs are drawn from the infrastructure assessment that was undertaken as part of preparing the Local Plan. This is because the plan identifies the scale and type of infrastructure needed to deliver the area's local development and growth needs (paragraphs 162 and 177 of NPPF). In determining the size of its infrastructure funding gap, the charging authority considers known and expected infrastructure costs and the other possible sources of funding to meet those costs. This process helps the charging authority to identify a levy funding target. The Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. Charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy. The Community Infrastructure Levy examination should not re-open infrastructure planning issues that have already been considered in putting in place a sound relevant Plan however in practice joint Local Plan and CIL examinations is common practice.
CIL	The Council should consider how the CIL might fund measures relating to the historic environment in support of infrastructure to deliver sustainable development and sustainable communities.	Historic England (1170)	The Council has a number of Conservation areas at risk. The Council has therefore amended the Regulation 123 list to include "Public realm improvements and enhancements".
CIL	The Council should consider raising the CIL threshold for small developments, it was felt that the basic rate of 15% is not enough when the levy is used to produce Neighbourhood Plans, new infrastructure in play areas, parks and green spaces, cultural and sports facilities, some schools, police stations, district heating schemes and other community safety facilities.	Individual (2075)	The provision of 15% (25% where there is a Neighbourhood Plan) of CIL being provided to Town and Parish Councils is set in National Legislation. The 15% is the statutory provision which must be given to Town or Parishes Councils it does not prevent local communities for applying for additional CIL funding for specific projects that fall with the provisions of the 123 list. The CIL levy itself is based on viability evidence of development sites. Raising the CIL levy is not supported by the viability evidence.
CIL	In general, there is support for the use of planning obligations (s106)/community infrastructure levy (CIL) as a way of securing the provision for sporting facilities and their maintenance. It may be more effective if the contributions are sought though planning obligations as opposed to CIL unless there is a specific project identified. If such a project is deliverable, then it may be more appropriate to fund through CIL and consequently should be on the Reg 123 list.	Sport England (169)	The policy provisions for the strategic sites requires provision of Children`s play areas and sports pitches. Amenity open space, parks, sports and recreation grounds. A suitable site for relocating Crediton Rugby Club is also required by the plan. All these are required to be provided by the developments. In addition the CIL 123 list makes provision for Leisure Facilities (sports facilities defined as publicly owned leisure centres, gyms and swimming pools.

CIL	The Council has produced a CIL Charging Schedule that is urban focused and the high rural levy will put at risk new developments in rural areas Viability assessments must be underpinned by robust evidence that takes account of the differences in economic viability between urban and rural developments. The Council should consider the use of different rates for rural areas if the charging schedule is not to prevent critically needed rural developments from coming forward.	CLA – County Land & Business Association (3649)	The differential rates are based on the variation in residential land values identified by Dixon Searle in their viability report. While land value can vary on a site to site basis, Figure 10, page 67 of the Dixon Searle report clearly shows the general range of residential land values and patterns. It is clear that generally residential land values are likely to be higher in the areas outside Tiverton, Crediton and Cullompton. The differential rates are therefore justified between urban and rural areas based on the viability evidence provided when considered overall. The Dixon Searle report states at Paragraph 3.2.6 " *The higher values and typical scheme types coming forward away from Tiverton, Cullompton and Crediton are likely to drive improved viability in the rural areas / smaller settlements and our view is that this could support some - - - - - - - differentiation for all areas outside these 3 main settlements; "*
Instalments Policy			
CIL	Several representations stated The Council have not produced an Instalments or Exemptions Policy or a policy on the introduction of relief from CIL to comment on despite stating that they will 'consider the introduction of relief when it considers the adoption of CIL after examination' and that they will prepare an instalments policy before adoption.	South West HARP Planning Consortium (1581); Bell Cornweall LLP (3775); Gladman Developments (5312)	The Council will provide an Instalment. There is no requirement to have a policy on Exceptional Circumstances Relief. The power to offer relief can be activated/deactivated at any point AFTER a charging schedule is approved. The Council will keep under review the basis for having a policy, but do not intend to produce one at this stage.
CIL	There is a need to review CIL tariffs once they have been set. The economic climate will inevitably change over the course of the plan period and as such the levy rates should be set to maintain development viability.	Gladman Developments (5312)	CIL rates will be adjusted annually to take account of inflationary changes. In addition to annual indexation, the Council have a duty to keep its adopted levy rates appropriate over time. The planning policy context within which the levy operates as well as wider economic and market-related changes over time may indicate the need to adjust rates. If evidence emerges to indicate that the adopted charge rates are no longer appropriate, the Council will commence the process of a formal review of the Charging Schedule. This will involve the same evidence requirements, consultation opportunities and examination that are required to introduce the initial Charging Schedule.
CIL	There is as yet no instalment policy. Larger developments with significant upfront costs can be significantly affected by the front loading payment of CIL. Levy requirements can be critical to viability and an Instalments Policy should be prepared by the Council.	Bell Cornwell LLP (3775)	An instalment policy will be provided by the Council at submission.
Infrastructure Plan/Reg 123 list			

CIL	Greater clarity is needed over what is meant by 'other infrastructure' so that uncertainty does not stunt economic growth as encouraged by the NPPF.	Bell Cornwell LLP (3775)	Examples of "other Infrastructure" are listed in the policy document relating to 106 obligations. It is not a comprehensive list and it is not possible to compile such a list. Such additional infrastructure requirements will be site specific.
CIL	It is inappropriate to set the levy based on a partial understanding of the infrastructure costs and particularly where the total money needed for infrastructure is unknown.	Gladman Developments (5312)	Infrastructure needs are drawn from the infrastructure assessment that was undertaken as part of preparing the Local Plan. This is because the plan identifies the scale and type of infrastructure needed to deliver the area's local development and growth needs (paragraphs 162 and 177 of NPPF). In determining the size of its infrastructure funding gap, the charging authority consider known and expected infrastructure costs and the other possible sources of funding to meet those costs. This process will help the charging authority to identify a levy funding target. The Government recognises that there will be uncertainty in pinpointing other infrastructure funding sources, particularly beyond the short-term. Charging authorities should focus on providing evidence of an aggregate funding gap that demonstrates the need to put in place the levy. The Community Infrastructure Levy examination should not re-open infrastructure planning issues that have already been considered in putting in place a sound relevant Plan.
CIL	The Council should consider using some of the CIL finances derived from developments north of Newton St Cyres towards improving the road infrastructure south of Crediton as new developments in this area impact on road usage throughout the parish. In addition, the Council should consider a cycle/footpath between Crediton and Exeter to be included within the Local Plan with financial contributions provided through CIL.	Newton St Cyres Parish Council (46)	There are no proposals for the improvement of the A377 south of Crediton or Newton St Cyres and DCC Cycle Strategy set out their ambitions for the Devon cycle network. But due to limited funding it did not seek to extend the cycle network and an Exeter-Crediton cycle link was not prioritised. The strategy is now adopted. The route is heavily constrained and deliverability would be very unlikely with the plan period.
CIL	The strategic provision of public open space/green infrastructure should include improvements and/or extensions to public rights of way and recreational trails.	Devon Countryside Access Forum (1534)	The strategic provision of open space/green infrastructure could include extensions and improvements to public rights of ways within those areas.
CIL	One respondent refers to upgrades to the waste water treatment facilities and states that maintenance to the access roads should be completed as a prerequisite, that these roads are made safe, secure and fit for purpose, before any facilities upgrades.	Collipriest Lane Action Group (3594)	The road leading to the Sewage Treatment Works in Tiverton known as "Collipriest Road/CollipriestLane" is a principally a private road shared by a number of householders, land owners and South West Water. Its maintenance and improvement is a matter for those having rights over the roadway. It is not a highway for motor vehicles maintainable at public expense.

CIL	The Council may wish to clarify how development specific planning obligations and S106 will continue to offer opportunities for funding improvements to and the mitigation of adverse impacts on the historic environment such as archaeological investigations, access and interpretation, and the repair and reuse of buildings or other heritage assets.	Historic England (1170)	The Council has a number of Conservation areas at risk. The Council has therefore amended the Regulation 123 list to include "Public realm improvements and enhancements".
CIL	The Regulations 123 list should refer to the conservation and enhancement of Mid Devon's historic townscape, heritage assets and/or their settings to support the funding of appropriate initiatives.	Historic England (1170)	The Council has a number of Conservation areas at risk. The Council has therefore amended the Regulation 123 list to include "Public realm improvements and enhancements".
CIL	No payment in kind policy has been produced by the Council. There is a danger of development paying twice particularly with open space provision.	Bell Cornwell LLP (3775)	The CIL Regulations provide the Council with the discretion to accept CIL payments 'in kind', such as through the transfer of land or the completion of infrastructure works on or off the development site. The Council is proposing to allow payments in kind in line with the CIL Regulations. It will remain in the Council's discretion whether to accept payments in kind.
CIL	Demand for Criminal Justice Centre (CJC), Exeter. Devon & Cornwall Police consider it appropriate that a proportion of the funding gap for the CJC is met by CIL and financial contributions via planning obligations from the strategic sites as part of the development proposals in Mid Devon. CJC should be identified as critical infrastructure in Plan rather than desirable.	Devon and Cornwall Police (5762)	The CJC is identified in the Mid Devon Infrastructure Plan as desirable Strategic Infrastructure and an allocation of £1.05 million from CIL and developer contributions is identified. The IP defines critical infrastructure as that 'required to deliver the strategic objectives of the Local Plan. Critical requirements contribute to delivering the wider strategic aims of the Plan, and may also mitigate the impacts of development schemes. The plan may fail without the delivery of this infrastructure'. Whilst 'Desirable' is infrastructure required to 'enhance the effectiveness, efficiency and quality of infrastructure or services, creating a better place to live and work.' Failure to fund the CJC is not likely to result in the failure of the plan, and hence is not critical.

This page is intentionally left blank

Appendix 2

Mid Devon
DISTRICT COUNCIL

Mid Devon Local Plan Review 2013-33

Schedule of Minor Modifications

Date: November 2016

No.	Policy/ paragraph	Change	Reason
1.	General	Amend reference of English Heritage to Historic England throughout the document where appropriate.	To reflect rebranding of English Heritage to Historic England
2.	General	Remove weblinks and replace with reference to websites rather than the links provided e.g. 'available on the Mid Devon District Council website'.	Reference to appropriate websites instead of providing weblinks is considered appropriate to future proof the use of the Local Plan in which weblinks can change over time or be broken.
3.	General	Amendment to Policy and paragraph numbers.	To reflect the proposed modifications set out in this schedule of proposed minor modifications.
4.	Spatial Strategy	Insert text after the Spatial Strategy section on 'Other Market Towns' as follows: '*Junction 27, M5 Motorway* *Regionally significant transport infrastructure linkages and acts as a gateway to the South West Peninsula.* *Development will be targeted to:* • *Provide a high quality tourist and leisure focused development to meet needs identified within the*	To reflect the Council decision on 22nd September 2016 to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.

<table>
<tr><td></td><td></td><td>tourism study.
• Associated outlet/discounted retail floorspace to meet a regional comparison floorspace need and deliver the tourist and leisure elements of the allocation. Safeguarding existing town centres through planning controls.
• Ensuring enhanced linkages to Tiverton and Cullompton and the National Rail Network.
• Mitigating environmental impacts.
• Upgrading directly affected transport infrastructure. ‘</td><td></td></tr>
<tr><td>5.</td><td>Neighbourhood Planning</td><td>Amend paragraph 1.19 as follows:

1.19 Depending on its scope, the preparation of a neighbourhood plan can be a complex and time-consuming process, requiring a certain amount of technical expertise. The Council will support local communities wishing to pursue neighbourhood planning. Cullompton, Crediton, ~~and~~ Silverton and Tiverton / Halberton were the first to initiate neighbourhood planning in Mid Devon.</td><td>To reflect the Tiverton and Halberton Neighbourhood Plan area designation on 28 July 2015.</td></tr>
<tr><td>6.</td><td>Superseded policies</td><td>Amend the following superseded policies:

<table>
<tr><td>AL/TIV/9</td><td>Blundells School</td><td>Replaced by: TIV16: Blundells School
~~The site is not considered deliverable~~</td></tr>
<tr><td>AL/TIV/21</td><td>Tidcombe Hall</td><td>Replaced by TIV13-Tidcombe Hall</td></tr>
<tr><td>AL/BA/1</td><td>Bampton, School Close</td><td>~~Deleted: Site permitted and under construction~~. Replaced by: BA4 School Close, Bampton</td></tr>
<tr><td>AL/BA/2</td><td>Bampton, Bourchier Close</td><td>Deleted: ~~Site has not come forward since~~</td></tr>
</table>
</td><td>To reflect the most up to date information. The justification for these changes is set out elsewhere in the document.</td></tr>
</table>

					~~allocation.~~ Site no longer required in accordance with the strategy for Bampton.	
			DM14	Design of Housing	Replaced by DM12: Housing Standards ~~Design of Housing~~	
			DM13	Dwelling Sizes	Replaced by: DM13 Dwelling Sizes	
7.	Overall provision of housing	Insert text before paragraph 2.2 as follows: *[Will become paragraph 2.1a] "National policy requires that the Council uses its evidence (known as a Strategic Housing Market Assessment, or SHMA) to ensure that the Local Plan meets the full, objectively assessed needs for housing, and that planning for housing is considered over Housing Market Areas. The most recent SHMA for the Exeter Housing Market Area (incorporating Mid Devon, along with Exeter, East Devon and Teignbridge) published 2015, sets out the Objectively Assessed Need for Mid Devon and the remainder of the HMA.* *[Will become paragraph 2.1b] 2.1b The SHMA sets out the housing need range for Mid Devon of 359 – 381. Further explanation is given in the SHMA document. This Local Plan sets a housing target of 393 dwellings, above the housing need range set in the SHMA to ensure that housing provision in the plan is consistent with the additional need arising from job creation at Junction 27 of the M5. The HMA concludes that there is no need for further upward adjustment to reflect market signals or other such factors.* Amend paragraph 2.2 as follows: "~~7,200~~ *7,860* dwellings are required over the plan period, equating to ~~360~~ *393* dwellings per year. The following table sets out the situation at 31st March ~~2014~~ *2016*, indicating a remaining need for about ~~5,511~~*4,924* dwellings to be allocated.				To better explain the housing target arising from the SHMA 2015. To reflect the revised target contained within policy S2 and to update the housing completions and commitments data to an April 2016 base. To reflect the Council decision on 22nd September 2016 to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.

Local Plan requirement	~~7,200~~*7,860*
Completions since 2013	~~320~~*924*
Commitments (dwellings under construction or with planning permission)	~~1,369~~ *2,012*
Uncommitted requirement	~~5,511~~*4,924*

Table 4: Housing requirement

Amend paragraph 2.3 as follows:

"Across the district this breaks down as follows:

Location	Requirement	Completions (from 1 April 2013 – 31 March ~~2015~~2016)	Commitments (at 1 April ~~2015~~2016)	Remainder
Tiverton	~~2,160~~*2,358*(30%)	~~93~~*261*	~~522~~*745*	~~1,545~~*1,352*
Cullompton	~~3,600~~*3,930* (50%)	~~87~~*209*	~~199~~*487*	~~3,314~~*3,234*
Crediton	~~720~~*786*(10%)	~~58~~*107*	~~216~~*245*	~~446~~*434*
Rural	~~720~~*786* (10%)	~~82~~*347*	~~432~~*535*	~~206-~~*-96*
Total	~~7,200~~*7,860*	~~320~~*924*	~~1,369~~*2,012*	~~5511~~*4,924*

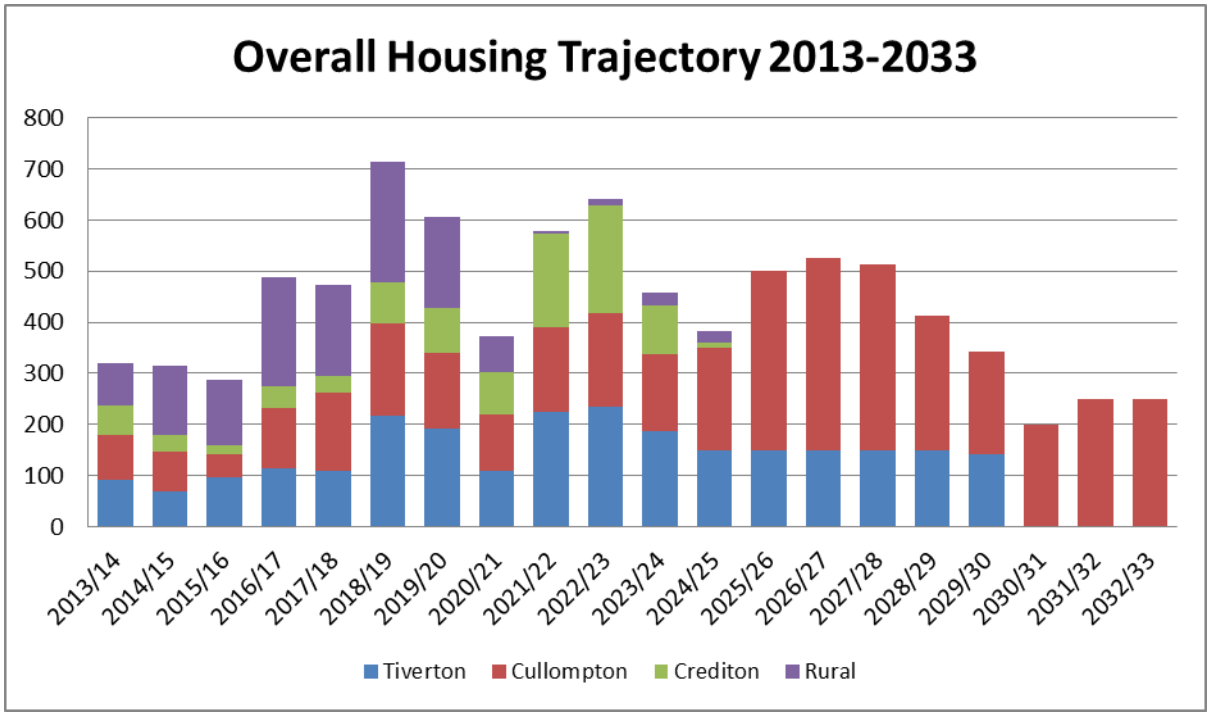
	(100%)			

Table 5: Housing requirement by area

Amend the beginning of paragraph 2.4 as follows: ”The Local Plan allocates 10% more housing than is required, to provide flexibility and account for unforeseen circumstances that might prevent some sites from coming forward as expected *such as not all commitments translating into completions*. “

Added for clarity.

Amend Chart 1: Overall housing trajectory as follows:



Amend Table 6: Housing Forecast 2013 – 2033 as follows:

Location	Policy	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Total
Tiverton																						
Eastern Urban Extension	TIV1-TIV5									57	150	150	150	150	150	150	150	143				1250
Howden Court	TIV9						10															10
Roundhill	TIV10						12	8														20
Phoenix Lane	TIV12									25	35											60
Tidcombe Hall (contingency)	TIV13																					0
Blundells School	TIV16						12	25	25	50	50	38										200
Commitments					114	110	183	160	85	93												745
Completions		93	70	98																		261
Total		93	70	98	114	110	217	193	110	225	235	188	150	150	150	150	150	143	0	0	0	2546
Cullompton																						
NW Cullompton	CU1-CU6					12	75	75	75	150	150	150	150	150	150	150	63					1350
East Cullompton	CU7-CU12												50	200	200	200	200	200	200	250	250	1750
Knowle Lane	CU13										30											30

Ware Park and Footlands	CU 14															25	13						38
Colebrook (contingency)	CU 21																						0
Commitments					118	140	105	71	35	16	2												487
Completions		87	78	44																			209
Total		87	78	44	118	152	180	146	110	166	182	150	200	350	375	363	263	200	200	250	250		3864
Crediton																							
Red Hill Cross	CRE 2									25	50	50	10										135
Cromwells Meadow	CRE 3						12	23															35
Woods Group	CRE 4									8													8
Pedlerspool	CRE 5					12	25	25	50	50	38												200
Sports Fields	CRE 6									25	50	45											120
Stonewall Lane	CRE 7									25	25												50
Land at Barn Park	CRE 8							12	8														20
Alexandra Close	CRE 9						12	3															15
Commitments					44	20	33	25	25	50	48												245
Completions		58	31	18																			107
Total		58	31	18	44	32	82	88	83	183	211	95	10	0	0	0	0	0	0	0	0		935
Rural sites																							
Newton Square	BA1									5													5
Hollywell	BO 1							12	8														20
Hele Road	BR1							7															7

Barton	CH1							12	8														20
Land off Church Lane	CB1							12	8														20
Barnshill Close	CF1							7															7
Land adj school	CF2							12	10														22
Old Abbatoir	CO1						15	15															30
Linhay Close	CL1						6																6
Hunters Hill	CL2						10																10
Land adj Fishers Way	HA1							10															10
Greenaway	MO1							12	8														20
Court Orchard	NE1					12	13																25
Former Tiverton Parkway Hotel	SP1							10															10
Higher Town	SP2										12	25	23										60
Fannys Lane	SA1							8															8
Old Butterleigh Road	SI1							8															8
The Garage	SI2							5															5
South of Broadlands	TH1						12																12
West of Uffculme	UF1						12	25	23														60
Land east of M5	WI1						12	25	5														42
Commitm					21	16	15																53

ents					2	8	5																5
Completions		82	137	128																			347
Total		82	137	128	212	180	235	180	70	5	12	25	23	0	0	0	0	0	0	0	0		1289
Totals																							
Total		320	316	288	488	474	714	607	373	579	640	458	383	500	525	513	413	343	200	250	250		8634

8.	Overall provision of housing	Replace Table 7 with the following: |		
---	---	---
A	Local Plan requirement 2013-2033	~~7,200~~*7,860*
B	Implied annual rate 2013-2033 (A ÷ 20)	~~360~~*393*
C	Local Plan requirement to date, 2013-*2016* ~~2014~~ (B * ~~1~~ 3)	~~360~~*1,179*
D	Completions April 2013-March *2016* ~~2014~~	~~320~~*924*
E	Shortfall to date, 2013-*2016* ~~2014~~ (C – D)	~~40~~*255*
F	Local Plan requirement *2016-2021* ~~2015-2022~~ (B * 5)	~~1,800~~*1,965*
G	5 year supply requirement (E + F)	~~1,840~~*2,220* | Replace second and third sentences of paragraph 2.7 to state *'Within certain year brackets, such as 2021/22-2025/26 and 2026/27-2030/31, this is substantially higher, as shown in the table below. The table indicates that even applying the 20% buffer in the short term, there is flexibility in the plan to ensure sufficient housing will come forward for the Council to demonstrate a five year supply in accordance with national policy.'*	To update the five year supply calculation with the latest housing monitoring data.

<table>
<tr><td></td><td></td><td>Replace Table 8 with the following:<table><tr><td></td><td>2016/17-2020/21</td><td>2021/22-2025/26</td><td>2026/27-2030/31</td></tr><tr><td>Requirement</td><td>2220</td><td>1965</td><td>1136</td></tr><tr><td>Trajectory</td><td>2651</td><td>2560</td><td>1994</td></tr><tr><td>Surplus</td><td>20%</td><td>30%</td><td>76%</td></tr></table></td><td></td></tr>
<tr><td>9.</td><td>Overall provision of housing</td><td>Amend the beginning of paragraph 2.8 to state ‘All the housing sites in the Local Plan…’</td><td>To clarify that only housing sites have been subject to the Strategic Housing Land Availability Assessment.</td></tr>
<tr><td>10.</td><td>Extra provision</td><td>Within paragraph 2.9 amend ‘628’ to ‘774’.</td><td>To update the figures based on the latest housing monitoring data and revisions to allocations.</td></tr>
<tr><td>11.</td><td>Extra provision</td><td>Amend the beginning of paragraph 2.11 to state ‘The Local Plan allocates <s>three</s> two ‘contingency sites’…</td><td>To reflect the removal of the Wynnards Mead contingency site.</td></tr>
<tr><td>12.</td><td>Commercial development</td><td>Amend the last sentence of paragraph 2.12 to state:
“Nevertheless, uncontrolled retail and some other proposals in the wrong location can have serious adverse impacts on town centres and surrounding uses, so there will be careful consideration of these proposals on sites not allocated for such a use.”</td><td>Added for clarity.</td></tr>
</table>

13.	Commercial development	Amend paragraph 2.14 to replace 14,000 with *7,000* square metres and 154,000 with *147,000* square metres.	Reference to 14,000 square metres was made in error. 7,000 square metres reflects findings of the retail study.
14.	Development Strategy	For clarity amend paragraph 2.15 "…the Council will consider alternative uses as set out in paragraph *2.12* and Policy DM19 (protection of employment land)."	In response to comment from Willand Parish Council (44) that the last line of paragraph 2.15 should refer to 2.12 not 2.13. Reference to 2.13 was made in error.
15.	Policy S1, Sustainable development priorities	Criterion c) add *"through controls on Junction 27 retail"* after *"Tiverton, Crediton and Cullompton,"* Criterion (i) add *"recreational trails"* after "public rights of way".	To reflect the Council decision on 22nd September 2016 to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. In response to comment from the Devon Countryside Access Forum (1534).

<table>
<tr>
<td>16.</td>
<td>Policy S2, Amount and distribution of development</td>
<td>Replace “7,200” with “7,860” and “154,000” with “147,000” in the first paragraph, amend the sentence before the table and the table in the policy as follows:

Development targets are approximately as follows:

<table>
<tr><th>Location</th><th>Total Residential (commitments and allocations; dwellings)</th><th>Total Commercial (commitments and allocations; square metres)</th></tr>
<tr><td>Tiverton</td><td><s>2,160</s>2,358</td><td><s>30,800</s>29,400</td></tr>
<tr><td>Cullompton</td><td><s>3,600</s>3,930</td><td><s>77,000</s>73,500</td></tr>
<tr><td>Crediton</td><td><s>720</s>786</td><td><s>15,400</s>14,700</td></tr>
<tr><td>Rural Areas</td><td><s>720</s>786</td><td><s>30,800</s>29,400</td></tr>
<tr><td>Total</td><td><s>7,200</s>7,860</td><td><s>154,000</s>147,000</td></tr>
</table>

Within the second paragraph of the policy add the following after the last sentence:
“In addition, development as proposed at Junction 27 of the M5 meets a tourism / leisure need in a location which is suitable for its regional role with a controlled retail element supporting the tourism and leisure aspects of the proposal.”

Within paragraph 2.20 add the following after first sentence:
“A summary of the SHMA outputs on housing need is contained in paragraphs 2.1a and 2.1b.”

Add an additional paragraph 2.25a:
“In addition to the development targets as set out in the policy above, land at Junction 27 is allocated for 42,550 sqm of commercial floorspace to meet a tourism/leisure need in a location suitable for its regional</td>
<td>To better reflect the Strategic Housing Market Assessment outputs and the overall revision of the commercial development target to better reflect the Retail Study evidence.

To provide clarity in the policy and to reflect the Council decision on 22nd September 2016 to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.</td>
</tr>
</table>

		role with a retail element supporting the tourism and leisure aspects of the proposal. This will provide a high quality tourist and leisure focussed development to meet needs identified within the tourism study."	
17.	Policy S3 Meeting housing needs	Amend a) by replacing "7,200" with "*7,860*" and "360" with "*393*". Amend paragraph 2.26 by adding acronym (SHMA) after 'Strategic Housing Market Assessment' and an explanation: *'Objectively Assessed Need' (OAN) is determined by examining demographic projections, jobs-led population forecasts and market signals which may affect housing need. The SHMA concludes that Mid Devon's housing need falls between 359 and 381 dwellings per year.* ~~This has established the level and types of housing required with a total of 7,200, and with an annual building rate of 360 taking into account the latest population projections and the Government's intention to increase the level of housing supply~~. *This Local Plan sets a housing target of 393 dwellings, above the housing need range set in the SHMA to ensure that housing provision in the plan is consistent with the additional need arising from job creation at Junction 27 of the M5. "* Amend paragraph 2.27 by replacing "96" with *"124"* and "27%" with "*30%*" and additional text '*Additional affordable housing will also continue to come forward as windfalls resulting from Homes and communities Agency investment, exception sites and delivery of housing on Council-owned land.'* Amend paragraph 2.29 by adding *"and other sites as they come forward"* after "strategic site allocations". Within paragraph 2.31 replace remainder of paragraph from the point which states "As a result a group of Councils in Devon' with '*As a result a group of Councils within Devon commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) to ascertain the need for gypsy, traveller and travelling*	To better reflect the findings of the SHMA and the GTAA and also the inclusion of Junction 27 and associated housing.

<table>
<tr><td></td><td></td><td>showpeople pitch or plot requirements. This study indicated that between 2014-34 within Mid Devon there is a need for 35 pitches for gypsies and travellers and 11 plots for travelling showpeople. The need for gypsy and traveller pitches will be accommodated by pitches within larger housing sites, for example at Tiverton Eastern Urban Extension, North West Cullompton, East Cullompton and Pedlerspool in Crediton. The Council is working with the travelling showpeople community to approve a large site near Cullompton which would meet the need requirements set out in the GTAA. Policy DM7 (gypsy and traveller accommodation) manages the development of specific sites."</td><td></td></tr>
<tr><td>18.</td><td>Policy S3 Meeting housing needs</td><td>Amend c) as follows:

To support self-build and custom dwellings meeting the needs of local communities, <s>affordable self build</s> such dwellings will be permitted as affordable housing in locations outside settlement limits in accordance with Policy DM6;

Amend d) as follows:

To support self-build and custom housing on sites of 20 dwellings or more….

Amend paragraph 2.30 as follows: "The Government is supporting the delivery of larger numbers of self-build and custom homes through such measures as exempting such housing from the payment of CIL. For the purposes of CIL exemption, 'self-build' is defined as all homes built or commissioned by individuals or groups of individuals for their own use. The definition used in the Self-build and Custom Housebuilding Act 2015 is included in the glossary."</td><td>In response to a comment by Lightwood Land c/o Pegasus Planning and to reflect the Housing and Planning Act 2016 which describes self-build and custom housebuilding under a single definition.</td></tr>
<tr><td>19.</td><td>Policy S4 Ensuring housing delivery</td><td>Amend table within policy S3 as follows:
<table><tr><td>Year

(1st April – 31st March)</td><td>Action Levels</td><td>Cumulative Target</td></tr></table></td><td>To reflect the revised housing target.</td></tr>
</table>

		2013/14	0	393		
		2014/15	0	786		
		2015/16	393	1179		
		2016/17	786	1572		
		2017/18	1179	1965		
		2018/19	1572	2358		
		2019/20	1965	2751		
		2020/21	2358	3144		
		2021/22	2751	3537		
		2022/23	3144	3930		
		2023/24	3537	4323		
		2024/25	3930	4716		
		2025/26	4323	5109		
		2026/27	4716	5502		
		2027/28	5109	5895		
		2028/29	5502	6288		
		2029/30	5895	6681		
		2030/31	6288	7074		
		2031/32	6681	7467		
		2032/33	7074	7860		

20.	Policy S5 Public open space	Amend S5 Policy as follows: ~~In the parishes~~ *Within the parish boundaries* of Tiverton, Cullompton and Crediton and the *parishes containing* villages defined in Policy S13, the following standards for the provision of high quality open space will be applied: Type of open space | Quantity standard | Access standard	To clarify the initial paragraph and to provide greater ease in calculating standard requirements. Amendments to the

					supporting text have also been made to reflect this change.

	(~~hectare per 1000 population~~*square metres per dwelling)*	
Allotments	~~0.25~~ *6*	300 metres or 6-7 minutes' walk time
Amenity green space	~~1.0~~*23.5*	300 metres or 6-7 minutes' walk time
Parks, sport and recreation grounds	~~1.50~~*35* include both public and private grounds (excluding education sites)	600 metres or 12-13 minutes' walk time
Play space (children)	~~0.06~~*1.5*	300 metres or 6-7 minutes' walk time
Youth space (teenagers)	~~0.02~~*0.5*	600 metres or 12-13 minutes' walk time

In all other parishes, the following standards for the provision of open space will be applied:

Type of open space	Quantity standard (~~hectare per 1000 population~~ *square metres per dwelling*)	Access standard
Allotments	~~0.25~~ *6* (for new provision)	600 metres or 12-13 minutes' walk time
Recreation space	~~1.20~~ *28* to include both	600 metres or 12-13

			public and private grounds (excluding education sites)	minutes' walk time	
			Play space (children and youth	~~0.05~~ *1*	600 metres or 12-13 minutes' walk time
		Development of 11 or more dwellings within the parishes of Tiverton, Cullompton and Crediton, and 6 or more dwellings elsewhere, ~~New housing developments~~ will provide open space onsite or through offsite financial contributions, as follows: Amend heading in second column of third table in policy as follows: *Up to* ~~1.~~49 dwelling Amend paragraph 2.35 as follows: The standards ~~will be~~*are* applied to development proposals according to the average size of households in Mid Devon (2.35 people). ~~For example, a development of 200 dwellings will be assumed to give rise to 470 people. Applying the standards in Policy S5, this development will be required to provide for 0.118 hectares allotment land, 0.47 hectares amenity green space and so on.~~		
21.	Policy S5 Public open space	Amend paragraph 2.37 as follows: "Smaller developments *(fewer than 6 dwellings in rural areas or 11 dwellings in the town*s) will not be required to provide *a public open space contribution, in accordance with national guidance. Most housing developments* ~~the full range of open space onsite, but nonetheless the residents of those developments will~~ increase the demand for open space in the area, *but a financial contribution towards a public open space project outside the site (an offsite contribution) will be accepted according to the amount of development being proposed, as set out in the policy.* The Open Space and Play Area Strategy ~~sets out~~ *describes*…"		To reflect national policy regarding thresholds for tariff-based financial contributions through S106 Agreements.

<table>
<tr><td>22.</td><td>Policy S5 Public open space</td><td>Amend paragraph 2.38 as follows:
"…Open Space Supplementary Planning Document, to be undertaken ~~in 2015~~after the adoption of the Local Plan.</td><td>Amendments to the supporting text to update the context of the Local Plan.</td></tr>
<tr><td>23.</td><td>Policy S6 Employment</td><td>Within the policy replace '154,000' with '147,000' and within paragraph 2.46 replace '14,850' with 'approximately 7,000'</td><td>The original figures were based on an inaccurate interpretation of the findings of the Retail Study.</td></tr>
<tr><td>24.</td><td>Policy S6 Employment</td><td>Replace the following rows of the table after paragraph 2.47 to state:
<table>
<tr><td>Tiverton</td><td>Phoenix Lane</td><td>TIV12</td><td>1.4</td><td>1</td><td>~~8,000~~
7,000</td><td>78</td></tr>
<tr><td>Cullompton</td><td>North West Urban Extension</td><td>CU1-6</td><td>95</td><td>3</td><td>~~21,000~~
10,000</td><td>85</td></tr>
<tr><td>Cullompton</td><td>Venn Farm</td><td>CU19</td><td>4.4</td><td>2.5</td><td>~~9,000~~12,000</td><td>10</td></tr>
<tr><td>Willand</td><td>Willand Industrial Estate</td><td>WI2</td><td>~~2.2~~ 9.2</td><td>~~2.2~~ 9.2</td><td>~~8,800~~ 13,000</td><td>13</td></tr>
<tr><td></td><td>~~Total~~</td><td></td><td></td><td></td><td>~~121,975~~</td><td></td></tr>
</table>
At the end of paragraph 2.46 add the following text:
"In addition, development as proposed at Junction 27 of the M5 meets a tourism / leisure need in a location which is suitable for its regional role with a controlled retail element supporting the tourism and leisure aspects of the proposal."</td><td>To update the floorspace figures to reflect the latest proposed allocations. The total has been deleted as it was superfluous to the purpose of the table which is to set out the Local Plan allocations and where their policies can be found in the document. Total figures for commercial development are set out in the 'Overall provision of housing and employment</td></tr>
</table>

			development section of the plan' with targets outlined under S2 'Amount and distribution of development'. Supporting text of paragraph 2.46 updated to reflect the Council decision on 22nd September to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.
25.	Policy S7 Town centres	Amend paragraph 2.48 by adding: *"This focus on healthy town centres does not preclude retail, leisure and recreation uses within strategic site allocations, such as East Cullompton. Sustainable development of such large sites requires a mix of uses, providing residents with close access to employment, recreation and small-scale convenience shopping, though these mixed uses must be carefully planned so as not to undermine town centres. A masterplan will set out the principles to be followed in subsequent planning applications. A sequential test applied at planning application stage will be considered in this context. The allocation of land at Junction 27 to provide a high quality tourist and leisure focused development to meet needs identified within the tourism study will include associated outlet/discounted retail floorspace to meet a regional comparison floorspace need and deliver the tourist and leisure elements of the allocation. Existing town centres will be safeguarded through planning controls."* Amend table under 2.51 to refer to *7,000sqm*. of mixed commercial floorspace rather than 8,000sqm.	In response to representation from Lightwood Land c/o Pegasus Planning (3678), which questioned application of policy to East Cullompton and to reflect the proposed allocation at J27. Amendment following updated commercial

			figures.
26.	Policy S8 Infrastructure	Paragraph 2.54 is updated as follows: The strategic sites (Tiverton Eastern Urban Extension, North West Cullompton ~~and~~, East Cullompton *and Junction 27*) will be zero-rated for CIL and these developments will be required to pay for necessary infrastructure through Section 106 agreements, undergoing viability assessment at planning application stage if necessary.	To reflect the proposed allocation of J27.
27.	Policy S9 Environment	Delete "environmental" from "special environmental qualities" in Criterion e).	In response to representation from Blackdown Hills AONB Partnership (1195).
28.	Policy S10 Tiverton	Add "*and areas to the north*." At the end of the first sentence.	In response to representation from Exmoor National Park (115) to reflect the wider area served by Tiverton.
29.	Policy S10 Tiverton	Within policy amend '2,160' to *'2,358'*, '540' to *'660'* and '30,800' to *'29,400'*. Within criterion a) amend '8,000' to *'7,000'*. Within paragraph 2.60 amend '2,160' to *'2,358'* and '600' to '*1,000'* and the final sentence to '~~Two~~A contingency site~~s have~~ has been allocated within the town, forming part of the strategy for providing flexibility within the plan.'	To reflect the revised development targets, latest housing monitoring data and the proposed deletion of TIV14 Wynnards Mead contingency site.

30.	Policy S10 Tiverton	Add "*and their interchange in the town centre;*" at the end of b).	In response to representation from Devon County Council (626) given bus station improvements are proposed.
31.	Policy S10 Tiverton	Add "*working with natural processes wherever possible*" at the end of f)	In response to Environment Agency representation (943).
32.	Policy S10 Tiverton	At end of paragraph 2.59 insert: *"Cumulative traffic impacts on Junction 27 of the M5 must also be considered. While the evidence suggests that improvements to signalisation of the junction have provided capacity for planned strategic development in Tiverton, additional development may require improvements to the junction. Traffic assessments will be required where appropriate to consider impacts on the local and strategic road network."*	In response to representation from Highways England (1172).
33.	Policy S10 Tiverton	In table below paragraph 2.63 replace '1520 dwellings' against Eastern Urban Extension with '*1580* dwellings' and replace '300 dwellings' against Farleigh Meadows with '*255* dwellings'	In response to approved applications for the Eastern Urban Extension site and representations from N Jillings for Devonshire Homes Ltd (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Mr R Persey c/o Jillings Hutton (4654) to ensure that the most up to date information on site

<table>
<tr><td></td><td></td><td></td><td>capacity is reflected throughout the plan.</td></tr>
<tr><td>34.</td><td>Policy S10
Tiverton</td><td>In table below paragraph 2.63 replace ‘8,000 sqm.’ against Phoenix Lane with ‘7,000sqm’.</td><td>To reflect the revised need for non-food retail as set out in the Retail Study 2012.</td></tr>
<tr><td>35.</td><td>Policy S10
Tiverton</td><td>In table below paragraph 2.63 delete row containing Wynnards Mead.</td><td>To reflect the proposed deletion of the contingency.</td></tr>
<tr><td>36.</td><td>Policy S10
Tiverton</td><td>In table below paragraph 2.63 include the following:
<table><tr><td>Blundells School</td><td>TIV16</td><td>14</td><td>200 dwellings</td><td>XX</td></tr></table></td><td>To reflect the proposed allocation of Blundells School.</td></tr>
<tr><td>37.</td><td>Policy S11
Cullompton</td><td>Within policy amend ‘3,600’ to ‘3,930’, ‘900’ to ‘1,100’ and ’77,000’ to ’73,500’.</td><td>To reflect the revised development targets.</td></tr>
<tr><td>38.</td><td>Policy S11
Cullompton</td><td>Add to Criterion g): “and make provision for green infrastructure.”</td><td>In response to representation from Environment Agency (943).</td></tr>
<tr><td>39.</td><td>Policy S11
Cullompton</td><td>Amend paragraph 2.64 by replacing the final sentence as follows “<s>The Environment Agency (EA) is a statutory consultee for all development within a CDA</s>The Environment Agency is a statutory consultee on all developments in Critical Drainage Areas and flood zones 2 and 3, while the Lead Local Flood Authority (Devon County Council) will be a statutory consultee on all major development.”</td><td>To reflect amended legal situation.</td></tr>
<tr><td>40.</td><td>Policy S11
Cullompton</td><td>Add to paragraph 2.66: “The town centre acts as a strategic relief route for the M5 during closures resulting in significant congestion”</td><td>To provide additional local context.</td></tr>
</table>

41.	Policy S11 Cullompton	Amend North West Cullompton entry in table under paragraph 2.69 to state 1,350 dwellings.	To reflect amendment to policy
42.	Policy S11 Cullompton	Amend East Cullompton entry in table under paragraph 2.69 to state *1,700* dwellings within plan period.	To reflect the later commencement of the site within the overall trajectory.
43.	Policy S11 Cullompton	Amend Knowle Lane entry in table under paragraph 2.69 to state *296* dwellings.	To reflect the revised capacity following the grant of reserved matters consent.
44.	Policy S11 Cullompton	Amend Land at Exeter Road entry in table under paragraph 2.69 to *24* dwellings	To reflect the dwelling stipulated within the planning permission for the site. Part of the site remains undeveloped, but there is uncertainty regarding delivery. It could nevertheless come forward as a windfall.
45.	Policy S11 Cullompton	Amend Cummings Nursery entry in table under paragraph 2.69 to *100* dwellings.	To reflect the revised site total arising from the reserved matters permission.
46.	Policy S11 Cullompton	Amend Venn farm entry in table under paragraph 2.69 to *12,000* sqm.	To reflect the revised total arising from the grant of planning

<table>
<tr><td></td><td></td><td></td><td>permission.</td></tr>
<tr><td>47.</td><td>Policy S12 Crediton</td><td>Within policy amend ‘720’ to ‘786’, ‘180’ to ‘220’ and ’15,400’ to ’14,700’. Within paragraph 2.73 amend ‘720’ to ‘783’.</td><td>To reflect the revised development targets.</td></tr>
<tr><td>48.</td><td>Policy S12 Crediton</td><td>Add “e) community and education facilities and other infrastructure to support the development proposed.”</td><td>In response to representations, reflecting the infrastructure needs of the town.</td></tr>
<tr><td>49.</td><td>Policy S13 Villages</td><td>Amend penultimate sentence of paragraph 2.80 to state “However, recent permissions indicate there is demand for employment in Willand so Willand Industrial Estate is retained along with Scott’s Quarry at Bampton because the development has planning permission and is deliverable.”</td><td>To reflect the latest information about the deliverability of the Willand Industrial Estate allocation.</td></tr>
<tr><td>50.</td><td>Policy S14 Countryside</td><td>Amend criterion a) to omit ‘gypsy and traveller accommodation’ and add to paragraph 2.82: “National policy requires that new sites for travellers should be very strictly limited in open countryside that is away from existing settlements or outside areas allocated in the development plan. In certain circumstances the development of such sites outside of settlement limits will be appropriate, providing it can meet the criteria set out within Policy DM7 (gypsy and traveller accommodation).”</td><td>To reflect Planning Policy for Traveller Sites published in August 2015.</td></tr>
<tr><td>51.</td><td>Site allocations introduction</td><td>Amend table 10 under paragraph 3.2 as follows:
<table>
<tr><th>Use</th><th>Completions 1 April 2013 – 31 March <s>2014</s>2016</th><th>Commitments at 31 March <s>2014</s>2016</th><th>Net requirement</th><th>Uncommitted Allocations to 2033</th></tr>
<tr><td>Housing (dwellings)</td><td><s>320</s>924</td><td><s>1,369</s>2,012</td><td><s>5,511</s>4,924</td><td><s>6,139</s>5,648</td></tr>
<tr><td>Commercial</td><td>9,787</td><td>43,259</td><td>100,954</td><td>121,620</td></tr>
</table></td><td>To update the table with the latest monitoring data.</td></tr>
</table>

<table>
<tr><td></td><td></td><td>(employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)</td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>52.</td><td>Site allocations Tiverton section</td><td colspan="5">Replace Table 11, under paragraph 3.3 with the following:

<table><tr><th>Use</th><th>Commitments at 31 March ~~2014~~2016</th><th>Completions since 2013</th><th>Uncommitted Allocations</th><th>Total</th></tr><tr><td>Housing (dwellings)</td><td>~~522~~745</td><td>~~93~~261</td><td>~~1,643~~1,540</td><td>~~2,258~~2,546</td></tr><tr><td>Commercial (employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain</td><td>805</td><td>1,550</td><td>38,000</td><td>40,355</td></tr></table></td><td>To update the table with the latest monitoring data.</td></tr>
</table>

<table>
<tr><td></td><td></td><td>position at 31st March 2014)</td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>53.</td><td>Site allocations Tiverton section</td><td colspan="5">Within paragraph 3.4 amend first sentence to read "~~Six~~ Seven sites are allocated for housing in Tiverton, excluding ~~two~~ one contingency site~~s~~ at Tidcombe Hall ~~and Wynnard's Mead~~…."

Amend final sentence of paragraph 3.4 to read "…and applications for in excess of 1,000 dwellings ~~pending determination~~ now with planning permission or resolution to grant subject to a section 106 agreement."</td><td>To reflect the removal of the Wynnards Mead contingency site and to provide the latest position in regards to the applications on the Tiverton Eastern Urban Extension site.</td></tr>
<tr><td>54.</td><td>Site allocations Tiverton section</td><td colspan="5">Replace Table 12 with the following:

<table><tr><th>Site</th><th>Policy</th><th>Gross site area (ha)</th><th>Net site area (ha)</th><th>No. dwellings allocated without permission</th></tr><tr><td>Eastern Urban Extension</td><td>TIV1-TIV5</td><td>153</td><td>64.86</td><td>~~152~~01,250</td></tr><tr><td>~~Moorhayes Park~~</td><td>~~TIV8~~</td><td>~~0.4~~</td><td>~~0.4~~</td><td>~~8~~</td></tr><tr><td>Howden Court</td><td>TIV9</td><td>0.47</td><td>0.38</td><td>10</td></tr><tr><td>Roundhill</td><td>TIV10</td><td>0.4</td><td>0.4</td><td>20</td></tr><tr><td>~~Palmerston Park~~</td><td>~~TIV11~~</td><td>~~0.9~~</td><td>~~0.72~~</td><td>~~25~~</td></tr></table></td><td>To reflect the latest position with regard to allocated sites without planning permission.</td></tr>
</table>

<table>
<tr><td></td><td></td><td>
<table>
<tr><td>Phoenix Lane</td><td>TIV12</td><td>1.4</td><td>1</td><td>60</td></tr>
<tr><td>Blundells School</td><td>TIV16</td><td>14</td><td>6</td><td>200</td></tr>
<tr><td>Total</td><td></td><td></td><td></td><td>~~1,643~~1,540</td></tr>
</table>
</td><td></td></tr>
<tr><td>55.</td><td>Site allocations Tiverton section</td><td>Amend first sentence of paragraph 3.5 to state ‘A number of housing sites were allocated in the previous Local Plan and already have planning approval, but are either not yet under construction or only recently implemented.’

Replace Table 13 with the following:
<table>
<tr><th>Site with planning permission</th><th>Policy</th><th>Site area</th><th>Dwellings with planning permission</th></tr>
<tr><td>Eastern Urban Extension</td><td>TIV1-5</td><td>153</td><td>330</td></tr>
<tr><td>Farleigh Meadows</td><td>TIV6</td><td>8.2</td><td>~~300~~255</td></tr>
<tr><td>Town Hall</td><td>TIV7</td><td>0.5</td><td>~~59~~58</td></tr>
<tr><td>Moorhayes Park</td><td>TIV8</td><td>0.4</td><td>4</td></tr>
<tr><td>Palmerston Park</td><td>TIV11</td><td>0.9</td><td>26</td></tr>
<tr><td>Total</td><td></td><td>~~8.7~~</td><td>~~359~~693</td></tr>
</table>
Table 13: Housing allocations with planning permission (position at 31 March ~~2014~~2016)
Within Table 14 amend ‘8,000’ against Phoenix Lane to ‘7,000’.</td><td>In response to representations from N Jillings for Devonshire Homes Ltd (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Mr R Persey c/o Jillings Hutton (4654) to ensure that the most up to date information on site capacity is reflected throughout the plan. To also update the table with the latest information about permitted sites.</td></tr>
<tr><td>56.</td><td>TIV1 Eastern Urban Extension</td><td>Amend Criterion a) to replace “1520” with “1580 to 1830”.

Add new first sentence to paragraph 3.8 to state “The allocation is carried forward from the Allocation and Infrastructure DPD which identifies it for 1550 to 2000 dwellings.”</td><td>Amend quantum of development to 1580 to 1830 dwellings to provide a range to</td></tr>
</table>

		After the 3rd sentence of paragraph 3.8 insert the following: *"Taking into account permisisons 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. More detailed masterplanning of Area B is yet to take place and will establish the final number of dwellings and may demonstrate that a higher number of dwellings are able to be accommodated. Accordingly a range of housing numbers is given for the allocation. This approach to housing numbers reflects that taken by the Inspector on the Allocations and Infrastructure DPD.*	enable greater flexibility for the remaining masterplanning work. The lower end of the range has been increased to reflect recent permissions granted on Area A. . Paragraph 3.8 updated to provide explanation of the updated housing figure.
57.	TIV2 Eastern Urban Extension Transport Provision	Amend Criterion a) and b) as follows: (a) Provision of a new *grade-separated* junction to the A361 and road links to the site; (b) Traffic calming and environmental enhancement between Heathcoat Way and Putson Lane, including Blundell's Road ~~and Tidcombe Lane~~	In response to representation from Devon County Council (626). Reference to Tidcombe Lane removed from criterion B in response to confirmation from DCC that traffic calming of Tidcombe Lane not required.
58.	TIV2 Eastern Urban Extension	At the end of paragraph 3.14 add the following sentence: "*The first phase of Blundells Road traffic calming and environmental enhancement has been implemented."*	Supporting text amended to provide an

	Transport Provision	Amend paragraph 3.16 as follows: "~~This development is not expected to exceed approximately 1,500 homes.~~ *The final number of dwellings on the site will be established following further masterplanning exercise in relation to Area B.* However, additional development of this site or further expansion to the east *if exceeding 2,000 dwellings* would likely trigger a requirement for a second access onto Heathcoat Way. Devon County Council has considered options for the route of this road, should it be required in the future. Amend paragraph 3.20, replace final sentence with: "~~Ongoing support of appropriate bus services will be required from the development until the point at which such services are self-supporting.~~ *Support of appropriate bus services will be required from the development for a minimum period of 5 years"*	update on the latest information available. In response to representation from Devon County Council (626).
59.	TIV3 Eastern Urban Extension Environmental Protection and Green Infrastructure	Separate criterion e) into two criterion and amend wording as follows: e) Appropriate provision of a sewerage system to serve the development*;* ~~and a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance~~ *f) The provision of a strategic Sustainable Urban Drainage Scheme provided in step with development to deal with all surface water from the development, paying particular attention in relation to runoff into Tidcombe Fen SSSI in terms of quality and quantity of water entering the fen, and arrangements for future maintenance of the scheme;* Amend other criterion numbers accordingly.	Request by the Environment Agency particularly having regard to the sensitivity of Tidcombe Fen SSSI.

60.	Policy TIV6 Farleigh Meadows	Within criterion a) of the policy replace '300' with *'255'*. Within paragraph 3.35 amend the first sentence to read: "This is a previously allocated site that has planning permission *and* ~~but~~ has ~~not yet~~ commenced development." Within paragraph 3.35 amend third sentence to read: "The remaining 8.2 hectares has the capacity for ~~about 300~~*255* dwellings…" Amend paragraph 3.37 as follows "An outline application for development at Farleigh Meadows was granted permission for the erection of up to 300 dwellings in 2013, *which was reduced to 255 dwellings at reserved matters stage.* ~~The proposal~~ *Both applications* met the requirements…"	In response to representations from N Jillings for Devonshire Homes Ltd (1050); Pemberton Hutton Developments c/o Jillings Hutton (5786); Mr R Persey c/o Jillings Hutton (4654) to ensure that the most up to date information on site capacity is reflected throughout the plan.
61.	Policy TIV7 Town Hall / St Andrew Street	Amend 3rd sentence of paragraph 3.38 as follows: As *the new build part of* this development has not been built out, it is considered appropriate to include a policy target of 28% affordable housing to reflect the Council's viability evidence. Any revised scheme submitted in the future would need to be assessed against the criteria of the policy above and market conditions prevalent at that time.	Supported text amended to add clarity.
62.	Policy TIV8 Moorhayes Park	Replace final sentence of paragraph 3.40 with "~~A flood risk assessment will need to consider the potential for flooding~~ *A flood risk assessment will need to consider the potential for flooding from the leat including a scenario of blockage of local culverts/bridges that convey the leat."*	In response to Environment Agency representation (943) to ensure the latest flood advice is reflected in policy.
63.	Policy TIV9 Howden Court	Replace criterion 'b' with 'Submission of a Junction Capacity Assessment to determine the need for a right turn lane from the A396 *if accessed via the* ~~into~~ Howden Court *development*; and'. Within paragraph 3.42 the third sentence amend beginning of sentence to state 'On the advice of the	As the landowner (the Housing Department) has confirmed that the proposed access would

		Highway Authority, *if the site is accessed via the adjacent Howden Court development, it* ~~this development~~ may need to be served by a right turn lane from the A396…'.	likely not be via the recently developed Howden Court allocation, but instead via Arnold Crescent to the north.
64.	Policy TIV11 Palmerston Park	Within criterion b) replace 'a protected habitat' with '*any* protected habitat *or species*'.	In response to Environment Agency representation (943).
65.	Policy TIV12 Phoenix Lane	Within criterion b) amend '8,000' to '7,000'.	To reflect the revised retail need arising from the correct interpretation of the evidence.
66.	Policy TIV13 Tidcombe Hall CONTINGENCY SITE	Amend site area from 5.0ha to *8.4ha*.	Error in site measurement.
67.	Policy TIV13 Tidcombe Hall CONTINGENCY SITE	Separate criterion d) to form: d) Design and landscaping which protects the setting of the Grand Western Canal, Tidcombe Hall and Conservation Areas; and *e)* Archaeological investigations and appropriate mitigation measures.	Error in formatting.
68.	Policy TIV14 Wynnards Mead CONTINGENCY SITE	Delete allocation.	Following preparation of a Historic Environment Appraisal, as requested by Historic England representation (1170), this has

			indicated that the developable area, once the setting of various heritage assets is greatly reduced. Part of the remaining area is very steep (and therefore potentially undevelopable). The remaining quantum of development on the field to the north is unlikely to be of a sufficient size to boost supply in accordance with Policy S4 and therefore cannot fill its function as a contingency site. Accordingly it is proposed to be deleted.
69.	Policy TIV15 Tiverton Infrastructure	Amend criterion b) as follows " *Traffic calming and environmental enhancement* ~~Public realm improvements and traffic calming~~ to Blundell's Road in association with the Tiverton Eastern Urban Extension;"	Amended text for clarity.
70.	Policy TIV15 Tiverton Infrastructure	Insert new criterion between h) and i) to state *"Enhanced library service provision;"* Amend other criterion numbers accordingly.	In response to Devon County Council representation (626)

71.	Policy TIV16 Blundells School	Insert new policy after TIV15 as follows: Policy TIV16 ***Blundells School*** ***A site of 14 hectares north of Blundells School is allocated for residential development subject to the following:*** ***a) 200 dwellings with 28% affordable housing;*** ***b) Approximately 8 hectares of informal green infrastructure adjoining the River Lowman;*** ***c) Appropriate land shaping to raise areas for development above flood zone 3, including an allowance for the effects of climate change and to create additional floodplain to compensate for the loss of floodplain;*** ***d) Provision of a junction on Heathcoat Way and a safeguarded road route through the site to serve as a future second strategic road access for development at Tiverton eastern urban extension;*** ***e) Provision and enhancement of cycle and pedestrian links in the area;*** ***f) Site contamination assessment and remediation to mitigate risks associated with former and current land-uses including the scrapyard and former poultry factory measures;*** ***g) Provision of a sustainable urban drainage scheme to deal with all surface water from the development and arrangements for future maintenance;*** ***h) Implementation of transport plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts.*** *3.47 Land to the north of Blundells Road in the vicinity of Blundells School consists of a mix of Greenfield and brownfield land , including unattractive buildings no longer in use, in and adjoining the floodplain of the River Lowman. Current and former uses have the potential to cause contamination, including an impact on river quality, and development of this area has the potential to resolve such issues. The site is bounded by development to three sides, with the River Lowman forming the northern*	To reflect the inclusion of land at Junction 27 and associated housing.

		boundary. Most of the site was previously allocated for an extension to the Tiverton Business Park, which lies north of the river. *3.48 The owners have previously confirmed availability, have sought allocation of the site, supporting the view that the site is viable. It is suitable for a relatively high density of development, as it would adjoin a large area of public open space. It is proposed to bring forward the residential element of the allocation from the previous plan (Allocations and Infrastructure DPD 2011).* *3.49 The flooding issues associated with the development of this site have been examined. The regeneration and sustainability benefits arising from redevelopment are sufficient that the sequential test set out in national policy is overcome, and the measures set out in the policy overcome the exceptions tests. The policy requires that remodelling of the site be carried out, in order to raise certain areas and lower others, the end result being no change to the functionality of the floodplain to deal with a 1:100 year return period flood event, including appropriate allowance for the effects of climate change. This remodelling would create a total of 6 hectares of developable land along the southern edge of the site, and 8 hectares of floodplain, which would be provided as Green Infrastructure. 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.* *3.50 The western end of Blundells Road has air quality issues which have been within about 15% of exceeding the relevant guidelines. Additional road traffic from this site has the potential to bring this permanently over the relevant limits if access is obtained from Blundells Road. Accordingly, access to the site is proposed to be direct from Heathcoat Way via a new junction. The design and location of this junction and site access may in the future form part of a second strategic access to the Eastern Urban Extension. The development of this site will need to ensure that any future route through it to service the Eastern Urban Extension is not precluded. Non-vehicular access into and through the site should also be enhanced, through new and improved cycle and pedestrian routes including non-vehicular links to Blundells Road. An air quality assessment will be required with any application.* *3.51 The site contains a working scrapyard, adjoining the River Lowman, which has the potential to harm water quality. Its removal and cleanup of the site would be a particular benefit, and is a key*	

<table>
<tr><td></td><td></td><td colspan="5">justification for this allocation. Similarly, the former poultry factory on the site may be contaminated and is becoming increasingly derelict. It would be inappropriate to allow redevelopment of land within the site for new housing before the removal of the scrapyard, given the impact on the living conditions and health of occupiers arising from its continued operation. Accordingly , no residential development will be permitted on the site until the scrapyard has been removed and the site remediated. Appropriate measures, agreed with the Council, will be needed to allow the site's development.
3.52 Provision of a Sustainable Urban Drainage Scheme will be required, to deal with the quality and quantity of surface water.</td><td></td></tr>
<tr><td>72.</td><td>Site allocations Cullompton section</td><td colspan="5">Replace Table 15 with the following:
<table><tr><th>Use</th><th>Commitments at 31 March <s>2014</s>2016</th><th>Completions from 1 April 2013 – 31 March <s>2014</s>2016</th><th>Uncommitted Allocations (within the plan period)</th><th>Total</th></tr><tr><td>Housing (dwellings)</td><td><s>199</s>209</td><td><s>87</s>487</td><td><s>3,533</s>3,118</td><td><s>3,819</s>3,814</td></tr><tr><td>Commercial (employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)</td><td>19,669</td><td>3,598</td><td>57,000</td><td>89,267</td></tr></table></td><td>To update the tables and text with the latest monitoring information/latest position with regard to permitted sites.</td></tr>
</table>

Add additional sentence to end of paragraph 3.64 to state *'Four sites are wholly or partially without planning permission and these are shown below:'*

Replace Table 16 with the following:

Site	**Policy**	**Gross Site Area (ha)**	**Net site area (ha)**	~~**Allocated dwellings**~~ ***Uncommitted Allocations (within the plan period)***
North West Cullompton	CU1-6	95	60	~~1,200~~*1,350*
East Cullompton	CU7-12	160	96	~~2,100~~*1,700*
Knowle Lane	CU13	9.8	5.9	30
Ware Park & Footlands	CU14	2.1	1.3	38
~~Exeter Road~~	~~CU15~~	~~1.4~~	~~1.1~~	~~45~~
~~Cummings Nursery~~	~~CU16~~	~~5.3~~	~~3.2~~	~~120~~
Total				~~3533~~ *3,118*

Amend paragraph 3.65 with the following: "Knowle Lane (Policy CU13) has planning permission for ~~285~~*266* dwellings. Part of the site remains undeveloped and this is represented in Table 16. *Similarly Exeter Road (Policy CU15) has permission for 24 dwellings; there is uncertainty about the remainder of the site (it was originally allocated for 45 dwellings) and the balance is no longer shown above. Cummings Nursery (Policy CU16) now has commenced construction with permission for 100 dwellings."*

Within Table 17 amend '9,000' to *'12,000'* against Venn Farm. Amend table total '65,000' to '*68,000*'

73.	Policy CU1 North West Cullompton	Amend '1200' to '*1350*' in policy. Amend'21,000' to '10,000' square metres commercial floorspace in policy. Add the following text to the end of paragraph 3.70: *"Traffic management measures on Willand Road and Tiverton Road will also be required. Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate its impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7."*	To reflect the North West Cullompton Masterplan SPD (Adopted February 2016) and a boundary amendment to North West Cullompton.
74.	Policy CU2 North West Cullompton Transport Provision	As part of the development of North West Cullompton, the following transport infrastructure will be provided *and funded by* ~~at the expense of~~ all new development within the site:~~:~~ a) Provision of a network of streets linking to the existing highway network, including a through route ~~suitable for buses~~ linking Tiverton Road to Willand Road *suitable for buses* and ~~wider~~ *all* agricultural vehicles; b) Provision of bus, pedestrian and cycle routes at appropriate locations throughout the development, creating an attractive, permeable network for non-car modes travelling within, into and out of the area; c) Cycle and pedestrian links to and from the town centre and within the mixed-use urban extension; d) Implementation of travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts; e) *Financial contributions to* bus service enhancements within, into and out of, the mixed-use urban extension; and **a** f) *Financial Contributions to* bus service enhancements between Cullompton, Exeter, Tiverton Parkway and Tiverton. g) *Financial contributions towards the Town Centre Relief Road and traffic management measures on Willand Road and Tiverton Road.* Insert the following text after the second sentence of paragraph 3.75: *The development will need to mitigate its impact upon capacity at junction 28 of the M5 by financial*	Objections raised by Persimmon Homes South West (3640) to the term "at the expense of" raising issues over viability and affordable housing. "Suitable for buses" moved to later part of sentence, "wider" removed as it is undefined and amended to "all". DCC request contributions from development to Town Centre Relief Road

		contribution towards junction improvements. Delete from 3.76 "~~These will need to be designed as part of the masterplanning process.~~ " and insert the following text after the second sentence of paragraph 3.76: *"Applications will be expected to respond to these aspirations and as set out in the adopted masterplan SPD for the site."* Amend paragraph 3.79 as follows: "~~As part of the masterplanning exercise the~~ *The* development should be designed to be served by a permeable network of streets providing access to/from the development. "	Updated to reflect the adopted North West Cullompton Masterplan.
75.	Policy CU3 North West Cullompton Environmental Protection and Green Infrastructure	Amend the following sections of policy CU3 as follows: As part of the development of North West Cullompton, the following environmental protection and enhancement measures will be ~~implemented at the expense of~~ provided and funded by all new development within the site: (a) ~~Measures including~~ A strategic landscaping and tree planting scheme to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside; (b) An area of 28 hectares for strategic green infrastructure, laid out and managed with an appropriate mix of public parkland, open space, landscaping and potential local nature reserve ~~and including an extension to the cemetery~~. (c) Areas of equipped and laid out public open space, totalling ~~0.16~~ 0.7 hectares of equipped ~~children's~~ play, ~~0.05 hectares teenage facilities~~, 2.6 hectares amenity open space, 4 hectares for parks, sports and recreation grounds, 0.7 hectares of allotments and 0.1 hectares for a community garden adjoining the health centre; (e) Appropriate provision for sewerage systems serving the development, and provision of a *strategically designed, and phased,* Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;	Objections raised by Persimmon Homes South Westto the term "at the expense of" raising issues over viability and affordable housing. ~~Measures including~~ Removed 'measures including' from criterion (a) as was superfluous. Policy updated to reflect the adopted North West Cullompton Masterplan SPD.

			Amended wording regarding criterion e) requested by the Environment Agency.
76.	Policy CU3 North West Cullompton Environmental Protection and Green Infrastructure	Amend paragraph 3.81 as follows: There is an area of flood plain associated with a watercourse running across the site from west to east. There are also a number of small watercourses running through the site for which flood risk and flood zone data is unknown. A flood risk assessment will need to consider the potential of flooding along these watercourses. The layout of the development will need to take this into account. Areas of floodplain should be retained as part of the strategic green infrastructure. The urbanisation of the area has the potential to increase surface water run-off elsewhere, through the loss of permeable surfaces. The inclusion of a sustainable urban drainage scheme *(SUDS)* approach for the entire development will ensure that there is no additional run-off from the site as a result of development. *Critical Drainage Area designation will require a net reduction in rain water runoff which affects parts of Willand Road and adjacent properties. Measures should be put in place to reduce this.* Sustainable urban drainage schemes usually involve the provision of ponds, swales and other soft areas which can serve as a dual use for public open space and can be incorporated into wildlife networks. *The role of landscaping and tree-planting in flood prevention and carbon reduction should be recognised in the development.* A *detailed sustainable drainage* strategy *together with proposals for ongoing management and maintenance* for dealing with surface water must be prepared of the site *which builds on the high level approach set out in the adopted masterplan SPD in order* to determine the number, size and location of the required SUDS features.	Changes in red requested by the Environment Agency as this part of Cullompton is identified as a critical drainage area. To reflect the North West Cullompton Masterplan (Adopted February 2016)
77.	Policy CU3 North West Cullompton Environmental Protection and Green Infrastructure	Amend paragraph 3.84 to state: *"*A number of listed buildings lie within or close to the area. The setting of these will need assessment and protection as part of the layout and design work ~~associated with the masterplanning exercise,~~ ~~or~~ *and* subsequent planning applications. *Careful consideration needs to be given to the design of the new road through the site linking Tiverton Road to Willand Road. The cemetery and chapels could be closely affected by the road which runs close to the cemetery extension and could be prominent given the topography. Appropriate boundary treatments and screening is critical to mitigate*	Paragraph 3.84 updated to reflect the adopted North West Cullompton Masterplan SPD and in response to Historic England representation

		any potential harm."	(1170) which requested that the impact of the proposal, potential harm and mitigation be informed by a Historic Environment Appraisal which was subsequently undertaken by the Council.
78.	CU4 North West Cullompton Community Facilities	Remove words "at the expense of " and insert *"and funded by"*	Objections raised by Persimmon Homes South West c/o CLP Planning Ltd (3640) the term "at the expense of" raising issues over viability and affordable housing.
79.	CU4 North West Cullompton Community Facilities	Amend the following criterion in policy CU4 as follows: "b) Construction costs for *300* places that *arise from the development to contribute to* ~~of~~ a *420 place* primary school with provision for early years;" Add the following to the end of paragraph 3.86: *"…and the adopted masterplan SPD."* Amend the last sentence of paragraph 3.87 as follows: The location of community facilities ~~will be considered as part of the masterplanning process~~ *has been established within the masterplan for the site,* to ensure the highest level of access for residents and	Requested change by Devon County Council (626) representation. To reflect the adoption of the North West Cullompton Masterplan SPD.

		other uses.	
80.	CU5 North West Cullompton Carbon Reduction and Air Quality	Remove words "at the expense of " and insert *"funded by"*	Objections raised by Persimmon Homes South West c/o CLP Planning Ltd (3640) to the term "at the expense of" raising issues over viability and affordable housing
81.	CU5 North West Cullompton Carbon Reduction and Air Quality	Amend criterion e) to include "Offsite tree planting *where sufficient cannot be accommodated onsite*"	To provide clarity in the policy the circumstances when offsite tree planting would be considered.
82.	Policy CU6 North West Cullompton Phasing	Amend Policy CU6 as follows: Criterion (c) "Provision of commercial development *after the delivery of the first 500 houses and prior to the delivery of the first 800* houses ~~in step with housing~~, at a rate of at least 0.9~~1~~ hectare per 150 ~~350~~ occupied dwellings *thereafter*;" Criterion (d) "Provision of *8.8 hectares of* strategic green infrastructure *including* ~~broadly in step with development, with~~ equipped public open space *and one playing pitch prior to the occupation of no more than* ~~provided at a rate of at least 1 hectare per 200~~ *500 dwellings;"* Criterion (e) "~~Occupation of no more than 400 dwellings before the~~ Implementation of *local* bus service improvements *prior to the occupation of no more than 500 dwellings and strategic bus service enhancements phased with development*;" Criterion (f)"Occupation of no more than *500* ~~300~~ dwellings before the opening of a 'through route' linking Willand Road to Tiverton Road *and the delivery of traffic management measures on Willand*	Change to CU6 c, d, e,f,g, h and insert new criteria (i) and supporting text proposed to reflect the adopted Masterplan.

		Road;" Criterion (g) "Transfer of ~~serviced~~ land for a primary school *together with right of accesses* to the Local Education Authority prior to the *commencement* of the ~~occupation of any housing~~ development on the site, and transfer of funding for education faciltities in instalments; and" Criterion (h) "The necessary sustainable urban drainage features, and linking pipe work is integrated and phased appropriately in step with development *and, where required, temporary measures should be taken during construction to protect downstream areas from additional water run-off.* Add new criterion (i) to state: *"Provision of M5 access improvements before any dwellings are occupied and thereafter broadly in step with development."*	
83.	Policy CU6 North West Cullompton Phasing	Amend paragraph 3.91 as follows: The phasing of development will have an important impact on the surrounding area, but it will also impact on the economic viability of the development. The policy sets out the general approach to phasing, *with more detail being provided within the adopted masterplan SPD February 2016*. ~~However, this will need to be supplemented by a phasing strategy prepared as part of the masterplanning of the development.~~ Legal obligations and planning conditions will be used to control these phasing requirements. Amend '300' to '*500'* in the second sentence of paragraph 3.94 Add the following to the end of supporting paragraph 3.94: *"Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate its impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7."* Amend paragraph 3.95 as follows: The development will generate the need for additional primary school provision *over and above existing*	Changes to supporting text proposed to reflect the adopted Masterplan

		requirement within the town. To ensure that reliance on car based trips is reduced, it is important to ensure that this is provided within close proximity of new dwellings within the urban extension. It will therefore be a requirement that land is transferred to the Local Education Authority *with right of access* before ~~any houses are occupied~~ *the development commences*.	
84.	Policy CU6 North West Cullompton Phasing	Add to the end of Policy CU6 criterion (h): *"and, where required, temporary measures should be taken during construction to protect downstream areas from additional water run-off."*	Identified as a critical drainage area by EA and raised by individual. Having regard to EA issues about pluvial run off temporary measures are likely to be necessary during construction phase.
85.	Policy CU7 East Cullompton	Within criterion a) Amend "2100" to "*1,750"* and "500" to *"850".* Add the following text at the end of paragraph 3.94: *The Council has been working closely with statutory consultees to ensure emerging proposals for Junction 28 M5 improvements are appropriately designed.*	To reflect the anticipated later commencement of the site. To reflect the latest advice from the Highway Authority.
86.	Policy CU9 East Cullompton Environmental Protection and Green Infrastructure	Add additional criterion after g) to state *"Design solutions which respect the settings of listed buildings adjoining the site."* Add additional supporting paragraph after 3.108 to state *"Two listed buildings are adjacent to the northern boundary of the site. The setting of these will need assessment and protection as part of the layout and design work associated with the masterplanning exercise, and subsequent planning applications."*	Informed by the Historic Environment Appraisal undertaken by the Council and to ensure consideration is giving to protecting the setting of adjoining listed

			buildings.
87.	Policy CU9 East Cullompton Environmental Protection and Green Infrastructure	Amend CU9 criterion f) as follows: "f) Appropriate provision of a sewerage system to serve the development and a *strategically designed, and phased,* Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance."	To address Environment Agency concerns. Inserted words advised by EA.
88.	Policy CU9 East Cullompton Environmental Protection and Green Infrastructure	Add to para 3.107: "The role of landscaping and tree-planting in flood prevention and carbon reduction should also be recognised in the development." Amend the first sentence of para 3.108 as follows: "The development of this site will have an impact on the character of the area. The incorporation of appropriate *screening*, landscaping and tree planting will act to mitigate this and should be designed to support high quality green infrastructure areas ~~and~~ wildlife corridors *and noise attenuation*. "	Additional text to recognise the role of landscaping and tree-planting in flood prevention and carbon reduction. Additional text to recognise noise impact.
89.	Policy CU10 East Cullompton Community Facilities	Replace CU10 (c) with following wording: *Construction costs for a primary school of at least 630 places plus additional early years provision. The required primary school capacity should be delivered through the provision of either one or two schools;*	To reflect Devon County Council (626) proposed rewording.
90.	Policy CU10 East Cullompton Community Facilities	Add additional text to end of para 3.111: *"The need for additional health care provision could be accommodated within the community facilities."*	To provide clarity that additional health care provision could be accommodated within the community

			facilities.
91.	Policy CU11 East Cullompton Carbon Reduction and Air Quality	Amend criterion e) as follows: "Offsite tree planting *where sufficient cannot be accommodated onsite*"	To provide clarity in the policy the circumstances when offsite tree planting would be considered.
92.	Policy CU12 East Cullompton Phasing	Amend criterion (a) to state: "Provision of affordable housing will be ~~in broad~~ broadly in step with the market housing**"** Amend Criterion (f) to state: "Provision of the first phase of *comprehensive* M5 access improvements before any dwellings are occupied, followed by strategic highways infrastructure…" Amend Criterion (g) to state: "Transfer of serviced land *together with right of access* for ~~a~~ primary school*(s)* at no cost to the Local Education Authority prior to the first occupation of residential development…" Amend supporting text of 3.116 as follows: Devon County Council's Strategic Highways Option Report (2014) sets out an initial assessment of the various elements phasing of transport infrastructure needed to service the site~~. A scheme, referred to in the report and scheduled to be delivered during 2014/15, only provides sufficient capacity for the allocations contained with the previous Local Plan.~~ *A signalisation scheme at junction 28 of the M5 was undertaken in 2015. However this scheme does not produce junction capacity to accommodate this development.* The first phase referred to in criterion (f) above therefore only relates to the subsequent	Amended for clarity. Added for clarity. To reflect the latest advice from the Highway Authority.

		highway works set out in the Devon County Council report. *The Council has been working closely with statutory consultees to ensure emerging proposals for junction 28 M5 improvements are appropriately designed.* Amend supporting text of paragraph 3.117 as follows: While East Cullompton developers will be expected to pay for most of the infrastructure associated with this development through a Section 106 legal agreement, the Town Centre Relief Road was allocated in the previous Local Plan and was required in response to other developments in and around Cullompton. With the allocation of East Cullompton, *a larger area is available within which to locate the relief road as it is proposed as part of the transport mitigation in connection with this allocation*. ~~it may now be possible to deliver the relief road on the eastern side of the motorway, possibly as part of the transport mitigation to serve East Cullompton.~~ Dependent on the final route option, the relief *road may be either east or west of the motorway. Development contributions are proposed via planning obligations on East Cullompton and NW Cullompton developments.* ~~may either by funded by the development of East Cullompton or through the Community Infrastructure Levy.~~ In addition, the Council will seek external sources of funding to help bear the cost of highways works that are needed early in the East Cullompton development, as these are critical to the delivery of this strategic site. Add '*together with right of access' after '*the serviced land should…*'* in paragraph 3.119.	
93.	Policy CU13 Knowle Lane	Within criterion a) amend "315" to *"296"* and within paragraph 3.122 amend "285" to *"266"* and "315" to *"296".* Add new criterion (j) to state: *'Provision of M5 access improvements before more than 266 dwellings are occupied.'* Add '*its delivery is not dependent upon further M5 access improvements'* after the first sentence of 3.122.	To reflect revised site capacity following granting of the reserved matters consent over the majority of the site. Supporting text updated to reflect the latest advice from the Highway Authority.

94.	Policy CU14	Amend policy criterion b) to state "No development until the road through the North West Cullompton site (Policy CU1) linking Tiverton Road to Willand Road is fully in operation *for public use."* Amend policy criterion c) to state "No development until *the significant improvements works associated with the provision of access to the East Cullompton allocation* ~~an improvement scheme or mitigation measures~~ have been implemented at M5 Junction 28.;" Amend paragraph 3.127 as follows: " The site will also impact on the capacity of Junction 28 of the M5 motorway which at present cannot accommodate the additional trips generated by this development. *Significant improvement works, including provision of a new overbridge, are proposed to provide additional junction capacity and access to the East Cullompton allocation (CU7-CU12). Once completed, these works should* ~~An improvement scheme, being developed by Devon County Council is scheduled to be delivered during 2014/15 and should~~ provide the additional capacity required….'	Policy criterion b) proposed change added for clarity. Amendment to policy criterion c) to delay development of the site until after improvements works have taken place in response to the latest traffic modelling of the capacity of J28 by Devon County Council.
95.	Policy CU15 Land at Exeter Road	Within criterion a) amend "45" to *"24".* Replace the final sentence of paragraph 3.128 with the following: "~~The site can accommodate 45 dwellings, of which 28% will be affordable.~~ Planning permission has been granted for 24 dwellings, though potentially the site could accommodate more *subject to sufficient capacity being available at J28 of the M5.*"	To reflect the recent planning permission granted on the site. Part of the site does not have permission however there is uncertainty over its delivery and it is unlikely to make the contribution in numbers stipulated by the original policy. It is therefore assumed to

			make no further contribution to supply, however this would not preclude the remainder coming forward on a windfall basis. Paragraph 3.128 updated to reflect the latest advice from the Highway Authority.
96.	Policy CU16 Cummings Nursery	Within criterion a) amend "120" to *"100"* and "35%" to *"30%"*. Amend third sentence of paragraph 3.130 as follows: "The site has ~~outline~~ reserved matters permission for ~~120~~100 dwellings including ~~35~~30% affordable housing~~but has not yet commenced construction~~." Add the following sentence to the end of paragraph 3.130: "*Any revised scheme proposing additional housing numbers will be subject to capacity at junction 28 of the M5."*	To reflect the obligations and dwelling numbers permitted in the reserved matters application. Paragraph 3.130 updated to reflect the latest advice from the Highway Authority.
97.	Policy CU17 Week Farm	Delete criterion c) *"Development shall not commence until the completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway."* Amend criterion numbers following the above accordingly. Include an additional criterion as follows: *"g) Provision of M5 access improvements before any commercial floorspace is brought into use."*	These works were undertaken in 2015. The plan has been updated to reflect recently completed highways works.

		Include the following at paragraph 3.134: *Signalisation* ~~Development should not commence until improvement~~ works ~~programmed~~ at M5 Junction 28 ~~are complete~~ *were undertaken in 2015. Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate it's impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7. A transport assessment to accompany a planning application would need to consider the impacts on the local and strategic road network including Junction 28 of the M5.*	Additional text also provided to clarify requirements of the transport assessment and impacts on the M5 Junction 28.
98.	Policy CU18 Venn Farm	Within criterion a) amend "9,000" to *"12,000".* Replace 'B2 – B8' with 'B1 – B8'. Delete criterion c) *"Development shall not commence until the completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway."* Amend criterion numbers following the above accordingly. Include an additional criterion as follows: *"g) Provision of M5 access improvements before any commercial floorspace is brought into use."* Add the following sentence to paragraph 3.139: "*Planning permission was granted in March 2015 for 12,000 sq.m of B1, B2 and B8 floorspace. A reserved matters planning application has been submitted for part of the site.*	To reflect the quantum of development recently granted permission on the site. These works were undertaken in 2015.

		Amend paragraph 3.140 as follows: *Signalisation* ~~Planned improvement~~ works to Junction 28 *were undertaken in 2015* ~~will accommodate development at Venn Farm and the~~ Highways ~~Agency~~ England has removed a holding direction that previously prevented the development from taking place. *Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate it's impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7. Planning permission already granted does not include this requirement however it would apply to any new full or outline applications.* Access is achievable via Saunders Way, avoiding increased use of Kingsmill Road.	The plan has been updated to reflect recently completed highways works. Additional text also provided to clarify requirements as a result of impacts on the M5 Junction 28.
99.	Policy CU19 Town Centre Relief Road	Amend the last sentence of criterion d) to state: "Appropriate noise measures to mitigate the effects from the relief road including the provision of landscaping ~~Provision of landscaping to mitigate the effects of noise from the relief road~~ Add additional criterion e) to state: *"Archaeological investigation and appropriate mitigation."* Add new paragraph after 3.143 to state: *"If the final route of the road is located on the western side of the motorway, there is the potential for impact on the settings of nearby listed buildings and the Cullompton conservation area. The extent of any impact will depend on the road's design and elevation above the flood plain, and therefore the final scheme will need to incorporate design solutions which mitigate such impacts. The site also lies in an area known to have been occupied since at least the Roman era, the area potentially containing archaeological deposits from this period onwards. Archaeological investigation and mitigation will therefore be required."*	To provide greater clarity and flexibility. To reflect the findings of the Council's Historic Environment Appraisal of local plan sites.

100.	Policy CU19 Town Centre Relief Road	Within paragraph 3.142 amend as follows: "The Town Centre Relief Road, previously known as the Eastern Relief Road, is an integral part of the development strategy for Cullompton, designed to relieve traffic through the town centre in conjunction with a road through the North West urban extension to link Tiverton Road to Willand Road. The evidence in 2010 concluded that a new road to the east of the town centre is essential if the objectives of traffic relief, air quality improvement and with it town centre enhancement, are to be achieved. *It is also important since the town centre acts as a strategic relief route for the M5 during closures resulting in significant congestion.* Careful consideration will need to be taken in finalising the route, which could be located either side of the motorway. The aim will be to cause minimum impact on the CCA fields and *acceptability in terms of flood risk and flood flows*. Devon County Council is producing a Flood Risk Assessment and will consult on the options for the exact route of the road *should the final route impact on the loss of sports or open space, replacement provision will need to be made available in a suitable location*. At the planning application stage, safety measures such as the closure of the relief road via an automated system prior to its flooding may need to be considered. *The Council has been working closely with statutory consultees to ensure emerging proposals for junction 28 M5 improvements are appropriately designed.*" Within paragraph 3.142, at the end of the 4th sentence add "*, should the final route impact on the loss of sports or open space, replacement provision will need to be made available in advance of any development."* Add the following sentence at the end of paragraph 3.142: "*The Council has been working closely with statutory consultees to ensure proposals for Junction 28 improvements are appropriately designed.*	To provide additional local context and clarity. In response to representation from individual (2160) to ensure there is no short-term loss of provision of sports or open space during the development.
101.	Policy CU20 Cullompton Infrastructure	Amend 3rd sentence of policy to state: "The Council will use *developer funding via planning oblications and* the Community Infrastructure Levy ~~and planning obligations~~ where appropriate,…	Amended for clarity.

		At the end of policy criterion b) add: "*and other Cullompton allocations;"* Within the policy add criterion after l) to state 'Provision of works to reduce flood risk'.	In response to Environment Agency representation (943) and individual (3588) given the importance attached to reducing flood risk following the designation of Cullompton as a Critical Drainage Area.
102.	Policy CU21 Land at Colebrook	Replace criterion b) with 'The development shall not commence until ~~the Town Centre Relief Road has been provided~~ *completion of the North West Cullompton through route linking Tiverton Road to Willand road;'* Replace paragraph 3.149 with '~~If this site comes forward for development, it must contribute to the provision of offsite highways infrastructure. Development in this location would increase traffic through the town centre, so would not be permissible until the Town Centre Relief Road has been provided, offering an alternative route.~~ *Development in this location has the potential to place pressure on the capacity of both the strategic and local road network. Devon County Council has therefore stipulated that development should only take place providing there is sufficient network capacity. If released, the site will need to be phased to come forward after further M5 access improvements are implemented. Any application for development must undertake an assessment of the impact of the proposal on both the capacity of the local road network and Junction 28 of the M5 and permission will only be granted where there are no significant adverse impacts which cannot be mitigated. Site commencement will also need to be deferred until after the completion of the through route linking Willand Road to Tiverton Road, which is being provided as part of the North West Cullompton allocation. The site is expected to*	The revised criteria reflect the constraints of the road network in Cullompton and specify the circumstances when it would be acceptable for development to take place. .

<table>
<tr><td></td><td></td><td>contribute to the provision of off-site highways infrastructure. The development would also be expected to provide two points of access from Siskin~~s~~ Chase.</td><td></td></tr>
<tr><td>103.</td><td>Site allocations Crediton section</td><td>Replace Table 18 with the following:
<table>
<tr><th>Use</th><th>Commitments at 31 March ~~2014~~2016</th><th>Completions from 1 April 2013 – 31 March ~~2014~~2016</th><th>Uncommitted Allocations</th><th>Total</th></tr>
<tr><td>Housing (dwellings)</td><td>~~216~~245</td><td>~~58~~107</td><td>~~633~~583</td><td>~~907~~935</td></tr>
<tr><td>Commercial (employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)</td><td>551</td><td>3,598</td><td>9,820</td><td>13,969</td></tr>
</table>
Amend paragraph 3.153 to state “Nine housing sites are allocated in Crediton, including Wellparks ~~and Red Hill Cross~~ which ~~have~~ has planning permission. All housing sites are considered achievable in principle, corresponding to a Crediton map that accompanies this document. Sites without planning permission are shown in Table 19 below:”

Amend Table 19 as follows:
<table>
<tr><th>Site</th><th>Policy</th><th>Gross Site</th><th>Net site area</th><th>Uncommitted Local Plan</th></tr>
</table></td><td>To update the tables and text with the latest monitoring information/latest position with regard to permitted sites.</td></tr>
</table>

				Area (ha)	**(ha)**	**allocations**	
			~~Wellparks~~	~~CRE1~~	~~7.9~~	~~4.74~~	~~185~~
			Red Hill Cross	CRE2	3.1	1.86	135
			Cromwells Meadow	CRE3	2.4	1.44	35
			The Woods Group	CRE4	0.17	0.17	8
			Pedlerspool	CRE5	23.5	14.1	200
			Sports Fields	CRE6	5.5	3.3	120
			Stonewall Lane	CRE7	3.2	1.92	50
			Land at Barn Park	CRE8	1.64	1.3	20
			Land off Alexandra Close	CRE9	0.63	0.504	15
			Total				~~765~~583
104.	Policy CRE1 Wellparks	Add criterion e) *"Improved pedestrian and cycle access to the town centre and facilities to the south of the A377."*					In response to Crediton Neighbourhood Plan Steering Group representation (1734) and to mirror provision proposed as part of the planning permission (granted subject to S106).
105.	Policy CRE2 Red Hill Cross	Replace criterion c) with "~~Provision of a safe and convenient footpath from Old Tiverton Road to the footway on the southern boundary of the site on Exhibition Road~~ *Improved access to the town centre for pedestrians and cyclists;"*					In response to representations from Crediton Town Council

		Replace the first sentence of paragraph 3.161 with "~~For the safety and convenience of pedestrians a footpath is required from the access to the site to link to the existing footway on the southern boundary of the site on Exhibition Road~~ *The development will also be expected to provide improved access to the town centre for pedestrians and cyclists with scope for improvements along Exhibition Road. The development will need to contribute towards these and other improvements to the local pedestrian and cycle way network. A comprehensive approach to pedestrian and cycle route improvements should be taken in relation to allocations CRE2 Red Hill Cross, CRE5 Pedlerspool and CRE6 Sports Fields all on Exhibition Road."*	(678), Sustainable Crediton (2689) and Crediton Neighbourhood Plan Steering Group (1734) .
106.	Policy CRE2 Red Hill Cross	Replace paragraph 3.159 with the following: *'The site previously had outline planning permission for 135 dwellings with 22% affordable housing, however the permission lapsed in 2016. It is understood that delivery of the site is likely to take place after the Pedlerspool allocation has received permission with options for joint access being considered.*	To update the text given the planning permission on the site has lapsed.
107.	Policy CRE2 Red Hill Cross	Replace paragraph 3.160 with "~~The site is in a prominent position, which is visible from historic Shobrooke Park to the east. Detailed design and development which respect the local distinctiveness, including a generous landscape margin on the east facing side of the site will mitigate any potential impact.~~*The site is in a prominent position, which is visible from historic Shobrooke Park to the east. Detailed design and development which respect local distinctiveness, including a generous landscape margin on the east facing side of the site will mitigate any potential impact."*	In response to Historic England representation (1170) which requested that the impact of the proposal, potential harm and mitigation be informed by a Historic Environment Appraisal which was subsequently undertaken by the Council.
108.	Policy CRE3 Cromwells Meadow	Add criterion b): *"Archaeological investigations and appropriate mitigation measures."* At end of paragraph 3.163 add additional sentence to state: *"The site also lies in an area of archaeological potential on the western edge of the floodplain. Archaeological investigation and*	To reflect the findings of the Council's Historic Environment Appraisal of all local plan sites.

		appropriate mitigation will be required.'	
109.	Policy CRE3 Cromwells Meadow	At the end of paragraph 3.162 add new sentence *'Appropriate landscaping will be required along the eastern boundary given the potential visibility of the site from historic Shobrooke Park."*	In response to Historic England representation (1170) which requested that the impact of the proposal, potential harm and mitigation be informed by a Historic Environment Appraisal which was subsequently undertaken by the Council.
110.	Policy CRE4 The Woods Group	Delete full stop at end of paragraph 3.165 and insert *", whilst the site contains a number of unlisted buildings of strong traditional local character. The retention and conversion of these buildings would enhance the character of the conservation area. The loss of these buildings would be considered unacceptable without special justification."*	To reflect the findings of the Council's Historic Environment Appraisal of all local plan sites.
111.	Policy CRE5 Pedlerspool	Replace criterion b) with " ~~Extra care housing comprising at least 25 units~~ *A serviced site of 1.1 hectares for a new primary school"* Replace criterion d) with "~~A phasing strategy which ensures that extra care housing and a site for sports pitches are delivered broadly in step with the housing development~~ *A phasing strategy which ensures that sites for the sports pitches, affordable housing and gypsy and traveller pitches are delivered broadly in step with the housing development, and the school is transferred to the local education authority at a timetable agreed with Devon County Council."* Replace paragraph 3.167 with "~~A need has been identified in Crediton for 25 extra care housing units. These should be provided within the Pedlerspool site in lieu of an employment use which was included in~~	In response to representation from Devon County Council (626) which sets out the need for a new primary school in Crediton. This site is a suitable location given the quantum of development being focused on the north

		~~a previous Local Plan policy. Commercial uses would still be considered on this site in addition to extra care housing, should a proposal demonstrate a suitable relationship between housing and commercial uses.~~ *Devon County Council has identified that there is a need for a new primary school in Crediton. Both existing schools are on constrained sites and are being expanded to their maximum potential. This site is a suitable location for a new school, given that the north east part of the town is the focus of growth and provides the opportunity to balance the distribution of schools in Crediton, thereby reducing travel distances for future and existing residents of this part of the town. Given that the need for the school arises from the wider growth of Crediton, the Pedlerspool allocation will not be expected to meet the full costs of providing the facility. The actual cost to the development and the timing of the transfer will be subject to negotiation between the landowner/developer, Mid Devon District Council and Devon County Council as Local Education Authority. The school should be provided within the site in lieu of an employment use which was included in a previous Local Plan policy. Commercial uses would still be considered on this site in addition to the school should a proposal demonstrate a suitable relationship between housing, commercial and community uses."*	east of the settlement. The school is proposed in lieu of the extra care scheme, which retains an employment-generating use on site. The delivery of the school is considered to be a higher priority than the extra care scheme, as it is required to mitigate the impact of proposed development on pupil place provision within the town.
112.	Policy CRE5 Pedlerspool	Insert new criterion between h) and i) to state *"Improved access to the town centre for pedestrians and cyclists;"* Amend criterion numbering following the above accordingly. Insert the following at the end of paragraph 3.170 "*The development will also be required to provide improved access to the town centre for pedestrians and cyclists with scope for improvements along Exhibition Road. The development will need to contribute towards these and other improvements to the local pedestrian and cycle way network. A comprehensive approach to pedestrian and cycle route improvements should be taken in relation to allocations CRE2 Red Hill Cross, CRE5 Pedlerspool and CRE6 Sports Fields all on Exhibition Road.*"	In response to representations from Crediton Town Council (678), Sustainable Crediton (2689) and Crediton Neighbourhood Plan Steering Group (1734) and in the interests of joined up planning.
113.	Policy CRE5 Pedlerspool	Replace paragraph 3.171 with "~~A small watercourse runs along the southern boundary of the site. A flood risk assessment will need to consider the potential for flooding. An onsite Sustainable Urban Drainage~~	In response to representation from the

		~~Scheme will require implementation to negate any increase in flood risk. Sustainable drainage is a standard requirement of Policy DM1.~~ *The River Creedy flows to the east of the site. Hydrological and hydraulic assessment should be undertaken to verify the flood extent. The results of the modelling will inform the location of different uses on the site, directing residential development to areas of lowest flood risk. This will need to be set out in a Flood Risk Assessment and accompanying drainage strategy."*	Environment Agency (943).
114.	Policy CRE6 Sports fields, Exhibition Road	Insert new criterion between c) and d) to state *"Improved access to the town centre for pedestrians and cyclists;"* Amend the criterion numbers following the above accordingly. Insert new paragraph after 3.174a to state *"The development will also be required to provide improved access to the town centre for pedestrians and cyclists with scope for improvements along Exhibition Road. The development will need to contribute towards these and other improvements to the local pedestrian and cycle way network. A comprehensive approach to pedestrian and cycle route improvements should be taken in relation to allocations CRE2 Red Hill Cross, CRE5 Pedlerspool and CRE6 Sports Fields all on Exhibition Road."*	In response to representations from Crediton Town Council (678), Sustainable Crediton (2689) and Crediton Neighbourhood Plan Steering Group (1734).
115.	Policy CRE7 Stonewall Lane	Within paragraph 3.177 amend as follows: "…. Any scheme for the redevelopment of the site would need to ensure adequate landscaping is provided to mitigate any landscape or visual impacts*, as well as any heritage impacts associated with the adjoining Creedy Park. High quality design will be required in accordance with Policy DM1. There is the potential for cumulative highway impacts on the local road network arising from the development of this site and the nearby Pedlerspool allocation. A Transport Assessment will need to be provided, which comprehensively assesses the transport issues related to development of the site, taking into account the potential cumulative impact of nearby allocations*…."	In response to Historic England representation (1170) which requested that the impact of the proposal, potential harm and mitigation be informed by a Historic Environment Appraisal which was subsequently undertaken by the Council and in response to MJ Gleeson c/o Bell

			Cornwell LLP (3775) representation and to ensure the need to cumulatively assess the transport impacts of CRE5 and CRE7 is set out in both policies.
116.	Policy CRE10 Land south of A377	Replace '1.9 hectares' in policy to '2.6 hectares'.	In response to Tesco Stores Limited C/O Burnett Planning (4323) representation requesting the site area be increased to cover the areas deemed appropriate for employment development in application reference 09/00244/MOUT but not to include those proposed for landscaping or drainage.
117.	Policy CRE10 Land south of A377	Replace paragraph 3.182 with "~~There is a small watercourse which passes through the centre of the site. A flood risk assessment will need to consider the potential for flooding.~~ *A better understanding of the flows of the Rivers Yeo and Creedy, undertaken by the Environment Agency, has indicated that this area is at greater risk of flooding than indicated at the time of the original permissions which covered the wider Tesco site. They have indicated that some of the site may actually lie within an area of floodplain that*	In response to Environment Agency (943) representation and subsequent advice provided.

		would be highly functional in times of severe flood, and subsequently development previously considered acceptable could now exacerbate flood risk. A Flood Risk Assessment will therefore need to be submitted with any application on the site which will need to incorporate both a comprehensive level survey of the site's current arrangement, and additional modelling taking into account current levels. The purpose of such will be to determine the risks so that fully informed decisions regarding the suitability, or otherwise, of the currently undeveloped plots that benefit from outline permission can be made. The layout, site and floor levels of any development will be heavily dictated by the flood risks."	
118.	Policy CRE10 Land south of A377	At the end of paragraph 3.182 insert additional sentence to state *"Appropriate landscaping and sensitive design and materials will be required given the position of the site to the south of the historic Downes park and garden and the listed complex at Wellparks."*	In response to Historic England representation (1170) which requested that the impact of the proposal, potential harm and mitigation be informed by a Historic Environment Appraisal which was subsequently undertaken by the Council.
119.	Policy CRE11 Crediton Infrastructure	Add additional criterion k) *"Provision of works to reduce flood risk."*	In response to Environment Agency (943) representation.
120.	Policy J27 Land at Junction 27.	Insert new policy after CRE11 as follows: ***Land at Junction27*** *Policy J27* ***Land at Junction 27 of the M5 Motorway***	To reflect the Council decision on 22nd September 2016 to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated

		A site of approximately 71 hectares adjoining the south bound carriageway of the M5 motorway, adjacent to junction 27 is identified for major development. The land, which lies to the south of the A38, is allocated for the provision of a major high quality regional tourism, leisure and retail attraction supported by ancillary roadside services and supporting infrastructure including a pedestrian bridge across the M5 motorway linking the site to Tiverton Parkway railway station. ***The site provides a prime location for delivery of a major leisure destination themed around agriculture and the agri-economy; the regional environment and tourism; outdoor land and water-based adventure activities and outlet-retailing. The site provides a major opportunity to deliver a unique leisure destination at the gateway to Devon and Cornwall which should be realised as a single cohesive and comprehensively masterplanned visitor attraction.*** ***The allocation makes provision for the following elements:*** • ***Travel Hub (7ha) – Motorway/roadside services; electric car hub; hotel.*** • ***Agronomy Visitor Centre (9ha) – exhibition space and hall, gallery; research and education space; regional visitor centre and hotel.*** • ***Outdoor Adventure Zone (6ha) – Surf lake/lagoon; beach; high ropes adventure area.*** • ***Outlet Shopping Village (6ha) - Designer outlet shopping centre retailing controlled goods comprising discontinued/end-of-range lines, seconds and surplus/sample stock.*** ***The development is subject to the following:*** ***a) Provision of supporting access roads, parking and infrastructure/landscaping (43 ha);*** ***b) Provision of transport improvements to ensure appropriate accessibility for all modes, including new or improved access and egress onto the M5 motorway and pedestrian and cycling links across the motorway to Tiverton Parkway Railway Station;*** ***c) Environmental protection and enhancement including noise mitigation;***	retail.

		d) A comprehensive phasing programme to ensure the tourist and leisure provisions are delivered at the same time as the retail and service elements of the development; and ***e) Prior to the approval of any planning permission for the site any required mitigation measures for the Culm Grasslands Special Area of Conservation shall be identified and agreed together with a time-scale for their provision and a mechanism for their maintenance.*** ***Development of the site should be brought forward in accordance with the terms of a detailed development brief, comprehensive masterplanning including at least two stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document before any planning application for the any part of the site is determined.*** *3.184a A site of 71 hectares is allocated to the south and east of Junction 27 of the M5 motorway. The allocation identifies the land for tourism, leisure and retail development. The proposal seeks to significantly increase the tourism and leisure offer available in Mid Devon as identified in the Mid Devon Tourism Study 2014. The 2014 study identified that the M5 and the mainline railway provides an opportunity to develop Mid Devon`s tourism infrastructure around these key links. To encourage a greater proportion of people to break their journey in the area, for instance to visit a local attraction, market or retail facilities or to stay. It identifies that this opportunity builds on the District's location at the gateway location to Exmoor and the North Devon Coast; and on the route to Dartmoor, the South Devon Coast and Cornwall from much of the UK. Given the volume of tourists who pass through Mid Devon on route to other destinations, such as North and South Devon and Cornwall, the study identified that more could be done to encourage these tourists to stop en-route and increase the length of time (and money) tourists spend in Mid Devon.* *3.184b The study identified six potential strands to assist the growth of tourism in Mid Devon offering opportunities for visitors to stop and stay when travelling through to destinations further south and west. The allocation at J27 makes provision to directly address three of the recommended strategies by setting*	

		a policy which can provide a major tourist, leisure and retail facility which caters for all age groups and which encourages visitors passing through to stop and spend time in Mid Devon. *3.184c The allocation includes associated outlet/discounted retail floorspace to meet a regional comparison need and deliver the tourist and leisure elements of the allocation. Existing town centres will be safeguarded through planning controls.* *3.184d The proposals for a major facility of this nature needs to be considered carefully in terms of its impacts and the policy makes provision for detailed transport assessments, environmental protection and green infrastructure, energy conservation, provision of improved public transport, pollution and drainage considerations, phasing and importantly master planning with full public consultation prior to any planning applications being approved. Controls using legal agreements will be required to control the extent and types of use that take place on the site, particularly in respect of retailing which will be tightly controlled. Section 106 planning obligations will also make provision for any necessary infrastructure and public transport improvements and would need to ensure appropriate mechanisms are in place to ensure that the integrity of the Culm Grasslands SAC will not be adversely affected.*	
121.	Site allocations Rural Areas section	Amend Table 21 as follows:	To update the tables and text with the latest monitoring information/latest position with regard to permitted sites. To also reflect the deletion of the proposed allocation HE1 'Depot', the inclusion of the site UF1 'West of Uffculme' which was allowed at

Use	**Commitments at 31 March ~~2014~~*2016***	**Completions from 1 April 2013 to 31 March ~~2014~~*2016***	***Uncommitted* Allocations**	**Total**
Housing (dwellings)	~~432~~*535*	~~82~~*347*	~~330~~*407*	~~844~~*1,289*
Commercial (employment, retail and leisure) square metres floorspace **(Note at time of*	20,733	4,119	8,800	33,652

publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)					

Amend Table 22 as follows:

Parish/location	Policy	Site	Gross Site Area (ha)	Net site area (ha)	*Uncommitted* Local Plan allocations
Bampton	BA1	Newton Square	0.25	0.25	5
Bow	BO1	Hollywell	1.2	0.96	20
~~Bow~~	~~BO2~~	~~West of Godfrey Gardens~~	~~0.23~~	~~0.23~~	~~6~~
Bradninch	BR1	Hele Road	0.3	0.3	7
Chawleigh	CH1	Barton	1.25	1	20
Cheriton Bishop	CB1	Land off Church Lane	1.9	1.52	~~30~~*20*
Cheriton Fitzpaine	CF1	Barnshill Close	0.3	0.3	7

appeal, the inclusion of the permitted and previously allocated site 'School Close', and the proposal not to delete the remainder of the existing allocation WI2. The site total for WI1 'Land east of M5' within the table did not reflect the total in the allocation policy and has been amended here for consistency.

		Cheriton Fitzpaine	CF2	Land adj school	1.1	0.88	22
		Copplestone	CO1	Old Abbatoir	1.5	1.2	30
		Culmstock	CL1	Linhay Close	0.23	0.23	6
		Culmstock	CL2	Hunter's Hill	0.4	0.4	10
		Halberton	HA1	Land adj Fishers Way	0.6	0.48	10
		~~Hemyock~~	~~HE1~~	~~Depot~~	~~0.55~~	~~0.44~~	~~10~~
		Morchard Bishop	MO1	Greenaway	1.2	0.96	20
		Newton St Cyres	NE1	Court Orchard	2.7	1.62	25
		Sampford Peverell	SP1	Former Tiverton Parkway Hotel	0.45	0.36	10
		Sampford Peverell	*SP2*	*Higher Town*	*6*	*3.6*	*60*
		Sandford	SA1	Fanny's Lane	1.5	1.2	~~*278*~~
		Silverton	SI1	Old Butterleigh Road	0.35	0.35	8
		Silverton	SI2	The Garage	0.11	0.11	5
		Thorverton	TH1	South of Broadlands	0.7	0.56	12
		Uffculme	*UF1*	*West of Uffculme*	*3.49*	*2.1*	*60*

Willand	WI1	Land east of M5	2.9	1.74	~~40~~ 42
Total					~~330~~*347*

Amend paragraph 3.187 as follows: "~~Three~~*Five* allocated housing sites already have planning approval, and these are set out below. The figures for these sites are based on the position as at 31st March ~~2014~~*2016*. *The site, 'West of Uffculme' was granted permission on appeal, but fell outside the monitoring year and hence is included in the table above."*

Amend Table 23 with the following:

Site	**Policy**	**Site area**	**Dwellings with planning permission**
Stone crushing works (Scotts Quarry), Bampton	BA2	3.41	18
Ashleigh Park, Bampton	BA3	0.3	7
School Close, Bampton	*BA4*	*0.7*	*26*
West of Godfreys Gardens, Bow	*BO2*	*0.23*	*6*
Fanny's Lane, Sandford	SA1	1.12	19
Total			~~44~~*76*

Amend Table 24 with the following:

Parish/location	**Site**	**Gross site area (ha)**	**Net site area (ha)**	**Floorspace (sq.m)**

		Bampton	Stone crushing works (Scott's Quarry), Bampton	0.45	0.36	355	
		Willand	Willand Industrial Estate	~~2.2~~*9.2*	~~2.2~~*5.52*	~~8,800~~*22,000*	
		Total				~~9,155~~*22,355*	
122.	OBA4 School Close Bampton	Insert additional policy after BA3 to state: ***Policy BA4*** ***School Close, Bampton*** ***A site of 0.7 hectares at School Close, Bampton is allocated for residential development subject to the following:*** ***a) 26 dwellings with 38% affordable housing;*** ***b) Access to be achieved off West Street;*** ***c) Traffic calming measures along West Street;*** ***d) Provision of a pedestrian footpath along West Street to link with the entrance to the site on West Street; and*** ***e) Provision of a Drainage Strategy and a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;*** *3.194a This greenfield site is located towards the south of the former primary school and forms the remaining part of a previous allocation. It slopes upwards from north to south with the higher ground of the former school site on approximately the same level as that of the lower portions of the site.*					To be consistent with the approach taken elsewhere in the plan that all permitted but unimplemented existing allocations be rolled forward into the Local Plan Review.

		3.194b An application for 26 dwellings and associated vehicular and pedestrian accesses was granted outline permission by the Council in April 2013 subject to conditions. The permission includes 10 affordable units and consequently, the policy provides the criteria to be applied as a starting point, should any revised scheme be submitted. *3.194c Parts of West Street are narrow and it is a Devon County Council Highways requirement that improvements, in the form of traffic calming measures, shall be made to the section immediately to the east of the access point and include the provision of a pedestrian path to link with an existing path further along West Street.*	
123.	Policy BO1 Land adjacent to Hollywell, Bow	Within paragraph 3.195 amend as follows "Due to a large number of existing accesses further south along Station Road, *advice from the Highway Authority states that* a suitable access can only be achieved into the site via the north west corner where the boundary abuts Station Road. The existing house, 'Hollywell', will therefore need to be demolished to deliver the required access. *However, an alternative access option will be considered if a suitable scheme can be demonstrated to the satisfaction of the Highway Authority."*	In response to Bow Parish Council representation (47) and to ensure the policy is suitably flexible to respond to alternative highway options.
124.	Policy CH1 Barton, Chawleigh	Insert additional criterion between b) and c) to state *"Design solution which respects the setting of the conservation area and listed buildings; and"* Amend criterion numbers following the above accordingly. Insert additional sentence at the end of supporting paragraph 3.201 to state *"Appropriate landscaping will be required to mitigate any potential impact on the conservation area and listed buildings, including the grade I church which lies to the south east."*	In response to Historic England representation (1170) which requested that the impact of the proposal, potential harm and mitigation be informed by a Historic Environment Appraisal which was subsequently undertaken by the

			Council.
125.	Policy CB1 Land off Church Lane, Cheriton Bishop	Amend site area to "*1.4 hectares"* from 1.9 hectares and reduce '30' to *"20"* dwellings in criterion a).	In response to Cheriton Bishop Parish Council representation (42) and Individuals (4163, 5359, 5320, 4326, 4361, 5661, 4672, 4167, 4630, 4210, 4316, 5781, 4634, 4083, 4296, 4220) to ensure proposal is more in keeping with the existing pattern of development.
126.	Policy CB1 Land off Church Lane, Cheriton Bishop	Add new criterion d) to state *"Provision of a landscape buffer along the northern boundary of the site."*	In response to Cheriton Bishop Parish Council representation (42) to reduce the impact on amenity of the neighbouring properties
127.	Policy CB1 Land off Church Lane, Cheriton Bishop	At end of paragraph 3.203 add new sentence to state *"A design solution which provides the footpath on the inside of replacement planting to offset the loss of the hedgerow will be looked upon favourably at the planning application stage."*	In response to Cheriton Bishop Parish Council representation (42) and Individuals (4489, 4672, 4316) to ensure consideration is given to retaining the hedgerow

			along the boundary with the main road.
128.	Policy CF1 Barnhill Close, Cheriton Fitzpaine	At the end of paragraph 3.205 add the following: 'The site lies outside but relatively close to the edge of the conservation area. Appropriate design and choice of materials should ensure that there is no detrimental impact on the character and appearance of the historic environment.'	To reflect the findings of the Council's Historic Environment Appraisal of local plan sites.
129.	Policy HA1 Land Adjacent Fishers Way Halberton	Delete criterion c) and delete supporting paragraph 3.213.	The Devon County Council Archaeology Team has confirmed that the scale and situation of the development would not have an impact on any known heritage assets. As such they do not require any archaeological investigation to take place.
130.	Policy HA1 Land Adjacent Fishers Way, Halberton	Within the third sentence of paragraph 3.212 replace '20-25%' with *"25-50%".*	Error in text which did not reflect the original advice provided by Devon County Council as set out in the SHLAA site appraisals.

131.	Policy HA1 Land Adjacent Fishers Way, Halberton	Add additional sentence at the end of paragraph 3.212 to state: 'The site lies a short distance from the edge of the conservation area. Appropriate design, choice of materials and landscaping should ensure that there is no detrimental impact on the character and appearance of the historic environment.'	To reflect the findings of the Council's Historic Environment Appraisal of local plan sites.
132.	Policy HE1 Depot, Hemyock	Delete policy.	In response to representations from Messers Brooks & Nicholson c/o Greenslade Taylor Hunt (5767) and Individual (4376) which indicate the site is no longer immediately deliverable.
133.	Policy NE1 Court Orchard	Insert new criterion between b) and c) to state *"Design which respects the setting of the conservation area;"* Amend criterion numbers following the above accordingly. Within paragraph 3.222 after second sentence insert *"The conservation area boundary was revised in 2015 and now extends up to the south western boundary of the site. Careful design will be required to ensure the development can be sensitively accommodated."*	In response to Historic England representation (1170) which requested that the impact of the proposal, potential harm and mitigation be informed by a Historic Environment Appraisal which was subsequently undertaken by the Council and to reflect the revised conservation area boundary.

134.	Policy SP1 Former Tiverton Parkway Hotel, Sampford Peverell	Within the first sentence of paragraph 3.224 replace '20-25%' with *"0-25%"*.	Error in text which did not reflect the original advice provided by Devon County Council as set out in the SHLAA site appraisals.
135.	Policy SP1 Higher Town, Sampford Peverell	Insert new policy after SP1 as follows: *Policy SP2* ***Higher Town, Sampford Peverell*** ***A site of 6 hectares at Higher Town, Sampford Peverell is allocated for residential development, subject to the following:*** ***a) 60 dwellings with 30% affordable housing;*** ***b) No development until the completion of improved access works to the A361;*** ***c) Landscaping and design which respect the setting and character of the area;*** ***d) Provision of a drainage strategy and Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;*** ***e) Mitigation of any wildlife impact including protection of hedgerows; and*** ***f) Archaeological investigation and appropriate mitigation.*** *3.224a The site is on the edge of Sampford Peverell, outside the main built up part of the village. The site is elevated and will require careful landscaping and mitigation measures. Development of the highest ground should remain undeveloped. Low density and good design will be required to respect the existing character of edge-of village housing and conservation area. The site is currently bounded by hedgerow. 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*	To reflect the inclusion of land at Junction 27 and associated housing.

		development. *3.224b This site lies in an area of archaeological potential with the Historic Environment Record recoding prehistoric activity. Any application will need to be accompanied by archaeological investigation and appropriate mitigation.* *3.224c The Highway Authority has advised that any development of the site should only commence once improvements to the A361 junction have been implemented.*	
136.	Add Uffculme, land west of Harvesters in following appeal decision	***Policy UF1*** ***Land west of Uffculme, Uffculme*** ***A site of 3.49 hectares at land west of Uffculme, Uffculme, is allocated for residential development subject to the following:*** ***a) 60 dwellings with 35% affordable housing;*** ***b) Archaeological investigation and appropriate mitigation; and*** ***c) Provision of a drainage strategy and Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance.*** *3.238 The site is located to the west of Uffculme, adjacent to Uffculme Road. It comprises an agricultural field together with part of the rear garden belonging to the property known as Harvesters. The field has a frontage onto Uffculme Road from which access would be taken. An appeal decision has granted outline planning permission on the site for 60 dwellings with 35% affordable housing. The policy provides the criteria to be applied as a starting point, should any revised scheme be submitted. The site occupies an area where prehistoric activity is recorded in the wider landscape. Archaeological investigation and appropriate mitigation will therefore be required.*	This site was consulted upon as an option site in 2014. It was not included within the proposed submission version but was granted permission at appeal in 2016. It is proposed to be included in the plan as an allocation for Uffculme.

137.	Policy WI2, Willand Industrial Estate, Willand	Within the policy replace '2.2' with *"9.2"* hectares. Within criterion a) replace '8,800' with *"22,000".* Amend paragraph 3.238 as follows: "The site comprises level land within and adjoining the existing Willand Industrial Estate. ~~It is part of a larger site that was previously allocated, but only part of Pase 1 of the development has proved deliverable. This smaller allocation will complete the development of industrial land close to the existing access into the industrial estate, commensurate with rural employment needs, while larger commercial allocations are located in more strategically accessible locations at Cullompton and Tiverton.~~ *It is part of a larger site allocated in the previous Local Plan, which has been partly developed. Access has now been secured to Phase 2 and an application for nearly 13,000 sqm of employment units has been submitted. This application would facilitate the relocation of Pallex from the neighbouring industrial estate to a purpose built Regional Distribution Centre within Phase 2 whilst providing a range of different sized units to meet market demand. It is anticipated that any remaining unconsented parts of the site could come forward over the plan period."*	In response to representations from Pallex SW Ltd c/o WYG Planning (5769), which have addressed the Council's original reasons for deletion as the remainder of the site is now deliverable, with access to Phase 2 having been secured. The viability of delivering employment units in this location, which was another of the Council's concerns, is addressed by the representor's marketing report which demonstrates demand for a range of employment units sizes in this location and by the submission of a planning application for approx. 13,000sqm employment on this phase covering the

			entirety of phase 2. Also in response to representation from Willand Parish Council (44), the remaining undeveloped parts, approximately 0.45 hectares, of Phase 1 are also to be included within the enlarged allocation.
138.	DM1 High Quality Design	Amend Criterion d) as follows: "Creation of safe and accessible places that also encourage *and enable* sustainable modes of travel such as walking and cycling;"	To reflect representation by Crediton Neighbourhood Plan (1734), Crediton Town Council (678). It is also consistent with terminology used in other DM policies in the Local Plan Review such as DM5.
139.	DM1 High Quality Design	Amend paragraph 4.5 as follows 'Development proposals must also accord with sustainable waste management principles, the requirements for which are set out in Policy W4 'Waste Prevention' within the Devon Waste Plan. *The Devon County Council Waste Management and Infrastructure SPD should also be a material consideration.* Development Proposals….'	To reflect comment from Devon County Council (626) and better reflect the context of Mid Devon Local Plan and its relationship to

			other relevant documents.
140.	DM1 High Quality Design	Following paragraph 4.5 and a new paragraph: '*Soft landscaped SuDs are best placed to provide water quantity, water quality, public amenity and biodiversity benefits. When considering SuDs there is a preference for 'soft' landscaped solutions which should be sought in the first instance where possible and appropriate. Robust evidence should be provided where no soft landscaped solutions are used'.*	To reflect Environment Agency (943) preference for hierarchical approach. Devon County Council also supports this approach.
141.	DM2 Renewable and low carbon energy	Amend paragraph 4.6 as follows: '…. Examples of development considered under this policy include ~~wind turbines,~~ hydropower, ~~or~~ solar installations, and energy systems associated with other development such as combined heat and power (CHP) or district heating. *Any wind turbine proposals will be considered in the context of the 18 June 2015 Written Ministerial Statement or latest government guidance thereafter. Evidence for this plan has identified that there is limited capacity for wind turbine development which includes reasons of landscape constraints of the district. Therefore no area within this plan has been identified as suitable for wind energy development.*	To reflect changes to National policy and updated evidence in response to the change in National policy.
142.	DM2 Renewable and low carbon energy	Add the following statement to paragraph 4.6: *Any wind turbine proposals will be considered in the context of the 18 June 2015 Written Ministerial Statement which requires planning applications for such development should only be granted if areas of suitable for wind energy development are identified in Local or Neighbourhood Plans. Following consideration of the evidence commissioned, the Council has concluded that it does not propose to identify such areas at a district level. This does not preclude suitable areas for wind energy development to come forward in Neighbourhood Plans.* Amend paragraph 4.8 as follows "For instance, renewable and low carbon energy proposals that use *waste* materials originating…."	Paragraph 4.6 updated to reflect the Government's Written Ministerial Statement of the 18 June 2015. To reflect Devon County Council (626) comment that the word 'waste' should precede 'materials' in paragraph

			4.8 to provide clarity. Devon County Council suggests the existing wording implies that the County are the Local Planning Authority for any energy development that uses fuel brought into the site which is incorrect.
143.	DM3 Transport and air quality	Add additional sentence to the beginning of Policy DM3: '*Development must ensure safe access to the transport network.* Development proposals that would…'	To reflect Devon County Council (626) comment that the policy could also refer to safe access to the transport network.
144.	DM3 Transport and air quality	Add a new paragraph under 4.9 "*A Transport Statement is similar to a Transport Assessment but is less detailed and can be used in some cases where transport issues arising from the development proposals do not require a full Transport Assessment. Where a Transport Statement in lieu of a Transport Assessment is considered acceptable this will be agreed by the planning authority in consultation with Devon County Council as the highway authority. All major applications will require a Transport Assessment unless advised by the planning authority ".*	To reflect Devon County Council (626) comment that transport statements are different from transport assessments and may be acceptable in some cases in lieu of a transport assessment.
145.	DM5 Parking	Within Non-residential table B8 Warehousing and distribution amend Cycle Parking Standard from '1 per 46.5' to *"1 per 465"*	Error in table and to ensure consistency with the provision of cycle

			parking for all other uses.
146.	DM5 Parking	Re-order supporting text paragraphs. Paragraph 4.21 to be place under 4.19.	To improve the readability of the supporting text. Numbered 4.19a for purposes of submission.
147.	DM7 Gypsy and traveller accommodation	~~Gypsy and traveller accommodation~~ *Traveller sites* Planning applications for gypsy and traveller pitches, ~~including pitches~~ *or plots* for travelling showpeople, will be permitted where: ~~a) The need cannot be met on another suitable site in Mid Devon which has consent or is allocated for gypsy and traveller pitches;~~ ~~b) Local services can be accessed without the use of a car;~~ *a)* Suitable onsite facilities will be provided including space for children's play; *b)* The proposal will have suitable environmental quality for residents including non-isolating boundary treatments; and *c)* Occupation will be limited to those who meet the Government's published definition of gypsies and travellers, including travelling showpeople~~.~~; *Where development proposals are considered under S13 local services can be accessed without the use of a car.* *Where development proposals are considered under S14, the need cannot be met on another suitable site in Mid Devon which has consent or is allocated for gypsy and traveller pitches.*	To provide clarity on the circumstances in which this policy will be relevant in-line with other strategic policies in the Local Plan.

		Sites with associated employment or storage elements may be permitted where there is specific justification and the location *of the proposed development* will not have harmful impacts on local amenity or the local environment. Gypsy and traveller accommodation may be included as part of the affordable housing requirement.	
148.	DM7 Gypsy and traveller accommodation	Amendment to paragraph 4.28 '….national policy indicated that local planning authorities should *very* strictly limit new traveller site development in the countryside…'	To reflect Planning Policy for Traveller Sites published in August 2015.
149.	DM7 Gypsy and traveller accommodation	Replace first sentence of paragraph 4.29 with 'There is a need for 35 new pitches for gypsies and travellers for the period 2014-34. This need is proposed to be met on the largest strategic allocations. The travelling showpeople community is predominantly based in one large site at Cullompton, which is at capacity. A need for 11 plots has been identified and the Council is in discussions with a landowner to grant permission for one additional site near to the town which will meet the outstanding requirement.	To reflect new updated Mid Devon evidence on Gypsy and Traveller Accommodation Assessment.
150.	DM9 Conversion of Rural buildings	Additional paragraph to be inserted in supporting text under paragraph 4.38 *'Policy DM9 refers to the conversion of existing buildings to a residential, tourism or employment use. Proposals for new-build employment and expansion of existing businesses will be assessed against DM18. Other policies in the Local Plan will also be applied as appropriate.'*	To provide clarity in the supporting text.
151.	DM12 Design of Housing	Amend policy DM12 as follows: "Policy DM12 ~~Design of Housing~~ *Housing Standards* New housing development should be designed to deliver: ~~a) High quality local places taking into account physical context, local character, density and land use mix;~~ ~~b)~~ *a)* Adequate levels of daylight, sunlight and privacy to private amenity spaces and principal windows;	To avoid repetition within the Local Plan a number of criterion have been deleted as they are repetitive of DM1 High Quality Design. Also to provide clarity DM12 and DM13 have also been

		~~c)~~ *b)* Suitably sized rooms and overall floorspace which allows for adequate storage and movement within the building together *as set out in the Nationally Described Space Standard* with external space for recycling, refuse and cycle storage; ~~d) Adaptable dwellings that can accommodate a range of occupiers and their changing needs over time which will include the provision of a stairway suitable for stairlift installation or space for the provision of a lift in homes with more than one storey;~~ ~~e)~~ *c)* Private amenity space that reflect the size, location, floorspace and orientation of the property; *and* ~~f) Sustainable forms of development that maximise the natural benefits of the site through design, materials, technology and orientation;~~ ~~g)~~ *d)* On sites of 10 houses or more the provision of 30% of dwellings built to Level 2 of Building Regulations Part M 'access to and use of dwellings'.~~; and~~ ~~h) Car parking in accordance with Policy DM5~~	combined to form this proposed policy. The criterion in DM13 are no longer set out as they are repetitive of the Nationally Described Space Standard, instead reference to the space standard is made within criterion b). The change also responds to Home Builders Federation (129) comment that the policy does not reflect Ministerial Statement 25th March in criterion c), d) and g). The supporting text from DM13 has been transferred to sit under this combined policy. The title of this policy has also been changed to better reflect the combined content.
152.	DM13 Dwelling sizes	Combine policy with DM12 as set out above.	To provide clarity DM12 and DM13 have also

			been combined to form this proposed policy set out above in DM12. The criterion in DM13 are no longer set out as they are repetitive of the Nationally Described Space Standard, instead reference to the space standard is made within criterion b). The change also responds to Home Builders Federation (129) comment that the policy does not reflect Ministerial Statement 25th March in criterion c), d) and g). The supporting text from DM13 has been transferred to sit under this combined policy. The title of this policy has also been changed to better reflect the combined content.
153.	DM14 Town	Remove 'and Bampton' from the second line of DM14.	Bampton is not

	centre development		classified in the Local Plan Review as a town, as such its town centre boundary is proposed for deletion, this also reflects comment from Willand Parish Council (44).
154.	DM14 Town centre development	Amend second sentence of the policy to read "Within defined town centres, development proposals for *main town centre uses,* community and residential development will be supported where they:"	To ensure a consistent approach across policies and to align closely with the NPPF.
155.	DM14 Town centre development	Amend last sentence of the policy to read "Within primary shopping frontages, at ground floor level the proportion of A1, *A2 and A3* ~~retail~~ uses will not be permitted to fall below ~~65~~85% of all units"	To reflect changes to permitted development rights. The updated percentage reflects the increased range of uses considered within the primary shopping frontages and historic evidence demonstrating an average of 85% of A1-A3 uses within the town centres in Mid Devon since 2009.
156.	DM15 Development outside town	Remove 'and Bampton' fro m first line of DM15.	Bampton is not classified in the Local Plan Review as a town,

	centres		as such its town centre boundary is proposed for deletion, this also reflects comment from Willand Parish Council (44).
157.	DM15 Development outside town centres	Amend third paragraph of policy to read: The Council will require an impact assessment to be submitted for any proposals for retail, ~~and~~ leisure *and office* development outside town centres, where the ~~*proposed*~~ *total* gross floorspace would exceed 500 square metres. Amend paragraph 4.48 as follows; "National policy requires local authorities to apply a sequential approach to ~~retail development in towns~~ *main town centre uses*, to ensure the vitality and viability of town centres are not harmed by out-of-centre development. A proportionate, locally set threshold may be applied to retail*, leisure and office* floorspace proposed outside of town centres, over which an impact assessment should be required. The Mid Devon Retail Study recommends a threshold of 500 square metres gross floorspace. *The need for an impact assessment will be considered in the context of each application and will be required where the development will result in total gross floorspace of over 500 square metres, either itself or cumulatively with other existing or proposed development of a similar type."*	The inclusion of the word 'office' reflects the wording in the NPPF. The amendment of the word 'proposed' to 'total' in the policy clarity as to when an impact assessment will be required. Amendments to the supporting text are also provided to reflect these changes.
158.	DM15 Development outside town centres	Addition of new paragraph under 4.51 after '….Tourism Study and any other appropriate evidence' to include: *"Where specific allocations of this plan contain proposals for uses which are subject to the sequential test, a proportionate approach to the application of the test will be required, reflecting the strategic decisions already made through the local plan process. However, the local planning authority will still fully consider the potential impact on town centre vitality and viability to ensure that the primary role of the town*	To provide guidance and clarity of what is to be considered when proposals for uses which are subject to the sequential test have been allocated.

		centres in meeting such development needs is maintained." Start new paragraph of existing supporting text after the above proposed change: 'Where proposals are predicated to have a likely adverse impact…..'	
159.	DM22 Tourism and leisure development	Amend criterion b) to "Where ~~possible~~*appropriate,* involve conversion or replacement of existing buildings; and"	To improve clarity in applying the policy in a range of circumstances. The word 'appropriate' is considered in this instance more suitable than 'possible' in the context of this policy.
160.	DM23 Community Facilities	Amend third sentence of paragraph 4.70 as follows: "National policy seeks to retain and develop local services and community facilities and guard against their unnecessary loss, *while the vision for this Local Plan recognises the importance of providing safe, healthy and crime free neighbourhoods.*"	To provide clarity in context.
161.	DM24 Protection of Local Green Space and recreational land/buildings	Include Bampton Millennium Green as Local Green Space.	To reflect request from Bampton Society (1319) and Mid Devon CPRE (486). The green space is in reasonably close proximity to the community. It is demonstrably special to the local community in conformity with the purposes of a Millennium Green, it is

			local in character and is not an extensive tract of land.
162.	DM24 Protection of Local Green Space and recreational land/buildings	Remove Bickleigh Church Green from Local Green Space designations.	Since the proposed submission consultation, the reconsideration of Bickleigh Church Green has been reconsidered as a local heritage asset and has been removed from the register. Reasons for its removal include the lack of historic significance as a 'green' and historic community use of the space appears to be very occasional and therefore does support the claim that the plot has been used as a community space. For the reasons above it is considered that Bickleigh Church Green no longer meets the second test in

			paragraph 77 of the NPPF and therefore should be undesignated as a Local Green Space in the Local Plan Review. This also responds to comments from individuals (5237, 5827) that Bickleigh Church Green should not be designated as Local Green Space as there is no historic significance and it is private land.
163.	DM24 Protection of Local Green Space and recreational land/buildings	Include Sandford Millennium Green as Local Green Space	To reflect request from Bampton Society (1319) and Mid Devon CPRE (486). The green space is in reasonably close proximity to the community. It is demonstrably special to the local community in conformity with the purposes of a Millenium Green, it is local in character and is not an

			extensive tract of land.
164.	DM25 Development affecting heritage assets	Amend criterion b) as follows: '…to consider their significance, character, setting *(including views to or from), appearance, design, layout* and local distinctiveness…'	To reflect comments by Historic England (1170). An exact copy of the representation has not been reflected in line with national guidance, in which in drafting policies undue repetition has been avoided by using criteria which sets out principles that are common to the different types of heritage assets. As such the full replacement policy by Historic England is not recommended however aspects of the suggested policy have been incorporated.
165.	DM25 Development affecting heritage	Amend point e) as follows: "…as set down in the guidance from ~~English Heritage: "The Setting of Heritage Assets"~~*Historic England: 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning:3'."*	To reflect rebranding of English Heritage to Historic England and

	assets		replacement of 'The Setting of Heritage Assets' with 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning: 3'
166.	DM25 Development affecting heritage assets	Amend paragraph 4.83 to state: Details of Mid Devon's non-designated heritage assets are on the register of heritage assets, which is available on the Council's website at ~~www.middevon.gov.uk/heritageassets~~. ~~The Council's online Public Access system at www.middevon.gov.uk/online applications has a property address search facility that identifies where heritage assets are present~~. Further details of heritage assets are available from ~~English Heritage~~ Historic England and the Historic Environment Service at Devon County Council, which holds the Devon County Historic Environment Record. The Council will publish a local register of non-designated heritage assets	To reflect comment from National Trust (170) and ensure most up to date information is available to the user.
167.	DM26 Green infrastructure in major development	Add new sentence at the end of Policy DM26 "*Where appropriate, the Council will seek contributions toward off-site green infrastructure where on-site green infrastructure is unfavourable.*"	To reflect comment from the Environment Agency (943). The amendment will guide development to look towards off-site contribution where on-site provision is deemed inappropriate/unfavourable.

168.	DM26 Green infrastructure in major development	Add sentence at the end of paragraph 4.86: *"Green infrastructure in some cases can also serve the purpose of protecting or enhancing heritage assets."*	To reflect comment from Historic England (1170). The addition of the sentence provides clarity.
169.	DM27 Protected landscapes	Amend first sentence of paragraph 4.94 " …are proposed within *or adjoining* protected landscapes or adjoining National Parks, it must be demonstrated…"	To respond to comment from Blackdown Hills AONB Partnership (1195) that applications adjoining should be applied equally to AONB's as well as National Park's.
170.	DM27 Protected landscapes	Add wording to paragraph 4.94 "*The impact of light pollution should also be considered with particular regard provided for the Dark Sky Reserve status of Exmoor National Park."*	To respond to comment from Exmoor National Park authority (115) that consideration should be given to light pollution to minimise impacts on the Dark Sky Reserve status of Exmoor National Park.
171.	DM28 Other protected sites	Add sentence at the end of criterion c) of policy: *"Where mitigation measures are not possible compensatory measures in some cases may be considered appropriate."*	To respond to Environment Agency (943) comment that compensatory measures should be included in the policy.

172.	DM28 Other protected sites	Add wording to end of paragraph 4.102 as follows: "*Where development is permitted and would lead to an adverse impact, appropriate mitigation measures should be put in place. Compensatory measures in some cases, where mitigation measures are not possible, may be considered appropriate. Compensatory measures are not possible in all cases and will depend on the context of the protected site. In the case of Natura 2000 sites, compensatory measures may only be considered if the proposal is deemed to be of overriding public interest and would involve engagement with both Central Government and European Commission."*	To respond to Environment Agency (943) comment that compensatory measures should be included in the policy. Supporting has been proposed to set out the context for to the use of compensatory measures.
173.	Monitoring	Amend '360' to '380' against indicator 'Housing trajectory showing net additional dwellings from 2013-2033'	To reflect updated housing target.
174.	Monitoring	Against the indicator 'Total amount of additional commercial floorspace for whole district and individually for Tiverton, Cullompton, Crediton and rural areas' update the average annual completions figures to state: Mid Devon 7350 Tiverton 1470 Cullompton 3675 Crediton 735 Rural areas 1470	To reflect the revised commercial development target within Policy S6.
175.	Policies Map General	Amend key in all maps where relevant to reference 'Minerals Consultation Area' instead of 'Minerals Consultation Zone'.	To respond to Devon County Council (626) comment that reference to 'Minerals Consultation Zone' should be amended to 'Minerals Conservation

			Area'.
176.	Policies Map General	Base maps to be updated to show the latest OS mapping updates	Comment from Bradninch Town Council (86) and individuals (773, 5843) noted that recently developed affordable housing was not shown on the Bradninch policies map this was due to a time lag between completed housing and OS mapping updates. This also responds to comments from individuals (5269, 5781) with regard to the Cheriton Bishop policies map.
177.	Policies Map General	Conservation areas to be updated to show the latest Conservation are boundaries.	To reflect updated 2015 Conservation Area boundaries and to respond to comment by individual (4489) which identifies an error on the proposed submission Cheriton Bishop Map in which

			the Conservation Area boundary differs from what was shown on the policies map.
178.	Policies Map Tiverton	Removed a part of TIV10 Roundhill allocation which overlapped a small area of some gardens at Lower Cotteylands.	In response to representation from individuals (5262, 5326)
179.	Policies Map Tiverton	Removed a part of TIV9 Howden Court allocation which overlapped a small area at the side of 17 Arnold Crescent	In response to representation from individual (5870)
180.	Policies Map Tiverton	Delete TIV14 Wynnards Mead allocation from policies map.	Policy is proposed to be deleted.
181.	Policies Map Cullompton	Amend allocation CU1-CU6 to reflect adopted NW Cullompton masterplan amendments.	In response to the adoption of the NW Cullompton masterplan. This amendment also relates to the comment made by individual (1901), Growen Estates c/o Rocke Associates (5748) and Rull Hamlet Association (1796).
182.	Policies Map Cullompton	Amend allocation CU1-CU6 to reflect a boundary error at the end of St George's Well Avenue.	In response to new information presented by an individual (outside of Local Plan Review consultation) that the border of their

			property is incorrectly shown. Land Registry documents have been presented as evidence.
183.	Policies Map Cullompton	Amend allocation CU7-CU12 to exclude outline over private garden.	In response to representation from individuals (5563, 5370 and 5818)
184.	Policies Map Cullompton	Amend area for town centre relief road to incorporate land to the south.	In response to representation from individual 5211 that it would be appropriate to extend the area identified for town centre relief road to incorporate land to the south to allow consideration of Duke Street bridge as part of the transport solutions.
185.	Policies Map Crediton	Settlement limit boundary amended to include land identified for development adjoining CRE10.	To respond to comment by Tesco Store Limited C/O Burnett Planning (4323), as part of the site is suitable for development the principle of which has already been accepted

			via previous outline permissions.
186.	Policies Map Bampton	Include remaining allocation OBA4 School Close, Bampton (previously AL/BA/1) to be reflected on policies map. To be identified as 'BA4' on the policies map. Outline of allocation and settlement limit to be amended to follow area with planning permission.	To be consistent with the approach taken elsewhere in the plan that all permitted but unimplemented existing allocations be rolled forward into the Local Plan Review.
187.	Policies Map Bampton	Include Bampton Millennium Green as Local Green Space.	To reflect proposed policy change.
188.	Policies Map Bickleigh	Remove designation of Church Green from Bickleigh Policies Map as Local Green Space.	To reflect proposed policy change.
189.	Policies Map Cheriton Bishop	Reduce site area to 1.4 hectares for proposed allocation CB1.	In response to Cheriton Bishop Parish Council representation (42) and Individuals (5269, 4163, 5359, 4122, 5320, 4326, 4361, 4168, 4630, 5781, 4634) to ensure proposal is more in keeping with the existing pattern of development.
190.	Policies Map Hemyock	Remove allocation HE1 from the map. Delete 'Proposed Residential Allocation' from the key.	To reflect a proposed modification to the plan discussed in the

			Hemyock modifications section to remove the allocation HE1. Also in response to representations from Messers Brooks & Nicholson c/o Greenslade Taylor Hunt (5767) and Individual (4376).
191.	Policies Map Sandford	Include Sandford Millenium Green as Local Green Space.	To reflect proposed policy change.
192.	Policies Map Thorverton	Amend Thorverton Local Green Space northern boundary to reflect the Green's deeds.	To respond to individual (5215) comment that the Thorverton Millenium Green's deeds differs from the outline of the Local Green Space shown on the policies map.
193.	Policies Map Uffculme	Remove waste management facility from policies map.	To respond to Devon County Council (626) that the Waste Management Facility should be omitted as it is no longer in the Devon Waste Plan.
194.	Policies Map	Inclusion of allocation UF1 Land west of Uffculme	In response to an

	Uffculme		additional allocation proposed following the 2016 appeal decision allowing outline planning permission for up to 60 dwellings.
195.	Policies Map Willand	Reduce the size of the area marked 'Proposed deleted site' for the allocation WI2 and accordingly increase the size of the allocated area to 9.2ha	In response to representations from Pallex SW Ltd c/o WYG Planning (5769), which has addressed the Council's original reasons for deletion as the remainder of the site is now deliverable, with access to Phase 2 having been secured. The viability of delivering employment units in this location, which was another of the Council's concerns, is addressed by the representor's marketing report which demonstrates demand for a range of employment units sizes

			in this location and by the submission of a planning application for approx. 13,000sqm employment on this phase covering the entirety of phase 2. Also in response to representation from Willand Parish Council (44), the remaining undeveloped parts, approximately 0.45 hectares, of Phase 1 are also to be included within the enlarged allocation.
196.	Glossary	Add additional entry which states: “Public Rights of Way (PRoW): give you the right to walk, ride a horse or cycle along certain routes and are are legally protected in the same way as roads.”	Suggestion by Devon Countryside Access Forum (1534) to include a definition of Public Rights of Way in the Glossary.
197.	Glossary	Add additional entry which states: “Recreational Trail: a corridor, route or pathway, generally land or water based, primarily intended for recreational purposes, including walking, hiking, cycling, canoeing and horse-riding.”	Suggestion by Devon Countryside Access Forum (1534) to include a definition of recreational trails in the

			Glossary.
198.	Glossary	Add additional entry which states: “Green Infrastructure: A network of multi-functional green space with recreational, visual and ecological value.”	Omitted in error from glossary.
199.	Glossary	Add additional entry which states: “Self-Build and Custom Housebuilding: Homes built by individuals, associations of individuals or developers working with or for those individuals, to be occupied by those individuals. Homes that are built wholly or mainly to plans or specifications decided or offered by a developer/seller are excluded.”	To respond to comment by Lightwood Land c/o Pegasus Planning (3678) in which it is suggested that reference to self-build should be amended to self/custom build.
200.	Glossary	Add additional entry which states: “Community Facilities: community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. They include pubs, post offices, shops, village halls, allotments, places of worship and various recreational facilities.”	To respond to Devon and Cornwall Police c/o WYG (5762) to include a definition of community facilities in glossary.
201.	Glossary	Define ‘main town centre uses’ in glossary following the definition in the NPPF.	To provide clarity in interpretation of DM14 and DM15.

This page is intentionally left blank

1.0 Introduction

Preparation of the Local Plan

1.1 The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the development needs of the current generation does not worsen the lives of future generations. The National Planning Policy Framework (NPPF) sets out how local councils should achieve this through the preparation of Local Plans and decisions on planning applications, having regard to the economic, social and environmental roles of sustainable development.

1.2 The Government requires that Local Plans are 'sound', meaning that they are:

- Positively prepared
- Justified
- Effective
- Consistent with national policy

1.3 The preparation of the Mid Devon Local Plan 2013-2033 has been guided by national planning policy and legislation in this respect. The plan sets out the strategic policies for development, identifies sites for housing, employment, infrastructure and environmental protection, and provides general policies on matters such as the design of development.

1.4 This Local Plan supersedes and replaces the following earlier plans:

- Core Strategy 2026 (adopted 2007)
- Allocations and Infrastructure Development Plan Document (adopted 2010)
- Local Plan Part 3: Development Management Policies (adopted 2013)

1.5 The Mid Devon Local Plan also forms part of the Development Plan for the district, alongside Devon County Council's Waste and Minerals Local Plans.

1.6 National planning policy sets the planning framework within which the Local Plan Review has been prepared. The National Planning Policy Framework (NPPF) was introduced in March 2012 and replaced multiple national policy statements and guidance with an overarching planning policy document. The NPPF requires local planning authorities to base local plans on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. Assessments of and strategies for housing, employment and other uses should be integrated, taking full account of relevant market and economic signals. In May 2014 the Government launched web-based planning practice guidance that brought together supporting planning guidance entirely on-line in an accessible and useable way.

1.7 Most importantly, the NPPF applies a 'presumption in favour of sustainable development'. For plan-making this means:

- Local planning authorities should positively seek opportunities to meet the development needs of their area;
- Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:
  - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or
  - specific policies in the NPPF indicate development should be restricted (for example, restrictions on development affecting Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty, designated heritage assets or areas at risk of flooding).

1.8 The NPPF goes on to provide national policy on all areas of planning for development, such as design, transport, employment growth and the conservation of environmental and heritage assets. Before it can be adopted, a Local Plan must be subject to Examination in Public. The Planning Inspector applies tests of 'soundness', one of which refers to the plan's consistency with national policy. In addition, a Local Plan must be positively prepared, justified and effective, and the NPPF defines the meaning of these terms.

1.9 There is no longer a regional tier of planning policy in the form of a Regional Spatial Strategy. However, the Heart of the South West Local Economic Partnership (HotSW) has prepared a Strategic Economic Plan which has a bearing on strategic planning in Mid Devon.

1.10 Whilst national planning policy provides the planning framework within which a plan is to be prepared, the document has also been prepared in accordance with a regulatory framework set down by the EU requiring that the environmental impact of a plan be assessed. UK regulations take this a step further, requiring local planning authorities to also consider the social and economic impact of a plan in an environmental report when a Local Plan is submitted to the Secretary of State for Examination in Public, and subsequently adopted. Considering these three key elements together is central to assessing the sustainability of a plan. A Sustainability Appraisal has been carried out during the preparation of this Local Plan in order to gain an understanding of the sustainability challenges the district faces.

1.11 Local Authorities are also required to undertake a Habitat Regulations Assessment (HRA) of development plans. The HRA for the Mid Devon Local Plan Review considers the impact of the Plan on European sites either alone or in combination with other plans. European sites include Special Areas of Conservation (SACs) designated for species and habitats and Special Protected Areas (SPAs) designed for birds. Consideration is also provided to potential SPAs, candidate SACs, Sites of Community Importance and Ramsar sites. The HRA concludes that the development proposed in the Local Plan alone will not result in adverse effects on the integrity of European Sites around Mid Devon. However uncertainties exist regarding the potential for North Devon and Torridge Local Plan to have significant effects on the integrity of the Culm Grasslands SAC as a result of increased air pollution. Therefore it is not yet possible to conclude that there will be no likely significant effects as a result of implementing the new Mid Devon Local Plan in-combination with the North Devon and Torridge Local Plan. Further work has been commissioned to determine this impact; the HRA will be updated to reflect the latest evidence. The Sustainability Appraisal carried out during the preparation of the Local Plan has taken into account the findings of the HRA.

1.12 Furthermore, the Equalities Act 2010 requires Local Authorities to eliminate discrimination and promote equality when producing a Local Plan and Policies. An Equalities Impact Assessment

has been carried out to assess each policy and site allocation against five policy areas which have taken into account the 'protected characteristics' as set out in the Equalities Act. Policies have evolved and altered throughout the Local Plan Review process to reduce discrimination and promote equality.

1.13 The process of preparing the Local Plan and the Sustainability Appraisal has helped develop a picture of the district, its characteristics, constraints and sustainability issues. In particular Mid Devon is defined by:

- An inland district covering an area of 352 square miles, lying between Dartmoor, Exmoor and the Blackdown Hills
- One of the most sparsely populated local authorities in England and Wales with a high proportion of residents living outside the three market towns of Tiverton, Cullompton and Crediton
- Important transport routes cross cut the district, including the M5 motorway and A361, and the Great Western mainline railway
- A population of 78,600 (2013 Mid Year Estimate)
- High house prices compared with local wage levels, resulting in low levels of affordability (in line with a pattern which applies across the region and nationally)
- Low levels of inward commuting but high outcommuting, particularly to Exeter and Taunton
- High and increasing levels of car ownership
- 12 Sites of Special Scientific Interest, three Local Nature Reserves, two nature reserves managed by Devon Wildlife Trust and over 8 square kilometres of ancient woodland
- Rich historic environment including over 2000 listed buildings, 51 Conservation Areas, 49 Scheduled Monuments, 3 registered parks and gardens and 16 locally important parks and gardens
- Small areas of social deprivation within Tiverton, Cullompton and some of the remote rural areas

1.14 These characteristics and sustainability issues, and a range of other important issues which have informed the content of the plan, are discussed in greater detail in the accompanying Sustainability Appraisal (SA). The Local Plan has been prepared in response to these issues, seeking to deliver development in a sustainable manner, whilst respecting environmental limits. The SA charts this development process, reflecting how the plan has been put together following previous consultations and the production of evidence.

Vision and Spatial Strategy

Vision

1.15 The vision and spatial strategy describes how the sustainable development of Mid Devon will bring positive benefits to local communities through promoting community well-being, supporting economic success, conserving and enhancing the area and respecting environmental limits:

Mid Devon will be a prosperous and sustainable rural district, where individuals, families and communities can flourish as a result of access to good quality local employment, housing and services and a clean, green, safe environment. Local communities and private, public and voluntary organisations will work in partnership to meet social and economic needs in ways that enhance the environment and reduce the area's carbon footprint. High quality development in the right places with appropriate infrastructure will bring regeneration, social and economic benefits and enhance towns, villages and countryside while promoting sustainable use of energy and other resources and tackling the causes and effects of climate change. The Council will use planning and related powers to:

Promote community well-being

- Diverse, inclusive communities with a vibrant mix of accessible uses and local services
- Sufficient 'fit for purpose', decent homes which people can afford
- Safe, healthy and crime free neighbourhoods
- Active, involved, well-educated citizens
- A good range of opportunities to travel by active and sustainable modes
- Strong town and village communities
- Green Infrastructure for personal leisure amenity space

Support sustainable economic success

- A good range of jobs in urban and rural areas
- Growth that respects Mid Devon's relationship with Exeter and Taunton
- Profitable and expanding local businesses, attracting inward investment
- Attractive, lively and successful town centres
- Tourism and leisure enterprises that benefit the whole district
- Recognition of the role of heritage as a tourism attraction

Conserve and enhance the area

- High quality design in new developments
- Clean air and water
- Countryside, environment and heritage assets conserved and enhanced
- Attractive countryside providing for biodiversity and employment
- Effective reuse of existing buildings
- Conservation and enhancement of protected landscapes

Respect environmental limits

- Social and environmental benefits of development are optimised
- Developments use land, energy and resources effectively
- Waste is minimised and recycling rates are high
- Public transport, walking and cycling are encouraged
- Floodplains remain undeveloped
- Renewable energy projects within environmental limits

Spatial Strategy

Overall Strategy

In order to move towards achieving the vision, development will be managed to:

- Create a prosperous economy which increases inward investment into the district
- Meet objectively assessed needs for development, guided to locations which are or can be made sustainable, achieving a suitable balance of housing, employment, facilities and other uses within towns, villages, neighbourhoods and rural areas
- Reduce the need to travel by car, increasing the potential of public transport, cycling and walking
- Reduce carbon emissions in support of national targets
- Promote social inclusion and reduce inequalities by enhancing access for all to employment, services and housing

Cullompton

In the medium to long term, the market town of Cullompton will become the strategic focus of new development, reflecting its accessibility, economic potential and environmental capacity.

Development will be targeted to:

- Provide sustainable urban extensions containing a mix of fit for purpose homes, businesses, local shopping and other services and sustainable transport links
- Provide enhancements to the town centre through additional investment, traffic and transport improvements and environmental enhancements to provide a significant boost to its vitality and viability, provide for a better range of retail and other uses and a significantly improved visitor environment
- Develop any remaining underused brownfield sites within the town
- Protect and enhance the key environmental assets including heritage, biodiversity and air quality

Other Market Towns

The market towns of Tiverton and Crediton will be the secondary focuses of new development, in scale with their individual infrastructures, economies, characters and constraints.

Development will be targeted to:

- Provide a sustainable mix of fit for purpose homes, businesses, shops, leisure, health, education and many other uses, to resolve existing problems where feasible and to meet rural needs

- Protect and enhance their environmental assets including their character, biodiversity, heritage, setting and air quality
- Develop underused and brownfield sites within the towns in preference to greenfield land or public open spaces
- Enhance town centres as accessible, vital and viable locations for a vibrant mix of uses, and as public transport hubs

Junction 27, M5 Motorway

Regionally significant transport infrastructure linkages and acts as a gateway to the South West Peninsula.

Development will be targeted to:

- Provide a high quality tourist and leisure focused development to meet needs identified within the tourism study.
- Associated outlet/discounted retail floorspace to meet a regional comparison floorspace need and deliver the tourist and leisure elements of the allocation. Safeguarding existing town centres through planning controls.
- Ensuring enhanced linkages to Tiverton and Cullompton and the National Rail Network.
- Mitigating environmental impacts.
- Upgrading directly affected transport infrastructure.

Villages

A network of villages with sufficient services and public transport provision will be locations for limited development, targeted to:

- Provide for housing, shops, local services, community facilities and low impact businesses, at a scale commensurate with that of the existing village
- Avoid significantly increased travel by car
- Protect and enhance their environmental assets, including their character, biodiversity, heritage and setting

Countryside

Development in countryside areas outside defined towns and villages, including hamlets and other small settlements, will be targeted to:

- Meet agricultural and other rural business needs
- Promote environmental enhancement including landscape and biodiversity
- Encourage appropriate economic diversification to support the rural economy
- Provide infrastructure to meet the needs of the community

1.16 The Council has considered what strategic approaches are available to meet the vision for sustainable development which has been carried forward from the previous Core Strategy and which continues to reflect the national policy provisions for sustainable development. In particular, the NPPF requires that councils make significant efforts to meet the objectively assessed development needs for their area in their Local Plans. Environmental constraints at Tiverton and Crediton mean that a new approach to the strategic distribution of development is required in this Local Plan Review. Some provision in the more sustainable villages is now

proposed, but a wider distribution of housing in these smaller settlements risks significant increases in unsustainable travel. The possibility of a new settlement in the vicinity of Willand was examined but found to be both inappropriate and likely to be unachievable. Cullompton has more limited environmental constraints than the other market towns and long term growth potential to the east of the town. Cullompton Town Council is supportive of increased growth rates, reflecting the importance they attach to the economic renaissance of the town and in particular the town centre. Given these constraints, and the lack of feasibility of a new settlement led approach to strategic growth, Cullompton is the appropriate long term focus of the district's growth. The Council understands significant potential infrastructure constraints to this growth will need to be overcome, but by providing certainty to the long term planning policy of the area, the Council will be in a position to work towards overcoming these constraints. Further details are set out in strategic policy S11 Cullompton and in the Cullompton section of Chapter 3.0, Site Allocations.

Neighbourhood planning

1.17 The Localism Act 2011 devolved planning powers to local communities. A town or parish council designated as a neighbourhood forum can produce a neighbourhood plan, neighbourhood development order or community right to build order.

1.18 A neighbourhood plan must be consistent with the strategic planning policies of the district council, national planning policy and human rights legislation. A Sustainability Appraisal and Strategic Environmental Assessment may also be required. The plan is then subject to independent examination and a referendum. If it succeeds at referendum, a neighbourhood plan becomes part of the Mid Devon Development Plan and a statutory consideration in planning decisions.

1.19 Depending on its scope, the preparation of a neighbourhood plan can be a complex and time-consuming process, requiring a certain amount of technical expertise. The Council will support local communities wishing to pursue neighbourhood planning. Cullompton, Crediton, ~~and~~ Silverton and Tiverton / Halberton were the first to initiate neighbourhood planning in Mid Devon.

1.20 More information on neighbourhood planning and other community rights can be found on the Mid Devon website. ~~http://mycommunityrights.org.uk~~

Superseded policies

1.21 The Local Plan Review replaces and supersedes the policies of the previous Local Plan that was adopted in three parts: The Core Strategy 2026 (Local Plan Part 1) adopted in 2007, the Allocations and Infrastructure Development Plan Document (AIDPD) (Local Plan Part 2) adopted in 2010 and the Local Plan Part 3: Development Management Policies, adopted in 2013.

2007 Core Strategy Policy	Subject	Notes
COR1	Sustainable Communities	Replaced by: S1 Sustainable development priorities
COR2	Local Distinctiveness	Replaced by: S9 Environment
COR3	Meeting Housing Needs	Replaced by: S3 Meeting housing needs
COR4	Meeting Employment Needs	Replaced by: S6 Employment
COR5	Climate Change	Replaced by: S9 Environment
COR6	Town Centres	Replaced by: S7 Town centres
COR7	Previously Developed Land	Replaced by: S9 Environment
COR8	Infrastructure Provision	Replaced by: S8 Infrastructure
COR9	Access	Replaced by: S8 Infrastructure
COR10	Strategic Transport Networks	Deleted: Unnecessary
COR11	Flooding	Replaced by: S9 Environment
COR12	Development Focus	Replaced by: S2 Amount and distribution of development
COR13	Tiverton	Replaced by: S10 Tiverton
COR14	Cullompton	Replaced by: S11 Cullompton
COR15	Crediton	Replaced by: S12 Crediton
COR16	Bampton	Deleted: Bampton has been re-classified as a village
COR17	Villages	Replaced by: S13: Villages
COR18	Countryside	Replaced by: S14 Countryside

Table 1: Schedule of 2007 Core Strategy 2026 policies

2010 AIDPD	Subject	Notes
AL/DE/1	Housing Plan, Monitor and Manage	Replaced by: S4 Ensuring housing delivery
AL/DE/2	Overall Affordable Housing Provision	Replaced by: S3 Meeting housing needs
AL/DE/3	Affordable Housing Site Target	Replaced by:

		S3 Meeting housing needs
AL/DE/4	Occupation of Affordable Housing	Replaced by: S3 Meeting housing needs
AL/DE/5	Inclusive Design and Layout	Replaced by: S1 Sustainable development priorities
AL/DE/6	Exceptions Policy	Replaced by: DM6 Rural exceptions sites
AL/DE/7	Gypsy and Traveller Provision	Replaced by: DM7 Gypsy and traveller accommodation
AL/DE/8	Public Gypsy and Travellers Provision	Deleted: No equivalent policy
AL/IN/1	Community Infrastructure Levy	Deleted: Now set out in Community Infrastructure Levy Charging Schedule and supporting documentation prepared alongside the Local Plan Review
AL/IN/2	Development Without Community Infrastructure Levy	Deleted: Now set out in Community Infrastructure Levy Charging Schedule and supporting documentation prepared alongside the Local Plan Review
AL/IN/3	Public Open Space	Replaced by: S5 Public open space
AL/IN/4	Green Infrastructure	Replaced by: S9 Environment; DM26 Green infrastructure in major development
AL/IN/5	Education Provision	Replaced by: S8 Infrastructure
AL/IN/6	Carbon Footprint Reduction	Deleted: National policy moving away from delivery of on-site renewables to energy efficiency improvements delivered through the Building Regulations
AL/MO/1	Monitoring	Deleted: Section 5.0 of the Local Plan Review focuses on Monitoring
AL/TIV/1	Eastern Urban Extension	Replaced by: TIV1 Eastern Urban Extension
AL/TIV/2	Eastern Urban Extension Transport Provision	Replaced by: TIV2 Eastern Urban Extension Transport Provision
AL/TIV/3	Eastern Urban Extension Environmental Protection & Green Infrastructure	Replaced by: TIV3 Eastern Urban Extension Environmental Protection and Green Infrastructure
AL/TIV/4	Eastern Urban Extension Community Facilities	Replaced by: TIV4 Eastern Urban Extension Community Facilities
AL/TIV/5	Eastern Urban Extension Carbon Reduction & Air Quality	Deleted: Covered by Development Management policies on renewable energy, air quality and transport and pollution

AL/TIV/6	Eastern Urban Extension Phasing	Replaced by: TIV5 Eastern Urban Extension Phasing
AL/TIV/7	Eastern Urban Extension Masterplanning	Replaced by: TIV1 Eastern Urban Extension
AL/TIV/8	Farleigh Meadows	Replaced by: TIV6 Farleigh Meadows
AL/TIV/9	Blundells School	Replaced by: TIV16~~Deleted: The site is not considered deliverable.~~
AL/TIV/10	Howden Court	Replaced by: TIV9 Howden Court
AL/TIV/11	Belmont Hospital, Belmont Road	Deleted: Site permitted and under construction.
AL/TIV/12	St Andrew Street	Replaced by: TIV7 Town Hall/St Andrew Street
AL/TIV/13	William Street	Deleted: Part of site is complete. Remainder is not considered deliverable.
AL/TIV/14	Palmerston Park	Replaced by: TIV11 Palmerston Park
AL/TIV/15	Blundells Garage, Station Road	Deleted: Site permitted and built out.
AL/TIV/16	Roundhill	Replaced by: TIV10 Roundhill
AL/TIV/17	Hay Park, Canal Hill	Deleted: Concerns over deliverability. Within settlement limit therefore not necessary to remain allocated to come forward.
AL/TIV/18	The Avenue	Deleted: Concerns over deliverability. Part of site now has planning permission for one dwelling.
AL/TIV/19	Phoenix Lane	Replaced by: TIV12 Phoenix Lane
AL/TIV/20	Bampton Street	Deleted: Site has not come forward since allocation. Economic advice suggests unlikely that more than one town centre regeneration scheme to be likely to happen during plan period.
AL/TIV/21	Tidcombe Hall	Replaced by: TIV13 Tidcombe Hall
AL/CU/1	North West Cullompton	Replaced by: CU1 North West Cullompton
AL/CU/2	North West Cullompton Transport Provision	Replaced by: CU2 North West Cullompton Transport Provision
AL/CU/3	North West Cullompton Environmental Protection & Green Infrastructure	Replaced by: CU3 North West Cullompton Environmental Protection and Green Infrastructure
AL/CU/4	North West Cullompton Community Facilities	Replaced by: CU4 North West Cullompton Community Facilities
AL/CU/5	North West Cullompton Carbon Reduction & Air Quality	Replaced by: CU5 North West Cullompton Carbon Reduction and Air Quality
AL/CU/6	North West Cullompton Phasing	Replaced by: CU6 North West Cullompton

		Phasing
AL/CU/7	Masterplanning	Replaced in part by: CU1 North West Cullompton
AL/CU/8	Knowle Lane	Replaced by: CU13 Knowle Lane
AL/CU/9	Court Farm	Deleted: Majority of site permitted and built out. Remainder within settlement limit and does not need to be allocated to come forward.
AL/CU/10	Padbrook Farm	Deleted: Site permitted and built out.
AL/CU/11	Exeter Road	Replaced by: CU15 Land at Exeter Road
AL/CU/12	Lower Bull Ring	Deleted: Site permitted and built out.
AL/CU/13	Week Farm	Replaced by: CU17 Week Farm
AL/CU/14	Eastern Relief Road	Replaced by: CU19 Town Centre Relief Road
AL/CU/15	Cullompton Air Quality	Replaced in part by: S11 Cullompton Also, each site allocation within Cullompton is requires in their policy to have a transport assessment and implement a travel plan to minimise the carbon footprint and air quality impacts
AL/CU/16	M5 Junction 28	Replaced in part by: CU20 Cullompton Infrastructure
AL/CU/17	Town Centre Enhancement	Replaced in part by: CU20 Cullompton Infrastructure
AL/CU/18	Enhanced Walking and Cycling Route	Replaced by: CU8 East Cullompton Transport Provision
AL/CU/19	Railway Station Car Park	Replaced in part by: CU20 Cullompton Infrastructure
AL/CU/20	Colebrook	Replaced by: CU21 Land at Colebrook
AL/CRE/1	Wellparks	Replaced by: CRE1 Wellparks
AL/CRE/2	Red Hill Cross, Exhibition Road	Replaced by: CRE2 Red Hill Cross, Exhibition Road
AL/CRE/3	Cromwells Avenue	Replaced by: CRE3 Cromwells Meadow
AL/CRE/4	George Hill	Deleted: Site permitted and built out.
AL/CRE/5	The Bike Shed, High Street	Deleted: Site no longer available.
AL/CRE/6	The Woods Group, Exeter Road	Replaced by: CRE4 Woods Group, Exeter Road
AL/CRE/7	Wellparks A377	Replaced by: CRE1 Wellparks

AL/CRE/8	Crediton Air Quality	Replaced in part by: S12 Crediton CRE11 Crediton Infrastructure
AL/CRE/9	Crediton Link Road	Deleted: Crediton Link Road has been completed.
AL/CRE/10	Exhibition Road	Deleted: School no longer proposes to move to single site.
AL/CRE/11	Cemeteries	Replaced by: CRE2 Red Hill Cross, Exhibition Road
AL/CRE/12	Pedlerspool, Exhibition Road	Replaced by: CRE5 Pedlerspool, Exhibition Road
AL/BA/1	Bampton, School Close	~~Deleted: Site permitted and under construction.~~Replaced by: BA4 School Close, Bampton
AL/BA/2	Bampton, Bourchier Close	Deleted: ~~Site has not come forward since allocation.~~ Site no longer required in accordance with the strategy for Bampton.
AL/BA/3	Bampton, Ashleigh Park	Replaced by: BA3 Ashleigh Park, Bampton
AL/BA/4	Bampton, Newton Square	Replaced by: BA1 Newton Square, Bampton
AL/BO/1	Bow, West of Godfrey Gardens	Replaced by: BO2 West of Godfrey Gardens, Bow
AL/BO/2	Bow, South of Iter Cross	Deleted: No evidence of demand for employment allocation. Long-term protection of the allocation would be contrary to paragraph 22 of the National Planning Policy Framework.
AL/BO/3	Bow, South West of Junction Road	Deleted: No evidence of demand for employment allocation. Long-term protection of the allocation would be contrary to paragraph 22 of the National Planning Policy Framework.
AL/CO/1	Copplestone, Land off Bassett's Close	Deleted: Site not considered deliverable.
AL/CL/1	Culmstock, Linhay Close	Replaced by: CL1 Linhay Close, Culmstock
AL/CL/2	Culmstock, Hunters Hill	Replaced by: CL2 Hunter's Hill, Culmstock
AL/KE/1	Kentisbeare, South East of Village Hall	Deleted: No evidence of demand for employment in this location. Site has not come forward since allocated.
AL/MB/1	Morchard Bishop, Greenaway	Replaced by: MO1 Greenaway, Morchard Bishop
AL/SA/1	Sandford, South of Village Hall	Replaced by: SA1 Fanny's Lane, Sandford
AL/WI/1	Willand, Willand Moor	Deleted: Site has not come forward since allocation. Alternative allocation within the village

		included in Local Plan Review.
AL/WI/2	Willand, West of B3181	Replaced by: WI1 Land East of M5, Willand

Table 2: Schedule of 2010 Allocations and Infrastructure Development Plan Document policies

2013 Local Plan Part 3	Subject	Notes
DM1	Presumption in favour of sustainable development	Deleted: Inclusion of 'model' policy no longer required by the Planning Inspectorate
DM2	High quality design	Replaced by: DM1 High quality design
DM3	Sustainable design	Deleted: Government guidance states energy efficiency improvements in buildings to be delivered through Building Regulations. Superseded need for policy.
DM4	Waste Management	Deleted: Policy now included within Devon County Waste Plan 2014.
DM5	Renewable and low carbon energy	Replaced by: DM2 Renewable and low carbon energy
DM6	Transport and air quality	Replaced by: DM3 Transport and air quality
DM7	Pollution	Replaced by: DM4: Pollution
DM8	Parking	Replaced by: DM5 Parking
DM9	Cross subsidy of affordable housing on exception sites	Replaced by: DM6 Rural exception sites
DM10	Rural workers dwellings	Replaced by: DM8 Rural workers' dwellings
DM11	Conversion of rural buildings	Replaced by: DM9 Conversion of rural buildings
DM12	Replacement dwellings in rural areas	Replaced by: DM10 Replacement dwellings in rural areas
DM13	Residential extensions and ancillary development	Replaced by: DM11 Residential extensions and ancillary development
DM14	Design of housing	Replaced by: DM12 Housing Standards~~Design of housing~~
DM15	Dwelling sizes	~~Replaced by: DM13 Dwelling sizes~~ Replaced by: DM12 Housing Standards
DM16	Town centre development	Replaced by: DM14 Town centre development
DM17	Development outside town centres	Replaced by: DM15 Development outside town centres
DM18	Front of shops and business premises	Replaced by: DM16 Front of shops and business premises
DM19	Rural shopping	Replaced by: DM17 Rural shopping

DM20	Rural employment development	Replaced by: DM18 Rural employment development
DM21	Protection of employment land	Replaced by: DM19 Protection of employment land
DM22	Agricultural development	Replaced by: DM20 Agricultural development
DM23	Equestrian development	Replaced by: DM21 Equestrian development
DM24	Tourism and leisure development	Replaced by: DM22 Tourism and leisure development
DM25	Community facilities	Replaced by: DM23 Community facilities
DM26	Protection of recreational land and buildings	Replaced by: DM24 Protection of Local Green Space and recreational land/buildings
DM27	Development affecting heritage assets	Replaced by: DM25 Development affecting heritage assets
DM28	Green infrastructure in major development	Replaced by: DM26 Green infrastructure in major development
DM29	Protected landscapes	Replaced by: DM27 Protected landscapes
DM30	Other protected sites	Replaced by: DM28 Other protected sites
DM31	Planning enforcement	Replaced by: DM39 Planning enforcement
BA1	Bampton Stone Crushing Works	Replaced by: BA2 Stone Crushing Works (Scott's Quarry), Bampton
WI1	Willand Industrial Estate	Replaced by: WI2 Willand Industrial Estate, Willand

Table 3: 2013 Local Plan Part 3: Development Management Policies

2.0 Development Strategy and Strategic Policies

Sustainable development principles

The National Planning Policy Framework (NPPF) is clear that the purpose of the planning system is to contribute to the achievement of sustainable development.

NPPF, Paragraph 7 states that: "There are three distinct dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- **an economic role** – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;

- **a social role** – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and

- **an environmental role –** contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."

NPPF, Paragraphs 8 and 9 clarify that "These roles should not be undertaken in isolation because they are mutually dependent" and:

Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment, as well as in people's quality of life, including (but not limited to):

- Making it easier for jobs to be created in cities, towns and villages;
- Moving from a net loss of biodiversity to achieving net gains for nature;
- Replacing poor design with better design;
- Improving the conditions in which people live, work, travel and take leisure; and
- Widening the choice of high quality homes.

Therefore to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system. This Local Plan takes into account local circumstances to achieve sustainable development in Mid Devon.

Overall provision of housing and employment

2.1 The Local Plan Review sets out the levels of development required over the period 2013-2033. This takes account of the Strategic Housing Market Assessment (2015), the Employment Land Review (2013) and the Retail Study (2012), all of which provide technical advice on the levels of need and demand for development in Mid Devon. The documents can be viewed on the Council's website. ~~at www.middevon.gov.uk/evidence.~~

Housing

~~2.2~~ 2.1a National policy requires that the Council uses its evidence (known as a Strategic Housing Market Assessment, or SHMA) to ensure that the Local Plan meets the full, objectively assessed needs for housing, and that planning for housing is considered over Housing Market Areas. The most recent SHMA for the Exeter Housing Market Area (incorporating Mid Devon, along with Exeter, East Devon and Teignbridge) published 2015, sets out the Objectively Assessed Need for Mid Devon and the remainder of the HMA.

2.1b The SHMA sets out the housing need range for Mid Devon of 359 – 381. Further explanation is given in the SHMA document. This Local Plan sets a housing target of 393 dwellings, above the housing need range set in the SHMA to ensure that housing provision in the plan is consistent with the additional need arising from job creation at Junction 27 of the M5. The HMA concludes that there is no need for further upward adjustment to reflect market signals or other such factors.

2.2 7,860 ~~7,200~~ dwellings are required over the plan period, equating to ~~360~~ 393 dwellings per year. The following table sets out the situation at 31st March ~~2014~~2016, indicating a remaining need for about ~~5,511~~4,924 dwellings to be allocated.

Local Plan requirement	~~7,200~~7,860
Completions since 2013	~~320~~924
Commitments (dwellings under construction or with planning permission)	~~1,369~~2,012
Uncommitted requirement	~~5,511~~4,924

Table 4: Housing requirement

2.3 Across the district, this breaks down as follows:

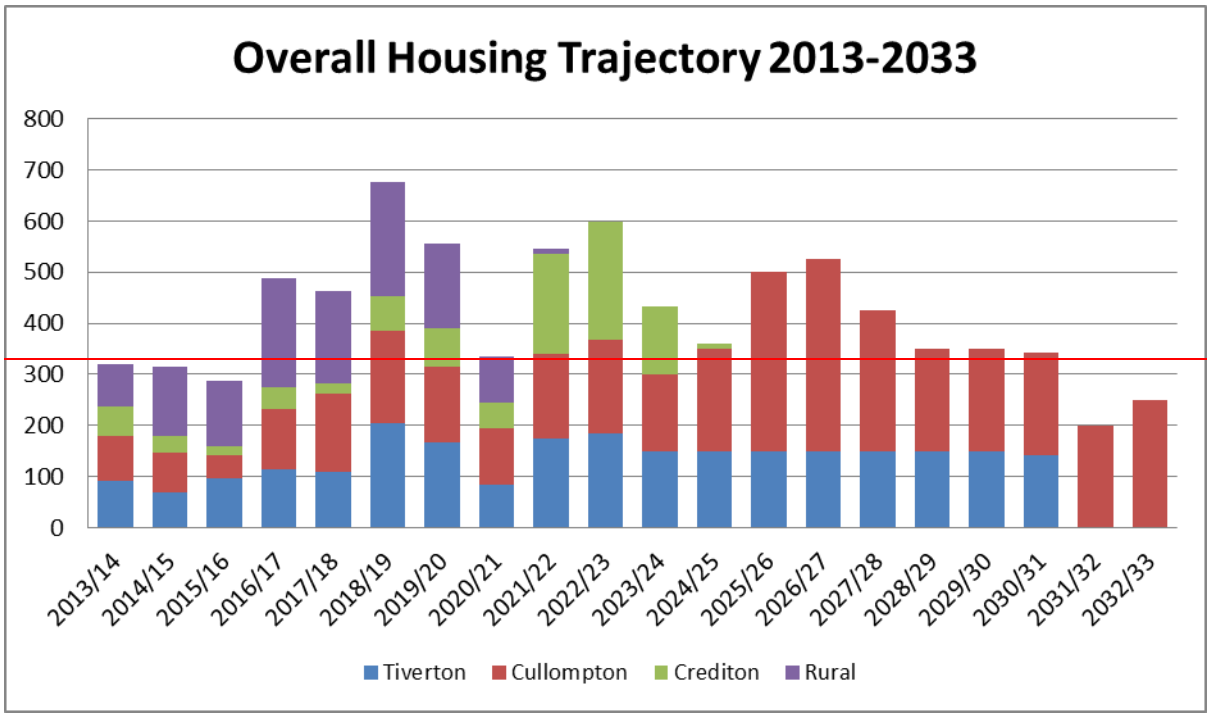
Location	Requirement	Completions (from 1 April 2013 – 31 March ~~2014~~2016)	Commitments (at 1 April ~~2014~~2016)	Remainder
Tiverton	~~2,160~~2,358 (30%)	~~93~~261	~~522~~745	~~1,545~~1,352
Cullompton	~~3,600~~3,930 (50%)	~~87~~209	~~199~~487	~~3,314~~3,234
Crediton	~~720~~ 786(10%)	~~58~~107	~~216~~245	~~446~~434

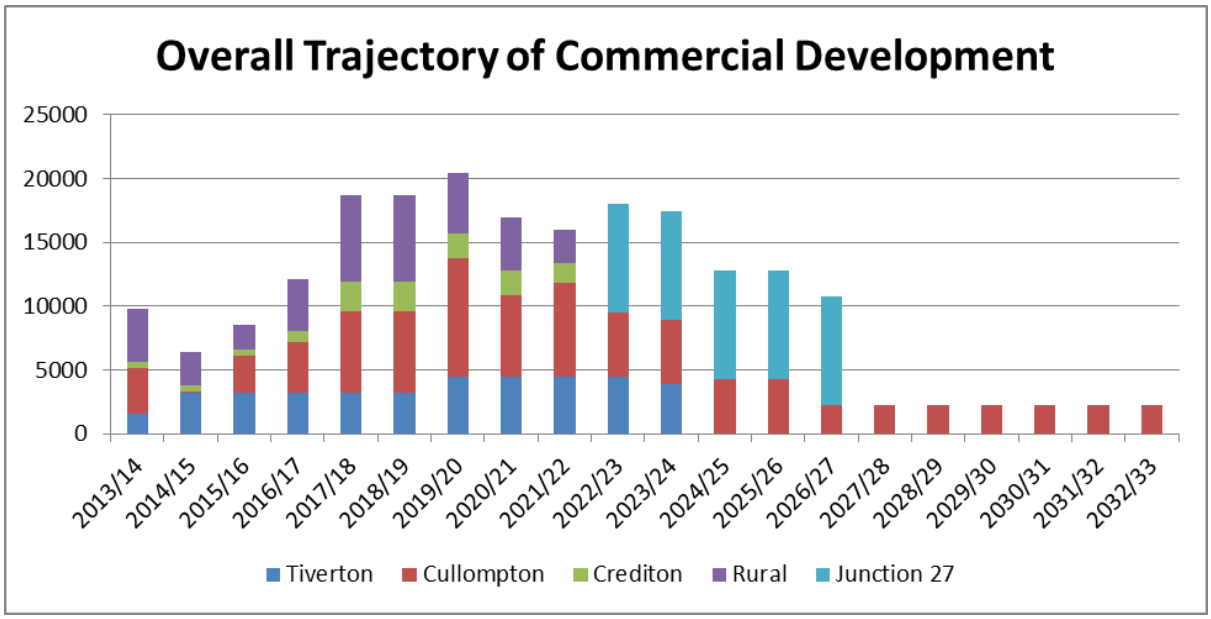
Rural	~~720~~ 786 (10%)	~~82~~347	~~432~~535	~~206~~- -96
Total	~~7,200~~7,860(100 %)	~~320~~924	~~1,369~~2,012	~~5,511~~ 4924

Table 5: Housing requirement by area

2.4 The Local Plan allocates 10% more housing than is required, to provide flexibility and account for unforeseen circumstances that might prevent some sites from coming forward as expected such as not all commitments translating into completions. The availability of land for housing, taking account of existing commitments and allocations is set out in the following trajectory. The development of existing commitments is forecast to take three years, spread evenly across that period. The development of allocated sites in Tiverton and Crediton will diminish in the latter part of the plan period, while Cullompton's role in meeting the district's long-term housing need is reflected in the town's forecast housing delivery up to 2033. Allocations in Crediton and rural areas will help to bolster housing supply in the first five years of the plan, allowing a sufficient lead-in period for the larger town sites, which have more complex infrastructure and Masterplanning requirements. These trajectories assume that housing will come forward at the earliest opportunity but it is largely the housing market that determines housing delivery and it is possible that sites will be delivered at different times and rates from those forecast. Also, windfall developments will continue to come forward throughout the plan period and these are not included in the trajectories.

Overall Housing Trajectory 2013 –– 2033





~~Tiverton~~																					
~~Eastern Urban Extension~~	~~TIV1-TIV5~~			~~12~~	~~75~~	~~75~~	~~75~~	~~150~~	~~150~~	~~150~~	~~150~~	~~150~~	~~150~~	~~150~~	~~150~~	~~83~~						~~1520~~
~~Moorhayes Park~~	~~TIV8~~			~~8~~																	~~8~~
~~Howden Court~~	~~TIV9~~					~~10~~															~~10~~
~~Roundhill~~	~~TIV10~~					~~12~~	~~8~~														~~20~~
~~Palmerston Park~~	~~TIV11~~					~~12~~	~~13~~														~~25~~
~~Phoenix Lane~~	~~TIV12~~								~~2~~	~~35~~											~~60~~
~~Tidcombe Hall (contingency)~~	~~TIV13~~																				~~0~~
~~Wynnards Mead (contingency)~~	~~TIV14~~																				~~0~~
~~Commitments~~		~~93~~	~~174~~	~~174~~	~~174~~																~~615~~
~~**Total**~~		~~**93**~~	~~**174**~~	~~**194**~~	~~**249**~~	~~**109**~~	~~**96**~~	~~**150**~~	~~**175**~~	~~**185**~~	~~**150**~~	~~**150**~~	~~**150**~~	~~**150**~~	~~**150**~~	~~**83**~~					~~**2258**~~
~~Cullompton~~																					
~~NW Cullompton Urban Extension~~	~~CU1-CU6~~						~~12~~	~~75~~	~~150~~	~~150~~	~~150~~	~~150~~	~~150~~	~~150~~	~~150~~	~~63~~						~~1200~~
~~East Cullompton Urban Extension~~	~~CU7-CU12~~										~~50~~	~~200~~	~~200~~	~~200~~	~~200~~	~~200~~	~~200~~	~~200~~	~~200~~	~~250~~	~~2100~~

Knowle Lane	CU13								25	5												30
Ware Park and Footlands	CU14								25	13												38
Exeter Road	CU15					12	25	8														45
Cummings Nursery	CU16				12	25	25	25	33													120
Colebrook (contingency)	CU21																					0
Commitments		87	66	66	67																	286
Total		**87**	**66**	**66**	**79**	**37**	**62**	**108**	**233**	**168**	**200**	**350**	**350**	**350**	**350**	**263**	**200**	**200**	**200**	**200**	**250**	**3819**
Crediton																						
Wellparks	CRE1				12	25	25	25	50	48												185
Cromwells Meadow	CRE3					12	23															35
Woods Group	CRE4					8																8
Pedlerspool	CRE5					12	25	25	50	50	38											200
Sports Fields	CRE6								25	50	45											120
Stonewall Lane	CRE7								25	25												50
Land at Barn Park	CRE8					12	8															20
Alexandra Close	CRE9					12	3															15
Commitments		58	72	72	72																	274
Total		**58**	**72**	**72**	**84**	**81**	**84**	**50**	**150**	**173**	**83**											**907**
Rural sites																						
Newton Square	BA1					5																5
Hollywell	BO1					12	8															20
Godfrey Gardens	BO2				6																	6
Hele Road	BR1					7																7
Barton	CH1					12	8															20
Land off Church Lane	CB1					12	18															30
Barnshill Close	CF1					7																7
Land adj school	CF2					12	10															22
Old Abbatoir	CO1					12	18															30
Linhay Close	CL1					6																6
Hunters Hill	CL2					10																10
Land adj Fishers Way	HA1					10																10

Depot	HE1					10															10
Greenaway	MO1					12	8														20
Court Orchard	NE1					12	13														25
Former Tiverton Parkway Hotel	SP1					10															10
Fannys Lane	SA1					12	15														27
Old Butterleigh Road	SI1					8															8
The Garage	SI2					5															5
South of Broadlands	TH1					12															12
Land east of M5	WI1					12	25	3													40
Commitments		82	144	144	144																514
Total		**82**	**144**	**144**	**150**	**19318**	**123**	**3**													**844**
Total		**320**	**456**	**476**	**562**	**425**	**365**	**311**	**558**	**526**	**433**	**500**	**500**	**500**	**500**	**346**	**200**	**200**	**200**	**250**	**7828**

Location	Policy	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	Total
Tiverton																						
Eastern Urban Extension	TIV 1-TIV 5									57	150	150	150	150	150	150	150	143				1250
Howden Court	TIV 9						10															10
Roundhill	TIV 10						12	8														20
Phoenix Lane	TIV 12									25	35											60
Tidcombe Hall (contingency)	TIV 13																					0
Blundells School	TIV 16						12	25	25	50	50	38										200
Commitments					114	110	183	160	85	93												745
Completions		93	70	98																		261
Total		93	70	98	114	110	217	193	110	225	235	188	150	150	150	150	150	143	0	0	0	2546
Cullompton																						
NW Cullompton	CU 1-CU 6					12	75	75	75	150	150	150	150	150	150	150	150	63				1350

East Cullompton	CU7-CU12												50	200	200	200	200	200	200	250	250	1750
Knowle Lane	CU13										30											30
Ware Park and Footlands	CU14														25	13						38
Colebrook (contingency)	CU21																					0
Commitments					118	140	105	71	35	16	2											487
Completions		87	78	44																		209
Total		87	78	44	118	152	180	146	110	166	182	150	200	350	375	363	263	200	200	250	250	3864
Crediton																						
Red Hill Cross	CRE2									25	50	50	10									135
Cromwells Meadow	CRE3						12	23														35
Woods Group	CRE4									8												8
Pedlerspool	CRE5					12	25	25	50	50	38											200
Sports Fields	CRE6									25	50	45										120
Stonewall Lane	CRE7									25	25											50
Land at Barn Park	CRE8							12	8													20
Alexandra Close	CRE9						12	3														15
Commitments					44	20	33	25	25	50	48											245
Completions		58	31	18																		107
Total		58	31	18	44	32	82	88	83	183	211	95	10	0	0	0	0	0	0	0	0	935
Rural sites																						
Newton Square	BA1									5												5
Hollywell	BO1							12	8													20
Hele Road	BR1							7														7
Barton	CH1							12	8													20
Land off Church Lane	CB1							12	8													20
Barnshill Close	CF1							7														7
Land adj school	CF2							12	10													22
Old Abbatoir	CO1						15	15														30
Linhay Close	CL1						6															6

Hunters Hill	CL2						10															10
Land adj Fishers Way	HA1							10														10
Greenaway	MO1							12	8													20
Court Orchard	NE1					12	13															25
Former Tiverton Parkway Hotel	SP1							10														10
Higher Town	SP2										12	25	23									60
Fannys Lane	SA1							8														8
Old Butterleigh Road	SI1							8														8
The Garage	SI2							5														5
South of Broadlands	TH1						12															12
West of Uffculme	UF1						12	25	23													60
Land east of M5	WI1						12	25	5													42
Commitments					212	168	155															535
Completions		82	137	128																		347
Total		82	137	128	212	180	235	180	70	5	12	25	23	0	0	0	0	0	0	0	0	1289
Totals																						
Total		320	316	288	488	474	714	607	373	579	640	458	383	500	525	513	413	343	200	250	250	8634

Table 6: Housing forecast 2013-2033

2.5 The availability, suitability and achievability of the sites have been assessed during the Local Plan's preparation, through the Strategic Housing Land Availability Assessment (SHLAA) in accordance with national policy and guidance. The Council is therefore confident that they can and will deliver sufficient housing to meet Mid Devon's requirements. Delivery of housing will be monitored annually with information published in the Authority's Monitoring Report each December. Where performance falls significantly below the development targets and the Council is no longer able to demonstrate a five year supply of housing in accordance with national policy, the Council will take action as set out in Policy S4. The Local Plan will be reviewed and new sites identified if strategic sites in this plan fail to come forward.

2.6 The following table illustrates the requirement for five years' supply of housing. This is adjusted annually to take account of how many houses have been built since the beginning of the plan period (2013), with any shortfall included in the requirement for the next five years.

~~A~~	~~Local Plan requirement 2013-2033~~	~~7,200~~

~~B~~	~~Implied annual rate 2013-2033 (A ÷ 20)~~	~~360~~
~~C~~	~~Local Plan requirement to date, 2013-2014 (B * 1)~~	~~360~~
~~D~~	~~Completions April 2013-March 2014~~	~~320~~
~~E~~	~~Shortfall to date, 2013-2014 (C – D)~~	~~40~~
~~F~~	~~Local Plan requirement 2015-2020 (B * 5)~~	~~1,800~~
~~G~~	~~5 year supply requirement (E + F)~~	~~1,840~~

A	Local Plan requirement 2013-2033	~~7,600~~7,860
B	Implied annual rate 2013-2033 (A ÷20)	~~380~~393
C	Local Plan requirement to date, 2013-2016 (B * 3)	~~1,140~~1,179
D	Completions April 2013-March 2016	924
E	Shortfall to date, 2013-2016 (C – D)	~~216~~255
F	Local Plan requirement 2016-2021 (B * 5)	~~1,900~~1,965
G	5 year supply requirement (E + F)	~~2,116~~2,220

Table 7: Five year housing requirement

2.7 Over the entire plan period (2013-2033) there is provision for 10% more housing than required, as explained in paragraph 2.4. ~~Within certain year brackets, such as 2015-2020 and 2020-2025, this is substantially higher, as shown in the table below. This maximises flexibility of housing delivery in the short to medium term, ensuring that sufficient housing will come forward for the Council to demonstrate a five year supply in accordance with national policy.~~ Within certain year brackets, such as 2021/22-2025/26 and 2026/27-2030/31, this is substantially higher, as shown in the table below. The table indicates that even applying the 20% buffer in the short term, there is flexibility in the plan to ensure sufficient housing will come forward for the Council to demonstrate a five year supply in accordance with national policy.

	~~2015-2020~~	~~2020-2025~~	~~2025-2030~~
~~Requirement~~	~~1,840~~	~~1,800~~	~~1,800~~
~~Trajectory~~	~~2,169~~	~~2,487~~	~~1,746~~
~~Surplus~~	~~15%~~	~~38%~~	~~0%~~

	2016/17-2020/21	2021/22-2025/26	2026/27-2030/31
Requirement	2220	1965	1136
Trajectory	2651	2560	1994
Surplus	20%	30%	76%

Table 8: Housing supply in five year tranches

2.8 All the housing sites in the Local Plan have been subject to the Strategic Housing Land Availability Assessment and have been deemed to be deliverable. However, the plan has to be able to deal with uncertainty, reflecting that changes in the housing market or other circumstances may prevent allocated sites from being delivered at the rate the Council has forecast. The Local Plan deals with this uncertainty in three ways.

Extra provision

2.9 The Local Plan makes provision for ~~628~~774 dwellings over and above the identified requirement.

Windfalls

2.10 Windfalls are dwellings that come forward on sites that are not allocated. Other than windfalls included in the figures for existing committed sites (those under construction or with planning permission), the Local Plan makes no allowance for windfalls likely to occur in the plan period. However, it is highly likely that trends in windfall development will continue, and the Council's annual update of the district's housing supply will take account of windfall developments if and when appropriate. When including windfalls, the Council will assume a minimum of 104 dwellings per year, which was accepted by the Strategic Housing Land Availability Assessment Panel (SHLAA Panel) in the Mid Devon SHLAA Report (2013).

Contingency sites

2.11 The Local Plan allocates ~~three~~ two 'contingency sites' for housing. These developments will only be permitted if housing delivery across the district falls below defined 'action levels' or the Council is unable to demonstrate a five year housing supply in accordance with national policy. The release of contingency sites will be the Council's preference if the supply of housing is insufficient, but proposals on other sites will also be considered on their merits according to the presumption in favour of sustainable development set out in national policy.

Commercial development

2.12 The Local Plan sets targets for commercial development, which can include traditional employment uses (B1-B8 use classes) such as offices, industrial development and storage and distribution, and also a range of other commercial uses such as retail, leisure and hospitality. Site allocation policies set out the uses considered acceptable in a certain location, but the Council maintains a flexible approach to employment development and will consider jobs creation as a supporting factor in any proposal. Nevertheless, uncontrolled retail and some other proposals in the wrong location can have serious adverse impacts on town centres and surrounding uses, so there will be careful consideration of these proposals on sites not allocated for such a use.

2.13 Allocations for commercial development are consistent with the Local Plan strategy being broadly in accordance with the housing locations for significant long-term growth in Cullompton, short-medium term growth in Tiverton, and growth in Crediton and rural areas that is proportionate to their circumstances and environmental constraints. The following table shows completions since 2013, existing commitments, (sites under construction and existing planning consents) and the amount of development allocated across Mid Devon. Figures are in square metres floorspace.

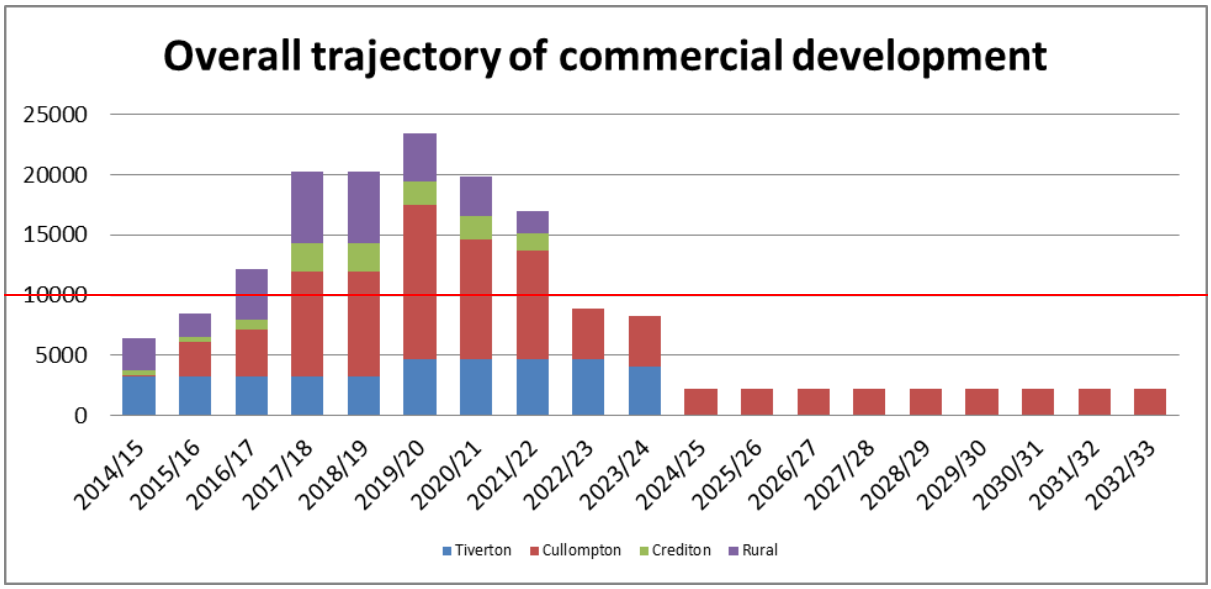
Location	Completions	Commitments	Local Plan provision (sqm)
Tiverton	1,550	805	~~38,000~~37,000
Cullompton	3,598	19,669	~~65~~57,000
Crediton	520	2052	9,820
Junction 27	0	0	42,550
Rural	4,119	20,733	~~8,800~~13,000
Totals	9,787	43,259	~~121,620~~159,370

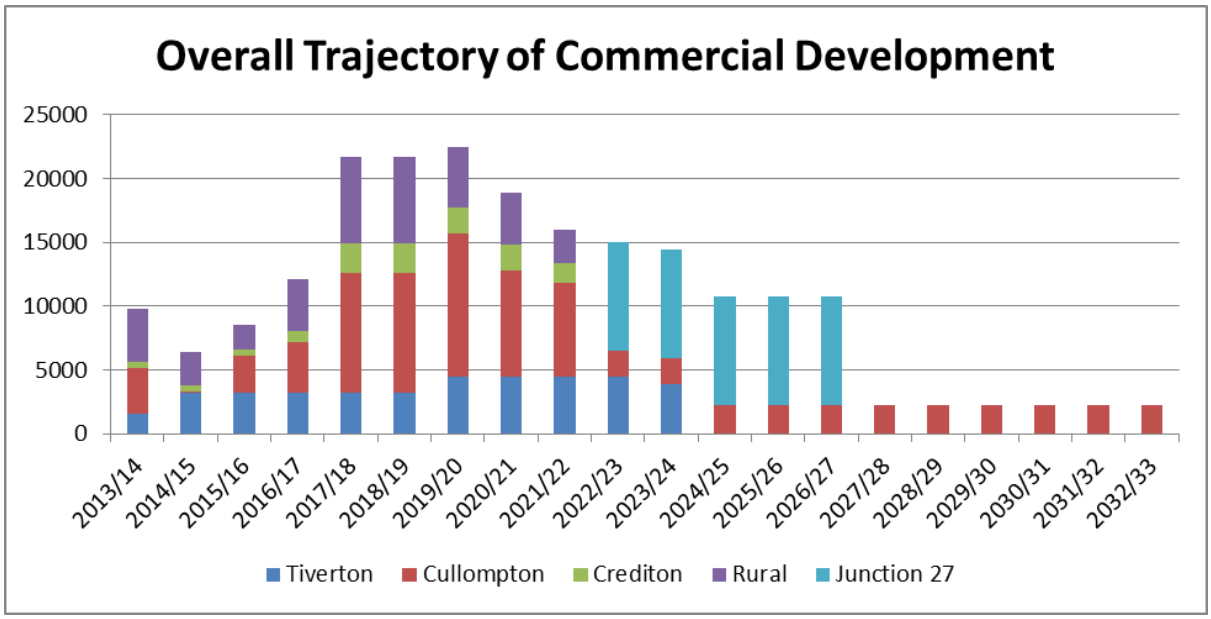
Table 9: Commercial land completions, commitments and allocations

2.14 The Employment Land Review (2013) recommends the Council plan for 30-40 hectares employment land, which is considered equivalent to approximately 140,000 square metres floorspace. The Retail Study (2012) identifies a limited need for non-food retail at around ~~14~~7,000 square metres. Taking this evidence into account, the Local Plan sets a commercial development requirement of ~~154~~147,000 square metres, with allocations distributed as shown in Table 9.

2.15 To provide flexibility of provision and allow for growth, the Local Plan makes provision for about ~~20~~19% more commercial floorspace than is required across the district's settlements. There is an excess of commercial land supply in the most sustainable locations – Tiverton and Cullompton – while Crediton is more constrained due to the limited availability of suitable land. Rural areas are often not suitable for large-scale employment growth, though windfall development in rural areas and on existing employment sites is likely to continue, given past performance and supportive Local Plan policies. In addition the Local Plan makes provision for a further 29% commercial floorspace at Junction 27 for a high quality tourist and leisure focussed development to meet needs identified within the tourism study. The allocated sites have been subject to Strategic Commercial Land Availability Assessment (SCLAA) and are considered available, suitable and achievable. In the event that circumstances change and a site is no longer viable for its designated use, the Council will consider alternative uses as set out in paragraph 2.~~13~~ 12 and Policy DM19 (protection of employment land).

2.16 The following trajectory illustrates the expected annual provision of commercial development across the district, taking account of existing commitments and allocations. The development of existing commitments is forecast to take seven years, spread evenly across that period. This takes account of slow historic rates of commercial development in Mid Devon. Cullompton's role in meeting the district's long-term development needs is shown in the town's forecast delivery up to 2033, while Tiverton's commercial growth from allocated sites tails off with the completion of the Eastern Urban Extension. The development of allocated sites in Crediton and rural areas may have been completed by the latter part of the plan period, but it is highly likely that windfall developments will continue to come forward.





Policy S1

Sustainable development priorities

The following strategic priorities outline what will need to be achieved to deliver the Vision and address the key issues that have been identified in Mid Devon. All development will be expected to support the creation of sustainable communities by:

a) A development focus at Tiverton, Cullompton and Crediton as Mid Devon's most sustainable settlements, with long-term growth to the east of Cullompton and a limited level of development in identified villages;

b) Building a strong, competitive economy through access to education, training and jobs, infrastructure, the creation of new enterprise, economic regeneration and flexibility of uses to respond to changing circumstances;

c) Ensuring the vitality of town centres and communities through a hierarchy of centres, defined town centre shopping areas, a diverse retail offer at Tiverton, Crediton and Cullompton, through controls on Junction 27 retail and support for the vitality and viability of defined villages;

d) Supporting a prosperous rural economy through the conversion of suitable existing buildings and well-designed new buildings in suitable locations, diversification of agricultural and other land-based businesses, support for equestrian activities, retention and development of local services and community facilities in villages, and the promotion of sustainable rural tourism and leisure development;

e) Promoting sustainable transport by delivering appropriate infrastructure, reducing the need to travel by car, integrating public transport and other forms of sustainable travel such as walking and cycling, and providing safe environments while recognising Mid Devon's rural locality;

f) Supporting high quality communications infrastructure by supporting the expansion of telecommunications and high speed broadband throughout Mid Devon;

g) Delivering a wide choice of high quality homes through a diverse housing mix and by meeting the housing needs of all sectors of the community including the provision of housing for the elderly and disabled, those wishing to build their own home, affordable housing and gypsy and traveller pitches;

h) Requiring good sustainable design that respects local character, heritage, surroundings and materials, creates safe and accessible environments, designs out crime and establishes a strong sense of place;

i) Promoting healthy communities through the delivery of social, educational, recreational and cultural facilities and services, access to high quality open space, public rights of way, recreational trails and accessible land, and opportunities for sport and recreation and the designation of Local Green Space;

j) Meeting the challenge of climate change by supporting a low carbon future, energy efficiency, increasing the use and supply of renewable and low carbon energy, managing flood risk and conserving natural resources. Encourage the effective use of land, taking into account the economic and other benefits of the best and most versatile agricultural land;

k) Conserving and enhancing the natural environment by protecting and enhancing valued landscapes including the Blackdown Hills Area of Outstanding Natural Beauty, Exmoor and Dartmoor National Parks, providing accessible green infrastructure, and preventing significant harm to soil, air, water, noise and visual quality, in particular air quality as a local issue at Crediton and Cullompton;

l) Minimising impacts on biodiversity and geodiversity by recognising the wider benefits of ecosystems, delivering natural environment objectives, providing a net gain in biodiversity and by the protection of International, European, National and local designated wildlife sites; and

m) Conserving and enhancing the historic environment through the identification and protection of designated and non-designated heritage assets and assessing the impact of new development on the historic character of Mid Devon's landscapes and townscapes.

2.17 It is a legal requirement that Local Plans contribute to the achievement of sustainable development. The Council will work in partnership with town and parish councils and other public bodies to ensure that all new development reinforces and delivers sustainable communities in line with guiding principles set out in Policy S1, which correspond to the vision and strategy for the district.

2.18 The sustainable development priorities aim to deliver varied and vibrant places by concentrating activities and facilities in accessible locations. The strategy aims to build a strong, competitive economy through inward investment and deliver a wide choice of high quality homes. Development will provide or utilise accessible green infrastructure networks including public open spaces, public rights of way, cycleways and other green linkages. Sustainable modes of transport include walking, cycling and public transport, though it is recognised that the private car will continue to play a significant role given the rural nature of Mid Devon. The strategy requires good design which conserves and enhances the historic and natural environment, promotes healthy life styles and reduces pollution. The supply of renewable energy should not be supported where it harms the special qualities of protected landscapes or their setting.

2.19 The Council will monitor development to ensure that the Local Plan delivers sustainable development.

Policy S2

Amount and distribution of development

The diverse development needs of the community will be met through the provision of approximately ~~7,200~~7,860 dwellings and ~~154,000~~ 147,000 square metres of commercial floorspace between 1st April 2013 and 31st March 2033.

Development will be concentrated at Tiverton, Cullompton and Crediton, to a scale and mix appropriate to their individual infrastructures, economies, characters and constraints. Other settlements will have more limited development which meets local needs and promotes vibrant rural communities. In addition, development as proposed at Junction 27 of the M5 meets a tourism / leisure need in a location which is suitable for its regional role with a controlled retail element supporting the tourism and leisure aspects of the proposal.

Development targets are approximately as follows:

Location	Total Residential (commitments and allocations; dwellings)	Total Commercial (commitments and allocations; square metres)
Tiverton	~~2,160~~2,358	~~30,800~~29,400
Cullompton	~~3,600~~3,930	~~77,000~~73,500
Crediton	~~720~~786	~~15,400~~14,700
Rural areas	~~720~~786	~~30,800~~29,400
Total	~~7,200~~7,860	~~154,000~~147,000

2.20 The Strategic Housing Market Assessment (SHMA, 2015) identifies the amount and type of housing that should be provided in Mid Devon. The target for commercial development is based on the Employment Land Review (2013) and the Retail Study (2012). Paragraphs 2.1-2.16 explain how the allocations in the Local Plan will meet the development targets set out in Policy S2 above, while Policies S3 and S6 provide more detail on the types of housing and employment to be delivered. A summary of the SHMA outputs on housing need is contained in paragraphs 2.1a and 2.1b.

2.21 Central to Policy S2 is the role of Cullompton in meeting the district's long-term development needs. This is a departure from historic planning strategy which focused the majority of development in Tiverton, commensurate with the size and sub-regional role of the town. Available and suitable land for development in Tiverton has become increasingly scarce as the town has grown, whereas the expansion of Cullompton is both achievable and supported by the local community.

2.22 National policy advises that planning should actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable. The largest allocation in the Local Plan is East Cullompton (Policies CU7-CU12), which will have access onto the M5 motorway and deliver significant improvements to highways infrastructure for the whole town. The Council supports the reopening of a railway station at Cullompton and the Local Plan allocates a possible site for this. Pedestrian and cycle links to the town centre will be improved, and residents will be in close proximity to job opportunities within Cullompton and also at Willand, Tiverton and Exeter. The concurrent development of the North West Cullompton Urban Extension will see a new road linking Tiverton Road to Willand Road, which will relieve traffic congestion in the town centre, improving local air quality and the living conditions of residents. In addition, a new relief road to the east of the town centre will further improve local air quality by diverting north- and south-bound traffic away from Fore Street. Significant growth in Cullompton can be made sustainable through this investment in infrastructure, addressing long-standing issues of air quality and motorway junction capacity. New and expanded education facilities will also be provided within the town, to accommodate the impacts of new development.

2.23 Tiverton will continue to expand through the development of the Tiverton Eastern Urban Extension (EUE) and a number of smaller sites. The adopted EUE Masterplan proposes up to 1,520 dwellings and 30,000 square metres commercial floorspace, with a new junction onto the A361, a new primary school and community facilities.

2.24 Crediton is the smallest of Mid Devon's market towns but serves a wide area in terms of employment, education and shopping. The physical constraints of Crediton limit the options for developable sites, and there are existing problems of traffic congestion through the town centre. Air quality should improve when the Crediton Link Road opens and a proportion of HGV and other traffic is drawn away from Exeter Road to the Lords Meadow Industrial Estate, but the housing target for Crediton only amounts to 10% of the district total due to the traffic and topographical constraints that exist.

2.25 Rural areas are expected to accommodate around 10% of the housing requirement for Mid Devon. The Local Plan generally allocates small sites, the development of which will help to support the vitality of rural areas without harming their character or putting undue pressure on

local infrastructure. Commercial development in rural areas will come forward on non-allocated sites according to demand, enabled by supportive general policies, but the Local Plan also retains small employment allocations in Bampton and Willand as these sites are already permitted or well-connected to existing commercial uses and infrastructure.

2.25a In addition to the development targets as set out in the policy above, land at Junction 27 is allocated for 42,550 sqm of commercial floorspace to meet a tourism/leisure need in a location suitable for its regional role with a retail element supporting the tourism and leisure aspects of the proposal. This will provide a high quality tourist and leisure focussed development to meet needs identified within the tourism study.

Housing

Policy S3

Meeting housing needs

a) The diverse housing needs of Mid Devon will be met through the provision of approximately ~~7,200~~ 7,860 dwellings between 1st April 2013 and 31st March 2033. In line with the predicted continuing need for new housing the expected annual rate of new housing development will be ~~360~~ 393 dwellings per annum;

b) Unless otherwise stated in a site allocation policy, on open market housing sites (i.e. excluding exception sites provided under Rural Exception Sites under policy DM6) of 11 dwellings or more in Tiverton, Cullompton and Crediton a target of 28% affordable dwellings, and on sites elsewhere of 6 dwellings or more a target of 30% affordable dwellings will be applied to the total number of dwellings, depending on viability and providing a mix of dwelling sizes and types appropriate to the evolving needs of Mid Devon's population. Sites of between 6 – 10 dwellings outside Tiverton, Cullompton and Crediton will be permitted to make a financial contribution sufficient to provide the affordable dwellings in another location;

c) To support self-build and custom dwellings meeting the needs of local communities, ~~affordable self-build~~such dwellings will be permitted as affordable housing in locations outside settlement limits in accordance with Policy DM6;

d) To support self-build and custom housing on sites of 20 dwellings or more developers will supply at least 5% of serviced dwelling plots for sale to self-builders for a period of 12 months per plot and any plots subsequently developed for self-build must be completed within 3 years of purchase by a self-builder; and

e) A five year supply of gypsy and traveller pitches will be allocated on deliverable sites within Mid Devon to ensure that the predicted need for traveller sites will be met. A further supply of developable sites or broad locations for growth will be identified equivalent to a further ten years of predicted growth. The Housing Authority will seek to provide a public site for gypsy and traveller pitches within Mid Devon, subject to the availability of funding.

2.26 As recognised in the National Planning Policy Framework (NPPF) "~~"~~every effort should be made objectively to identify and then meet the housing needs....of an area". To do this the

Council has commissioned a Strategic Housing Market Assessment (SHMA) in conjunction with other Councils to establish the level and types of housing need in Mid Devon. 'Objectively Assessed Need' (OAN) is determined by examining demographic projections, jobs-led population forecasts and market signals which may affect housing need. The SHMA concludes that Mid Devon's housing need falls between 359 and 381 dwellings per year. ~~This has established the level and types of housing required with a total of 7,200 and an annual building rate of 360, taking into account the latest population projections and the Government's intention to increase the level of housing supply.~~. This Local Plan sets a housing target of 393 dwellings, above the housing need range set in the SHMA to ensure that housing provision in the plan is consistent with the additional need arising from job creation at Junction 27 of the M5.

2.27 The Council's Corporate Plan has 'Better Homes' as one of its five main objectives and the long term vision is "To ensure that the housing needs of our residents are met through the provision of affordable homes and good quality housing in both the public and private sector". The design policies in this plan will be utilised to achieve good quality housing for Mid Devon residents. The need for affordable housing has been established by the Strategic Market Housing Assessment (SHMA). The SHMA concluded that ~~96~~ 124 units of affordable housing are needed per year to meet existing "backlog" need and future needs arising in the district. This is equivalent to about ~~27~~30% of the total housing need for Mid Devon. This is reflected in the affordable housing policy which requires development to meet this need by providing a proportion of dwellings as affordable on sites above the threshold. Additional affordable housing will also continue to come forward as windfalls resulting from Homes and Communities Agency investment, exception sites and delivery of housing on Council-owned land.

2.28 The application of the affordable housing policy is anticipated to deliver ~~just~~ over 2,000 affordable dwellings across the plan period, equating to approximately ~~27~~30% of total housing supply. However it is recognised that the level of supply is unlikely to meet the anticipated need as not all allocations will come forward or others may be developed with a lower housing number than specified in the policy. Furthermore, the Council has to consider the implications of meeting the need on the viability of new housing development. Viability assessment work undertaken for the Council in relation to the Community Infrastructure Levy (CIL) has established that for the targets of 30% in rural areas and a target in the towns of 28% CIL charges of £60 and £40 respectively are viable. However, as affordable housing is secured through planning obligations rather than CIL, the proportion to be provided onsite is negotiable and the Council may accept financial contributions in lieu of onsite provision, which can result in a lower level of affordable housing delivery than anticipated. Setting the affordable housing targets at the level proposed is therefore considered an appropriate balance between meeting the majority of the need within the district, whilst ensuring the delivery of other important elements such as infrastructure, essential to achieve sustainable development over the plan period to 2033.

2.29 The SHMA forecasts a significant increase in Mid Devon's older population. Given the resource demands associated with very elderly people, such as specially adapted bathrooms and the need for lifts, this is a significant figure. Care homes or retirement complexes will be provided through the development of strategic site allocations and other sites as they come forward. ~~and~~ Policy DM12 (design of housing) requires all new housing development to be designed in a way that allows adaptation according to the changing needs of occupiers. The Building Regulations will also ensure that new housing meets certain requirements for

adaptability and an ageing population. As a result, there is no need for a specific policy target related to housing for older people.

2.30 The Government is supporting the delivery of larger numbers of self-build and custom homes through such measures as exempting such housing from the payment of CIL. For the purposes of CIL exemption, 'self-build' is defined as all homes built or commissioned by individuals or groups of individuals for their own use. The definition used in the Self-build and Custom Housebuilding Act 2015 is included in the glossary. Local evidence suggests that there is a demand for such housing in Mid Devon in that approximately 2,000 people search online for self-build plots every year in Mid Devon and the Council's Citizen's Panel Survey (2013) shows that 12% of respondents were considering building their own home. Policy S3 therefore includes a requirement for 5% of plots on sites of 20 houses or more to be made available for purchase by self-builders. The self-build element will form part of the market dwellings available on the site, with the percentage applied to the total number of properties on a site. For example, a site of 100 dwellings, where a policy of 25% affordable housing applies, will provide 25 affordable dwellings and 75 dwellings for sale on the open market, of which 5 of the latter would need to be provided as plots for self-build. Such plots will be marketed for a period of 12 months before being returned to the builder's control. The self-build property needs to be lived in as the owner's principal residence for 3 years, as this is a condition of the exemption from CIL liability.

2.31 As set out in the Government statement 'Planning policy for traveller sites' the government's aim is to ensure fair and equal treatment for gypsies and travellers in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community. To achieve this aim the statement indicates that working collaboratively local planning authorities should make their own assessment of need for traveller sites and identify a five year supply of deliverable sites with a further ten year supply of developable sites or broad locations for growth on top of this. As a result a group of Councils within Devon commissioned a Gypsy and Traveller Accommodation Assessment (GTAA) to ascertain the need for gypsy, traveller and travelling showpeople pitch or plot requirements. This study indicated that between 2014-34 within Mid Devon there is a need for 35 pitches for gypsies and travellers and 11 plots for travelling showpeople. The need for gypsy and traveller pitches will be accommodated by pitches within larger housing sites, for example at Tiverton Eastern Urban Extension, North West Cullompton, East Cullompton and Pedlerspool in Crediton. The Council is working with the travelling showpeople community to approve a large site near Cullompton which would meet the need requirements set out in the GTAA. Policy DM7 (gypsy and traveller accommodation) manages the development of specific sites.~~As a result a group of councils in Devon has commissioned a Gypsy and Traveller Accommodation Assessment to ascertain the need for gypsy and traveller pitches and the predicted need will be accommodated by pitches within larger housing sites. For example, the allocated strategic sites at Tiverton Eastern Urban Extension, North West Cullompton and East Cullompton each have provisions for pitches for gypsies and travellers as does the allocation at Pedlerspool in Crediton. Policy DM7 (gypsy and traveller accommodation) manages the development of specific sites.~~

Policy S4

Ensuring housing delivery

The local planning authority will monitor the delivery of housing against the annual target set out in Policy S3 and against the total completions which should have taken place since the start of the Local Plan period. Cumulative dwelling completions since 1st April 2013 will be compared with the following defined action levels:

~~Year (1st April-31st March)~~	~~Action Levels~~	~~Cumulative Target~~
~~2013/14~~	~~0~~	~~360~~
~~2014/15~~	~~0~~	~~720~~
~~2015/16~~	~~360~~	~~1080~~
~~2016/17~~	~~720~~	~~1440~~
~~2017/18~~	~~1080~~	~~1800~~
~~2018/19~~	~~1440~~	~~2160~~
~~2019/20~~	~~1800~~	~~2520~~
~~2020/21~~	~~2160~~	~~2880~~
~~2021/22~~	~~2520~~	~~3240~~
~~2022/23~~	~~2880~~	~~3600~~
~~2023/24~~	~~3240~~	~~3960~~
~~2024/25~~	~~3600~~	~~4320~~
~~2025/26~~	~~3960~~	~~4680~~
~~2026/27~~	~~4320~~	~~5040~~
~~2027/28~~	~~4680~~	~~5400~~
~~2028/29~~	~~5040~~	~~5760~~
~~2029/30~~	~~5400~~	~~6120~~
~~2030/31~~	~~5760~~	~~6480~~
~~2031/32~~	~~6120~~	~~6840~~
~~2032/33~~	~~6480~~	~~7200~~

Year (1st April – 31st March)	Action Levels	Cumulative Target
2013/14	0	393
2014/15	0	786

2015/16	393	1179
2016/17	786	1572
2017/18	1179	1965
2018/19	1572	2358
2019/20	1965	2751
2020/21	2358	3144
2021/22	2751	3537
2022/23	3144	3930
2023/24	3537	4323
2024/25	3930	4716
2025/26	4323	5109
2026/27	4716	5502
2027/28	5109	5895
2028/29	5502	6288
2029/30	5895	6681
2030/31	6288	7074
2031/32	6681	7467
2032/33	7074	7860

If cumulative completions since 2013 fall below the expected completions total by over two years' worth of the annual target (as expressed in the defined action level for that year), or a five year supply of deliverable sites cannot be demonstrated, the Council will work proactively to bring forward allocations or outstanding planning consents. If this is insufficient to deliver the necessary level of housing, identified contingency sites will be permitted to boost housing supply.

2.32 To ensure that Mid Devon can deliver the level of housing development required to meet identified housing need there needs to be a mechanism that will allow further sites to come forward if for any reason the expected level of delivery falls significantly below the annual target set out under Policy S3. If housing delivery falls below the action level this will be addressed through proactive development management to bring forward allocated and permitted sites, and then through the release of deliverable contingency sites. However, there will be variation of delivery across the years so it is important that the action level when the designated contingency sites will come forward will not trigger their release in response to normal variations in completions. The trigger level will therefore be when delivery has fallen two years' worth of expected annual completions behind the expected overall total for that year (ie equivalent to 10% of overall plan housing need).

2.33 The National Planning Policy Framework requires local planning authorities ensure that there is a supply of specific deliverable housing sites with a capacity equivalent to 105% or five years' worth of the annual housing target. The Local Plan proposals are designed to ensure that a five year supply of housing land is and remains available through the plan period, from existing permissions and allocations. However, should the Council at any time be unable to demonstrate a five year housing supply, it will prioritise actions to overcome constraints to the development of permitted or allocated sites. If that is insufficient or will not deal with the issue

quickly enough, the Council will permit the development of one or more of the contingency sites in order to boost short term housing supply. The Council will monitor the level of housing supply through its Authority's Monitoring Report and instigate an early review of the Local Plan to identify further sites if necessary.

Policy S5

Public open space

~~In the parishes~~Within the parish boundaries of Tiverton, Cullompton and Crediton~~,~~ and the parishes containing villages defined in Policy S13, the following standards for the provision of high quality open space will be applied:

Type of open space	Quantity standard (~~hectare per 1000 population~~square metres per dwelling)	Access standard
Allotments	~~0.25~~6	300 metres or 6-7 minutes' walk time
Amenity green space	~~1.0~~23.5	300 metres or 6-7 minutes' walk time
Parks, sport and recreation grounds	~~1.50~~35 include both public and private grounds (excluding education sites)	600 metres or 12-13 minutes' walk time
Play space (children)	~~0.06~~1.5	300 metres or 6-7 minutes' walk time
Youth space (teenagers)	~~0.02~~0.5	600 metres or 12-13 minutes' walk time

In all other parishes, the following standards for the provision of open space will be applied:

Type of open space	Quantity standard (~~hectare per 1000 population~~square metres per dwelling)	Access standard
Allotments	~~0.25~~6 (for new provision)	600 metres or 12-13 minutes' walk time
Recreation space	~~1.20~~28 to include both public and private grounds (excluding education sites)	600 metres or 12-13 minutes' walk time
Play space (children and youth)	~~0.05~~1	600 metres or 12-13 minutes' walk time

Developments of 11 or more dwellings within the parishes of Tiverton, Cullompton and Crediton, and 6 or more dwellings elsewhere,~~New housing developments~~ will provide open space onsite or through offsite financial contributions, as follows:

Type of provision	Up to~~1~~ 49 dwellings	50-199 dwellings	200+ dwellings
Play space	Offsite	Onsite	Onsite
Amenity/natural green space	Offsite	Onsite	Onsite
Allotments	Offsite	Onsite	Onsite
Park, sport and recreation ground	Offsite	Offsite	Onsite
Teenage facilities	Offsite	Offsite	Onsite

2.34 Access to public open space including sports facilities is an essential element of healthy communities and national policy promotes such provision. To this end the Council has undertaken an Open Space and Play Area Study (2014) to identify the level of supply across Mid Devon and the gaps in open space provision. This results in the above standards, which aim to maintain the current level of provision per person as Mid Devon's population increases, and to increase the provision for teenage facilities which has been identified as a particular area of open space deficiency. Teenage facilities might include skateboard parks, basketball courts and 'free access' Multi Use Games Areas (MUGAs). In practice, there will always be some flexibility of use where younger children use equipment designed for youths and vice versa.

2.35 The types of applicable public open space are set out in the policy. For the purposes of this policy, other spaces such as grass verges, tree-lined avenues and sustainable urban drainage schemes are not classed as public open space. The standards ~~will be~~are applied to development proposals according to the average size of households in Mid Devon (2.35 people). ~~For example, a development of 200 dwellings will be assumed to give rise to 470 people. Applying the standards in Policy S5, this development will be required to provide for 0.118 hectares allotment land, 0.47 hectares amenity green space and so on.~~

2.36 Onsite open space will be provided by the developer and designed in such a way as to maximise the attractiveness, safety and overall quality of the development. The provision of larger multi-functional open space 'hubs' is considered preferable to smaller fragmented open spaces across a development. The balance of onsite and offsite provision according to site size is set out in the policy, but the Council will consider on a case-by-case basis any proposals that seek to justify a different solution. A planning obligation will be used to control the long-term maintenance of onsite open space through a management company.

2.37 Smaller developments (fewer than 6 dwellings in rural areas or 11 dwellings in the towns) will not be required to provide a public open space contribution, in accordance with national guidance. Most housing developments ~~the full range of open space onsite, but nonetheless the residents of those developments will~~ increase the demand for open space in the area, but a financial contribution towards a public open space project outside the site (an offsite contribution) will be accepted according to the amount of development being proposed, as set

out in the policy. The Open Space and Play Area Strategy ~~sets out~~describes which types of housing (such as open market, affordable or accommodation for the elderly) will be eligible for offsite provision of public open space. The Council will identify locations across the district that require open space improvement or new provision, and for eligible developments will require a financial contribution through a planning obligation which secures funding for a specific project. The amount required is related to the cost of providing and maintaining open space, expressed as a cost per person as set out in the Open Space and Play Area Strategy. The Council will monitor the use of funds collected in this way to ensure that planning obligations are directly related to the open space needs associated with each development. To comply with legislation, no more than five such planning obligations will be required for a single project.

2.38 Viability testing undertaken by the Council has demonstrated that not all sites may be able to fund the full cost of the off-site contribution. Therefore, the Council will consider a reduced contribution where it can be demonstrated that payment of the full cost would make the development unviable. Further details on the policy's application, including information on the consideration and submission of viability evidence will be set out in a review of the existing Open Space Supplementary Planning Document, to be undertaken ~~in 2015~~after the adoption of the Local Plan.

2.39 The Council will not use the Community Infrastructure Levy (CIL) to fund open space provision, to avoid illegal double-charging of developers who are required to provide onsite open space as part of well-designed development while also paying CIL. However, at least 15% of CIL receipts will be transferred to the parish council in the area a development takes place, and parish councils may spend this money on any infrastructure in their area which may include the creation, development, repair or maintenance of existing areas of open space.

2.40 Policy DM24 protects existing public open spaces from development, including some identified areas of 'Local Green Space'. Communities may also seek to protect such areas through designation in a neighbourhood plan or by registering sites as Assets of Community Value (as defined in the glossary).

Employment

Policy S6

Employment

The employment needs of the community will be met through the development of ~~154~~147,000 square metres of commercial floorspace comprising a range of employment-generating uses, including:

a) Offices, industry, storage and distribution (B1-B8);
b) Retail, tourism and leisure (A1-A5, C1, D2 and relevant sui generis uses);
c) Development for healthcare, education and public facilities (C2-C2a, D1); and
d) Other forms of sustainable employment-generating uses.

2.41 The Council's employment strategy is inclusive, seeking to provide the jobs the market can deliver by promoting a range of employment-generating uses. While the majority of commercial land allocations comprise B1, B2 and B8 uses, the plan has a positive approach to other uses that provide jobs in a sustainable manner.

2.42 Employment floorspace is measured according to 'gross internal floorspace', meaning the area of floor inside the walls. This applies to use classes B1 (business), B2 (general industry) and B8 (storage and distribution) and will generally be applied to all commercial development, except for retail within use class A1 (shops). A1 retail floorspace is 'net floorspace', meaning the area of a store used for sales. Within this class, 'convenience' means food sales, while 'comparison' means anything else.

2.43 The Employment Land Review (2013) presents forecasts for employment land in Mid Devon, taking account of economic projections and past take-up of employment land. The Employment Land Review recommends that the Council plan for 30-40 hectares of employment land over a twenty year period, equating to approximately 140,000 square metres floorspace.

2.44 Very large employment sites can be more difficult to deliver due to high infrastructure costs, and there is an identified shortage of small-scale employment sites. Development Management policies allow for small-scale employment and other commercial development in suitable locations. These sites can come forward according to market demand and a land allocation will not always be necessary. However, the towns are usually the most sustainable locations for planned employment growth, where there is an existing local population and access to services. Commercial development is expected to be delivered through a combination of site allocations and windfall developments elsewhere.

2.45 The Local Plan's employment strategy seeks to guide a deliverable level of development to the most sustainable locations while recognising that larger employment centres such as Exeter and Taunton will continue to draw some of Mid Devon's working population, and suitable employment in rural areas will benefit the rural economy.

2.46 The Retail Study (2012) identifies a quantitative need of ~~14,580~~approximately 7,000 square metres of comparison retail floorspace up to 2026. Long-term forecasting of retail demand is not very reliable, so the anticipated need has been applied across the plan period to 2033 on the understanding that allocated and non-allocated sites will come forward according to market demand and the plan will be reviewed before the need to 2026 is likely to have been exhausted. Retail development will generally be directed towards town centres and the Council will apply a sequential approach in assessing edge-of-centre or out-of-centre proposals, in accordance with Policies S7, DM14 and DM15. In addition, development as proposed at Junction 27 of the M5 meets a tourism / leisure need in a location which is suitable for its regional role with a controlled retail element supporting the tourism and leisure aspects of the proposal.

2.47 The following table sets out the Local Plan allocations which include employment-generating uses, and states where their policies can be found within this document:

Location	Site	Policy	Gross site area (ha)	Net site area (ha)	Floorspace (sq.m)	Local Plan page
Tiverton	Eastern Urban Extension	TIV1-5	153	6	30,000	65-74
Tiverton	Phoenix Lane	TIV12	1.4	1	~~8~~7,000	78-79
Cullompton	North West Urban Extension	CU1-6	95	3	~~21~~10,000	85-93
Cullompton	East Cullompton	CU7-13	160	5	20,000	94-103
Cullompton	Week Farm	CU18	10.7	8.7	15,000	107-108
Cullompton	Venn Farm	CU19	4.4	2.5	~~9,000~~12,000	108-109
Crediton	Wellparks	CRE1	22.9	1.2	2,220	113
Crediton	Land south of A377	CRE10	1.9	1.9	7,600	119-120
Junction 27	Junction 27	J27	71	28	42,550	XX
Bampton	Stone crushing works (Scott's Quarry), Bampton	BA2	0.45	0.36	355	123-124
Willand	Willand Industrial	WI2	~~2.2~~9.2	~~2.2~~9.2	~~8,800~~13,000	138

	Estate					
	~~**Total**~~				~~**121,975**~~	

Town centres

Policy S7

Town centres

The vitality and viability of the town centres of Tiverton, Cullompton and Crediton will be protected and enhanced by positive management so that economic regeneration and heritage conservation reinforce each other as follows:

a) Positive measures of enhancement and regeneration;
b) Promoting new homes, shops, leisure, offices and other key town centre uses which are well designed and contribute to vitality and viability;
c) Outside the town centres of Tiverton, Cullompton and Crediton, only permit new retail, leisure, office and other key town centre uses where they meet the sequential and impact tests set out in Policy DM15; and
d) Traffic management measures including improving sustainable travel opportunities and interchange facilities to improve town centre environment and accessibility.

2.48 Policy S7 seeks to secure the sustainability of Mid Devon's market towns, focusing development within town centres. The Council will work in partnership to deliver the objectives of Policy S7 and will integrate other local plans and strategies, including neighbourhood plans where these are being prepared. Investment will be directed to enhance and regenerate areas of environmental, social and economic deprivation. Networks and interchange facilities, which provide opportunities for better integration of public transport and sustainable ways of travelling, will be improved. Town centre health checks will be undertaken to monitor the condition of each of the market towns in respect of the objectives set out above. This focus on healthy town centres does not preclude retail, leisure and recreation uses within strategic site allocations, such as East Cullompton. Sustainable development of such large sites requires a mix of uses, providing residents with close access to employment, recreation and small-scale convenience shopping, though these mixed uses must be carefully planned so as not to undermine town centres. A masterplan will set~~s~~ out the principles to be followed in subsequent planning applications. A sequential test applied at planning application stage will be considered in this context. The allocation of land at Junction 27 to provide a high quality tourist and leisure focused development to meet needs identified within the tourism study will include associated outlet/discounted retail floorspace to meet a regional comparison floorspace need and deliver the tourist and leisure elements of the allocation. Existing town centres will be safeguarded through planning controls.

2.49 Mid Devon's town centres face a challenging future due to changing national retailer requirements, online shopping and reduced consumer spending. The Retail Study suggests that a changing role or focus for town centres may be required, involving conversion and redevelopment to other uses. To this end, the Local Plan incorporates tourism and leisure uses within the retail part of the commercial development target in Policy S2 and has a positive strategy for the enhancement and regeneration of town centres. Town centre redevelopment is expected to include some residential accommodation, to improve the viability of development and the vitality of the town centre.

2.50 Research by English Heritage, the Heritage Lottery Fund and others clearly demonstrate the significant contribution of heritage to the economy. Policy S7 emphasises the importance of heritage conservation in making the town centres attractive places to visit.

2.51 The following table contains details of the Local Plan's only town centre allocation, and states where the policy can be found within this document:

Location	Site	Policy	Site area (ha)	Use	Local Plan page
Tiverton	Phoenix Lane	TIV12	1.4	60 dwellings and ~~8~~7,000sqm. of mixed commercial floorspace	78-79

Infrastructure

Policy S8

Infrastructure

The location, scale and form of development will be guided by the need for community facilities and any existing infrastructure deficiencies. The Council will work with providers and developers to ensure that new development is served by necessary infrastructure in a predictable, timely and effective fashion. Development and transport planning will be coordinated to improve accessibility for the whole community and promote the use of sustainable modes of transport. The Council will set out key infrastructure and facility requirements for new development in an Infrastructure Plan, taking account of existing provision and cumulative impact of new development. Developers will be expected to contribute fairly towards, or bear the full

cost of, new or improved infrastructure and facilities where it is appropriate for them to do so, subject to viability assessment where appropriate.

2.52 Ensuring that new development is served by appropriate infrastructure is an important role of the planning system. This is achieved by the provision of infrastructure in step with development and by guiding development to places where there is existing capacity. There is also the possibility that new development can be guided to locations where its infrastructure will help to achieve wider planning objectives such as air quality improvements. Developments likely to generate significant levels of traffic must be supported by a robust transport evidence base.

2.53 This policy underpins site allocation policies such as the North West Cullompton and East Cullompton urban extensions, which will provide traffic solutions to improve motorway junction capacity and reduce traffic through the town centre. Facilities such as schools, green infrastructure and community halls will be provided or enhanced as appropriate, to account for the increased demand arising from new development. The strategic sites will also include care homes or other provision for older people in recognition of the aging population and its associated needs. The Council will guide development to locations where there is sufficient sewerage capacity, or require that increased capacity be provided in step with development which will help to deliver Water Framework Directive objectives. The need for investment will be reviewed and addressed by South West Water through 5 yearly cycle plans. Sewerage network improvements will be negotiated in line with the provisions of the Water Act in conjunction with developers as and when the need arises.

2.54 For most sites funds for infrastructure delivery will be secured through the Community Infrastructure Levy (CIL); a charge per square metre of eligible new development. The rate of payment for CIL has been subject to viability assessment which takes account of the other policy requirements affecting viability, such as affordable housing targets. Legal agreements under Section 106 of The Town and Country Planning Act (1990) may be used instead of CIL if the proceeds would exceed the amount of CIL that would be generated from the development. Section 106 Agreements, a type of planning obligation, will also be used to secure funding for specific public open space projects in the district, as discussed under Policy S5. The strategic sites (Tiverton Eastern Urban Extension, North West Cullompton, ~~and~~ East Cullompton and Junction 27) will be zero-rated for CIL and these developments will be required to pay for necessary infrastructure through Section 106 agreements, undergoing viability assessment at planning application stage if necessary.

2.55 There is currently a significant infrastructure funding gap and the Council will also seek external sources of funding to deliver key infrastructure. More information about the means of funding infrastructure can be found in the Infrastructure Plan (2014) and the 'Regulation 123' list for CIL, available on the website ~~at www.middevon.gov.uk/cil~~. CIL is also accompanied by a policy setting out the circumstances in which Section 106 agreements are to be used. It is anticipated that CIL will be adopted at the same time as the Local Plan.

Environment

Policy S9

Environment

Development will sustain the distinctive quality, character and diversity of Mid Devon's environmental assets and minimise the impact of development on climate change through:

a) High quality sustainable design which reinforces the character and distinctiveness of Mid Devon's historic built environment, mitigates and adapts to climate change and creates attractive places;
b) The efficient use and conservation of natural resources of land, water and energy, minimising pollution and preserving the quality and productivity of the best and most versatile agricultural land wherever possible;
c) The provision of measures to reduce the risk of flooding to life and property, requiring sustainable drainage systems including provisions for future maintenance, guiding development to locations of lowest flood risk by applying a sequential test where appropriate, and avoiding an increase in flood risk elsewhere;
d) Renewable energy development in locations where there is an acceptable local impact, including visual, on nearby residents, landscape character and wildlife, balanced with the wider sustainability benefits of renewable energy;
e) The preservation and enhancement of the distinctive qualities of Mid Devon's natural landscape, supporting opportunities identified within landscape character areas. Within or adjoining the Blackdown Hills Area of Outstanding Natural Beauty, and Exmoor and Dartmoor National Parks, the primary objective will be to protect the special ~~environmental~~ qualities of that landscape and its setting;
f) The protection and enhancement of designated sites of international, national and local biodiversity and geodiversity importance. On both designated and undesignated sites, development will support opportunities for protecting and enhancing species populations and linking habitats, providing mitigation and compensation measures where appropriate; and
g) The preservation and enhancement of Mid Devon's cultural and historic environment, and the protection of sites, buildings, areas and features of recognised national and local importance such as listed buildings, conservation areas, scheduled monuments and local heritage assets.

2.56 The environmental qualities of the district are highly valued by the community and the preservation and enhancement of Mid Devon's distinctive environmental assets are important to the achievement of sustainable development. Changes in land use, agricultural practices and new development are all threats to the quality of Mid Devon's environment unless properly managed, while the effects of climate change will provide both challenges and opportunities. New development will be located, designed and constructed in ways that reinforce local distinctiveness, respond to climate change and provide positive solutions for

protecting and enhancing environmental assets. Mitigation measures will be sought where appropriate, to achieve neutral or positive effects on the environment, including ecological measures which would help to deliver Water Framework Directive objectives.

2.57 The Government's approach in tackling climate change has evolved over time. Ambitious carbon reduction targets have led to Government incentives for renewable energy schemes, resulting in a marked increase in planning applications for wind turbines and field-scale solar energy development. The Mid Devon Landscape Sensitivity Assessment considers the susceptibility of different parts of the landscape to change as a result of wind and solar energy development of different sizes, scales and groupings. This assessment is a material consideration in decision-making, alongside evidence of biodiversity, noise, glare and other impacts.

2.58 Development Management policies on design, green infrastructure, protected landscapes/habitats and heritage assets provide detailed criteria for development.

Tiverton

Policy S10

Tiverton

Tiverton will continue to develop in a balanced way as a medium sized market town serving a rural hinterland in the central part of Mid Devon and to the north. The strategy will maintain its status as the largest urban area in Mid Devon and increase the self-sufficiency of the town and its area by improving access to housing, employment and services for its population and that of the surrounding rural areas. Proposals will provide for approximately ~~2,160~~2,358 dwellings, of which ~~540~~ 660 will be affordable, and ~~30,800~~ 29,400 gross square metres of commercial floor space over the plan period.

The Council will guide high quality development and other investment to:

a) Manage the town centre so that economic success and heritage reinforce each other, promoting new homes, shops, leisure, offices and key town centre uses which contribute to vitality and viability, including an additional ~~8,000~~7,000 square metres of gross commercial floorspace in accordance with the sequential approach in Policy DM15;

b) Enhance walking and cycling opportunities and bus services around the town, particularly improving access via these more sustainable modes to the town centre, Tiverton Parkway Station, Exeter and Taunton, and their interchange in the town centre;

c) Retain the green setting provided by the steep open hillsides, particularly to the west and south of the town and the historic parkland of Knightshayes to the north of the A361;

d) Protect the importance of Tidcombe Fen, other areas of biodiversity value and green infrastructure, supporting opportunities for enhancement;

e) Enhance the tourism and visitor role of the town and surrounding area; and

f) Support measures to reduce flood risk within Tiverton, working with natural processes wherever possible.

2.59 Tiverton is the largest settlement in Mid Devon, with the largest economic concentration and level of social and commercial services. It is the focus of a reasonable level of public transport provision. However, the long-term options for Tiverton's growth are constrained by the town's topography, flood plains and the position of the A361. Cumulative traffic impacts on Junction 27 of the M5 must also be considered. While the evidence suggests that improvements to signalisation of the junction have provided capacity for planned strategic development in Tiverton, additional development may require improvements to the junction. Traffic assessments will be required where appropriate to consider impacts on the local and strategic road network.

2.60 As the largest town in the district, there is an expectation that Tiverton will deliver approximately ~~2,160~~2,358dwellings over the plan period. Recent completions and current commitments total over ~~600~~ 1,000 dwellings. It is therefore expected that a significant proportion of the town's outstanding housing needs will be delivered as part of the Eastern Urban Extension allocation (TIV1-5), with the remainder provided by smaller allocations. Sites have been allocated in excess of the anticipated development levels to allow for flexibility in the supply of housing and employment, as discussed in paragraphs 2.1-2.16. A~~Two~~ contingency site~~s~~ ha~~s~~ve been allocated within the town, forming part of the strategy for providing flexibility within the plan.

2.61 Retail forecasts identify a need for additional non-food retail floorspace in Tiverton. The Retail Study (2012) recommends that site allocations for retail development include the redevelopment and improvement of the bus station and existing open-air car parks. The area around Phoenix Lane in Tiverton is available, suitable and achievable for a mixed use redevelopment scheme.

2.62 Historically, the take-up of employment allocations in Tiverton has been slow, while the larger urban centres of Exeter and Taunton are established employment destinations and will continue to draw a large number of Mid Devon's working residents. The Employment Land Review (2013) advises on the locations and amounts of development appropriate in the towns. In accordance with this, the Tiverton Eastern Urban Extension is expected to provide 30,000 square metres of employment floorspace, phased to come forward in step with housing development. Employment development in this location, close to the A361, may serve to claw back some of the jobs that are currently being lost to other settlements outside Mid Devon.

2.63 The following table sets out the allocations in Tiverton, their policy reference, site area and use, and states where the relevant policies can be found within this document:

Site	Policy	Site area (ha)	Use	Local Plan page(s)

Eastern Urban Extension	TIV1-TIV5	153	~~1520~~ 1580 dwellings and 30,000 sqm of commercial floorspace	65-74
Farleigh Meadows	TIV6	8.2	~~300~~ 255 dwellings	74
Town Hall	TIV7	0.5	59 dwellings	75
Moorhayes Park	TIV8	0.4	8 dwellings	76
Howden Court	TIV9	0.47	10 dwellings	76
Roundhill	TIV10	0.4	20 dwellings	77
Palmerston Park	TIV11	0.9	25 dwellings	77
Phoenix Lane	TIV12	1.4	60 dwellings and ~~8,000~~7,000sqm. of mixed commercial floorspace	78
Tidcombe Hall (contingency)	TIV13	5	100 dwellings	79
~~Wynnards Mead (contingency)~~	~~TIV14~~	~~6.3~~	~~70 dwellings~~	~~80~~
Blundells School	TIV16	14	200 dwellings	XX

Cullompton

Policy S11

Cullompton

Cullompton will develop as a fast growing market town with a strategic role in the hierarchy of settlements in Mid Devon. The town will become the strategic focus of new development reflecting its accessibility, economic potential and environmental capacity. This strategy will improve access to housing through urban extensions and expanded employment opportunities. There will be significant improvements to the town's infrastructure and connectivity, including the reopening of the railway station, and improved services for its population and nearby rural areas. Proposals will provide for approximately ~~3,600~~3,930dwellings, of which ~~900~~ 1,100 will be affordable, and ~~77,000~~73,500 gross square metres of commercial floor space over the plan period.

The Council will guide high quality development and other investment to:

a) Make any necessary improvements to the M5 motorway including junction 28 to maintain highway capacity and safety;

b) Promote further public transport improvements within Cullompton and to other urban centres (particularly Tiverton and Exeter) and improved access to the rail network by the reopening of Cullompton Railway Station;

c) Continue measures to support the implementation of the Cullompton Air Quality Action Plan including the construction of new highway links to relieve the town centre and enhanced walking and cycling opportunities around the town;

d) Manage the town centre so that economic regeneration and heritage reinforce each other by promoting new homes, shops, leisure, offices and other key town centre uses which are well designed and contribute to vitality and viability;

e) Provide community infrastructure such as education and enhanced open space to support new development proposals;

f) Enhance the tourism and visitor role of the town and surrounding area; and

g) Support measures to reduce flood risk within Cullompton and make provision for green infrastructure.

2.64 Cullompton is situated 11 miles north of Exeter and about 20 miles south west of Taunton. The M5 motorway runs close to the east side of the town. The B3181 runs through the centre of the town and links Exeter and Willand. The town lies in the Culm Valley with the river passing the east side of the town. Cullompton's location on the strategic road network, its close proximity to Exeter and the availability of land for development make it a suitable destination for long-term growth. A Critical Drainage Area (CDA) has been identified by the Environment Agency at Cullompton. The aim of this CDA is to ensure there is no increase in flood risk downstream as a result of development pressure. A Flood Risk Assessment will be required at the planning application stage for development proposed in the CDA to determine specific recommendations for mitigation. All new development will require additional water storage areas to be created within the site compared to the normal SUDs design thereby contributing to a reduction in flooding downstream. ~~The Environment Agency (EA) is a statutory consultee for all development within a CDA~~The Environment Agency (EA) is a statutory consultee on all developments in Critical Drainage Areas and flood zones 2 and 3, while the Lead Local Flood Authority (Devon County Council) will be a statutory consultee on all major development.~~.~~

2.65 The largest single site allocation in the Local Plan is East Cullompton (Policies CU7-CU12), which will have access onto the M5 motorway and deliver significant improvements to highways infrastructure for the whole town. There has also been a long-standing public desire to see the reopening of Cullompton Railway Station. The proposal is gaining momentum and is included within Network Rail's Western Route Study (draft for consultation) 2014 which sets out the strategic vision for the western part of the rail network over the next 30 years. The Council supports the reopening of the station and the Local Plan allocates a possible site for this. The combination of highways improvements and a new railway station provides an opportunity to significantly raise the profile of Cullompton and the wider area, attracting inward investment.

2.66 Pedestrian and cycle links to the town centre will be improved, and residents will be in close proximity to job opportunities within Cullompton and also at Willand, Tiverton and Exeter. The concurrent development of the North West Cullompton Urban Extension will see a new road linking Tiverton Road to Willand Road, which will relieve traffic congestion in the town centre, improving local air quality and the living conditions of residents. The town centre acts as a strategic relief route for the M5 during closures resulting in significant congestion. A new relief

road, to the east of the town centre, will further improve local air quality by diverting north- and south-bound traffic away from Fore Street. Note that the name of the road, originally called the Eastern Relief Road when allocated in the Allocations and Infrastructure DPD, has been amended to Town Centre Relief Road to more accurately reflect its role. Significant growth in Cullompton can be made sustainable through this investment in infrastructure, addressing long-standing issues of air quality and motorway junction capacity.

2.67 The major growth of the town will provide the opportunity to revitalise the town centre through additional investment, traffic and transport improvements. The growth of the town and proposed improvements will provide a significant boost to its vitality and viability, providing a more attractive retail environment through organic change in the town centre by which the use of existing underused and struggling premises is improved, rather than through the delivery of new retail floorspace. The need for additional retail floorspace will be reviewed as part of the process of preparing the next Local Plan.

2.68 Future employment provision is expected to be centred around the Kingsmill industrial estate and within the adjoining urban extension at East Cullompton. Access to the motorway will need to be improved before significant levels of development come forward. Masterplanning of the East Cullompton urban extension will include a phasing strategy which ensures that infrastructure is provided in step with development. One contingency site is allocated in the town, providing a level of flexibility to address any potential shortfall in completions as set out in Policy S4.

2.69 The following table sets out the allocations in Cullompton, their policy reference, site area and use, and states where the relevant policies can be found within this document:

Site	Policy	Site area (ha)	Use	Local Plan page(s)
North West Cullompton	CU1-6	103	~~1200~~ 1350 dwellings and ~~21,000~~10,000 sqm. commercial floorspace	85-93
East Cullompton	CU7-12	160	~~2,100~~1750 dwellings (within the plan period) and 20,000 sqm. commercial floorspace	94-103
Knowle Lane	CU13	9.8	~~315~~ 296 dwellings	103
Ware Park & Footlands	CU14	2.1	38 dwellings	104
Land at Exeter Road	CU15	1.4	~~45~~ 24 dwellings	105
Cummings Nursery	CU16	5.3	~~120~~ 100 dwellings	106

Week Farm	CU17	10.7	15,000 sqm. commercial floorspace	107
Venn Farm	CU18	4.4	~~9,000~~12,000 sqm. commercial floorspace	108
Colebrook (contingency)	CU21	4.8	100 dwellings	111

Crediton

Policy S12

Crediton

Crediton will continue to develop in its role as a small and vibrant market town, serving a rural hinterland in the western part of the district. The strategy aims to improve access to housing within the town, expand employment opportunities and improve the quantity and quality of the existing retail provision. Proposals will provide for approximately ~~720~~ 786 dwellings, of which ~~180~~ 220 will be affordable, and ~~15,400~~14,700 gross square metres of commercial floorspace over the plan period.

The following development will be supported over the plan period:

a) Proposals which support the economic regeneration of the town centre, including the provision of new homes, commercial development, cultural facilities and other key town centre uses which support the town centre's viability and vitality. Particular support will be given for proposals which improve the quantity and quality of existing retail provision within the town centre. All proposals within the town centre will need to play a positive role in sustaining and enhancing the significance of the area's heritage;

b) Proposals which respect the setting provided by the open areas of hillside and the adjoining historic parklands of Creedy Park, Shobrooke Park and Downes;

c) Continuation of measures to support the implementation of the Crediton Air Quality Action Plan, including enhanced walking and cycling opportunities around the town; ~~and~~

d) Enhance the tourism facilities and visitor role of the town and surrounding area; and~~.~~

e) Community and education facilities and other infrastructure to support the development proposed.

2.70 Crediton is a small and vibrant market town, located in the west of the district. The town is situated near to the Rivers Creedy and Yeo, and is set within a landscape of farmland extending across gently rolling hills and broad valleys. It lies within what is known as the 'Crediton Trough', a low lying flattish basin feature. The town's past is reflected in the historic core, principally focused around the High Street. The town is a focal point for the surrounding area, providing a level of employment and services. Opportunities for the expansion of Crediton are limited, given the steep topography around the town, adjoining historic parklands and traffic congestion through the town centre.

2.71 In 2006 Crediton was designated as an Air Quality Management Area as a result of unacceptably high levels of airborne pollutants in the centre of the settlement. However, one of the key actions set out within the Air Quality Action Plan, the Crediton Link Road, has been provided. This is likely to have a significant impact on local air quality, directing a proportion of HGV and other traffic to Lords Meadow

Industrial Estate, away from the town centre. Air quality monitoring will determine whether the pollutants have reduced sufficiently for the Air Quality Action Plan to be withdrawn.

2.72 The Employment Land Review (2013) points to a limited demand for employment growth in Crediton. The Retail Study (2012) identifies no requirement for additional retail floorspace within the town, but development management and town centre initiatives should seek to improve and upgrade the quality of the existing provision.

2.73 The total housing target for Crediton (~~720~~ 783 dwellings) represents 10% of the district's total requirement. This is lower than might be expected for a town of this size, but environmental constraints limit Crediton's expansion and the development can be more sustainably located elsewhere. The sites allocated in the Local Plan have been subject to Strategic Housing Land Availability Assessment (SHLAA) and are considered available, suitable and achievable.

2.74 The following table sets out the allocations in Crediton, their policy reference, site area and use, and states where the relevant policies can be found within this document:

Site	Policy	Site area (ha)	Use	Local Plan page(s)
Wellparks	CRE1	7.9	185 dwellings and 2,220sqm. commercial floorspace	113
Red Hill Cross	CRE2	3.1	135 dwellings	114
Cromwells Meadow	CRE3	2.4	35 dwellings	114
The Woods Group	CRE4	0.17	8 dwellings	115
Pedlerspool	CRE5	23.5	200 dwellings	115
Sports Fields	CRE6	5.5	120 dwellings	117
Stonewall Lane	CRE7	3.2	50 dwellings	118
Land at Barn Park	CRE8	1.64	20 dwellings	119
Land off Alexandra Close	CRE9	0.63	15 dwellings	119
Land south of A377	CRE10	1.9	7,600sqm. commercial floorspace	119

Rural areas

Policy S13

Villages

The following rural settlements will be designated as villages suitable for limited development: Bampton, Bow, Bradninch, Chawleigh, Cheriton Bishop, Cheriton Fitzpaine, Copplestone, Culmstock, Halberton, Hemyock, Holcombe Rogus, Kentisbeare, Lapford, Morchard Bishop, Newton St Cyres, Sampford Peverell, Sandford, Silverton, Thorverton, Uffculme, Willand and Yeoford.
Development will be limited to proposals within their defined settlement limits and to allocations for:

a) Small scale housing, employment, tourism and leisure;
b) Services and facilities serving the locality; and
c) Other limited development which enhances community vitality or meets a local social or economic need.

2.75 There are a number of settlements which do not function as market towns, but which provide a limited level of services which support vibrant rural communities. These are locations which are suitable for a limited level of development meeting local needs appropriate to their individual opportunities. Sites for affordable housing may also come forward in locations that are not designated villages in Policy S13 above, subject to local need as demonstrated through a local housing needs survey or other suitable evidence. Policy DM6 (rural exceptions sites) explains the Council's approach to considering 'exception sites' for affordable housing.

2.76 The 22 settlements set out in the policy are considered to be appropriate for a limited level of development, based on their physical characteristics, and the availability of the following three essential services identified:

- Educational facility
- Convenience store
- Transport service

2.77 Yeoford does not have a shop but is considered appropriate for inclusion in Policy S13 due to its accessibility to other settlements and the availability of public transport including an hourly train service. The settlement limits of the villages defined in Policy S13 are shown on the Policies Map and site allocations are set out in the relevant section of the Local Plan.

2.78 Rural areas are expected to accommodate approximately 10% of the housing requirement for Mid Devon up to 2033. 330 dwellings have been allocated and are considered available, suitable and achievable, capable of coming forward within the first 10 years of the plan. It is also likely that a small number of windfall developments will be built within settlement limits or through the rural exceptions policy (Policy DM6). Given that more than half of Mid Devon's population currently resides

outside the main towns, this is considered a sustainable approach which will maintain the vitality and viability of rural settlements.

2.79 Proposals for more than 5 dwellings in villages will be required to provide 30% affordable housing, which will be in the form of off-site contributions for sites of 6-10 dwellings. Exception sites may also come forward outside settlement limits, but these will need to demonstrate a need for affordable housing, and any element of market housing must be limited to the lowest amount possible to facilitate the provision of affordable housing. In appropriate circumstances, self-build housing will be permitted through the exceptions policy (Policy DM6). Other development management policies will also be applied, along with the Council's Supplementary Planning Document on Meeting Housing Needs.

2.80 Historically, employment sites in rural areas across Mid Devon have been delivered primarily through windfall sites with limited provision on allocated land. The 2012-2013 Mid Devon Employment Land Survey noted that since 2006 only two small parts of allocated land at Willand and approximately 50% of allocated land at Bampton had been completed. The Council recognises the importance of retaining and providing rural employment opportunities, but the combination of permitted development rights and supportive general policies is considered sufficient to deliver employment according to demand in rural areas. However, recent permissions indicate there is demand for employment in Willand so ~~A small allocation at~~the Willand Industrial Estate is retained ~~to allow for the completion of a development which already has access and infrastructure in place, and also~~along with Scott's Quarry at Bampton ~~is retained~~ because the development has planning permission and is deliverable. In general, site allocations within the towns meet the overall target for commercial development across the district, providing flexibility and choice in the market.

Countryside

Policy S14

Countryside

Development outside the settlements defined by Policies S10-S13 will preserve and where possible enhance the character, appearance and biodiversity of the countryside while promoting sustainable diversification of the rural economy. Detailed development management policies will permit agricultural and other appropriate rural uses, subject to the following criteria:

a) Affordable and low cost housing to meet local needs, ~~gypsy and traveller accommodation,~~ residential conversion of appropriate existing buildings, replacement dwellings, housing essential to accommodate a rural worker and accommodation ancillary to a dwelling;
b) Appropriately scaled retail, employment, farm diversification, tourism and leisure related development (including appropriate conversion of existing buildings);

c) Appropriately scaled and designed extensions and other physical alterations to existing buildings;
d) Agricultural and equestrian development;
e) Community facilities, such as educational facilities, buildings associated with public open space, transportation and infrastructure proposals (including green infrastructure); and
f) Renewable energy and telecommunications.

2.81 National policy supports thriving rural communities and encourages multiple benefits from the use of land in rural areas. Development in the countryside in the context of this policy is defined by land outside of the settlement limits of the main towns (S10-S12) and villages (S13). A strong rural economy is promoted by national policy through sustainable growth of business and enterprise in rural areas. Development in the countryside will be managed to meet local need, promote vibrant rural communities and help provide appropriate forms of agricultural and rural diversification to support the rural economy and sustain environmental qualities of the countryside. Development management policies allow for small-scale employment development in suitable locations whilst retaining the intrinsic character and beauty of the countryside. These sites can come forward according to market demand.

2.82 To promote sustainable development in rural areas, housing has been allocated where it will enhance or maintain the vitality of rural communities. New isolated homes will be avoided in the countryside unless there are special circumstances as set out in national policy and supplemented in relevant Local Plan policies such as Policy DM6 (rural exception sites), DM8 (rural workers dwellings) and DM9 (conversion of rural buildings). In the context of the Mid Devon Local Plan, 'isolated' refers to any location outside of defined settlement limits. Such land is defined as the countryside which can include small settlements and hamlets. National policy requires that new sites for travellers should be very strictly limited in open countryside that is away from existing settlements or outside areas allocated in the development plan. In certain circumstances the development of such sites outside of settlement limits will be appropriate, providing it can meet the criteria set out within Policy DM7 (gypsy and traveller accommodation).

2.83 National policy advocates the provision of market housing in rural areas where it would facilitate the provision of significant affordable housing required to meet housing need. To facilitate the provision of affordable and low cost (discounted) housing in rural areas across Mid Devon, rural exception sites will be considered in line with Policy DM6 and the Council's Supplementary Planning Document on Meeting Housing Needs.

3.0 Site Allocations

Site Allocations

3.1 The overall amount of development is discussed earlier in this plan, with Policy S2 setting out targets for development across the district. After existing commitments (sites under construction or with planning permission) have been deducted, there is a net requirement for dwellings and commercial floorspace to 2033.

3.2 Site allocations have been subject to Strategic Housing and Commercial Land Availability Assessments. This is a technical assessment of the broad suitability, availability and achievability of potential development sites. It does not indicate whether or not sites should be allocated; the selection of sites to be allocated has taken place through the preparation of the Local Plan, taking account of other information and consultation. The net requirement for development is shown in the table below, based on the targets contained in Policy S2.

Use	**Completions 1 April 2013 - 31 March 20162014**	**Commitments at 31 March 20142016**	**Net requirement**	**Uncommitted Allocations to 2033**
Housing (dwellings)	320924	1,3692,012	5,5114,924	6,1395,648
Commercial (employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)	9,787	43,259	100,954	121,620

Table 10: Overall development need and land supply

Tiverton

3.3 The development strategy for Tiverton is set out under Policy S10. The following table summarises Tiverton's supply of housing and commercial development.

Use	Commitments at 31 March ~~20142016~~	Completions since 2013	Uncommitted Allocations	Total
Housing (dwellings)	~~522~~745	~~93~~261	~~1,643~~1,540	~~2,258~~2,546
Commercial (employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)	805	1,550	38,000	40,355

Table 11: Development supply in Tiverton

3.4 ~~Six~~ Seven sites are allocated for housing in Tiverton, excluding ~~two~~ one contingency site~~s~~ at Tidcombe Hall ~~and Wynnard's Mead~~ that will be permitted to come forward if the Council's housing supply proves insufficient, as set out in Policy S4. All housing sites are considered achievable in principle, corresponding to a Tiverton map that accompanies this document. Net site areas shown in Table 12 reflect the land area considered developable after land has been provided for access, strategic landscaping and other uses. For very small sites, the whole site area is often considered developable. The majority of Tiverton's housing is to be provided through the strategic site Eastern Urban Extension (TIV1-5). Although the housing growth of the town is therefore dependent on this site coming forward, there is limited risk associated with this because there is a good track record of joint working between the Council and the site promoters, with half of the site covered by an adopted masterplan, and applications for in excess of 1,000 dwellings ~~pending determination~~now with planning permission or resolution to grant subject to a section 106 agreement.

Table 12: Allocations in Tiverton, excluding sites/dwellings with planning permission

Site	Policy	Gross site area (ha)	Net site area (ha)	No. dwellings allocated without permission
Eastern Urban Extension	TIV1-TIV5	153	64.86	~~1520~~1250
~~Moorhayes Park~~	~~TIV8~~	~~0.4~~	~~0.4~~	~~8~~
Howden Court	TIV9	0.47	0.38	10
Roundhill	TIV10	0.4	0.4	20
~~Palmerston Park~~	~~TIV11~~	~~0.9~~	~~0.72~~	~~25~~

Phoenix Lane	TIV12	1.4	1	60
Blundells School	TIV16	14	6	200
Total				~~1643~~1,540

3.5 A number of housing sites were allocated in the previous Local Plan and already have planning approval, but are either not yet under construction or only recently implemented. These sites are retained as Local Plan allocations to ensure that policy criteria still apply in the event that revised schemes are submitted or planning permission lapses.

Site with planning permission	Policy	Site area	Dwellings with planning permission
Eastern Urban Extension	TIV1-5	153	330
Farleigh Meadows	TIV6	8.2	~~300~~255
Town Hall	TIV7	0.5	~~59~~58
Moorhayes Park	TIV8	0.4	4
Palmerston Park	TIV11	0.9	26
Total		~~8.7~~	~~359~~693

Table 13: Housing allocations with planning permission (position at 31 March ~~2014~~2016)

3.6 Two sites in Tiverton are allocated to deliver employment up to 2033, through a range of uses. The amount of floorspace to be provided by commercial development depends on the use. For instance, office development on multiple floors provides a greater amount of floorspace per hectare than a single-storey warehouse, and some commercial uses require more land for parking than others. Floorspace assumptions for different uses are set out in the methodology for Strategic Commercial Land Availability Assessment (SCLAA), but the Council recognises that this is only a starting point and a higher or lower density of development may be justified depending on the nature of the proposal that comes forward.

Site	Policy	Gross site area (ha)	Net site area (ha)	Floorspace (sq.m)
Eastern Urban Extension	TIV1-5	153	6	30,000
Phoenix Lane	TIV12	1.4	1	~~8,000~~7,000
Total				38,000

Table 14: Allocated sites for commercial development

Policy TIV1

Eastern Urban Extension

A site of 153 hectares east of Tiverton is allocated for mixed use development as follows:

a) ~~1520~~ 1580 to 1830 dwellings;
b) A proportion of affordable dwellings subject to further assessment of viability to include at least five pitches for gypsies and travellers;
c) At least 30,000 square metres commercial floorspace;
d) 47 hectares strategic green infrastructure;
e) Highway mitigation measures and transport provision to ensure appropriate accessibility for all modes;
f) Environmental protection and enhancement;
g) Community facilities to meet local needs arising, including a new primary school and neighbourhood centre;
h) An agreed strategy to bring forward development and infrastructure in step and retain the overall viability of development; and
i) Compliance with the adopted masterplan and completion of a public Masterplanning exercise in respect of the southeast of the site (Area B in the adopted masterplan).

3.8 The allocation is carried forward from the Allocation and Infrastructure DPD which identifies it for from 1550 to 2000 dwellings. The masterplan for the Tiverton Eastern Urban Extension was adopted in April 2014. It includes provision for 15~~80~~~~20~~22 dwellings, 30,000 square metres mixed commercial floorspace and a target of 35% affordable housing (subject to viability as each phase comes forward). 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. More detailed masterplanning of Area B is yet to take place and will establish the final number of dwellings and may demonstrate that a higher number of dwellings are able to be accommodated. Accordingly a range of housing numbers is given for the allocation. This approach to housing numbers reflects that taken by the Inspector on the Allocations and Infrastructure DPD.- At least five gypsy and traveller pitches will be provided, some of which will be in the first phase of development, helping to meet the needs identified in the Gypsy and Traveller Accommodation Assessment (2015). The masterplan includes a phasing strategy which ensures that a new junction onto the A361 be provided early in the development, along with traffic calming and environmental enhancement on Blundell's Road. The development will also provide a new primary school, a neighbourhood centre for shopping and community use, and various forms of open space to meet the needs of residents.

3.9 The site was originally intended to accommodate up to 2,000 houses and this would have necessitated a new access road to link the development to Heathcoat Way, thereby allowing Blundell's Road to be closed to general traffic and used mainly for access by sustainable travel modes. The allocated site is no longer expected to deliver this amount of housing and the access road cannot be justified for the amount of development proposed. However, any proposal for significant further development to the east of the allocated urban extension would

be likely to trigger the requirement for this additional road, subject to detailed design and the advice of the Highway Authority (Devon County Council).

3.10 The Tiverton Eastern Urban Extension meets most of Tiverton's development needs and is expected to take 10-15 years to be completed. As the largest of Mid Devon's towns, Tiverton is a sustainable location for development to meet the housing and employment needs of a growing population. Environmental constraints such as topography, flood plains and the position of the A361 limit the opportunities for expansion, making the Post Hill area the only suitable site for a development of this size. This necessitates the loss of some Grade 2 agricultural land. However, longer terms strategic housing needs for Mid Devon will be met through housing allocations at Cullompton which is less constrained.

3.11 The provision of affordable housing is an important local priority and the adopted masterplan includes a target of 35% affordable housing. However, developments must continue to be viable and affordable housing targets can make a considerable difference to viability. In the case of the Tiverton Eastern Urban Extension, there are considerable infrastructure costs and these bear heavily on the viability of this strategically important development. The Council therefore proposes that the proportion and timescale for provision of affordable housing be subject to further assessment of viability. It is expected that sites will contain a mix of housing types, including where appropriate provision for the elderly. The affordable housing requirement will need to be reassessed as applications come forward to ensure that affordable housing need continues to be met whilst ensuring the development remains viable. External funding sources, such as the Local Transport Fund are being used to contribute towards the cost of the road junction on to the A361. Furthermore, to reflect the high cost of infrastructure the site will be zero-rated for Community Infrastructure Levy. Instead, infrastructure will be funded through Section 106 agreements, of which delivery of the site will be limited to no more than five per infrastructure type or project.

3.12 The policies for this allocation are based on the evidence available to the Council when preparing them. It is important that the policies are not seen as rigid and unalterable in the light of new evidence. Therefore, where new information or evidence arises which indicates an alternative approach to a particular subject and this retains the overall strategic thrust of the proposals, then the Council will consider such proposals. Nevertheless, the policies and requirements of this plan should not be overturned lightly or without clear justification.

Policy TIV2

Eastern Urban Extension Transport Provision

To support the Eastern Urban Extension, the following transport infrastructure will be provided:

a) Provision of a new grade-separated junction to the A361 and road links into the site;
b) Traffic calming and environmental enhancement between Heathcoat Way and Putson Lane, including Blundell's Road ~~and Tidcombe Lane~~;

c) **Provision of bus, pedestrian and cycle routes at appropriate locations throughout the development, creating an attractive, permeable network for non-car modes travelling within, into and out of the area;**
d) **Cycle and pedestrian links to the Railway Walk, Grand Western Canal and nearby public rights of way;**
e) **Implementation of Travel Plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts;**
f) **Bus service enhancements between the main residential areas of Tiverton and the employment areas within the Eastern Urban Extension;**
g) **Bus service enhancements between Exeter, Tiverton Bus Station, the Eastern Urban Extension and Tiverton Parkway Station; and**
h) **New and improved offsite pedestrian and cycle links including improvements to a wider green infrastructure network.**

3.13 The provision of appropriate transport infrastructure is a key requirement of the urban extension, minimising impact on adjoining uses and promoting sustainable development. The key items of transport infrastructure are set out in the masterplan which was adopted in April 2014.

3.14 A direct access to the A361 will ensure that the site is both attractive for employment growth, and minimises the impact of traffic on other surrounding routes. The new junction is to be provided early in the development, along with improvements to Blundells Road and traffic calming measures to ensure a safe environment for all users of the highway and adjacent land. The first phase of Blundells Road traffic calming and environmental enhancement has been implemented.

3.15 It is expected that the junction onto the A361 will be achieved through a combination of developer and public funding. The Tiverton Eastern Urban Extension is excluded from the Community Infrastructure Levy (CIL) which applies elsewhere in the district, so the provision of infrastructure including financial contributions for bus service enhancements will be secured through planning obligations (Section 106 Agreements).

3.16 ~~This development is not expected to exceed approximately 1,500 homes.~~ The final number of dwellings on the site will be established following a further masterplannig exercise in relation to Area B. However, additional development of this site or further expansion to the east if exceeding 2,000 dwellings would likely trigger a requirement for a second access onto Heathcoat Way. Devon County Council has considered options for the route of this road, should it be required in the future.

3.17 Appropriate traffic calming and environmental enhancement along Blundell's Road together with cycle and pedestrian facilities have the opportunity to create an attractive sustainable transport corridor that respects the setting and operation of Blundell's School and the residential environment of the area. Devon County Council as Highway Authority will prepare a detailed design, subject to consultation.

3.18 It is essential that the development is served by an attractive, convenient and safe network of sustainable transport routes, including bus, cycle and pedestrian. Streets appropriate for bus use should be provided so that as far as possible, all buildings are within 400 metres of a bus route. The existing Blundell's Road and the A361 link will need to be included in these routes, together with appropriate streets within the urban extension. It is equally important that

cyclists have access to safe, attractive and direct cycle routes within the urban extension, linking together the dwellings, businesses and services in a network. These should link to the existing cycling and walking provision in the surrounding area, particularly the Railway Walk and Grand Western Canal (both part of the National Cycle Network) and public rights of way. The provision of Green Infrastructure will provide opportunities for off-road cycling and walking routes. The aim will be to integrate these sustainable transport provisions into the wide Tiverton and surrounding provision as far as possible.

3.19 There will be the need for developers to prepare and implement Travel Plans for the development as a whole and for the constituent parts, to promote softer and other less traditional measures relating to transport.

3.20 A major development must be served by high quality public transport in order to maximise its potential for sustainability and encourage alternatives to use of the car where possible. The urban extension will provide new commercial space serving Tiverton and therefore it is important that the existing residential areas of the town have improved public transport access to it. As a major new residential area, it is also important that residents of the extension can access key locations by public transport. A service linking Exeter, the Bus Station and Tiverton Parkway Rail Station via the Eastern Urban Extension would make a significant contribution in this regard and reduce the carbon footprint of the development. ~~Ongoing support of appropriate bus services will be required from the development until the point at which such services are self-supporting.~~ Support of appropriate bus services will be required from the development for a minimum period of 5 years.

Policy TIV3

Eastern Urban Extension Environmental Protection and Green Infrastructure

As part of the Eastern Urban Extension, the following environmental protection and enhancement measures will be implemented at the expense of all new development in the Eastern Urban Extension:

a) Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;

b) Provision and management of 47 hectares of land for strategic green infrastructure on the western and southern edges of the urban extension, including management and funding arrangements for the protection and enhancement of Tidcombe Fen Site of Special Scientific Interest, its catchment and land west of Pool Anthony Bridge;

c) Areas of equipped and laid out public open space, totalling 2 hectares of children's play, 8 hectares of sports pitches and 2 hectares of allotments;

d) A strategic landscaping and tree planting scheme to mitigate landscape impact, enhance biodiversity and the character of development;

e) Appropriate provision of a sewerage system to serve the development;

f) The provision of a strategic Sustainable Urban Drainage Scheme provided in step with development to deal with all surface water from the development, paying particular attention in relation to runoff into Tidcombe Fen SSSI in terms of quality and quantity of water entering the fen, and arrangements for future maintenance of the scheme;~~and a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;~~

gf) Detailed archaeological investigation and measures to record, and where necessary protect the archaeological interest of the site through appropriate design layout and mitigation; and

hg) Design solutions which respect the character and setting of heritage assets within and adjoining the site.

3.21 A number of key environmental requirements arise from the Eastern Urban Extension, to protect existing features of national and local importance, and to ensure that the development contributes to enhancements in the local environment.

3.22 Tidcombe Fen, which lies between Tiverton and the main part of the Tiverton Eastern Urban Extension, is a 10.7 hectare Site of Special Scientific Interest (SSSI) and as such must be protected. The site was notified in 1988 and is a type of wetland habitat rare in Devon. There is a wide variety of plant species unusual in its diversity, and fauna includes rare snail species. Active management of this habitat is currently undertaken by a local trust. One of the key issues is the impact of development on the quality and flows of water entering the SSSI, and its water levels. Avoidance of harm to its catchment area is therefore vital. A contribution to continued management of the SSSI and its catchment will be required.

3.23 There are a number of other areas of biodiversity interest within and adjoining the area of the urban extension and measures will need to be incorporated which protect and enhance their value. The Grand Western Canal is a designated County Wildlife Site and a substantial buffer zone will be retained between the canal and the development to preserve its special environmental quality. The layout of the development should promote the continued use of species-rich hedgerows as wildlife corridors, acting to prevent their fragmentation and providing appropriate treatment where such corridors cross roads and other linear features.

3.24 The provision of public open space for local benefits and for the wider benefit of Tiverton will be important in defining the character of the urban extension. The adopted masterplan provides for at least two hectares each of children's play space and allotments, while eight hectares for sports pitches will be provided through a combination of onsite pitches and new or improved sports provision elsewhere in Tiverton.

3.25 The development will need to take a strategic approach to Sustainable Urban Drainage to ensure that there is no additional run-off from the site arising from the development. This is in

order to avoid an increase in flood risk on site and downstream. Particular care will be required in relation to runoff into the Tidcombe Fen SSSI to ensure that the quantity and quality of water entering the Fen and its catchment are carefully controlled.

3.26 There are various heritage assets in and around the site, including listed buildings, scheduled ancient monuments, the Grand Western Canal and Blundell's Conservation Area. The site is also within the defined 'setting area' for Knightshayes Court, which is on the national register of historic parks and gardens. The development must have appropriate regard to the character and setting of all heritage assets affected. The urban extension also occupies an area of known archaeological potential, in particular with regard to prehistoric activity. There are two archaeological funerary sites of national importance just outside the development site that are Scheduled Ancient Monuments. Further archaeological assessment will be required across the Eastern Urban Extension site.

Policy TIV4

Eastern Urban Extension Community Facilities

As part of the Eastern Urban Extension, the following community infrastructure will be provided at the expense of all new development in the urban extension area:

a) One serviced site of 1.93 hectares for a primary school at no cost to the Local Education Authority;
b) Construction cost for one primary school of 420 places and early years provision;
c) A site of 2.0 hectares for a shopping and community centre, of which 1.0 hectare will be for community buildings at no cost to the provider;
d) Contribution to new and improved facilities at the secondary school; and
e) Construction cost of appropriate community facilities and buildings including youth and children's provision and a community hall.

3.27 The creation of a genuine urban extension requires that the residents and workers have access to a range of community facilities within easy walking or cycling distance, thereby discouraging car trips for essential local purposes. It is also important that, as far as possible, the development of this site will not lead to unacceptable pressures on existing services and facilities within Tiverton and the wider area. Accordingly, this policy sets out the requirements for provision of community facilities within the development and elsewhere.

3.28 The adopted masterplan includes a phasing plan which ensures a new primary school is provided at no cost to the Local Education Authority at an appropriate point in the development. The development will also need to provide new and enhanced secondary provision to accommodate the demand it will generate. The Education Authority has undertaken a feasibility study in respect of expansion and enhancement of Tiverton High School. Enhancements may include an expansion of the school site. A neighbourhood centre will also be provided within the urban extension site to act as a community focal point and located in conjunction with the primary school. The neighbourhood centre will include shops to meet local, convenience needs and community facilities including a community meeting space and youth provision. It may also form the location for local medical facilities, child care

and small-scale offices. An element of residential accommodation may also be appropriate as part of a mixed use approach.

Policy TIV5

Eastern Urban Extension Phasing

The development of the Eastern Urban Extension must be carried out in accordance with an approved phasing strategy, to ensure that the development and infrastructure come forward in step, minimising the impact of the development and taking account of the need for development to remain viable. Detailed justification must be provided if there is any proposed deviation from the following requirements:

a) 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;
b) 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;
c) The occupation of no more than 200 dwellings or 4,000 square metres employment floorspace before the provision of a 'Phase 1' traffic calming scheme at Blundell's School and improvements to the roundabouts at Heathcoat Way and Lowman Way, as set out in the adopted masterplan;
d) Prior to the commencement of construction south of Blundell's Road the transfer of land for the primary school and its access to the Local Education Authority;
e) Prior to the first occupation of development south of Blundell's Road the servicing of the site for the primary school;
f) The occupation of no more than 400 dwellings before the construction of the first phase of the primary school;
g) The occupation of no more than 400 dwellings before the provision of temporary open space on the future school and neighbourhood centre site;
h) The occupation of no more than 600 dwellings or 10,000 square metres commercial floorspace before the completion of the full movement grade separated junction to the A361 and completion of the traffic calming and environmental enhancement of Blundell's Road between Putson Lane and Heathcoat Way;
i) The occupation on no more than 600 dwellings before the implementation of arrangements for the management and funding for the Green Infrastructure west of Pool Anthony Bridge;
j) The occupation of no more than 600 dwellings before the implementation of bus service enhancements;
k) The occupation of no more than 600 dwellings before the provision of a 2.0 ha serviced neighbourhood centre site;
l) The occupation of no more than 1000 dwellings before the provision of Green Infrastructure between Pool Anthony Bridge and Manley Railway Bridge within Area A as defined in the adopted masterplan, with necessary management and funding arrangements;

m) The occupation of no more than 1250 dwellings before the provision of Green Infrastructure between Pool Anthony Railway Bridge and Manley Railway Bridge within the Area B as defined in the adopted masterplan, with necessary management and funding arrangements; and

n) Phased delivery of cycle and pedestrian links to the railway walk, Grand Western Canal and nearby public rights of way.

3.29 The phasing of development will have a key influence on the impact on surrounding areas, but also on the viability of development. The above policy sets out the approach to phasing which has been negotiated and agreed through the adoption of the masterplan as a Supplementary Planning Document. Legal obligations and conditions on planning consents will be used to control these phasing requirements. Other features such as sustainable urban drainage and linking pipework should be integrated and phased appropriately in step with development.

3.30 The provision of a new junction onto the A361 is critical to the success of the scheme, to prevent unacceptable increases in traffic along Blundell's Road and allow commercial development in the northwest corner of the site to be delivered. Given the expense of building new roads, construction of the new junction will take place in phases but is required early in the development.

3.31 Public open space and pedestrian and cycle links will be expected to come forward in pace with the development rather than a specific trigger point being identified for provision. The provision of affordable housing will be subject to viability assessment as each phase of the development is proposed in more detail through a planning application.

3.32 The adopted masterplan sets out areas of the site (A and B), with more detailed survey and design work having been included for Area A. The phasing and delivery of green infrastructure should be further informed by an additional Masterplanning exercise for Area B to the southeast of the site, which is expected to be delivered after Area A.

3.33 It is expected that a serviced site for the neighbourhood centre will be provided no later than the occupation of 600 dwellings, but may be as early as the commencement of construction to the south of Blundell's Road. The Masterplan SPD identifies that the construction of community facilities within the neighbourhood centre will commence within phase 1b and will be built out by the end of phase 1c (up to 1000 dwellings). The funding and timing of the provision of community facilities will be secured via a planning obligation (Section 106 Agreement) at planning application stage.

3.34 The provision of land for the new primary school and the construction of its first phase are timed to allow the Education Authority to secure the site at an early stage in order to plan for and meet the need arising from the new development. No specific trigger is set out for enhanced secondary education. This will be expected to be provided in pace with development in order to meets its needs.

Policy TIV6

Farleigh Meadows

A site of 11.2 hectares at Farleigh Meadows is allocated for residential development, subject to the following:

a) ~~300~~ 255 dwellings on land in Flood Zone 1, with 35% affordable housing;
b) 3 hectares of informal amenity open space within the floodplain with appropriate security measures to prevent access to and pollution of the Mill Leat;
c) Two vehicular access points;
d) Cycle and pedestrian routes providing links between Rackenford Road, Higher Loughborough and Washfield Lane, incorporating and enhancing the Exe Valley Way;
e) Protection of oak trees subject to Tree Preservation Orders within the site, incorporated within public open space where appropriate;
f) Careful design and landscaping treatment of the boundary between housing and amenity open space, taking account of impact on views from the north and east; and
g) Measures to mitigate impact on air quality at Leat Street.

3.35 This is a previously allocated site that has planning permission and~~but~~ has ~~not yet~~ commenced development. Of the 11.2 hectare site, the eastern most 3 hectares are in Flood Zone 3 and therefore not suitable for housing development; this is proposed as informal space. The remaining 8.2 hectares has the capacity for ~~about~~ 255~~300~~ dwellings, taking account of the need to protect attractive mature trees within the site, which are subject to a Tree Preservation Order. The Mill Leat which runs along the eastern edge of the proposed informal amenity open space, will need to be provided with fencing and planting to ensure safety as well as avoidance of pollution to a vital water source for Heathcoat's factory. This will have to retain access for maintenance. Discussion with Heathcoat Fabrics Ltd should take place around the necessary details.

3.36 Two vehicular access points are required and gaps in the cycle and pedestrian routes in the vicinity will need to be addressed. In particular, the existing Exe Valley Way which runs through the site should be enhanced to provide pedestrian and cycle links to the south and north. Leat Street, which is about 500m to the south east of this site, has poor air quality, and this site has the potential to worsen this through traffic generation. Where significant change is proposed to the existing consented scheme, updated studies of the potential impact will be required and should fund relevant measures to mitigate any impact. The site has the potential to impact on views from Knightshayes, a Historic Park and Garden, and this should be considered in the layout, design and landscaping.

3.37 An outline application for development at Farleigh Meadows was granted permission for the erection of up to 300 dwellings in 2013, which was reduced to 255 dwellings at reserved matters stage. ~~The proposal~~Both applications met the requirements of the policy including agreement to maintain a 35% affordable housing target. The affordable housing percentage of 35% is retained in the policy to reflect the planning permission that was granted, as that percentage was clearly considered viable for this development. Any revised scheme will be

considered against this target and evidence would be required to justify any proposed reduction.

Policy TIV7

Town Hall / St Andrew Street

A site of 0.5 hectares at St Andrew Street is allocated for residential development as follows:

a) 59 dwellings, incorporating conversion of buildings adjoining St Andrew Street, including 28% affordable housing;
b) Design which protects the character and setting of heritage assets both onsite and adjoining the site, and enhances the setting of the River Exe;
c) Archaeological investigation and appropriate mitigation; and
d) Ground floors to be raised and provision of flood evacuation/access routes.

3.38 An application for development at St Andrew Street was granted permission in 2013 for the erection 45 apartments for older persons, excluding the 14 dwellings to be provided through the conversion of buildings adjoining St Andrew Street. The proposal met the requirements of the site allocation policy with the exception of affordable housing provision, which was considered financially justified. As the new build part of this development has not been built out, it is considered appropriate to include a policy target of 28% affordable housing to reflect the Council's viability evidence. Any revised scheme submitted in the future would need to be assessed against the criteria of the policy above and market conditions prevalent at that time.

3.39 The design of this site is important as it is a highly visible site from the direction of the river. A scheme should enhance the views of the Conservation Area from this direction, while respecting the character and setting of the associated listed buildings. As a central site, there is the potential for archaeological remains, and this should be investigated. The site is within the 100 year floodplain, although behind a flood wall. Due to its regeneration importance to the town centre, the site passes the relevant sequential test set out in national guidance. Where appropriate the provision of raised floor levels and access/egress to dry land in the event of flooding should be provided.

Policy TIV8

Moorhayes Park

A site of 0.4 hectares at Moorhayes Park is allocated for residential development, subject to the following:

a) 8 dwellings;
b) Access to be provided from Hayne Court; and
c) Archaeological investigation and appropriate mitigation.

3.40 This site is located within Moorhayes Park and is bounded by the A361 to the north, modern housing to the east and is adjacent to a transformer station to the west. It is currently an overgrown area and not in use. The site falls within the built up area of Tiverton and as a result it is likely that there will be no landscape impact. An existing access from Hayne Court is suitable. It is in an area of known prehistoric activity and appropriate archaeological investigation would be required. A preliminary ecological appraisal has been undertaken which concludes that the site is of limited ecological value. The town leat runs to the east of the site. A flood risk assessment will need to consider the potential for flooding from the leat including a scenario of blockage of local culverts/bridges that convey the leat.~~A flood risk assessment will need to consider the potential for flooding.~~

3.41 Planning permission has been granted for the development of this site, including one affordable dwelling. Any revised scheme will be expected to meet the latest policy criteria for affordable housing.

Policy TIV9

Howden Court

A site of 0.53 hectares at Howden Court is allocated for residential development, subject to the following:

a) 10 dwellings;
b) Submission of a Junction Capacity Assessment to determine the need for a right turning lane from the A396 if accessed via the~~into~~ Howden Court development; and
c) Provision of a pedestrian and cycle route from Howden Court to Palmerston Park.

3.42 This site is located on the western edge of Tiverton bounded by residential development to the east. This site is the remaining part of a previous allocation for 65 dwellings, of which 50 have been built or are committed. On the advice of the Highway Authority,~~-~~ if the site is accessed via the adjacent Howden Court development, it ~~this development~~ may need to be served by a right turning lane from the A396, as cumulatively the housing will exceed 50 dwellings. Any planning application should be accompanied by a Junction Capacity Assessment which should assess the need for the right turning lane as a result of the additional development being proposed on the site.

Policy TIV10

Roundhill

A site of 0.4 hectares at Roundhill is allocated for residential development, subject to the following:

a) 20 affordable dwellings; and
b) Investigation of ground stability and implementation of appropriate remediation works.

3.43 The site comprises underused garages in the Council's ownership with existing housing to the north, south and east. It is a brownfield site and can be made available for 100% affordable housing. A number of dwellings adjoining the site have rights of access over part of it and these will need to be maintained as part of the development. Approximately 35 car parking spaces and garages will be retained/provided on the site as part of the redevelopment. Potential mineshafts may be found in the area; appropriate investigations will need to be undertaken and should accompany any application.

Policy TIV11

Palmerston Park

A site of 0.9 hectares at Palmerston Park is allocated for residential development subject to the following:

a) 25 affordable dwellings;
b) Habitat and protected species reports including a programme of appropriate mitigation and compensation for loss of any protected habitat or species if appropriate; and
c) Investigation of ground stability and implementation of appropriate remediation works.

3.44 This site lies to the west of Tiverton adjacent to Palmerston Park and close to Howden Industrial Estate. It was previously used as allotments but is now unused and overgrown. The land is steeply sloping upwards to the west. It is well screened from the east by sycamore trees and high banks. The northern half of the site is deciduous woodland, classed as a priority habitat in the UK Biodiversity Action Plan. A habitat survey of the site will be required to establish in more detail the characteristics of the woodland, the importance of the habitat, and identify mitigation or compensation that may be required.

3.45 The site is in the Council's ownership and can be made available for 100% affordable housing which is a considerable benefit arising from development of this site. There is a potential impact on the landscape character due to the loss of trees on the elevated part of the site. The site is visible from the east side of the River Exe. The impact on the landscape will require careful treatment. Potential mineshafts may be found in the area; appropriate investigations will need to be undertaken and should accompany any application. The site is expected to accommodate 25 dwellings, avoiding development of the higher, steeply sloping part of the site.

Policy TIV12

Phoenix Lane

A site of 1.4 hectares at Phoenix Lane is allocated for redevelopment as a high quality shopping, leisure and residential area with accessible public space. Redevelopment is subject to the following:

a) 60 dwellings with 28% affordable housing;
b) ~~8~~7,000 square metres of mixed commercial floorspace including retail, office and leisure uses;
c) Redesign and enhancement of the bus station to include an improved, safe and attractive passenger waiting area with adequate provision for buses and taxi ranks;
d) Improved pedestrian access between Phoenix Lane and the Pannier market, and between Phoenix Lane and the multi-storey car park;
e) Retention or relocation of the war memorial within the Town Centre;
f) Outstanding design that announces the southern entrance to Tiverton's primary shopping area while respecting and enhancing the character, appearance and setting of heritage assets and steep open hillsides;
g) Retention of the listed building, Gotham House, and measures to protect its character, appearance and setting including the protection of the Town Leat;
h) Adequate parking and service areas to serve the needs of existing and proposed uses;
i) Archaeological investigation and appropriate mitigation;
j) Provision of a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance; and
k) Comprehensive Masterplanning of the development including at least two stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document, before any planning application is determined.

3.46 The Mid Devon Retail Study (2012) identifies Phoenix Lane as an area suitable for retail development. At present it is a wide pedestrianised road providing a link between the multi-storey car park and bus station to the core shopping area of Tiverton. However, the street is wider than necessary and redevelopment could provide an attractive shopping frontage with residential accommodation above. There are also opportunities to improve the bus station and links to the Pannier Market and the multi-storey car park. Masterplanning of Tiverton town centre is in progress to identify the best ways of enhancing the town centre's attractiveness as a destination for tourism, shopping and leisure.

3.47 High quality design will be crucial to the success of redevelopment of this area. It is essential that the historic character of the town centre is respected, the setting of important listed buildings preserved, and views in and out of the conservation area sensitively treated. Gotham House, a Grade II* listed building, must be retained and its character respected, though the redevelopment may include the conversion of this building to residential accommodation, subject to detailed plans. The bus station and car park are the main point of

entrance to the town centre for visitors, so the development must improve and enhance the visual quality of this area and the perception of Tiverton town centre as a whole.

Policy TIV13

Tidcombe Hall CONTINGENCY SITE

A site of ~~5.0~~8.4 hectares at Tidcombe Hall is identified as a contingency site for residential development to be released in accordance with Policy S4, subject to the following:

a) 100 dwellings with 28% affordable housing;
b) Vehicular access point on to Canal Hill and improvements to Tidcombe Lane northwards from the site;
c) Walking and cycling enhancements and connection to surrounding public rights of way and green infrastructure networks;
d) Design and landscaping which protects the setting of the Grand Western Canal, Tidcombe Hall and Conservation Areas; and
e) Archaeological investigations and appropriate mitigation measures.

3.48 This site is primarily greenfield and is identified as a contingency site to be released in accordance with Policy S4. Whilst acceptable in some respects there are a number of constraints which make it less suitable than the sites allocated in the Local Plan, including landscape and highway constraints that need to be mitigated.

3.49 The site adjoins the south eastern limits of Tiverton. It extends from the grounds of Tidcombe Hall southwards including agricultural land as far as Newts Hill. Rising generally from north to south, it is more prominent at its south west corner. Although the site could accommodate more than 100 dwellings, a lower density would help protect the setting of the canal and Tidcombe Hall. The site is adjacent to residential development to the west, and low density reflecting this existing development would be appropriate.

3.50 The northern part of the site at Tidcombe Hall lies within the Grand Western Canal Conservation Area and faces the canal itself, which is also a Country Park. Tidcombe Hall is an unlisted building but is considered a heritage asset and the setting should be respected. Development to the south and east of the hall may be significant. Design and landscaping should protect Tidcombe Hall and the Grand Western Canal Conservation Area from the impact of the development including their settings. There is potential for archaeological remains that should be surveyed with appropriate mitigation provided if necessary.

3.51 A key factor is access. Tidcombe Lane has limited width without footways and Tidcombe Bridge is very narrow. Improvements to Tidcombe Lane will be necessary northwards from the site to ensure the safety of pedestrians, although not necessarily to increase its traffic capacity. A single vehicular access point on to Canal Hill will need to be supplemented with a secondary emergency access designed to be located at the end of the main cul-de-sac within the site.

3.52 A watercourse runs through the site and this should be preserved as part of the open space provision. A flood risk assessment will need to consider the potential for this watercourse to cause flooding.

~~Policy TIV14~~

~~Wynnards Mead CONTINGENCY SITE~~

~~**A site of 6.3 hectares at Wynnards Mead, Baker's Hill is allocated as a contingency site for residential development, subject to the following:**~~

~~**a) 70 dwellings with 28% affordable housing;**~~
~~**b) Design and landscaping which minimises impact to landscape character and protects the character and setting of the adjoining listed building and the unlisted house within the site 'Wynnards Mead';**~~
~~**c) Upgrading of the lane to 'Wynnards Mead Cottages' to provide the vehicular access point with widening of the frontage. The existing access to the house Wynnards Mead to form a secondary access for pedestrians and cyclists; and**~~
~~**d) Site contamination assessment and remediation to mitigate risks associated with the historic quarry to the north of the site.**~~

~~3.53 This site is identified as a contingency site, to be released in accordance with Policy S4 if housing completions across the district fall below the required level. The development of the site, while acceptable in principle, is considered less suitable than other sites in the Local Plan due to the potential impact on heritage assets. Both the provision of housing and the necessary highways works to provide safe access could harm the character and setting of an adjoining listed building and Wynnards Mead itself, which is considered a local heritage asset.~~

~~3.54 The site lies to the west of Tiverton and comprises a large house with associated grounds and agricultural land. The site is set on the north side of Cottey Brook, sloping down north to south. The unlisted house 'Wynnards Mead' and its gardens are in the middle of the site. There is a listed building immediately to the west of the site, which is elevated and visible from a number of viewpoints in the area. The site itself is elevated, and therefore is visible from a number of viewpoints, including Seven Crosses Road to the south. Accordingly, there could be some landscape impact from development in this location. The impact on the landscape will require careful treatment.~~

~~3.55 The policy requires design and landscaping which minimises the impact to landscape character, the adjoining listed building and the unlisted house within the site. This should include a buffer and planting to the west of the allocation to protect the setting of the listed building and south to protect setting of 'Wynnards Mead' house. A lower than usual density is also assumed to reflect the topography and to protect the settings of heritage assets in the area.~~

~~3.56 Vehicular access to the site is to be sought via the existing lane off Baker's Hill at the western side of the northern boundary. The frontage on to Baker's Hill will need to be widened to accommodate the passing of two vehicles as well as the provision of visibility splays. This will impact on the low wall and bank which will require retaining walls. The existing access to the~~

~~house Wynnards Mead is proposed as a route for pedestrians and cyclists, as well as forming the secondary emergency access point.~~

~~3.57 A small area of the site (0.6ha in the north) may be contaminated land as a result of a historic quarry. Development of this area has the potential to remediate this contamination and mitigate risks associated with the historic use.~~

Policy TIV15

Tiverton Infrastructure

The Council will work with partners to deliver the following infrastructure for Tiverton:

a) Provision of a new junction onto the A361 to serve the Tiverton Eastern Urban Extension;

b) Traffic calming and environmental enhancement ~~Public realm improvements and traffic calming~~ to Blundell's Road in association with the Tiverton Eastern Urban Extension;

c) Provision of increased capacity at roundabouts on Heathcoat Way;

d) Bus service enhancements;

e) Expansion and improvement of primary and secondary education facilities;

f) Public open space and green infrastructure;

g) Expansion of emergency fire and rescue services;

h) Provision of healthcare facilities;

i) Enhanced library service provision;

j~~i~~) Community facilities including provision for children/youth, a GP surgery and community hall; and

k~~j~~) Provision of works to reduce flood risk.

3.58 Strategic Local Plan sites will be required to pay for specific items of infrastructure that are necessary to make the development acceptable. Other development (if eligible) will be charged the Community Infrastructure Levy (CIL) at a rate per square metre. CIL funds will be spent according to a prescribed list of infrastructure projects or types of infrastructure.

3.59 The Council's strategic infrastructure policy is set out earlier in the Local Plan under Policy S8, but there are infrastructure requirements specific to Tiverton that are listed under Policy TIV15. The Council will use CIL, planning obligations for strategic sites and other sources of funding to deliver the infrastructure listed wherever possible. The Council's Regulation 123 list and accompanying policy on the use of Section 106 agreements, sets out the mechanism will be used to fund infrastructure. Where another organisation is responsible for delivering the infrastructure required as a result of new development, the Council will work in partnership with the relevant bodies to ensure that infrastructure needs associated with development are addressed appropriately.

3.60 Devon County Council's Waste Plan, which had hearings as part of its examination in July 2014, allocates a site in Tiverton for the delivery of an Energy from Waste plant. A site within the Tiverton Eastern Urban Extension has been identified, being located in relatively close proximity to other development, allowing energy and heat recovered from the disposal of waste to be exported to nearby properties and businesses. The facility is included in Mid

Devon's Infrastructure Plan as an important piece of local infrastructure, though it is expected it would be fully funded by a private sector waste company, with no funds being required from developer contributions or CIL.

Policy TIV16

Blundells School

A site of 14 hectares north of Blundells School is allocated for residential development subject to the following:

a) 200 dwellings with 28% affordable housing;
b) Approximately 8 hectares of informal green infrastructure adjoining the River Lowman;
c) Appropriate land shaping to raise areas for development above flood zone 3, including an allowance for the effects of climate change and to create additional floodplain to compensate for the loss of floodplain;
d) Provision of a junction on Heathcoat Way and a safeguarded road route through the site to serve as a future second strategic road access for development at Tiverton eastern urban extension;
e) Provision and enhancement of cycle and pedestrian links in the area;
f) Site contamination assessment and remediation to mitigate risks associated with former and current land-uses including the scrapyard and former poultry factory measures;
g) Provision of a sustainable urban drainage scheme to deal with all surface water from the development and arrangements for future maintenance;
h) Implementation of transport plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts.

3.47 Land to the north of Blundells Road in the vicinity of Blundells School consists of a mix of Greenfield and brownfield land , including unattractive buildings no longer in use, in and adjoining the floodplain of the River Lowman. Current and former uses have the potential to cause contamination, including an impact on river quality, and development of this area has the potential to resolve such issues. The site is bounded by development to three sides, with the River Lowman forming the northern boundary. Most of the site was previously allocated for an extension to the Tiverton Business Park, which lies north of the river.

3.48 The owners have previously confirmed availability ,and have sought allocation of the site, supporting the view that the site is viable. It is suitable for a relatively high density of development, as it would adjoin a large area of public open space. It is proposed to bring forward the residential element of the allocation from the previous plan (Allocations and Infrastructure DPD 2011).

3.49 The flooding issues associated with the development of this site have been examined. The regeneration and sustainability benefits arising from redevelopment are sufficient that the sequential test set out in national policy is overcome, and the measures set out in the policy overcome the exceptions tests. The policy requires that remodelling of the site be carried out, in order to raise certain areas and lower others, the end result being no change to the functionality of the floodplain to deal with a 1:100 year return period flood event, including

appropriate allowance for the effects of climate change. This remodelling would create a total of 6 hectares of developable land along the southern edge of the site, and 8 hectares of floodplain, which would be provided as Green Infrastructure. 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.

3.50 The western end of Blundells Road has air quality issues which have been within about 15% of exceeding the relevant guidelines. Additional road traffic from this site has the potential to bring this permanently over the relevant limits if access is obtained from Blundells Road. Accordingly, access to the site is proposed to be direct from Heathcoat Way via a new junction. The design and location of this junction and site access may in the future form part of a second strategic access to the Eastern Urban Extension. The development of this site will need to ensure that any future route through it to service the Eastern Urban Extension is not precluded. Non-vehicular access into and through the site should also be enhanced, through new and improved cycle and pedestrian routes including non-vehicular links to Blundells Road. An air quality assessment will be required with any application.

3.51 The site contains a working scrapyard, adjoining the River Lowman, which has the potential to harm water quality. Its removal and cleanup of the site would be a particular benefit, and is a key justification for this allocation. Similarly, the former poultry factory on the site may be contaminated and is becoming increasingly derelict. It would be inappropriate to allow redevelopment of land within the site for new housing before the removal of the scrapyard, given the impact on the living conditions and health of occupiers arising from its continued operation. Accordingly, no residential development will be permitted on the site until the scrapyard has been removed and the site remediated. Appropriate measures, agreed with the Council, will be needed to allow the site's development.

3.52 Provision of a Sustainable Urban Drainage Scheme will be required, to deal with the quality and quantity of surface water.

This page is intentionally left blank

Cullompton

3.61 Cullompton will develop as a fast growing market town and will become the principal focus of development for the district in the medium to long term in accordance with the development strategy set out in Policy S11.

3.62 Cullompton Town Council is preparing a neighbourhood plan which may contain policies and site allocations additional to those in the Local Plan. The neighbourhood plan is subject to a separate process of consultation and examination. Local Plan allocations to the north-west and east of Cullompton have strategic implications for Mid Devon and neighbouring districts, particularly with regard to impacts on the strategic road network. The Local Plan takes precedence over any neighbourhood plan where strategic policies are concerned.

3.63 The following table summarises the development supply for Cullompton.

Use	Commitments at 31 March ~~2014~~2016	Completions from 1 April 2013 – 31 March ~~2014~~ 2016	Uncommitted Allocations (within the plan period)	Total
Housing (dwellings)	~~199~~209	~~87~~487	~~3,533~~3,118	~~3,819~~3814
Commercial (employment, retail and leisure) square metres floorspace	19,669	3,598	~~66,000~~ 57,000	~~89,267~~ 80,267

Table 15: Development supply in Cullompton

3.64 Six sites are allocated for housing in Cullompton, excluding one contingency site at Colebrook that will be permitted to come forward if the Council's housing supply proves insufficient, as set out in Policy S4. All housing sites are considered achievable in principle, corresponding to a Cullompton map that accompanies this document. Four sites are wholly or partially without planning permission and these are shown below:

Site	Policy	Gross Site Area (ha)	Net site area (ha)	Uncommitted Allocationsed ~~dwellings~~(within the plan period)
North West Cullompton	CU1-6	95	60	~~1,200~~ 1,350
East Cullompton	CU7-12	160	96	~~2100~~1,700
Knowle Lane	CU13	9.8	5.9	30
Ware Park & Footlands	CU14	2.1	1.3	38
~~Exeter Road~~	~~CU15~~	~~1.4~~	~~1.1~~	~~45~~
~~Cummings Nursery~~	~~CU16~~	~~5.3~~	~~3.2~~	~~120~~

Total				~~3533~~3,118

Table 16: Housing allocations, excluding sites/dwellings with planning permission

3.65 Knowle Lane (Policy CU13) has planning permission for ~~285~~ 266 dwellings. Part of the site remains undeveloped and this is represented in Table 16. Similarly Exeter Road (Policy CU15) has permission for 24 dwellings with the remainder shown above; there is uncertainty about the remainder of the site (it was originally allocated for 45 dwellings) and the balance is no longer shown above. Cummings Nursery (Policy CU16) now has commenced construction with permission for 100 dwellings.

3.66 Land for commercial development is allocated within the north-west and east Cullompton urban extensions, and also at Week Farm and Venn Farm in the Kingsmill area.

3.67 The amount of floorspace to be provided by commercial development depends on the use. For instance, office development on multiple floors provides a greater amount of floorspace per hectare than a single-storey warehouse, and some commercial uses require more land for parking than others. Floorspace assumptions for different uses are set out in the methodology for Strategic Commercial Land Availability Assessment (SCLAA), but the Council recognises that this is only a starting point and a higher or lower density of development may be justified depending on the nature of the proposal that comes forward.

Site	Policy	Gross site area (ha)	Net site area (ha)	Floorspace (sq.m)
North West Urban Extension	CU1-6	95	3	~~21,000~~ 10,000
East Cullompton	CU7-12	160	5	20,000
Week Farm	CU17	10.7	8.7	15,000
Venn Farm	CU18	4.4	2.5	~~9,000~~12,000
Total				~~66,000~~ 57,000

Table 17: Allocations for commercial development

Policy CU1

North West Cullompton

A site of 95 hectares to the North West of Cullompton is allocated for mixed use development subject to the following:

a) ~~1200~~ 1350 dwellings with 28% affordable housing to include at least five pitches for gypsies and travellers and provision of extra care housing;
b) 5% of housing to be provided as serviced plots for sale to self-builders;
c) 10,000~~21,000~~ square metres commercial floorspace to include a care home or retirement complex, and other suitable uses such as a hotel or leisure development;
d) Provision of at least 28 hectares strategic green infrastructure;

e) Provision of a road linking Tiverton Road to Willand Road, and transport provision to ensure appropriate accessibility for all modes;
f) Environmental protection and enhancement;
g) Community facilities and primary school to meet local needs arising;
h) Carbon reduction and air quality improvements;
i) An agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development; and
j) Comprehensive Masterplanning of the development including at least two stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document, before any planning application is determined.

3.68 Land to the north-west of Cullompton is currently in agricultural use. The western boundaries are formed by hedgerows, the eastern by Willand Road and the adjoining development. The southern end of the site wraps around the steeper northern and western slopes of St Andrews Hill, its southern edge again formed by hedgerows and development. A stream with a narrow flood plain runs west to east through the site, and another steam forms the boundary at the northern end of the site.

3.69 Development of this site must be carefully planned to ensure that impact on the landscape is minimised through measures such as avoiding the development of higher ground, appropriate landscaping and ensuring that areas at risk of flooding remain undeveloped.

3.70 There are severe traffic congestion problems on Cullompton High Street and at its junction with Tiverton Road, having an adverse effect on air quality, living conditions and the attractiveness of the town centre. This development will be required to provide a road linking Tiverton Road to Willand Road, not only diverting traffic from the new development away from the town centre but also providing an alternative route for other vehicles. Traffic management measures on Willand Road and Tiverton Road will also be required. Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate its impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7.

3.71 This development will also provide affordable housing including at least five gypsy and traveller pitches, contributing to the need identified in the Gypsy and Traveller Accommodation Assessment (2015). Part of the affordable housing provision should comprise extra care housing, which enables older people to live independently in homes that are purpose-built in clusters of 50 units, with 24 hour care and support services available onsite.

3.72 In addition, provision of around 60 serviced plots for self-builders will diversify the choice of housing for potential residents, providing a low cost and reasonably straightforward option for those who wish to build their own home.

3.73 The Council will consider a range of commercial uses on this site, subject to masterplanning. Industrial, warehouse and office development is primarily located on the east side of Cullompton, and not necessarily compatible with housing development, but this is a sustainable location for a number of other employment-generating uses. The site should

include a residential care or nursing home to account for the aging population, or another form of development for the elderly which generates sufficient jobs. Self-contained retirement apartments where there is little or no onsite care will not be considered to constitute commercial development because they do not generate any significant number of jobs, but an extra care scheme or retirement 'village' or complex may be classed as commercial development if there will be a range of facilities and care services onsite. The site may also include other leisure or hospitality uses in addition to community facilities, a new primary school and various forms of open space.

3.74 The Local Plan sets out a framework for the development of North West Cullompton Urban Extension, but leaves many details for later consideration.
The preparation of a masterplan in consultation with stakeholders, including the local community, is an important step in achieving a comprehensive development with wider community benefits. The Council will resist ad-hoc development of phases with no reference to the overall vision and development strategy for the urban extension. The developers will be expected to produce a number of further studies and surveys to support the masterplan and work in partnership with the Council to achieve its adoption as a Supplementary Planning Document.

Policy CU2

North West Cullompton Transport Provision

As part of the development of North West Cullompton, the following transport infrastructure will be provided and funded by ~~at the expense of~~ all new development within the site:

a) Provision of a network of streets linking to the existing highway network, including a through route ~~suitable for buses~~ linking Tiverton Road to Willand Road suitable for buses and all~~wider~~ agricultural vehicles;
b) Provision of bus, pedestrian and cycle routes at appropriate locations throughout the development, creating an attractive, permeable network for non-car modes travelling within, into and out of the area;
c) Cycle and pedestrian links to and from the town centre and within the mixed-use urban extension;
d) Implementation of travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts;
e) Financial contributions to ~~B~~bus service enhancements within, into and out of, the mixed-use urban extension; and
f) Financial contributions to ~~B~~bus service enhancements between Cullompton, Exeter, Tiverton Parkway and Tiverton.
g) Financial contributions towards the Town Centre Relief Road ~~.~~ and traffic management measures on Willand Road and Tiverton Road.
h) Financial contributions towards capacity improvements at junction 28 M5.

3.75 The provision of appropriate transport infrastructure is a key requirement of the development. This can ensure that it is an attractive location for new development, that it minimises the impact on adjoining uses and accords with the need to promote sustainable development. The development will need to mitigate its impact upon capacity at junction 28 of the M5 by financial contribution towards junction improvements. The provision of a road through the site linking Tiverton Road to Willand Road will alleviate traffic congestion at the junction of Tiverton Road and High Street, and in the town centre generally. Combined with bus service enhancements and design which encourages non-car modes of travelling, this should reduce air pollutants in the town centre.

3.76 The development should be served by an attractive, convenient and safe network of sustainable transport routes, including bus, cycle and pedestrian. Streets appropriate for frequent bus routes should be provided so that as far as possible, all buildings are within 400 metres of bus stops. ~~These will need to be designed as part of the masterplanning process.~~ Applications will be expected to respond to these aspirations and as set out in the adopted masterplan SPD for the site. It is equally important that there is access to safe and direct cycle and pedestrian routes within the urban extension, linking together the dwellings, commercial uses and services. This can be achieved through the creation of off-road routes and also by ensuring that streets are designed appropriately for safe walking and cycling.

3.77 The provision of green infrastructure as set out in Policy CU3 will provide opportunities for off-road cycling and walking routes. These should be integrated into existing and proposed networks as far as possible. The creation of additional public rights of way should be examined.

3.78 Developers will be expected to prepare and implement travel plans for the development as a whole and for its constituent parts, to promote non-traditional measures relating to transport that can help minimise the development's carbon footprint and its impacts on air quality.

3.79 ~~As part of the masterplanning exercise~~ Tthe development should be designed to be served by a permeable network of streets providing access to/from the development. This should include a through-route linking Tiverton Road to Willand Road which is suitable for use as a bus route and other traffic bypassing the town centre.

Policy CU3

North West Cullompton Environmental Protection and Green Infrastructure

As part of the development of North West Cullompton, the following environmental protection and enhancement measures will be ~~implemented at the expense~~ provided and funded by ~~of~~ all new development within the site:

a) ~~Measures including a~~A strategic landscaping and tree planting scheme to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;

b) An area of 28 hectares for strategic green infrastructure, laid out and managed with an appropriate mix of public parkland, open space, landscaping and potential local nature reserve ~~and including an extension to the cemetery~~;

c) Areas of equipped and laid out public open space, totalling ~~0.16~~ 0.7 hectares of equipped ~~children's~~ play, ~~0.05 hectares teenage facilities~~, 2.6 hectares amenity open space, 4 hectares for parks, sports and recreation grounds, 0.7 hectares of allotments and 0.1 hectares for a community garden adjoining the health centre;

d) Protection and enhancement where possible of all existing Public Rights of Way;

e) Appropriate provision for sewerage systems serving the development, and provision of a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;

f) Detailed archaeological investigation and measures to record, and where necessary, protect the archaeological interest of the site through appropriate design, layout and mitigation; and

g) Design solutions which respect the settings of listed buildings within and adjoining the site.

3.80 The area proposed as green infrastructure on this site will include land managed for public access and biodiversity, and will provide a new recreation facility for the town. There are a number of potentially species rich hedgerows within the development and further detailed study of these features will be necessary to confirm their potential. The layout of development should promote the continued use of wildlife corridors, including watercourses, acting to prevent their fragmentation and providing appropriate treatment where such corridors cross roads and other linear features. There is potential for off-road cycle and pedestrian routes to follow these features, helping maintain their integrity. The requirement to extend the town cemetery, which adjoins this site, will need to be recognised in the proposals.

3.81 There is an area of flood plain associated with a watercourse running across the site from west to east. There are also a number of small watercourses running through the site for which flood risk and flood zone data is unknown. A flood risk assessment will need to consider the potential of flooding along these watercourses. The layout of the development will need to take this into account. Areas of floodplain should be retained as part of the strategic green infrastructure. The urbanisation of the area has the potential to increase surface water run-off elsewhere, through the loss of permeable surfaces. The inclusion of a sustainable urban drainage scheme (SUDS) approach for the entire development will ensure that there is no additional run-off from the site as a result of development. Critical Drainage Area designation will require a net reduction in rain water runoff which affects parts of Willand Road and adjacent properties. Measures should be put in place to reduce this. Sustainable urban drainage schemes usually involve the provision of ponds, swales and other soft areas which can serve as a dual use for public open space and can be incorporated into wildlife networks. The role of landscaping and tree-planting in flood prevention and carbon reduction should also be recognised in the development. A detailed sustainable drainage strategy together with proposals for ongoing management and maintenance for dealing with surface water must be prepared ~~as part of the masterplanning of the site~~ which builds on the high level approach set out in the adopted masterplan SPD in order to determine the number, size and location of the required SUDS features.

3.82 The development of this site will have an impact on the character of the area. The incorporation of appropriate landscaping and tree planting will act to mitigate this and should be designed to support high quality green infrastructure areas and wildlife corridors. Tree planting will also act to collect carbon dioxide, helping to reduce the overall carbon footprint of the scheme.

3.83 Archaeological investigations in the area have demonstrated the presence of extensive and significant prehistoric and Romano-British sites. The Historic Environment Record notes the presence of prehistoric enclosures and funerary monuments within the area, as well as a findspot of a Saxon metal object and prehistoric flint tools. Development must take account of the setting of the St Andrews Hill Scheduled Monument, a Roman Fort. An archaeological assessment must be undertaken, the results of which should be taken into account during the masterplanning exercise to ensure protection where necessary.

3.84 A number of listed buildings lie within or close to the area. The setting of these will need assessment and protection as part of the layout and design work ~~associated with the masterplanning exercise, or~~ and subsequent planning applications. Careful consideration needs to be given to the design of the new roads through the site linking Tiverton Road to Willand Road. The cemetery and chapels could be closely affected by the road which runs close to the cemetery extension and could be prominent given the topography. Appropriate boundary treatments and screening is critical to mitigate any potential harm.

Policy CU4

North West Cullompton Community Facilities

As part of the development of North West Cullompton, the following community infrastructure will be provided ~~at the expense of~~and funded by all new development within the site:

a) A serviced site of 2.1 hectares for a new primary school at no cost to the Local Education Authority;
b) Construction costs for ~~a~~ 300~~290~~ places that arise from the development to contribute to~~of~~ a 420 place primary school with provision for early years;
c) A site of 1.0 hectare for community uses including provision of a multi-purpose community building; and
d) Contribution towards sporting and leisure facilities.

3.85 The creation of an urban extension requires that residents and workers have access to a range of community facilities within easy walking or cycling distance. This will discourage trips by car for essential local purposes. It is also important that, as far as is possible, the development of the site does not result in unacceptable pressure on existing services and facilities within Cullompton and the surrounding area. This policy sets out the requirements for provision of community facilities within the development site and elsewhere in the town.

3.86 The provision of a new primary school in the urban extension will be required in order to provide local educational facilities for the resident school age children. The policy requires that the land for the school is serviced and provided free of charge to the education authority, within the timing of provision set out in the phasing policy and the adopted masterplan SPD.

3.87 Development of this site will lead to an increase in pressure on existing facilities and demand for new provision. The construction of a community centre and provision of equipped and laid out public open space will be required within the site. The location of community facilities ~~will be considered as part of the masterplanning process~~ has been established within the masterplan for the site, to ensure the highest level of access for residents and other users.

Policy CU5

North West Cullompton Carbon Reduction and Air Quality

The development of North West Cullompton will be required to implement a Carbon Reduction and Low Emissions Strategy ~~at the expense of~~funded by all new development in the site. This will propose measures to minimise the overall carbon footprint of the development, making provision for sources of decentralised onsite renewable or low-carbon energy and ensure that impact of the site on air quality is acceptable, such as:

a) Renewable and low carbon energy to provide a proportion of the site's energy use;
b) Measures to ensure that residents, employees and businesses are encouraged to travel in the most sustainable fashion, including travel plans, information, car clubs, lift-sharing and infrastructure for low emission vehicles;
c) Measures to encourage the sustainable treatment of waste;
d) Measures to manage the impacts of construction;
e) Offsite tree planting where sufficient cannot be accommodated onsite;
f) Energy improvements to existing buildings;
g) Other measures to capture or mitigate carbon emissions and air quality impacts from development.

3.88 The construction and use of buildings has major implications for the use of non-renewable resources. Fifty percent of the UK's carbon emissions come from the construction and operation of the built environment. As the population increases and climate changes, there is a clear need to mitigate and adapt to climate change through effective carbon reduction and other methods.

3.89 The Government has made a commitment to achieving zero carbon housing by 2016, with all emissions from regulated sources such as heating, hot water and lighting to be reduced to zero by this time. While changes to construction are to be introduced through the Building Regulations, Policy CU5 ensures that other methods of carbon reduction are also considered and incorporated into the development where appropriate, such as carbon offsetting, travel plans and design which encourages sustainable ways of living. The combination of planning and building control should ensure a sustainable development that minimises carbon

emissions from both housing and associated transport. Further detail will be required through the masterplanning exercise and subsequent planning applications.

3.90 Cullompton was declared an Air Quality Management Area (AQMA) in 2006 and an Air Quality Action Plan was published in 2010. An assessment of the air quality impact of the potential development proposed in the Local Plan was undertaken in 2014. Findings indicate that no significant cumulative air quality effects, including the impact of the North West Cullompton development is anticipated as a result of the development of sites set out in the Local Plan.

Policy CU6

North West Cullompton Phasing

A phasing strategy will be required for the development of North West Cullompton to ensure that the development and infrastructure come forward in step, minimising the impact of development while ensuring that the development remains viable. The strategy should take account of the following requirements, variation of which will have to be carefully justified. Development shall be subject to the following:

a) Provision of affordable housing will be in broad step with the market housing;

b) Provision of all serviced self-build plots after the 'through route' linking Tiverton Road to Willand Road is operational;

c) Provision of commercial development after the delivery of the first 500 houses and prior to the delivery of the first 800 houses ~~in step with housing~~, at a rate of at least 0.9~~1~~ hectare per 150~~350~~ occupied dwellings thereafter;

d) Provision of 8.8 hectares of strategic green infrastructure including ~~broadly in step with development, with~~ equipped public open space and one playing pitch prior to the occupation of no more than ~~provided at a rate of at least 1 hectare per~~ 500~~200~~ dwellings;

e) ~~Occupation of no more than 400 dwellings before the l~~implementation of local bus service improvements prior to the occupation of no more than 500 dwellings and strategic bus service enhancements phased with development;

f) Occupation of no more than 500~~300~~ dwellings before the opening of a 'through route' linking Willand Road to Tiverton Road and the delivery of traffic management measures on Willand Road;

g) Transfer of ~~serviced~~ land for a primary school together with right of access to the Local Education Authority prior to the commencement of the ~~occupation of any housing~~ development on the site, and transfer of funding for education facilities in instalments; and

h) The necessary sustainable urban drainage features, and linking pipe work is integrated and phased appropriately in step with development and, where required, temporary measures should be taken during construction to protect downstream areas from additional water run-off.

i) Provision of M5 access improvements before any dwellings are occupied and thereafter broadly in step with development.

3.91 The phasing of development will have an important impact on the surrounding area, but it will also impact on the economic viability of the development. The policy sets out the general approach to phasing, with more detail being provided within the adopted masterplan SPD February 2016. ~~However, this will need to be supplemented by a phasing strategy prepared as part of the masterplanning of the development.~~ Legal obligations and planning conditions will be used to control these phasing requirements.

3.92 The provision of transport links and improvements is a key element of the development. In addition to the need to minimise traffic generation from new development, it will also be necessary to carry out improvements to existing infrastructure to ensure that there is sufficient capacity available in order to cope with increased usage.

3.93 The provision of public transport to connect the site to the rest of the town and the wider area is an important part of the strategy to improve the overall sustainability of the urban extension and the town generally. The North West and East Cullompton urban extensions together will generate a significant increase in potential users of public transport. Accordingly, enhancements to the bus service will need to be implemented at an appropriate point in the development, before the occupation of no more than ~~300~~ 500 dwellings.

3.94 The creation of a through route linking Tiverton Road and Willand Road will serve an important function connecting the site to the wider highway network, providing a bus route and serving as a link from south west Cullompton to the north. A through route should be completed before the occupation of the ~~300~~ 500th dwelling. Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate its impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7.

3.95 The development will generate the need for additional primary school provision over and above existing ~~need~~ requirement within the town. To ensure that reliance on car based trips is reduced, it is important to ensure that this is provided within close proximity of new dwellings within the urban extension. It will therefore be a requirement that land is transferred to the Local Education Authority with right of access before ~~any houses are occupied~~ the development commences.

3.96 Commercial development will be provided in step with housing to ensure that facilities for older people and new jobs are delivered alongside the rising population of the town. Affordable housing, including extra care housing and gypsy and traveller pitches, will be provided at a rate of approximately 25%, in step with the market housing. Serviced plots for self-build should not come forward until after the through route linking Tiverton Road to Willand Road has been provided, as the sale of serviced plots will not generate sufficient funds to pay for road infrastructure and it is important not to impede the ability of standard housing development to progress and deliver the road at an early stage.

Policy CU7

East Cullompton

A site of 160 hectares to the East of Cullompton is allocated for mixed use development subject to the following:

a) ~~2100~~ 1,750 dwellings within the plan period and further development of at least ~~500~~ 850 dwellings post-2033;
b) 28% affordable housing to include extra care housing and at least ten pitches for gypsies and travellers, subject to viability;
c) 5% of housing to be provided as serviced plots for sale to self-builders;
d) 20,000 square metres commercial floorspace within the plan period and a further 12,000 post-2033, to include a care home or retirement complex, appropriately scaled retail development and other suitable uses such as offices and a hotel or leisure development;
e) Provision of at least 40 hectares strategic green infrastructure;
f) Transport provision to ensure appropriate accessibility for all modes, including a new or improved access and egress onto the M5 motorway and pedestrian and cycling links across the motorway to the existing town;
g) Environmental protection and enhancement and noise mitigation where necessary;
h) Assessment of land contamination and remediation if necessary;
i) Land and facilities for community use including a new primary school to meet local needs arising;
j) Contributions towards expansion of local secondary education facilities to meet needs arising;
k) Carbon reduction and air quality improvements;
l) Archaeological investigation and appropriate mitigation;
m) An agreed phasing strategy to bring forward development and infrastructure in step and retain the overall viability of development; and
n) Comprehensive Masterplanning of the development including at least two stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document, before any planning application is determined.

3.97 There is currently little development in Cullompton to the east of the motorway. This large area is predominantly agricultural land made up of multiple fields with hedgerows and some mature trees. While the loss of greenfield land is regrettable, Mid Devon is a rural district with insufficient brownfield land to meet the identified housing and employment needs of a growing population. The quality of the agricultural land in this area is mixed, falling predominantly within Grades 3a and 3b, and there are no alternative sites that could deliver this level of development. There are a number of streams on the site but no significant areas of flood plain. The Landscape Appraisal notes that the site is part of an area of gently undulating land, which is difficult to perceive in the surrounding landscape. Although visible from limited locations within the Blackdown Hills AONB to the east and high ground to the north-west of Cullompton, given the low levels of visibility of the site, phased development beginning from the west is acceptable. Nevertheless, development of this site must be carefully planned to ensure that impact on the landscape is minimised through appropriate landscaping and ensuring that areas at risk of flooding remain undeveloped.

3.98 Development in Cullompton is severely constrained by the limited capacity at Junction 28 of the motorway, in addition to traffic congestion and poor air quality in the town centre. This development, in combination with the urban extension to the northwest of Cullompton, presents an opportunity to resolve town centre traffic problems and provide an alternative means of access onto the M5. The Council has been working closely with statutory consultees to ensure emerging proposals for junction 28 M5 improvements are appropriately designed.

3.99 This development will also provide affordable housing including extra care housing and gypsy and traveller pitches, contributing to the needs identified in the Infrastructure Plan, Strategic Housing Market Assessment and the Gypsy and Traveller Accommodation Assessment. In addition, provision of around 130 serviced plots for self-builders will diversify the choice of housing for potential residents, providing a low cost and reasonably straightforward option for those who wish to build their own home. However, the provision of highways infrastructure is fundamental to the delivery of this scheme, and the Council will negotiate on the proportion of affordable housing and self-build plots if necessary to ensure the viability of development.

3.100 The Council will consider a range of commercial uses on this site, subject to masterplanning. The Kingsmill area is a well-established employment centre and further industrial, warehousing and office development may be appropriate where the urban extension adjoins this development and the allocated site at Week Farm. In addition, a development of this size will require small-scale retail development to meet local needs. The site should also include a residential care or nursing home to provide accommodation for the aging population, or another form of development for the elderly which generates sufficient jobs. Self-contained retirement apartments that include little or no onsite care will not be considered to constitute commercial development because they do not provide a significant number of jobs, but a retirement 'village' or complex may be classed as commercial development if there will be a range of facilities and care services onsite. The site may also include other leisure or hospitality uses in addition to community facilities, a new primary school and various forms of open space.

3.101 A masterplanning exercise will be essential to consider all the requirements of the development in more detail, including the phasing of infrastructure. The Local Plan sets out a framework for the development, but leaves many details for later consideration. The preparation of a masterplan in consultation with stakeholders, including the local community, is an important step in achieving a comprehensive development with wider community benefits. The Council will resist ad-hoc development of phases with no reference to the overall vision and development strategy for the urban extension. The developers will be expected to produce a number of further studies and surveys to support the masterplan and work in partnership with the Council to achieve its adoption as a Supplementary Planning Document.

Policy CU8

East Cullompton Transport Provision

As part of the development of East Cullompton, contributions towards or delivery of the following transport infrastructure will be provided by all new development within the site:

a) Provision of mitigation measures to ensure only acceptable impacts occur to J28 of the M5 as a result of traffic generated from the site;
b) Provision of appropriate highway improvements on roads around the development to ensure any unacceptable traffic impacts are mitigated;
c) Reopening of Cullompton Railway Station;
d) Provision of a network of streets linking to the existing highway network, and appropriate mitigation to reduce impacts on the existing road network such as Honiton Road;
e) Provision of bus, pedestrian and cycle routes at appropriate locations throughout the development, creating an attractive, permeable network for non-car modes travelling within, into and out of the area;
f) Safe and attractive cycle and pedestrian links to and from the town centre and within the mixed-use urban extension;
g) Creation of safe and attractive pedestrian and cycle links between the development and the Kingsmill Industrial Estate;
h) Implementation of travel plans and other non-traditional transport measures to minimise carbon footprint and air quality impacts;
i) Bus service enhancements within, into and out of, the mixed-use urban extension, linking to Cullompton town centre;
j) Bus service enhancements between Cullompton, Exeter, Tiverton Parkway and Tiverton.

3.102 The provision of appropriate transport infrastructure is a key requirement of the development. This must ensure that there is sufficient long-term capacity for vehicles travelling onto, off and across the motorway. A well-functioning road network will also ensure that this is an attractive location for new development, minimising the impact on adjoining uses and providing sustainable development that benefits the wider community. The reopening of Cullompton Railway Station is also a key part of the development strategy for revitalisation of the town, attracting inward investment and increasing opportunities for the use of sustainable modes of transport. East Cullompton, as the largest strategic allocation within the plan, is required to make contributions towards the reopening of the station, thereby providing future residents of the site with access to alternative modes of transport. The Council recognises that the high infrastructure costs of this site will not solely be funded by the development. As has been the case on other strategic sized sites, the Council will work with its partners and the development industry to secure external funding to ensure the delivery of the necessary infrastructure.

3.103 The development should be served by an attractive, convenient and safe network of sustainable transport routes, including bus, cycle and pedestrian. Streets appropriate for frequent bus routes should be provided so that as far as possible, all buildings are within 400 metres of bus stops. These will need to be designed as part of the masterplanning process. It is equally important that there is access to safe and direct cycle and pedestrian routes within the urban extension, linking together the dwellings, commercial uses and services. This can be achieved through the creation of off-road routes and also by ensuring that streets are designed appropriately for safe walking and cycling.

3.104 The provision of green infrastructure as set out in Policy CU9 will provide opportunities for off-road cycling and walking routes. These should be integrated into existing and proposed networks as far as possible. The creation of additional public rights of way should be examined.

3.105 Developers will be expected to prepare and implement travel plans for the development as a whole and for its constituent parts, to promote non-traditional measures relating to transport that can help minimise the development's carbon footprint and its impacts on air quality.

Policy CU9

East Cullompton Environmental Protection and Green Infrastructure

As part of the development of East Cullompton, the following environmental protection and enhancement measures will be implemented at the expense of all new development within the site:

a) Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;
b) An area of 40 hectares for strategic green infrastructure, laid out and managed with an appropriate mix of public parkland, open space, landscaping and local nature reserve;
c) Areas of equipped and laid out public open space, totalling 0.4 hectares of equipped children's play, 0.12 hectares for teenage facilities, 6 hectares amenity green space, 9 hectares of parks, sports and recreation grounds, and 1.5 hectares of allotments;
d) Protection and enhancement where possible of existing Public Rights of Way;
e) Appropriate screening and landscaping for properties adjacent to the M5;
f) Appropriate provision of a sewerage system to serve the development and a strategically designed, and phased, Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance; ~~and~~
g) A strategic landscaping and tree planting scheme to mitigate landscape impact, protect the setting of the Blackdown Hills Area of Outstanding Natural Beauty, and enhance biodiversity and the character of development; and
h) Design solutions which respect the settings of listed buildings adjoining the site.~~.~~

3.106 The area proposed as green infrastructure on this site will include land managed for public access and biodiversity, and will provide a new recreation facility for the town. There are a number of potentially species rich hedgerows and mature trees within the site, and further detailed study of these features will be necessary to confirm their potential. The layout of development should promote the continued use of wildlife corridors, including watercourses, acting to prevent their fragmentation and providing appropriate treatment where such corridors cross roads and other linear features. There is potential for off-road cycle and pedestrian routes to follow these features, helping maintain their integrity.

3.107 There are various areas of narrow flood plains associated with watercourses running across the site. For some of the small watercourses, a flood risk assessment will need to consider the potential of flooding as the current extent is unknown. These watercourses do not take up a significant area but the layout of the development will need to take flood plains into account. Areas of floodplain should be retained as part of the strategic green infrastructure providing wildlife corridors to other areas. The urbanisation of the area has the potential to increase surface water run-off elsewhere, through the loss of permeable surfaces. The inclusion of a sustainable urban drainage scheme approach for the entire development will ensure that there is no additional run-off from the site as a result of development. Sustainable urban drainage schemes usually involve the provision of ponds, swales and other soft areas which can serve as a dual use for public open space and can be incorporated into wildlife networks. A strategy for dealing with surface water must be prepared as part of the masterplanning of the site to determine the number, size and location of the required SUDS features. The role of landscaping and tree-planting in flood prevention and carbon reduction should also be recognised in the development.

3.108 The development of this site will have an impact on the character of the area. The incorporation of appropriate screening, landscaping and tree planting will act to mitigate this and should be designed to support high quality green infrastructure areas, ~~and~~ wildlife corridors and noise attenuation. Tree planting will also act to collect carbon dioxide, helping to reduce the overall carbon footprint of the scheme. Two listed buildings are adjacent to the northern boundary of the site. The setting of these will need assessment and protection as part of the layout and design work associated with the masterplanning exercise, and subsequent planning applications.

Policy CU10

East Cullompton Community Facilities

As part of the development of East Cullompton, the following community infrastructure will be provided at the expense of all new development within the site:

a) A site of 2.5 hectares for a new primary school at no cost to the Local Education Authority;

b) A site of 2 hectares for a shopping and community centre, and the provision of a multi-purpose community building for youth, children and other community uses;

c) ~~Construction costs for a 650 place primary school or two 325 place primary schools, including provision for early years education;~~Construction costs for a primary school of at least 630 places plus additional early years provision. The required primary school capacity should be delivered through the provision of either one or two schools;

d) Contributions towards the expansion of secondary education facilities in the local area;

e) Contributions towards the expansion or improvement of local library services; and

f) Contribution towards sporting and leisure facilities.

3.109 The creation of an urban extension requires that residents and workers have access to a range of community facilities within easy walking or cycling distance. This will discourage trips by car for essential local purposes. It is also important that, as far as is possible, the development of the site does not result in unacceptable pressure on existing services and facilities within Cullompton and the surrounding area. This policy sets out the requirements for provision of community facilities within the development site.

3.110 The provision of a new primary school in the urban extension will be required in order to provide local educational facilities for the resident school age children. The policy requires that the land and construction costs for the school are provided to the education authority, within the timing of provision set out in the phasing policy. The development of 2,600 dwellings is expected to give rise to 390 additional secondary school places and a contribution towards the expansion of Cullompton Community College will be required. The Masterplanning of the development will determine the phasing of secondary school contributions.

3.111 The level of community facilities in Cullompton has improved in recent years with the opening of the Hayridge Centre (incorporating the library), Cullompton Community Centre and The Walronds manor house and garden. 2,600 dwellings at East Cullompton will increase the use of these facilities and generate need for additional locally accessible community facilities east of the motorway. In addition to a neighbourhood centre which provides a range of shopping and community facilities, a contribution will be required towards the expansion or improvement of the town library. The need for additional health care provision could be accommodated within the community facilities.

Policy CU11

East Cullompton Carbon Reduction and Air Quality

The development of East Cullompton will be required to implement a Carbon Reduction and Low Emissions Strategy at the expense of all new development in the site. This will propose measures to minimise the overall carbon footprint of the development, making provision for sources of decentralised onsite renewable or low-carbon energy and ensure that impact of the site on air quality is acceptable, such as:

a) Renewable and low carbon energy to provide a proportion of the site's energy use;
b) Measures to ensure that residents, employees and businesses are encouraged to travel in the most sustainable fashion, including travel plans, information, car clubs, lift-sharing and infrastructure for low emission vehicles;
c) Measures to encourage the sustainable treatment of waste;
d) Measures to manage the impacts of construction;
e) Offsite tree planting where sufficient cannot be accommodated onsite;
f) Energy improvements to existing buildings; and
g) Other measures to capture or mitigate carbon emissions and air quality impacts from development.

3.112 The construction and use of buildings has major implications for the use of non-renewable resources. Fifty percent of the UK's carbon emissions come from the construction and operation of the built environment. As the population increases and climate changes, there is

a clear need to mitigate and adapt to climate change through effective carbon reduction and other methods.

3.113 The Government has made a commitment to achieving zero carbon housing by 2016, with all emissions from regulated sources such as heating, hot water and lighting to be reduced to zero by this time. While changes to construction are to be introduced through the Building Regulations, Policy CU11 ensures that other methods of carbon reduction are also considered and incorporated into the development where appropriate, such as carbon offsetting, travel plans and design which encourages sustainable ways of living. The combination of planning and building control should ensure a sustainable development that minimises carbon emissions from both housing and associated transport. Further detail will be required through the masterplanning exercise and subsequent planning applications.

3.114 Cullompton was declared an Air Quality Management Area (AQMA) in 2006 and an Air Quality Action Plan was published in 2010. In Cullompton, it is important to note that exceedances of pollutants are only along Fore Street, near the junction with the High Street and Tiverton Road. In the majority of other areas, pollutant concentrations have been monitored to be well below air quality objectives. An assessment of the air quality impact of the potential development proposed in the Local Plan was undertaken in 2014. Findings from this report indicate that the development of a new community at East Cullompton would not have a significant effect on the Cullompton AQMA. However during the masterplan design of the new community, the potential for air quality effects should be considered, in particular, the distance between the residential properties and the M5 should be selected to avoid adverse air quality impacts. Highway infrastructure improvements should also accompany the development to ensure capacity is increased to limit congestion on the local road network.

Policy CU12

East Cullompton Phasing

A phasing strategy will be required for the development of East Cullompton to ensure that the development and infrastructure come forward in step, minimising the impact of development while ensuring that the development remains viable. The strategy should take account of the following requirements, variation of which will have to be carefully justified. Development shall be subject to the following:

a) Provision of affordable housing will be ~~in~~ broad~~ly~~ in step with the market housing;
b) Provision of all serviced self-build plots after strategic highways infrastructure has been completed;
c) Provision of commercial development in step with housing, at a rate of at least 1 hectare per 500 occupied dwellings;
d) Provision of strategic green infrastructure broadly in step with development, with public open space provided at a rate of at least 1 hectare per 150 dwellings or phased to deliver a larger area of multi-functional public open space at a suitable stage in the development;
e) Implementation of bus service improvements in step with housing development, provided in appropriate instalments;

f) Provision of the first phase of comprehensive M5 access improvements before any dwellings are occupied, followed by strategic highways infrastructure broadly in step with development; and

g) Transfer of serviced land together with right of access for ~~a~~ primary school(s) at no cost to the Local Education Authority prior to the first occupation of residential development, with necessary funding to construct the facilities being paid to the Local Education Authority in appropriate instalments.

3.115 The phasing of development will have an important impact on the surrounding area, but it will also impact on the economic viability of the development. The policy sets out the general approach to phasing. However, this will need to be supplemented by a phasing strategy prepared as part of the masterplanning exercise, which may justify different phasing arrangements following more detailed analysis of infrastructure needs and the viability of development. Legal obligations and planning conditions will be used to control these phasing requirements.

3.116 The provision of transport links and improvements is a key element of the development. In addition to the need to minimise traffic generation from new development, it will also be necessary to carry out improvements to existing infrastructure to ensure that there is sufficient capacity available in order to cope with increased usage. Improved access onto the motorway will be required early in the development at substantial cost, which may cause some delay in the provision of other forms of infrastructure. Devon County Council's Strategic Highways Option Report (2014) sets out an initial assessment of the various elements phasing of transport infrastructure needed to service the site~~. A scheme, referred to in the report and scheduled to be delivered during 2014/15, only provides sufficient capacity for the allocations contained with the previous Local Plan.~~ A signalisation scheme at junction 28 of the M5 was undertaken in 2015. However this scheme does not produce junction capacity to accommodate this development. The first phase referred to in criterion (f) above therefore only relates to the subsequent highway works set out in the Devon County Council report. The Council has been working closely with statutory consultees to ensure emerging proposals for junction 28 M5 improvements are appropriately designed.

3.117 While East Cullompton developers will be expected to pay for most of the infrastructure associated with this development through a Section 106 legal agreement, the Town Centre Relief Road was allocated in the previous Local Plan and was required in response to other developments in and around Cullompton. With the allocation of East Cullompton, a larger area is available within which to locate the relief road as it is proposed as part of the transport mitigation in connection with this allocation.~~ it may now be possible to deliver the relief road on the eastern side of the motorway, possibly as part of the transport mitigation to serve East Cullompton.~~ Dependent on the final route option, the relief road may be either east or west of the motorway. Development contributions are proposed via planning obligations on East Cullompton and NW Cullompton developments. ~~may either by funded by the development of East Cullompton or through the Community Infrastructure Levy.~~ In addition, the Council will seek external sources of funding to help bear the cost of highways works that are needed early in the East Cullompton development, as these are critical to the delivery of this strategic site.

3.118 The provision of public transport to connect the site to the rest of the town and the wider area is an important part of the strategy to improve the overall sustainability of the urban extension and the town generally. The North West and East Cullompton urban extensions together will

generate a significant increase in potential users of public transport, including rail should the provider decide to reopen a station for the town. Enhancements to the bus service will need to be implemented at appropriate points in the development, phased according to the delivery of housing.

3.119 The development will generate the need for additional primary school provision, which may be in the form of one large school or two smaller primary schools delivered at different stages in the development. To ensure that a suitable location for the school is safeguarded early in the development and its construction phased according to arising need, the serviced land should together with right of access be transferred to the Local Education Authority before any dwellings are occupied and its construction costs paid in instalments.

3.120 Commercial development will be provided in step with housing to ensure that jobs and facilities for older people are delivered alongside the rising population of the town. Subject to viability, affordable housing will be provided at a rate of approximately 25%, in step with the market housing. Serviced plots for self-build should not come forward until after strategic highways infrastructure has been provided, as the sale of serviced plots will not generate sufficient funds to pay for new roads and it is important not to impede the ability of standard housing development to progress and deliver the roads at an early stage.

Policy CU13

Knowle Lane

A site of 9.8 hectares at Knowle Lane is allocated for residential development subject to the following:

a) ~~315~~ 296 dwellings with 35% affordable housing;
b) Provision of 2.7 hectares of green infrastructure, to include the retention of land in the floodplain as informal amenity open space;
c) Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;
d) Provision of access route up to and adjoining the existing development to the east of the site and the allocation to the south west (Policy CU14);
e) Provision of at least two points of vehicular access to the site;
f) Provision of cycle and pedestrian links within the development and linking to the wider transport network;
g) Provision of a community building;
h) Implementation of a Travel Plan and other measures to minimise carbon footprint and air quality impacts; and
i) The necessary sustainable urban drainage features, and linking pipe work is integrated and phased appropriately in step with development.
j) Provision of M5 access improvements before more than 266 dwellings are occupied.

3.121 Knowle Lane is a greenfield site located on the west of Cullompton and directly to the west of a development at Knowle Lane known as Kingfisher Reach. The site lies between the southern side of Tiverton Road and Ponsford Lane and the northern side of Knowle Lane. A water course (Crow Green Stream) runs west to east through the central part of the site. The land rises northwards and southwards from the watercourse. The existing boundary is made up of trees and hedges.

3.122 Planning permission has been granted for ~~285~~ 266 dwellings on a large part of the site, with 35% affordable housing. Its delivery is not dependent upon further M5 access improvements. Any revised scheme will be subject to the same affordable housing criteria as previously applied. The remaining part of the site has been confirmed as available and is also likely to come forward in the plan period, a total site commitment of ~~315~~ 296 dwellings. The consented site is considered the primary access route for the remaining part of the site and the adjoining allocation at Ware Park and Footlands (Policy CU14). Any planning applications will need to ensure suitable vehicular access arrangements are provided up to and adjoining the boundary with the adjacent sites in order to avoid the creation of any ransom strips.

3.123 The protection and enhancement of existing green infrastructure should be carried out where possible. This will entail the protection of existing watercourses, hedgerows and trees and the retention of the area of floodplain as an area of informal amenity open space.

Policy CU14

Ware Park and Footlands

A site of 2.1 hectares at Ware Park and Footlands is allocated for residential development subject to the following:

a) 38 dwellings with 28% affordable housing;
b) No development until the road through the North West Cullompton site (Policy CU1) linking Tiverton Road to Willand Road is fully in operation for public use;
c) No development until the significant improvement works associated with the provision of access to the East Cullompton allocation ~~an improvement scheme or mitigation measures~~ have been implemented at M5 Junction 28 ~~to the satisfaction of the Highway Authority and the Highways Agency~~England;
d) Archaeological investigation and appropriate mitigation;
e) Access from adjoining development at Knowle Lane (Policy CU13); and
f) Transport assessment and implementation of a travel plan and other non-traditional transport measures to minimise carbon footprint and air quality impacts.

3.124 This site is located to the west of Cullompton adjacent to the allocated site of Knowle Lane. The site is comprised of agricultural fields and Crow Green Stream runs along the northern boundary. The site is bounded by established hedge boundaries and is relatively flat. Access is only satisfactorily achievable through the Knowle Lane site (Policy CU13).

3.125 A geophysical survey undertaken in support of a planning application in this area identified anomalies within the proposed development site that may represent archaeological features, some of which may be indicative of industrial activity. In the light of the results of the geophysical survey and the presence of prehistoric as well as 18/19th century industrial activity recorded to the east in the adjacent development site, any groundworks associated with the development of this area have the potential to expose and destroy archaeological deposits associated with the known archaeological activity. Archaeological investigation and appropriate mitigation will be required.

3.126 Knowle Lane, by reason of its width and alignment, is unsuitable to accommodate additional traffic. Therefore, access to the site should instead be taken through the Knowle Lane allocation (Policy CU13) unless the road can be widened to the satisfaction of the Highway Authority. Development in this location will impact on Cullompton Air Quality Management Area and will require mitigation.

3.127 The site will also impact on the capacity of Junction 28 of the M5 motorway which at present cannot accommodate the additional trips generated by this development. Significant improvement works, including provision of a new overbridge, are proposed ~~programmed~~ to provide additional junction capacity and access to the East Cullompton allocation (CU7-CU12). Once completed, these works should ~~An improvement scheme, being developed by Devon County Council is scheduled to be delivered during 2014/15 and should~~ provide the additional capacity required. There are also issues with the capacity of Tiverton Road, and specifically the junction with the High Street to accommodate additional levels of traffic. The delivery of a new road through the North West Cullompton site (Policy CU1-CU6), linking

Tiverton Road to Willand Road, will allow local traffic to be distributed more widely around the road network. To avoid an unacceptable impact on both the M5 and the local road network in the short term, this site should only come forward upon completion of both the M5 improvements and the North West Cullompton through road.

Policy CU15

Land at Exeter Road

A site of 1.4 hectares at Exeter Road is allocated for residential development, subject to the following:

a) ~~45~~ 24 dwellings with 28% affordable housing;
b) Transport assessment and implementation of a travel plan and other non-traditional measures to minimise carbon footprint and air quality impacts; and
c) Archaeological investigation and appropriate mitigation.

3.128 The site consists of land to the south of the housing at the former Toad Hall, extending between the steep hillside to the west and Exeter road to the east. Two dwellings in large grounds make up a portion of the site, together with an area of underdeveloped open field between and behind them. A bowling club is located in the middle of and surrounded by the site. Planning permission has been granted for 24 dwellings, though potentially the site could accommodate more subject to sufficient capacity being available at J28 of the M5. ~~The site can accommodate 45 dwellings, of which 28% will be affordable.~~

3.129 The site lies in an area of known prehistoric activity. Any planning application for development here should be supported by an appropriate programme of archaeological work to allow the significance of any below-ground heritage assets with an archaeological interest to be understood along with the potential impact of any development upon them.

Policy CU16

Cummings Nursery

A site of 2.78 hectares at Cummings Nursery is allocated for residential development, subject to the following:

a) ~~120~~ 100 dwellings with ~~35~~30% affordable housing;
b) Retention of land in the floodplain as green infrastructure and informal amenity open space;
c) Appropriate noise mitigation and sound proofing to minimise the impact of the adjacent motorway;
d) Archaeological investigation and appropriate mitigation; and

e) Transport assessment and implementation of a travel plan and other non-traditional measures to minimise carbon footprint and air quality impacts.

3.130 This site comprises a former horticultural nursery located on the edge of Cullompton on the eastern side of the motorway. The site is covered by disused greenhouses. The site has ~~outline~~ reserved matters permission for ~~120~~ 100 dwellings including ~~35~~30% affordable housing~~, but has not yet commenced construction~~. Any revised scheme for the site will be required to achieve the same level of affordable housing as previously agreed, unless viability evidence proves that this is no longer possible. Any revised scheme proposing additional housing numbers will be subject to capacity at junction 28 of the M5.

3.131 The site lies between the flood plains of the River Culm (and the M5 corridor) and the Culm Lea/Riverside Drive housing estate with vehicular access direct from Honiton Road. The site is relatively level, falling away to the flood plain to the west. There is a mature native hedgerow along the western boundary that separates the site from an area of open space that drops down into the flood plain.

3.132 The dwellings are proposed to be erected following the demolition of the existing commercial greenhouse buildings on the site, clearance of other infrastructure and remediation of the site. The site has fallen into a state of dereliction as it has not been actively used for over 10 years. The new vehicular access is proposed from a position at the junction between Culm Lea and Riverside Drive.

3.133 The proposed development site lies in a landscape where prehistoric and Roman activity is recorded in the Historic Environment Record. The northern part of the site has probably been disturbed by the construction of the greenhouses, but the southern part still has potential for containing archaeological deposits. Archaeological investigation and mitigation will be required.

Policy CU17

Week Farm

A site of 10.7 hectares is allocated for employment development, subject to the following:

a) 15,000 square metres of employment floorspace within use classes B2-B8;
b) Provision of a vehicular link from the Kingsmill employment area to Honiton Road;
~~**c) Development shall not commence until the completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway;**~~
~~d~~c) Archaeological investigation and appropriate mitigation;
d~~e~~) Protection and enhancement of the existing Public Right of Way;
e~~f~~) Transport assessment and implementation of a travel plan and other non-traditional measures to minimise carbon footprint and air quality impacts; ~~and~~

f~~g~~) Provision of 2 hectares of green infrastructure to include the retention of land in the floodplain, providing a landscape buffer to the west of the site as an area of informal open space; and~~.~~

g) Provision of M5 access improvements before any commercial floorspace is brought into use.

3.134 The site is located east of the M5 motorway, adjacent to an existing area of significant employment development. The site could accommodate approximately 15,000 square metres of employment floor space. This is a lower density than would be expected for employment uses generally and is comparable to that anticipated on the consented adjacent site.

3.135 The site is allocated for B2-B8 use. However, the Council will consider proposals for alternative employment-generating uses on their merits. Development in this location will increase pressure on the motorway junction. Signalisation ~~Development should not commence until improvement~~ works ~~programmed~~ at M5 Junction 28 ~~are complete~~were undertaken in 2015. Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate it's impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7. A transport assessment to accompany a planning application would need to consider the impacts on the local and strategic road network including Junction 28 of the M5.

3.136 This site lies within a landscape that has evidence of prehistoric and Roman activity recorded in the Devon County Historic Environment Record. To the west, recent archaeological work has demonstrated the presence of prehistoric and Roman settlement in and around Cullompton. There is potential for the site to contain archaeological deposits associated with the known prehistoric and Roman activity in the vicinity, so archaeological investigation and appropriate mitigation will be required.

3.137 In order to improve accessibility the site will enable the creation of an additional point of access linking the site itself, along with the wider Kingsmill employment area, to Honiton Road. This is seen as an important advantage of the development of the site that will help to relieve pressure on the existing access to the area.

3.138 The site is bounded to the west by the River Ken and its associated floodplain. Development of the area of floodplain should be avoided and retained as green infrastructure, which may be designed into the development as an informal recreational area for those working at the site.

Policy CU18

Venn Farm

A site of 4.4 hectares is allocated for employment development, subject to the following:

a) ~~9,000~~12,000 sqm of employment floorspace within use classes ~~B2~~ B1-B8;
b) Suitable vehicular access which directs traffic to and from the site via Saunders Way;
~~c) Development shall not be commenced until the completion of improvements to M5 Junction 28 through signalisation of the slip roads east of the motorway;~~
c~~d~~) Archaeological investigation and appropriate mitigation;
d~~e~~) Transport assessment and implementation of a travel plan and other non-traditional measures to minimise carbon footprint and air quality impacts;
~~f~~e) Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside; ~~and~~
f~~g~~) Retention of areas within the floodplain as green infrastructure; and~~.~~
g) Provision of M5 access improvements before any commercial floorspace is brought into use.

3.139 Planning permission was granted in March 2015 for 12,000 sq m of B1, B2 and B8 floorspace. A reserved matters planning application has been submitted for part of the site. The site is located adjacent to the existing Kingsmill Industrial Estate on the east side of the M5 Motorway. The site is well contained by natural features comprising existing development to the south, the River Culm to the west and an existing track and road to the north and south east. The land to the north and east is low lying agricultural land and to the south is the remainder of the industrial estate. The western boundary is defined by the River Culm which is separated from the M5 motorway by low lying pasture which is predominantly within the river flood plain.

3.140 Signalisation ~~Planned improvement~~ works to Junction 28 were undertaken in 2015.~~will accommodate development at Venn Farm and the~~ Highways ~~Agency~~England has removed a holding direction that previously prevented the development from taking place. Devon County Council queue length monitoring at junction 28 of the M5 motorway indicates congestion at the AM peak. The development will need to mitigate it's impact upon the junction's capacity through implementation of an improvement scheme, either to the existing junction or in the form of more extensive junction improvement works involving a second overbridge required in connection with development east of Cullompton under policy CU7. Planning permission already granted does not include this requirement however it would apply to any new full or outline applications. Access is achievable via Saunders Way, avoiding increased use of Kingsmill Road.

3.141 This site lies in an area of archaeological potential and within a floodplain of the River Culm. Ground disturbance in this area may expose archaeological and palaeoenvironmental deposits, so archaeological investigation and appropriate mitigation will be required. Development should provide a habitat buffer in the floodplain and avoid any development within the floodplain unless the sequential test required by national policy has been met.

Policy CU19

Town Centre Relief Road

A relief road, providing traffic relief to the town centre, will be provided subject to the following:

a) Public consultation exercise before the route of the road is determined;
b) Provision of replacement open space and sporting facilities elsewhere in Cullompton if these are affected;
c) Provision of a shared use foot and cycleway; ~~and~~
d) Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network on the affected alignment and linking to the surrounding countryside. Appropriate noise measures to mitigate the effects from the relief road including the provision of landscaping~~Provision of landscaping to mitigate the effects of noise from the relief road; and.~~
e) Archaeological investigation and appropriate mitigation.

3.142 The Town Centre Relief Road, previously known as the Eastern Relief Road, is an integral part of the development strategy for Cullompton, designed to relieve traffic through the town centre in conjunction with a road through the North West urban extension to link Tiverton Road to Willand Road. The evidence in 2010 concluded that a new road to the east of the town centre is essential if the objectives of traffic relief, air quality improvement and with it town centre enhancement, are to be achieved. It is also important since ~~the~~ the town centre acts as a strategic relief route for the M5 during closures resulting in significant congestion. Careful consideration will need to be taken in finalising the route, which could be located either side of the motorway. The aim will be to cause minimum impact on the CCA fields and acceptability in terms of flood risk and flood flows.~~.~~ Devon County Council is producing a Flood Risk Assessment and will consult on the options for the exact route of the road should the final route impact on the loss of sports or open space, replacement provision will need to be made available in a suitable location. At the planning application stage, safety measures such as the closure of the relief road via an automated system prior to its flooding may need to be considered. The Council has been working closely with statutory consultees to ensure emerging proposals for junction 28 M5 improvements are appropriately designed.

3.143 Cullompton is facing the same traffic issues now as it was when the previous Local Plan was being prepared. Additional housing development has now taken place at Knowle Lane and Tiverton Road, contributing to Junction 28 improvements and funding for the Town Centre Relief Road, but work on the road has not yet commenced. The delivery of the road depends upon the delivery of the North West and East urban extensions and development elsewhere. The road is likely to be funded by either developer contributions or Community Infrastructure Levy as well as external sources of funding sought by the Council.

3.143a If the final route of the road is located on the western side of the motorway, there is the potential for impact on the settings of nearby listed buildings and the Cullompton conservation area. The extent of any impact will depend on the road's design and elevation above the flood plain, and therefore the final scheme will need to incorporate design solutions which

mitigate such impacts. The site also lies in an area known to have been occupied since at least the Roman era, the area potentially containing archaeological deposits from this period onwards. Archaeological investigation and mitigation will therefore be required.

Policy CU20

Cullompton Infrastructure

The Council will promote the reopening of the Cullompton Railway Station. A site for a new railway station north of Station Road is allocated for this purpose.
The Council will use developer funding via planning obligations and the Community Infrastructure Levy ~~and planning obligations~~ where appropriate, seek external sources of funding and work with partners to deliver the following infrastructure for Cullompton:

a) Provision of a Town Centre Relief Road and implementation of other measures in the Cullompton Air Quality Action Plan;
b) Mitigation to reduce traffic impacts on the Trunk and Local Road network in association with the East Cullompton Urban Extension and other Cullompton allocations;
c) Town centre regeneration and enhancement;
d) Extra care housing provision;
e) Expansion of library facilities;
f) Primary and secondary education facilities;
g) Public open space and green infrastructure;
h) Bus service enhancements;
i) Provision of railway and bus interchange;
j) Expansion of emergency fire and rescue services;
k) Provision of healthcare facilities; ~~and~~
l) Community facilities including sports and leisure facilities; and
m) ~~.~~Provision of works to reduce flood risk.

3.144 Strategic Local Plan sites will be required to pay for specific items of infrastructure that are necessary to make the development acceptable via planning obligations. Other development (if eligible) will be charged the Community Infrastructure Levy (CIL) at a rate per square metre. CIL funds will be spent according to a prescribed list of infrastructure projects or types of infrastructure.

3.145 The Council's strategic infrastructure policy is set out earlier in the Local Plan under Policy S8, but there are infrastructure requirements specific to Cullompton that are listed under Policy CU20. The Council will use CIL, planning obligations for strategic sites and other sources of funding to deliver the infrastructure listed wherever possible. Where another organisation is responsible for delivering the infrastructure required as a result of new development, the Council will work in partnership with the relevant bodies to ensure that infrastructure needs associated with development are addressed appropriately.

3.146 The Local Transport Plan includes a long-term aspiration to reopen Cullompton Railway Station. The Local Plan allocates land north of Station Road as a possible site for the new station, including land for a car park. There is also an aspiration to provide a bus interchange for the town which could be provided in the same location. The Council will work with Devon County Council and other partners to achieve this objective.

Policy CU21

Land at Colebrook CONTINGENCY SITE

A site of 4.8 hectares at Colebrook is identified as a contingency site for residential development to be released in accordance with Policy S4, subject to the following:

a) 100 dwellings with 28% affordable housing;
b) The development shall not commence until ~~the Town Centre Relief Road has been provided;~~completion of the North West Cullompton through route linking Tiverton Road to Willand Road;
c) Provision of two points of access from Siskin Chase;
d) Provision of 1.1 hectares of green infrastructure, to include the retention of land in the floodplain as informal amenity open space and for Sustainable Urban Drainage provision;
e) Measures to protect and enhance trees, hedgerows and other environmental features which contribute to the character and biodiversity, maintaining a wildlife network within the site and linking to the surrounding countryside;
f) Archaeological investigation and appropriate mitigation; and
g) Transport assessment and implementation of travel plans and other measures to minimise carbon footprint and air quality impacts.

3.147 The site is currently used for agricultural land and is adjacent to the Cullompton settlement limit. Colebrook Lane bisects the site, and the field boundaries and edging of the site are mainly comprised of hedgerows and trees. The site is fairly flat from Colebrook Lane to the south, but gently slopes towards the west, with land rising to the north.

3.148 This site is identified as a contingency site, to be released in accordance with Policy S4. Whilst the site is considered deliverable it is not allocated as one of the main sites for Cullompton as other allocations are strategically preferable, being of a size and location to deliver significant highways improvements which benefit the whole town.

3.149 ~~If this site comes forward for development, it must contribute to the provision of offsite highways infrastructure.~~ Development in this location has the potential to place pressure on the capacity of both the strategic and local road network. Devon County Council has therefore stipulated that development should only take place providing there is sufficient network capacity. If released, the site will need to be phased to come forward after further ~~access to~~ M5 access improvements are implemented. Any application for development must undertake an assessment of the impact of the proposal on both the capacity of the local road network and Junction 28 of the M5 and permission will only be granted where there are no significant adverse impacts which cannot be mitigated. Site commencement will also need to be deferred until after the icompletion of the through route linking Willand Road to Tiverton Road, which is being provided as part of the North West Cullompton allocation. The site is

expected to contribute to the provision of off-site highways infrastructure. ~~Development in this location would increase traffic through the town centre, so would not be permissible until the Town Centre Relief Road has been provided, offering an alternative route.~~ The development would also be expected to provide two points of access from Siskin~~s~~ Chase.

3.150 There is an area of floodplain on the southern edge of the site and it is proposed that this is incorporated into the 1.1 hectares of Green Infrastructure. Measures will also be necessary to protect existing environmental features including trees, hedgerows and the stream.

3.151 Archaeological investigations in the vicinity have demonstrated the presence of extensive and significant prehistoric and Romano-British sites. The Historic Environmental Record suggests areas of a prehistoric funerary monument occupying the valley floor. An archaeological assessment will need to be undertaken, the results of which should be taken into account during the detailed planning of the site to ensure protection where necessary.

This page is intentionally left blank

Crediton

3.152 The development strategy for Crediton is set out in Policy S12. The following table summarises Crediton's supply of housing and commercial development.

Use	Commitments at 31 March ~~2014~~2016	Completions from 1 April 2013 – 31 March ~~2014~~2016	Uncommitted Allocations	Total
Housing (dwellings)	~~216~~245	~~58~~107	~~633~~583	~~907~~935
Commercial (employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)	551	3,598	9,820	13,969

Table 18: Development supply in Crediton

3.153 Nine housing sites are allocated in Crediton, including Wellparks ~~and Red Hill Cross~~ which ~~have~~ has planning permission. All housing sites are considered achievable in principle, corresponding to a Crediton map that accompanies this document. Sites without planning permission are shown in Table 19 below:

Site	Policy	Gross Site Area (ha)	Net site area (ha)	Local Plan allocations
~~Wellparks~~	~~CRE1~~	~~7.9~~	~~4.74~~	~~185~~
Red Hill Cross	CRE2	3.1	1.86	135
Cromwells Meadow	CRE3	2.4	1.44	35
The Woods Group	CRE4	0.17	0.17	8
Pedlerspool	CRE5	23.5	14.1	200
Sports Fields	CRE6	5.5	3.3	120
Stonewall Lane	CRE7	3.2	1.92	50
Land at Barn Park	CRE8	1.64	1.3	20
Land off Alexandra Close	CRE9	0.63	0.504	15
Total				~~768~~583

Table 19: Housing land supply

3.154 Two sites in Crediton are expected to deliver commercial floorspace during the plan period. The amount of floorspace to be provided by commercial development depends on the use.

For instance, office development on multiple floors provides a greater amount of floorspace per hectare than a single-storey warehouse, and some commercial uses require more land for parking than others. Floorspace assumptions for different uses are set out in the methodology for Strategic Commercial Land Availability Assessment (SCLAA), but the Council recognises that this is only a starting point and a higher or lower density of development may be justified depending on the nature of the proposal that comes forward.

Site	Policy	Gross site area (ha)	Net site area (ha)	Floorspace (sq.m)
Wellparks	CRE1	22.9	1.2	2,220
Land south of A377	CRE10	2.6~~1.9~~	~~1.9~~2.6	7,600
Total				9,820

Table 20: Allocated sites for commercial development

Policy CRE1

Wellparks

A site of 22.9 hectares at Wellparks, A377 is allocated for residential and commercial development subject to the following:

a) 185 dwellings with 28% affordable housing on 7.9 hectares;
b) 2,220 square metres of commercial floorspace in the south east part of the site;
c) 15 hectares of Green Infrastructure on the upper slopes of the site;~~ and~~
d) Layout, design and landscaping that reflects the sloping, visible nature of the site, locally distinctive design and the need to protect the setting of Downes Historic Park and Garden and respect the character and setting of the listed buildings at Wellparks and Downes House; and~~.~~
e) Improved pedestrian and cycle access to the town centre and facilities to the south of the A377

3.155 This site is to the south east of Crediton and is adjacent to the new Crediton Link Road to the east and Crediton Conservation Area to the west. This prominent wooded hillside gives character and an attractive skyline to the eastern half of the town. The development of the site, even though it is on the lower southern edge of the hillside, would have an impact on the rural views to the south of the town, requiring careful design and mitigation.

3.156 Planning permission has been granted for 185 dwellings, including 27.5% affordable housing. The policy provides the criteria to be applied as a starting point, should any revised scheme be submitted.

3.157 Due to the constraints of the site in respect of the Local Historic Park and Garden, adjoining listed buildings and a number of large trees that are interspersed in the development, a lower than usual density is assumed. In respect of the impact on the landscape, this will require careful treatment.

3.158 A small watercourse runs along the boundary of the site. A flood risk assessment will need to consider the potential for flooding. An onsite Sustainable Urban Drainage Scheme will require implementation to negate any increase in flood risk and ensure that there is no additional run-off from the site as a result of development. Sustainable drainage is a standard requirement under Policy DM1.

Policy CRE2

Red Hill Cross, Exhibition Road

A site of 3.1 hectares at Red Hill Cross is allocated for residential development subject to the following:

a) 135 dwellings with 28% affordable housing;
b) Layout, design and landscaping that reflect the local distinctiveness, the visibility of the site and its sloping nature;
c) Improved access to the town centre for pedestrians and cyclists~~Provision of a safe and convenient footpath from Old Tiverton Road to the footway on the southern boundary of the site on Exhibition Road~~; and
d) Land for a 0.4 hectare extension to Crediton cemetery.

3.159 ~~This site has outline planning permission for 135 dwellings with 22% affordable housing, but has not yet commenced. The policy provides the criteria to be applied as a starting point, should any revised scheme be submitted.~~ The site previously had outline planning permission for 135 dwellings with 22% affordable housing, however the permission lapsed in 2016. It is understood that delivery of the site is likely to take place after the Pedlerspool allocation has received permission with options for joint access being considered.

3.160 The site is in a prominent position, which is visible from historic Shobrooke Park to the east. Detailed design and development which respect local distinctiveness, including a generous landscape margin on the east facing side of the site will mitigate any potential impact.~~The site is in a prominent location but detailed design and development respecting local distinctiveness will mitigate this.~~

3.161 ~~For the safety and convenience of pedestrians, a footpath is required from the access to the site to link to the existing footway on the southern boundary of the site on Exhibition Road.~~ The development will also be expected to provide improved access to the town centre for pedestrians and cyclists with scope for improvements along Exhibition Road. The development will need to contribute towards these and other improvements to the local pedestrian and cycle way network. A comprehensive approach to pedestrian and cycle route improvements should be taken in relation to allocations CRE2 Red Hill Cross, CRE5 Pedlerspool and CRE6 Sports Fields all on Exhibition Road. In addition, there is an identified need for an extension to Crediton cemetery which can be secured through the development of this site.

Policy CRE3

Cromwells Meadow

A site of 1.3 hectares at Cromwells Meadow is allocated for residential development subject to the following:

a) 35 dwellings with 28% affordable housing; and
~~a)~~b) Archaeological investigations and appropriate mitigation measures. ~~.~~

3.162 The site lies to the east of Crediton with residential development to the west and agricultural land to the east of the site. Vehicular access into the site can be achieved from Willow Walk. Appropriate landscaping will be required along the eastern boundary given the potential visibility of the site from historic Shobrooke Park.

3.163 There is an area of floodplain on the eastern boundary of the site. The layout of the development will need to take this into account. The urbanisation of the area would have the potential to increase surface water run-off elsewhere, through the loss of permeable surfaces. Sustainable drainage is a standard requirement for new development under Policy DM1. The site also lies in an area of archaeological potential on the western edge of the floodplain. Archaeological investigation and appropriate mitigation will be required.

Policy CRE4

Woods Group, Exeter Road

A site of 0.17 hectares at Woods Group is allocated for residential development subject to the following:

a) 8 dwellings;
b) Mitigation for potential onsite air quality issues with specific design to prevent worsening of air quality on Exeter Road and to avoid potential air quality issues for occupants; and
c) Design which respects the character and setting of adjoining listed buildings and the Conservation Area.

3.164 This is a small brownfield site within the built up area of Crediton and is suitable for redevelopment. It is located towards the south of Crediton and is currently occupied by a number of structures and scrap.

3.165 The design of the site is important as the site lies in part within the Conservation Area and adjoins listed buildings. ~~.~~ ~~–~~whilst the site contains a number of unlisted buildings of strong traditional local character. The retention and conversion of these buildings would enhance the character of the conservation area. The loss of these buildings would be considered unacceptable without special justification.

Policy CRE5

Pedlerspool, Exhibition Road

A site of 21 hectares at Pedlerspool, Crediton, is allocated for residential development subject to the following:

a) 200 dwellings with 28% affordable housing including at least five pitches for gypsies and travellers;

b) A serviced site of 1.1 hectares for a new primary school; ~~Extra care housing comprising at least 25 units;~~

c) A suitable site for the relocation of Crediton Rugby Club;

d) A phasing strategy which ensures that sites for the sports pitches, affordable housing and gypsy and traveller pitches are delivered broadly in step with the housing development, and the school is transferred to the local education authority at a timetable agreed with Devon County Council; ~~A phasing strategy which ensures that extra care housing and a site for sports pitches are delivered broadly in step with the housing development;~~

e) Layout, design and landscaping, including planting on the riverside that reflects the local distinctiveness and its sloping nature;

f) The protection of the setting of Creedy Historic Park and Garden and the wider area, including the upper slopes to south and west for Green Infrastructure and landscaping;

g) Facilitation of access to local bus routes via sustainable travel modes including possible extension of service;

h) Provision of suitable access arrangements from the A3072 and appropriate highway improvements along Stonewall Lane and Old Tiverton Road;

i) Improved access to the town centre for pedestrians and cyclists;

j~~i~~) Protection and enhancement of trees subject to Tree Preservation Orders within and adjoining the site; and

k~~j~~) An archaeological investigation and mitigation scheme.

3.166 This site falls within Sandford Parish, but will provide for the strategic growth of Crediton as it adjoins the settlement boundary. This site forms a large agricultural holding to the north east of Crediton and is bisected by a road running roughly through the middle. The site is bounded on three sides by country roads to the east, south and west.

3.167 Devon County Council has identified that there is a need for a new primary school in Crediton. Both existing schools are on constrained sites and are being expanded to their maximum potential. This site is a suitable location for a new school, given that the north east part of the town is the focus of growth and provides the opportunity to balance the distribution of schools in Crediton, thereby reducing travel distances for future and existing residents of this part of the town. Given that the need for the school arises from the wider growth of Crediton, the Pedlerspool allocation will not be expected to meet the full costs of providing the facility. The actual cost to the development and the timing of the transfer will be subject to negotiation between the landowner/developer, Mid Devon District Council and Devon County Council as Local Education Authority. The school should be provided within the site in lieu of an employment use which was included in a previous Local Plan policy. Commercial uses would still be considered on this site in addition to the school should a proposal demonstrate a

suitable relationship between housing, commercial and community uses. ~~A need has been identified in Crediton for 25 extra care housing units. These should be provided within the Pedlerspool site in lieu of an employment use which was included in a previous Local Plan policy. Commercial uses would still be considered on this site in addition to extra care housing, should a proposal demonstrate a suitable relationship between housing and commercial uses.~~

3.168 This site will provide an alternative location and improved facilities for the Crediton Rugby Club, allowing for housing development on the site of existing sports field to come forward (Policy CRE6).

3.169 The character of the local registered Historic Parkland at Creedy Park needs to be protected and the tree boundary protected and softened with native species. A buffer of trees should be provided around and within this site. Planting along the Park boundary should reflect the historic planting to extend and soften the transition into Green Infrastructure proposed on the floodplain area to the east.

3.170 Highway mitigation measures will need to be provided to offset the impact of developing the site. In particular there is the potential for cumulative highway impacts on the local road network arising from the development of this site and the nearby Stonewall Lane allocation. A Transport Assessment will need to be provided, which comprehensively assesses the transport issues related to development of the site, taking into account the potential cumulative impact of nearby allocations. A number of highway improvements are likely to be needed as a result. In particular there will need to be a realignment of the carriageways of Old Tiverton Road and the A3072 most likely requiring a roundabout design. Improvements will also be required at the junctions of Old Tiverton Road/Stonewall Lane and Pounds Hill/Stonewall Lane. Both Stonewall Lane and Old Tiverton Road are tree-lined in part, and therefore cannot be widened where they adjoin the site boundary without significant loss in tree cover. Instead, improvements to passing places along both Stonewall Lane and Old Tiverton Road should be provided. The development will also be required to provide improved access to the town centre for pedestrians and cyclists with scope for improvements along Exhibition Road. The development will need to contribute towards these and other improvements to the local pedestrian and cycle way network. A comprehensive approach to pedestrian and cycle route improvements should be taken in relation to allocations CRE2 Red Hill Cross, CRE5 Pedlerspool and CRE6 Sports Fields all on Exhibition Road.

3.171 The River Creedy flows to the east of the site. Hydrological and hydraulic assessment should be undertaken to verify the flood extent. The results of the modelling will inform the location of different uses on the site, directing residential development to areas of lowest flood risk. This will need to be set out in a Flood Risk Assessment and accompanying drainage strategy.~~A small watercourse runs along the southern boundary of the site. A flood risk assessment will need to consider the potential for flooding. An onsite Sustainable Urban Drainage Scheme will require implementation to negate any increase in flood risk. Sustainable drainage is a standard requirement of Policy DM1.~~

3.172 The site lies within an area of archaeological potential. Investigation and potential mitigation may be needed.

Policy CRE6

Sports fields, Exhibition Road

A site of 5.5 hectares at the sports fields, north and south of Exhibition Road, is allocated for residential development, subject to the following:

a) 120 dwellings with 28% affordable housing;
b) Relocation of the rugby club and associated pitches to a suitable alternative site before development is commenced;
c) Provision of a Transport Assessment to assess the need for a right turn lane into the northern part of the site;
d) Improved access to the town centre for pedestrians and cyclists; and
ed) Archaeological investigation and appropriate mitigation.

3.173 The site comprises the club house, main pitch and a number of training pitches currently used by Crediton Rugby Club. A site for the relocation of the club has been identified within the Pedlerspool site (Policy CRE5), freeing up this site for residential development. However, should the Pedlerspool site not come forward, another suitable alternative site for the rugby club and training pitches will need to be found before this allocation can be developed. The replacement sports facilities should result in no net loss in provision.

3.174 The part of the site to the south of Exhibition Road is flat with good access from the A3072, whilst the area to the north is steep adjoining the road, which has implications for design, layout and access. A right turn lane may be required in order to access the northern part of the site, the need for which should be identified by a Transport Assessment to be submitted by the applicant. The provision of secondary points of access will be necessary for both parts of the allocation, though it is acknowledged that achieving this may result in the loss of some of the trees which currently adjoin the north side of Exhibition Road.

3.174a The development will also be required to provide improved access to the town centre for pedestrians and cyclists with scope for improvements along Exhibition Road. The development will need to contribute towards these and other improvements to the local pedestrian and cycle way network. A comprehensive approach to pedestrian and cycle route improvements should be taken in relation to allocations CRE2 Red Hill Cross, CRE5 Pedlerspool and CRE6 Sports Fields all on Exhibition Road.

3.175 The site lies within an area of archaeological potential. Investigation and potential mitigation may be needed.

Policy CRE7

Stonewall Lane

A site of 3.2 hectares at Stonewall Lane is allocated for residential development subject to the following:

a) **50 dwellings with 28% affordable housing;**
b) **Relocation of playing fields to a suitable alternative site before development is commenced;**
c) **Layout, design and landscaping which reflects the elevated, visible nature of the site;**
d) **Diversion of Stonewall Lane through the site to Jockey Hill and widening of Stonewall Lane along its frontage and replacement of boundary landscape;**
e) **Provision of pedestrian crossing facility from the site to existing footpath network on Jockey Hill; and**
f) **Archaeological investigation and appropriate mitigation.**

3.176 The site is located on the north side of Crediton, within the settlement limit. It is currently used as playing fields owned by the Queen Elizabeth Academy Trust, which runs the school in Crediton. The site comprises two football pitches which the school considers too remote for effective daily use. The school has stated an intention to use the proceeds from the sale of the site to substantially reinvest in their Barnfield campus which will result in an increase in playing field capacity at that site. The redevelopment of playing fields needs to be closely controlled to ensure there is no net loss in playing provision. As a result the delivery of adequate alternative sports provision would need to be secured before development is commenced on the existing sports fields. Any new provision would need to match or exceed the sports land being lost, whether in terms of quantity, quality or both.

3.177 The site is elevated and visually prominent, offering wide views to the south. Any scheme for the redevelopment of the site would need to ensure adequate landscaping is provided to mitigate any landscape or visual impacts, as well as any heritage impacts associated with the adjoining Creedy Park. High quality design will be required in accordance with Policy DM1. There is the potential for cumulative highway impacts on the local road network arising from the development of this site and the nearby Pedlerspool allocation. A Transport Assessment will need to be provided, which comprehensively assesses the transport issues related to development of the site, taking into account the potential cumulative impact of nearby allocations. Stonewall Lane, which runs along the northern boundary of the site is narrow, whilst the junction where it meets Jockey Hill is sub-standard and has limited visibility, being located close to the crest of the hill. Stonewall Lane would need to be diverted through the site enabling construction of a new junction with Jockey Hill, to the south of the existing junction and providing suitable visibility splays. Stonewall Lane will need to be widened to provide sufficient width for two vehicles along the site frontage. Any loss of Devon Bank arising from the highway realignment will need to be replaced. The site also lies within an area of archaeological potential and investigation and potential mitigation may be needed.

Policy CRE8

Land at Barn Park

A site of 1.64 hectares at Barn Park is allocated for residential development subject to the following:

a) **20 dwellings with 28% affordable housing; and**
b) **Vehicular access from Barn Park.**

3.178 The site is located on the south of Crediton with residential development along the northern boundaries. The site is located relatively close to the town centre.

3.179 Access to the site will be through Barn Park as access is limited and the Highway Authority has advised that this is the maximum number of houses suitable for access through the existing housing estate.

Policy CRE9

Land at Alexandra Close

A site of 0.63 hectares at Alexandra Close is allocated for residential development subject to the following:

a) 15 dwellings with 28% affordable housing.

3.180 The site is a small field adjacent to modern housing on the north western side of Crediton.

Policy CRE10

Land south of A377

A site of ~~1.9~~2.6 hectares south of the A377 in Crediton is allocated for commercial development subject to the following:

a) 7,600 square metres of B1, B2 or B8 floorspace or other suitable commercial uses

3.181 This site adjoins the existing Tesco store and a restaurant, with access from the A377 on the east side of the town. The site was part of a larger allocation in a previous Local Plan, which subsequently had outline planning permission for mixed use development. This remaining part of the site is still available for commercial use, which may include B1-B8 uses such as offices, light industry or storage and distribution, or alternatively a suitable 'sui generis' use if appropriate.

3.182 ~~There is a small watercourse which passes through the centre of the site. A flood risk assessment will need to consider the potential for flooding.~~ A better understanding of the flows of the Rivers Yeo and Creedy, undertaken by the Environment Agency, has indicated that this area is at greater risk of flooding than indicated at the time of the original permissions which covered the wider Tesco site. They have indicated that some of the site may actually lie within an area of floodplain that would be highly functional in times of severe flood, and subsequently development previously considered acceptable could now exacerbate flood risk. A Flood Risk Assessment will therefore need to be submitted with any application on the site which will need to incorporate both a comprehensive level survey of the site's current

arrangement, and additional modelling taking into account current levels. The purpose of such will be to determine the risks so that fully informed decisions regarding the suitability, or otherwise, of the currently undeveloped plots that benefit from outline permission can be made. The layout, site and floor levels of any development will be heavily dictated by the flood risks. Appropriate landscaping and sensitive design and materials will be required given the position of the site to the south of the historic Downes park and garden and the listed complex at Wellparks.

Policy CRE11

Crediton Infrastructure

The Council will use the Community Infrastructure Levy and planning obligations where appropriate, seek external sources of funding and work with partners to deliver the following infrastructure for Crediton:

a) Enhanced pedestrian and cycle facilities to serve development;
b) Bus service enhancements;
c) Air quality improvements;
d) Expansion and improvement of primary and secondary education facilities;
e) Public open space and green infrastructure;
f) Expansion of emergency fire and rescue services;
g) Library reconfiguration to provide Devon Centre;
h) Extra care housing;
i) Community facilities including provision for children/youth; and
j) Potential highway improvements;
k) Provision of works to reduce flood risk.

3.183 Strategic Local Plan sites will be required to pay for specific items of infrastructure that are necessary to make the development acceptable. Other development (if eligible) will be charged the Community Infrastructure Levy (CIL) at a rate per square metre. CIL funds will be spent according to a prescribed list of infrastructure projects or types of infrastructure.

3.184 The Council's strategic infrastructure policy is set out earlier in the Local Plan under Policy S8, but there are infrastructure requirements specific to Crediton that are listed under Policy CRE11. The Council will use CIL, planning obligations for strategic sites and other sources of funding to deliver the infrastructure listed wherever possible. Where another organisation is responsible for delivering the infrastructure required as a result of new development, the Council will work in partnership with the relevant bodies to ensure that infrastructure needs associated with development are addressed appropriately.

Land at Junction27

Policy J27

Land at Junction 27 of the M5 Motorway

A site of approximately 71 hectares adjoining the south bound carriageway of the M5 motorway, adjacent to junction 27 is identified for major development. The land, which lies to the south of the A38, is allocated for the provision of a major high quality regional tourism, leisure and retail attraction supported by ancillary roadside services and supporting infrastructure including a pedestrian bridge across the M5 motorway linking the site to Tiverton Parkway railway station.

The site provides a prime location for delivery of a major leisure destination themed around agriculture and the agri-economy; the regional environment and tourism; outdoor land and water-based adventure activities and outlet-retailing. The site provides a major opportunity to deliver a unique leisure destination at the gateway to Devon and Cornwall which should be realised as a single cohesive and comprehensively masterplanned visitor attraction.

The allocation makes provision for the following elements:

- **Travel Hub (7ha) – Motorway/roadside services; electric car hub; hotel.**
- **Agronomy Visitor Centre (9ha) – exhibition space and hall, gallery; research and education space; regional visitor centre and hotel.**
- **Outdoor Adventure Zone (6ha) – Surf lake/lagoon; beach; high ropes adventure area.**
- **Outlet Shopping Village (6ha) - Designer outlet shopping centre retailing controlled goods comprising discontinued/end-of-range lines, seconds and surplus/sample stock.**

The development is subject to the following:

a) Provision of supporting access roads, parking and infrastructure/landscaping (43 ha);
b) Provision of transport improvements to ensure appropriate accessibility for all modes, including new or improved access and egress onto the M5 motorway and pedestrian and cycling links across the motorway to Tiverton Parkway Railway Station;
c) Environmental protection and enhancement including noise mitigation;
d) A comprehensive phasing programme to ensure the tourist and leisure provisions are delivered at the same time as the retail and service elements of the development; and
e) Prior to the approval of any planning permission for the site any required mitigation measures for the Culm Grasslands Special Area of Conservation shall be identified and agreed together with a time-scale for their provision and a mechanism for their maintenance.

Development of the site should be brought forward in accordance with the terms of a detailed development brief, comprehensive masterplanning including at least two stages of public consultation and adoption of the Masterplan as a Supplementary Planning Document before any planning application for the any part of the site is determined.

3.184a A site of 71 hectares is allocated to the south and east of Junction 27 of the M5 motorway. The allocation identifies the land for tourism, leisure and retail development. The proposal seeks to significantly increase the tourism and leisure offer available in Mid Devon as identified in the Mid Devon Tourism Study 2014. The 2014 study identified that the M5 and the mainline railway provides an opportunity to develop Mid Devon`s tourism infrastructure around these key links. To encourage a greater proportion of people to break their journey in the area, for instance to visit a local attraction, market or retail facilities or to stay. It identifies that this opportunity builds on the District's location at the gateway location to Exmoor and the North Devon Coast; and on the route to Dartmoor, the South Devon Coast and Cornwall from much of the UK. Given the volume of tourists who pass through Mid Devon on route to other destinations, such as North and South Devon and Cornwall, the study identified that more could be done to encourage these tourists to stop en-route and increase the length of time (and money) tourists spend in Mid Devon.

3.184b The study identified six potential strands to assist the growth of tourism in Mid Devon offering opportunities for visitors to stop and stay when travelling through to destinations further south and west. The allocation at J27 makes provision to directly address three of the recommended strategies by setting a policy which can provide a major tourist, leisure and retail facility which caters for all age groups and which encourages visitors passing through to stop and spend time in Mid Devon.

3.184c The allocation includes associated outlet/discounted retail floorspace to meet a regional comparison need and deliver the tourist and leisure elements of the allocation. Existing town centres will be safeguarded through planning controls.

3.184d The proposals for a major facility of this nature needs to be considered carefully in terms of its impacts and the policy makes provision for detailed transport assessments, environmental protection and green infrastructure, energy conservation, provision of improved public transport, pollution and drainage considerations, phasing and importantly master planning with full public consultation prior to any planning applications being approved. Controls using legal agreements will be required to control the extent and types of use that take place on the site, particularly in respect of retailing which will be tightly controlled. Section 106 planning obligations will also make provision for any necessary infrastructure and public transport improvements and would need to ensure appropriate mechanisms are in place to ensure that the integrity of the Culm Grasslands SAC will not be adversely affected.

Rural Areas

3.185 Strategy for rural areas is set out in Policy S13. The following table summarises the supply of housing and commercial development outside the three main towns.

Use	Commitments at 31 March ~~2014~~2016	Completions from 1 April 2013 to 31 March ~~2014~~2016	Uncommitted Allocations	Total
Housing (dwellings)	~~432~~535	~~82~~347	~~330~~407	~~844~~1,289
Commercial (employment, retail and leisure) square metres floorspace *(Note at time of publication latest commercial monitoring not yet available – figures presented remain position at 31st March 2014)	20,733	4,119	8,800	33,652

Table 21: Development supply in rural areas

3.186 Twenty-one housing sites are allocated in rural areas and are considered achievable in principle, corresponding to rural settlement maps that accompany this document. Most housing allocations in rural areas are expected to deliver around 20 dwellings per hectare due to the low density character of existing village development, but in some cases a higher or lower density is justified.

Parish/location	Policy	Site	Gross Site Area (ha)	Net site area (ha)	Uncommitted Local Plan allocations
Bampton	BA1	Newton Square	0.25	0.25	5
Bow	BO1	Hollywell	1.2	0.96	20
~~Bow~~	~~BO2~~	~~West of Godfreys Gardens~~	~~0.23~~	~~0.23~~	~~6~~
Bradninch	BR1	Hele Road	0.3	0.3	7
Chawleigh	CH1	Barton	1.25	1	20
Cheriton Bishop	CB1	Land off Church Lane	1.~~49~~	~~1~~1.~~52~~	~~30~~20
Cheriton Fitzpaine	CF1	Barnshill Close	0.3	0.3	7
Cheriton Fitzpaine	CF2	Land adj school	1.1	0.88	22
Copplestone	CO1	Old Abbatoir	1.5	1.2	30
Culmstock	CL1	Linhay Close	0.23	0.23	6
Culmstock	CL2	Hunter's Hill	0.4	0.4	10

Halberton	HA1	Land adj Fishers Way	0.6	0.48	10
~~Hemyock~~	~~HE1~~	~~Depot~~	~~0.55~~	~~0.44~~	~~10~~
Morchard Bishop	MO1	Greenaway	1.2	0.96	20
Newton St Cyres	NE1	Court Orchard	2.7	1.62	25
Sampford Peverell	SP1	Former Tiverton Parkway Hotel	0.45	0.36	10
Sampford Peverell	SP2	Higher Town	6	3.6	60
Sandford	SA1	Fanny's Lane	1.5	1.2	~~27~~8
Silverton	SI1	Old Butterleigh Road	0.35	0.35	8
Silverton	SI2	The Garage	0.11	0.11	5
Thorverton	TH1	South of Broadlands	0.7	0.56	12
Uffculme	UF1	West of Uffculme	3.49	2.1	60
Willand	WI1	Land east of M5	2.9	1.74	4~~2~~0
Total					~~330~~347

Table 22: Housing allocations in rural areas (excluding sites with planning permission)

3.187 ~~Three~~ Five allocated housing sites already have planning approval, and these are set out below. The figures for these sites are based on the position as at 31st March ~~2014~~2016. The site, 'West of Uffculme' was granted permission on appeal, but fell outside the monitoring year and hence is included in the table above.

Site	Policy	Site area	Dwellings with planning permission
Stone crushing works (Scotts Quarry), Bampton	BA2	3.41	18
Ashleigh Park, Bampton	BA3	0.3	7
School Close, Bampton	BA4	0.7	26
West of Godfreys Gardens, Bow	BO2	0.23	6
Fanny's Lane, Sandford	SA1	1.12	19
Total			~~44~~76

Table 23: Allocated housing sites with planning permission in rural areas

3.188 Evidence shows that employment in rural areas is more likely to come forward on unallocated sites, permissible under development management policies where planning permission is required at all. This is discussed further under Policy S6.

3.189 Only two rural sites are considered suitable for allocation for commercial development. Willand Industrial Estate has been allocated in previous Local Plans, Phase 1 having been commenced within recent years. The remaining land is available, suitable and achievable. Land at Scott's Quarry is the remaining undeveloped part of a previous Local Plan allocation and now has planning permission for mixed housing and commercial use.

Parish/location	Site	Gross site area (ha)	Net site area (ha)	Floorspace (sq.m)
Bampton	Stone crushing works (Scott's Quarry), Bampton	0.45	0.36	355
Willand	Willand Industrial Estate	~~2.2~~9.2	~~2.2~~5.52	~~8,800~~22,000
Total				~~9,155~~22,355

Table 24: Allocated commercial sites in rural areas

Policy BA1

Newton Square, Bampton

A site of 0.25 hectares to the rear of Newton Square, Bampton is allocated for residential development, subject to the following:

a) 5 dwellings;
b) Provision is made on site for the parking of delivery vehicles serving the convenience store at 4-6 Newton Square;
c) Design which respects and enhances the character and appearance of the Conservation Area; and
d) Archaeological investigation and appropriate mitigation measures.

3.190 The site comprises land to the rear of the existing convenience store. It is suitable being a brownfield site, lying partially within the existing settlement limit. The majority of the site lies within the Conservation Area where development should preserve or enhance the character and setting of the area. Access is likely to be obtainable only through the existing access off Newton Court which serves the convenience store and through which deliveries are made. Due to the width of the access, Newton Court is not suitable for the regular parking of delivery vehicles and provision should be made within the development site for this activity.

3.191 The site lies in an area of archaeological potential within the historic core of Bampton, so a programme of archaeological investigation will be required, with mitigation measures if necessary.

Policy BA2

Stone Crushing Works (Scott's Quarry), Bampton

A site of 0.45 hectares at Scott's Quarry, Bampton is allocated for mixed-use development, subject to the following:

a) 18 dwellings with 30% affordable housing;
b) 355 square metres of commercial floor space;
c) Protection of mature trees within the site;
d) Removal of spoil heap;
e) Site contamination assessment and remediation where appropriate; and
f) Provision of a drainage strategy and sustainable urban drainage scheme to deal with all surface water from the development and arrangements for future maintenance.

3.192 The site is the remaining part of a previous allocation. The site is bounded by mature trees on two sides (north and west) and currently contains a large spoil heap within the middle of the site. There is existing access which serves Woodland Close. An appeal decision has allowed mixed use development on the remaining employment part of the site, comprising 18 dwellings (including four affordable dwellings) and 6 B1 units (with a floorspace of 355 square metres). Should a revised scheme for the site be submitted, the current target of 30% affordable housing would apply as the starting point for negotiation.

3.193 The history of quarrying at the site highlights the possibility of the presence of contaminated land. Developing the site would require removal of the large spoil heap. Groundwater flooding maps show a 20-25% chance of groundwater emergence within the site boundary. Any planning application on the site will need to be accompanied by a drainage strategy which takes account of the potential for groundwater flooding in addition to considering surface water runoff. The subsequent design of the Sustainable Urban Drainage Scheme will need to be appropriate to the conditions identified. Suitable drainage is a standard requirement of Policies S9 and DM1 but the requirement is reiterated in Policy BA2 for clarity due to the specific potential of this site for groundwater flooding.

Policy BA3

Ashleigh Park, Bampton

A site of 0.3 hectares at Ashleigh Park, Bampton is allocated for residential development, subject to the following:

a) 7 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location;
b) Access is obtained off the existing estate road; and
c) Provision is made to replace any loss of allocated parking for existing dwellings in Ashleigh Park.

3.194 The site comprises agricultural land at the end of the existing cul-de-sac development of Ashleigh Park. The site slopes downwards from south to north, with the northern part of the site the flattest and the southern extent the steepest part of the site. Access is likely to involve the demolition of the garage serving 33 Ashleigh Park and this loss of allocated parking provision should be replaced to ensure adequate allocated parking provision is retained.

Policy BA4

School Close, Bampton

A site of 0.7 hectares at School Close, Bampton is allocated for residential development subject to the following:

a) 26 dwellings with 38% affordable housing;
b) Access to be achieved off West Street;
c) Traffic calming measures along West Street;
d) Provision of a pedestrian footpath along West Street to link with the entrance to the site on West Street; and
e) Provision of a Drainage Strategy and a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;

3.194a This greenfield site is located towards the south of the former primary school and forms the remaining part of a previous allocation. It slopes upwards from north to south with the higher ground of the former school site on approximately the same level as that of the lower portions of the site.

3.194b An application for 26 dwellings and associated vehicular and pedestrian accesses was granted outline permission by the Council in April 2013 subject to conditions. The permission includes 10 affordable units and consequently, the policy provides the criteria to be applied as a starting point, should any revised scheme be submitted.

3.194c Parts of West Street are narrow and it is a Devon County Council Highways requirement that improvements, in the form of traffic calming measures, shall be made to the section immediately to the east of the access point and include the provision of a pedestrian path to link with an existing path further along West Street.

Policy BO1

Land adjacent to Hollywell, Bow

A site of 1.2 hectares at land adjacent Hollywell, Bow is allocated for residential development, subject to the following:

a) 20 dwellings with 30% affordable housing;
b) Site access to come off Station Road via north west corner through the 'Hollywell' building; and

c) Archaeological investigation and appropriate mitigation measures.

3.195 The site is located within the village of Bow, along its southern border adjoining farmland and the open countryside. It is a flat agricultural field surrounded by hedging. The site is to the rear of a small number of detached bungalows, set in low density plots immediately to the west. Due to the large number of existing accesses further south along Station Road, advice from the Highway Authority states that a suitable access can only be achieved into the site via the north west corner where the boundary abuts Station Road. The existing house, 'Hollywell', will therefore need to be demolished to deliver the required access. However, an alternative access option will be considered if a suitable scheme can be demonstrated to the satisfaction of the ~~H~~highway Authority,

3.196 This site lies in an area of archaeological potential, with prehistoric settlement and funerary activity recorded in the vicinity. Therefore, investigation of archaeology on the site will be required, with mitigation if necessary.

Policy BO2

West of Godfreys Gardens, Bow

A site of 0.23 hectares West of Godfreys Gardens is allocated for affordable housing, subject to the following:

a) 6 dwellings with 100% affordable housing;
b) Provision of a pedestrian route linking Godfreys Gardens with Bow Mill Lane;
c) Archaeological investigations and appropriate mitigation measures; and
d) Access from Godfrey Gardens.

3.197 This greenfield site lies to the west of a residential area within Bow. It slopes generally from east to west with borders of hedgerow and trees and the retention of those features would ensure that landscape impact is minimal. An application for 6 affordable units and associated access road, parking and drainage was granted permission by the Council in April 2014 subject to conditions. Provision of a pedestrian through route linking Bow Mill Lane to the west ensures pedestrian and cycling access for existing and new residents to the village shop.

3.198 This site lies in an area of archaeological potential, with prehistoric settlement and funerary activity recorded in the vicinity. Therefore, archaeological investigation of the site will be required, and mitigation if necessary.

Policy BR1

Hele Road, Bradninch

A site of 0.3 hectares at Hele Road is allocated for residential development, subject to the following:

a) **7 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide affordable dwellings in another location;**
b) **Access point to be located on the northern part of the site frontage on to Hele Road; and**
c) **Archaeological investigations and appropriate mitigation measures.**

3.199 This site is located on the edge of the settlement of Bradninch; it is immediately adjacent to the settlement boundary and also has a boundary with the highway. There is housing to the western side of the site on the opposite side of the road. Services and shops are located in the village centre which is in close proximity. A bus stop is positioned adjacent to the site, and there are large trees surrounding the site. The site is located on a fairly busy road, and the bus stop may need to be moved from its current position if the site is developed. An adequate access is achievable to the north of the site.

3.200 The site lies in an area of archaeological potential demonstrated by the presence of prehistoric sites identified through aerial photography. Therefore, archaeological investigation of the site will be required, and mitigation if necessary.

Policy CH1

Barton, Chawleigh

A site of 1.25 hectares at the Barton is allocated for residential development, subject to the following:

a) **20 dwellings with 30% affordable housing;**
b) **Access to be achieved off School Close;** ~~**and**~~
c) Design solution which respects the setting of the conservation area and listed buildings; and
d~~**c**~~**) Archaeological investigation and appropriate mitigation measures.**

3.201 The site comprises part of an agricultural field to the north of the village of Chawleigh. The south western corner of the field contains a completed rural exception site named School Close. Access can be achieved off the exception site but road capacity should limit development to a maximum of 20 dwellings. The site is located in an area of archaeological potential and records indicate the presence of a prehistoric burial site. Therefore, archaeological investigation of the site will be required, and mitigation if necessary. Appropriate landscaping will be required to mitigate any potential impacts on the conservation area and listed buildings, including the grade I church which lies to the south east.

Policy CB1

Land off Church Lane, Cheriton Bishop

A site of 1.49 hectares at Land off Church Lane, Cheriton Bishop is allocated for residential development, subject to the following:

a) 2030 dwellings with 30% affordable housing, subject to Transport Assessment;
b) Assessment of the capacity of the junction of Church Lane and the main road (C50); and
c) Widening of Church Lane and provision of a footpath along site frontage; and.
d) Provision of a landscape buffer along the northern boundary of the site.

3.202 This site comprises part of a field located on the east side of Church Lane and to the north of Hescane Park. The site is located between the older part of the village to the north, and the more modern development to the south known as Cheriton Cross. There is the opportunity to integrate more closely the two elements of the village by developing this site. The land gently undulates, dropping away further to the east. Landscape impacts are likely to be low as there is existing housing along the southern and western boundaries, which will mitigate some of the impact.

3.203 The junction of Church Lane with the main road to the south of the site may place a limitation on the number of dwellings that can be achieved. Any planning application should be accompanied by a Transport Assessment which should assess the capacity of the junction to accommodate additional vehicles. Improvements may be required to the junction as a result. The widening of Church Lane along the site frontage will be necessary and a footpath will also be needed along the site frontage linking up with the existing provision to the south. A design solution which provides the footpath on the inside of replacement planting to offset the loss of the hedgerow will be looked upon favourably at the planning application stage.

3.204 A small watercourse runs along the southern boundary of the site. A flood risk assessment will need to consider the potential for flooding. An onsite Sustainable Urban Drainage Scheme will require implementation to negate any increase in flood risk. Suitable drainage is a standard requirement of Policies S9 and DM1.

Policy CF1

Barnshill Close, Cheriton Fitzpaine

A site of 0.3 hectares at Barnshill Close, Cheriton Fitzpaine is allocated for residential development, subject to the following:

a) 7 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location.

3.205 This site forms a rectangular block of land lying between the new school to the east and Barnshill Close to the west. It is a natural infill site which already has an existing access point to the south. The site is on higher ground than the road to the south, though any visual impact is likely to be minimal given the neighbouring uses. The site lies outside but relatively close to the edge of the conservation area. Appropriate design and choice of materials

should ensure that there is no detrimental impact on the character and appearance of the historic environment.

Policy CF2

Land adjacent school, Cheriton Fitzpaine

A site of 1.1 hectares adjacent to the school, Cheriton Fitzpaine is allocated for residential development, subject to the following:

a) 22 dwellings with 30% affordable housing.

3.206 This site forms an elongated and roughly triangular-shaped block of land lying on the eastern side of the village. It sits adjacent to the new primary school to the west. Developing the site will connect the White Cross area to the east with the remainder of the village. The local landscape is undulating, however the site is relatively flat. The adjacent school, and housing at White Cross will mitigate some of the visual impact.

Policy CO1

The Old Abattoir, Copplestone

A site of 1.5 hectares at The Old Abattoir, Copplestone is allocated for residential development and a car park subject to the following:

a) 30 dwellings with 30% affordable housing, subject to viability;
b) 100 space railway station car park in the eastern part of the site;
c) The existing access point off Shambles Drive to serve both the housing and the car park; and
d) Assessment of land contamination and appropriate remediation.

3.207 This site is located on the northern boundary of the village of Copplestone. It comprises a field with a number of dilapidated outbuildings. A small slaughterhouse once stood in the north east corner, though little trace of this now remains. It is not anticipated that there will be any harmful visual impact associated with developing this site.

3.208 Devon County Council has highlighted the need for a railway station car park at Copplestone. The eastern portion of the site, equating to approximately 0.25 hectares is allocated for provision of a 100 space car park. There is an existing access point off Shambles Drive which can service both the housing and the car park. It is anticipated that the car parking provision can also be used by residents. Should the cost of providing the car park make the development financially unviable, the Council will consider a reduced affordable housing provision subject to submission of robust viability evidence from the developer which justifies such a reduction.

3.209 There is the potential for land contamination associated with the slaughterhouse. Any planning application must be accompanied by a contaminated land report, and appropriate remediation will be required if necessary.

Policy CL1

Linhay Close, Culmstock

A site of 0.23 hectares at Linhay Close, Culmstock is allocated for residential development subject to the following:

a) 6 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location; and
b) Design and layout to respect the character of the Conservation Area.

3.210 This greenfield site forms part of a rectangular shaped field adjoining the village. Previously, there was an allocated site in this location with a requirement for 10 affordable dwellings. Part of the site was subsequently developed for six houses. The remaining site area has been combined with an adjacent piece of land to provide a small allocation for another six dwellings.

Policy CL2

Hunter's Hill, Culmstock

A site of 0.4 hectares at Hunter's Hill, Culmstock is allocated for residential development subject to the following:

a) 10 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location;
b) Landscaping and design which protect the setting of the Blackdown Hills Area of Outstanding Natural Beauty; and
c) Archaeological investigation and mitigation.

3.211 This is a greenfield site consisting of the south west corner of a field at the northern end of the village. The site was allocated for 100% affordable housing in 2010 but has not come forward. It is now allocated for a mixture of market and affordable housing, which is considered more likely to deliver the site whilst providing some housing for local needs. Given the sloping nature of the field and the location on the edge of Culmstock, the development should be sensitively designed with landscaping which protects the setting of the Blackdown Hills Area of Outstanding Natural Beauty.

Policy HA1

Land Adjacent Fishers Way, Halberton

A site of 0.6 hectares at land adjacent Fishers Way, Halberton is allocated for residential development, subject to the following:

a) 10 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location; and

b) Provision of a Drainage Strategy and a Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance.; and

c) Archaeological investigations and appropriate mitigation measures.

3.212 The site comprises part of a field to the south western edge of Halberton and sits adjacent to modern housing. The south eastern corner of the field was granted planning permission in 2006 and has been built out as a rural exception site. Groundwater flooding maps show a 25-50%20-25% chance of groundwater emergence within the site boundary. Any planning application on the site will need to be accompanied by a Drainage Strategy which takes account of the potential for groundwater flooding in addition to considering surface water runoff. The subsequent design of the Sustainable Urban Drainage Scheme will need to be appropriate to the conditions identified. Suitable drainage is a standard requirement of Policies S9 and DM1 but this is reiterated in Policy HA1 for clarity due to the specific potential for groundwater flooding on this site. The site lies a short distance from the edge of the conservation area. Appropriate design, choice of materials and landscaping should ensure that there is no detrimental impact on the character and appearance of the historic environment.

3.213 This site lies in an area of archaeological potential with the Historic Environment Record recording prehistoric activity. Any application will need to be accompanied by archaeological investigation and appropriate mitigation.

Policy HE1

Depot, Hemyock

A site of 0.55 hectares at the Depot, Hemyock is allocated for residential development, subject to the following:

a) 10 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location; subject to Transport Statement;

b) Archaeological investigation and appropriate mitigation measures; and

c) Mitigation of any wildlife impact including protection of hedgerows and trees.

3.214 This site lies within the village of Hemyock, in the Blackdown Hills AONB. It is an infill site surrounded by residential development on all sides. The site consists of a bungalow, garage/depot building, waste land and part greenfield land. As the site is bounded by

~~development it is considered that the impact on the special qualities of the AONB and other landscape impacts are likely to be low.~~

~~3.215 High Street, from which the site is accessed, is narrow in places and has very little capacity to accommodate additional traffic. A substitution of the existing traffic generation for an equivalent as a result of redeveloping the site for residential use has been confirmed as acceptable. Any planning application should be therefore be accompanied by a Transport Statement to justify that the housing numbers proposed will not result in any net increase in traffic.~~

~~3.216 The site lies in an area of high archaeological potential so any application will need to be accompanied by appropriate investigations. There may be some wildlife interest from trees, hedgerows and trees across the site. The buildings on the site may also be habitat for protected species such as owls. Investigation should therefore be carried out and appropriate mitigation measures taken.~~

Policy MO1

Greenaway, Morchard Bishop

A site of 1.2 hectares at Greenaway, Morchard Bishop is allocated for residential development, subject to the following:

a) 20 dwellings with 30% affordable housing;
b) Mitigation of any wildlife impact including protection of hedgerows;
c) Archaeological investigation and appropriate mitigation measures;
d) Road widening across the site frontage, provision of appropriate visibility splays and replacement provision of any lost Devon Bank; and
e) Provision of a footpath link into the estate to the east.

3.217 The site comprises agricultural land to the west of Morchard Bishop. It is bounded by allotment to the west of the site, residential development to the east and by a highway and farmstead to the south. The south east corner of the site was previously allocated for 10 affordable dwellings but is now proposed for a mixture of market and affordable housing.

3.218 There may be some wildlife interest from hedgerows which bound the site, so this should be investigated and mitigation measures proposed where appropriate. The site lies to the west of a possible prehistoric funerary monument. Any development here has the potential to expose archaeological and artefactual deposits associated with this, so any application will need to be accompanied by appropriate investigations.

3.219 To enable appropriate access to the site the policy requires road widening across the site frontage and a secondary pedestrian link to the estate to the east. Replacement of the Devon Bank should be incorporated into the design of the access point to mitigate for any loss.

Policy NE1

Court Orchard, Newton St Cyres

A site of 2.7 hectares at Court Orchard, Newton St Cyres is allocated for residential development and a new primary school, subject to the following:

a) 25 dwellings with 30% affordable housing, subject to viability;
b) A site of 1.1 hectares for a new primary school at no cost to the Local Education Authority;
c) Design which respects the setting of the conservation area;
d~~c~~) Archaeological investigations and appropriate mitigation measures;
e~~d~~) School sports provision only within flood zones 2 and 3 to the east of the site; and
f~~e~~) Widening of Station Road to reduce congestion.

3.220 The site lies on the northern edge of the village of Newton St Cyres adjacent to an existing housing estate. It is currently an apple orchard bounded by hedgerows on all sides which are occasionally interspersed by trees.

3.221 The site has been identified by Devon County Council as an appropriate site for the relocation of the existing primary school. The policy therefore requires the provision of a site for the new primary school as part of this development. Areas in flood zones 2 and 3 of the site should be used for school sports provision only. Should the cost of providing the school site make the development financially unviable, the Council will consider a reduced affordable housing provision subject to submission of robust viability evidence from the developer which justifies such a reduction.

3.222 The widening of Station Road to reduce congestion is also required by the policy. There may be some wildlife interest from hedgerows which bound the site and trees within the site, so the impact on protected species should be assessed and mitigation measures included where appropriate. The conservation area boundary was revised in 2015 and now extends up to the south western boundary of the site. Careful design will be required to ensure the development can be sensitively accommodated. The site lies in an area of archaeological potential and therefore any application will need to be accompanied by appropriate investigations.

Policy SP1

Former Tiverton Parkway Hotel, Sampford Peverell

A site of 0.45 hectares at the former Tiverton Parkway Hotel, Sampford Peverell is allocated for residential development and a doctors' surgery, subject to the following:

a) 10 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location, subject to viability;
b) Provision of a doctors' surgery;

c) Provision of a drainage strategy and Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance; and

d) Mitigation of any wildlife impact including protection of hedgerows.

3.223 This site is located on the eastern edge of Sampford Peverell. It was the location of the Tiverton Parkway Hotel, which has since been demolished. The site received planning permission in 2008 for a care home. An updated application in 2012 was consented for a 58 bed scheme and adjoining GP surgery. The applicants have since stated that they will no longer be pursuing this development and the site is available for housing. Any housing development should include the provision for a GP surgery. Should the cost of providing the GP surgery make the development unviable, the Council will consider a reduced affordable housing provision subject to submission of robust viability evidence from the developer which justifies such a reduction.

3.224 Groundwater flooding maps show a 0-25%~~20-25%~~ chance of groundwater emergence within the site boundary. Any planning application on the site will need to be accompanied by a Drainage Strategy which takes account of the potential for groundwater flooding in addition to considering surface water runoff. The subsequent design of the Sustainable Urban Drainage Scheme will need to be appropriate to the conditions identified. Suitable drainage is a standard requirement of Policies S9 and DM1 but the requirement is reiterated in Policy SP1 for clarity due to the specific potential for groundwater emergence on this site. There may also be some wildlife interest from hedgerows which bound the site, so the potential impact on protected species should be assessed and mitigation measures included if appropriate.

Policy SP2

Higher Town, Sampford Peverell

A site of 6 hectares at Higher Town, Sampford Peverell is allocated for residential development, subject to the following:

a) 60 dwellings with 30% affordable housing;
b) No development until the completion of improved access works to the A361;
c) Landscaping and design which respect the setting and character of the area;
d) Provision of a drainage strategy and Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance;
e) Mitigation of any wildlife impact including protection of hedgerows; and
f) Archaeological investigation and appropriate mitigation.

3.224a The site is on the edge of Sampford Peverell, outside the main built up part of the village. The site is elevated and will require careful landscaping and mitigation measures. Development of the highest ground should remain undeveloped. Low density and good design will be required to respect the existing character of edge-of village housing and conservation area. The site is currently bounded by hedgerow. 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.

3.224b This site lies in an area of archaeological potential with the Historic Environment Record recoding prehistoric activity. Any application will need to be accompanied by archaeological investigation and appropriate mitigation.

3.224c The Highway Authority has advised that any development of the site should only commence once improvements to the A361 junction have been implemented.

Policy SA1

Fanny's Lane, Sandford

A site of 1.5 hectares at Fanny's Lane, Sandford is allocated for residential development, subject to the following:

a) 27 dwellings with 30% affordable housing;
b) Buffer strip of planting or open space to protect the setting of the listed Park House and Sandford Conservation area; and
c) Careful design and landscaping to protect views towards Sandford and the historic core around St Swithun's Church.

3.225 The site comprises mainly greenfield land which is located within the village of Sandford. Part of the site was previously allocated and planning permission was granted for 19 dwellings on the northern part of the site in 2013. The site size has been enlarged from that which has planning permission to accommodate a limited number of additional dwellings. As such the number of houses required by the policy of 27 includes the 19 which are currently consented, resulting in a net gain of 8 dwellings.

3.226 The site lies adjacent to the conservation area and the western boundary of the site abuts the curtilage of a listed building. A buffer strip of planting or open space should be provided to protect the setting of this listed building. Careful design and landscaping is also required to avoid the development dominating views towards Sandford from the south east and to retain the emphasis on the historic core of St Swithun's Church and to protect the setting of the conservation area.

Policy SI1

Land at Old Butterleigh Road, Silverton

A site of 0.35 hectares at Old Butterleigh Road is allocated for residential development subject to the following:

a) 8 dwellings with 30% affordable housing which may be in the form of a financial contribution to provide the affordable dwellings in another location;
b) No development on the floodplain to the east of the site;

c) Widening of carriageway over site frontage and provision of grass verge; and

d) Design and layout to respect the character of the Conservation Area.

3.227 The site falls on the northern boundary of the village of Silverton and is on the eastern side of Old Butterleigh Road. The site is shielded to the north and west by high hedges which limit inward views.

3.228 A small watercourse runs along the eastern boundary of the site and the small area of floodplain associated with this should not be developed.

3.229 The carriageway will need to be widened across the site frontage to accommodate two passing vehicles. The footpath network terminates some distance to the south of the site. Rather than provide a new footway which does not connect with existing provision, a grass verge along the site frontage should be provided as defensible space for pedestrians.

Policy SI2

The Garage, Silverton

A site of 0.11 hectares at The Garage, Silverton is allocated for residential development subject to the following:

a) 5 dwellings;

b) Design and layout which respects the character of the Conservation Area;

c) Suitable design and layout of access arrangements; and

d) Site contamination and remediation where appropriate.

3.230 This is a small brownfield site which is located adjacent to a complex of residential dwellings, which is separated from and to the south of the main body of the village of Silverton. The site currently comprises an industrial unit which is used for storage and maintenance of vehicles.

3.231 The design of the site is important as it lies at the edge of the village's Conservation Area, being the first complex of buildings encountered when approaching Silverton along Newcourt Road. Design of the access to serve the five dwellings will need to be provided having specific regard to the neighbouring access serving the adjacent barn conversions and detailing appropriate visibility splays.

3.232 There is also the potential for land contamination as a result of the history of vehicle repair and fuel storage on the site. Assessment will therefore be required and remediation to take place where appropriate.

Policy TH1

South of Broadlands, Thorverton

A site of 0.7 hectares at South of Broadlands in Thorverton is allocated for residential development subject to the following:

a) 12 dwellings with 30% affordable housing;
b) Archaeological investigation and appropriate mitigation; and
c) Road widening and provision of footpath along site frontage extending northwards to connect with the existing network at the entrance to the Broadlands estate.

3.233 The site to the south of the village on the edge of the settlement. There is limited highway frontage to the C23. Road widening and a footpath north into the village, connecting to the existing provision at the entrance to the Broadlands estate will be required. The land required for the footpath is in the ownership of Devon County Council who currently maintain it as a grass verge.

3.234 The site is to the north of a large prehistoric enclosure and development will need to be supported by an appropriate level of archaeological works to allow the significance of the heritage asset to be understood.

3.235 As the site is partially located within a groundwater Source Protection Zone -appropriate forms of sustainable urban drainage should be used.

Policy UF1

Land west of Uffculme, Uffculme

A site of 3.49 hectares at land west of Uffculme, Uffculme, is allocated for residential development subject to the following:

a) 60 dwellings with 35% affordable housing;
b) Archaeological investigation and appropriate mitigation; and
c) Provision of a drainage strategy and Sustainable Urban Drainage Scheme to deal with all surface water from the development and arrangements for future maintenance.

3.238 The site is located to the west of Uffculme, adjacent to Uffculme Road. It comprises an agricultural field together with part of the rear garden belonging to the property known as Harvesters. The field has a frontage onto Uffculme Road from which access would be taken. An appeal decision has granted outline planning permission on the site for 60 dwellings with 35% affordable housing. The policy provides the criteria to be applied as a starting point, should any revised scheme be submitted. The site occupies an area where prehistoric activity is recorded in the wider landscape. Archaeological investigation and appropriate mitigation will therefore be required.

Policy WI1

Land east of M5, Willand

A site of 2.9 hectares at land east of M5, Willand, is allocated for residential development subject to the following:

a) 42 dwellings with 30% affordable housing;
b) Provision of buffer zone and appropriate planting to mitigate noise from the adjacent motorway;
c) Mitigation of any wildlife impact including protection of trees ;
d) Transport assessment of capacity at the junction of Silver Street and Meadow Park; and
e) Retention and enhancement of the public right of way.

3.236 The site is located to the south of Willand, adjacent to modern housing to the north and the M5 to the west. Noise from the M5 should be mitigated by a buffer zone and planting along the boundary to ensure residential amenity is not adversely affected. The site has a number of mature trees on the eastern boundary and established woodland along the north east boundary. Mitigation measures should be taken to ensure there are no adverse impacts on any of the surrounding biodiversity.

3.237 A Transport Assessment of the capacity of the junction of Silver Street and Meadow Park may result in a different number of dwellings from the number allocated. The current public footpath across the northern boundary of the site should be retained and enhanced.

Policy WI2

Willand Industrial Estate, Willand

A site of 9~~2~~.2 hectares is allocated for commercial uses subject to the following:

a) 22,000~~8,800~~ square metres of commercial floorspace within use classes B1, B2 and B8; and
b) Archaeological investigation and appropriate mitigation.

3.238 This site comprises level land within and adjoining the existing Willand Industrial Estate. ~~It is part of a larger site that was previously allocated, but only part of Phase 1 of the development has proved deliverable. This smaller allocation will complete the development of industrial land close to the existing access into the industrial estate, commensurate with rural employment needs, while larger commercial allocations are located in more strategically accessible locations at Cullompton and Tiverton.~~ It is part of a larger site allocated in the previous Local Plan which has partly been developed. Access has now been secured to Phase 2 and an application for nearly 13,000 sqm of employment units has been submitted. This application would facilitate the relocation of Pallex from the neighbouring industrial estate to a purpose built Regional Distribution Centre within Phase 2 whilst providing a range of different sized units to meet market demand. It is anticipated that any remaining unconsented parts of the site could come forward over the plan period.

Managing Development

Sustainable development principles

Policy DM1

High quality design

Designs of new development must be of high quality, based upon and demonstrating the following principles:

a) **Clear understanding of the characteristics of the site, its wider context and the surrounding area;**

b) **Efficient and effective use of the site, having regard to criterion (a);**

c) **Positive contribution to local character including any heritage or biodiversity assets and the setting of heritage assets;**

d) **Creation of safe and accessible places that also encourage and enable sustainable modes of travel such as walking and cycling;**

e) **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 properties and uses, taking account of:**

- **i) Architecture**
- **ii) Siting, layout, scale and massing**
- **iii) Orientation and fenestration**
- **iv) Materials, landscaping and green infrastructure**

f) **Appropriate drainage including sustainable drainage systems (SUDS), including arrangements for future maintenance, and connection of foul drainage to a mains sewer where available.**

4.1 National policy recognises that good design is a key aspect of sustainable development, is indivisible from good planning, and ensures that new development contributes positively to making places better for people. Policies S1 and S9 set out the Council's strategic objectives for locally distinctive, high quality development, including design which reinforces the character and legibility of the built environment and creates attractive places. Policy DM1 builds on this by setting out detailed criteria to guide high quality design on individual development sites.

4.2 The Mid Devon Town and Village Character Assessment identifies and evaluates the settlement character of the district, including patterns and similarities, distribution of land use, materials and key features of interest. The Devon and Mid Devon Landscape Character Assessments provide the equivalent information pertaining to landscape in the district. While

the level of information expected to accompany a planning application will vary depending on the development being proposed, applications for new buildings within or adjacent to towns and villages should demonstrate an understanding of the surrounding built environment. Where available, Conservation Area Appraisals will also provide an essential source of information for proposals within conservation areas. In addition to an understanding of local character and heritage, development proposals must respect the needs of neighbouring residents and the community, through the design of safe, accessible and attractive places that preserve general quality of life.

4.3 In creating visually attractive places that incorporate landscaping and green infrastructure, applicants are advised to consult Biodiversity by Design, published by the Town and Country Planning Association ~~(www.tcpa.org.uk)~~ for examples of how green infrastructure has been used to enhance the quality of development.

4.4 Designs should maximise opportunities for the use of sustainable transport modes for the movement of goods or people. National policy states that developments should be located and designed where practical to accommodate the efficient delivery of goods and supplies; prioritise pedestrian and cycle movements; have access to public transport; deliver safe and secure layouts that minimise conflicts between cars and pedestrians/cyclists; incorporate facilities for plug-in and other ultra-low emission vehicles; and consider the needs of people with disabilities by all modes of transport. Walking and cycling routes should be high quality, attractive and direct.

4.5 Development proposals must also accord with sustainable waste management principles, the requirements for which are set out in Policy W4 'Waste Prevention' within the Devon Waste Plan. The Devon County Council Waste Management and Infrastructure SPD should also be a material consideration. Development proposals should demonstrate compliance with this policy as part of the Design and Access Statement, where applicable. This is an essential step in the district's transition to more sustainable resource management, with the long-term aim of zero-waste or resource-neutral construction.

4.5a Soft landscaped SuDs are best placed to provide water quantity, water quality, public amenity and biodiversity benefits. When considering SuDs there is a preference for 'soft' landscaped solutions which should be sought in the first instance where possible and appropriate. Robust evidence should be provided where no soft landscaped solutions are used.

Policy DM2

Renewable and low carbon energy

The benefits of renewable and low carbon energy development will be weighed against its impact. Proposals will be permitted where they do not have significant adverse impacts on the character, amenity and visual quality of the area, including cumulative impacts of such developments within the parish or adjoining parishes. Proposals must demonstrate that impacts are or can be made acceptable, and that the development will preserve:

a) Landscape character and the character and setting of heritage assets;

b) Environmental amenity of nearby properties and the wider locality;
c) Quality and productivity of the best and most versatile agricultural land (grades 1, 2 and 3a); and
d) Biodiversity (avoiding habitat fragmentation).

4.6 Policy DM2 seeks to maximise renewable and low carbon energy while ensuring that adverse impacts are addressed satisfactorily, including cumulative impacts. Examples of development considered under this policy include ~~wind turbines,~~ hydropower, ~~ or~~ solar installations, and energy systems associated with other development such as combined heat and power (CHP) or district heating. Any wind turbine proposals will be considered in the context of the 18 June 2015 Written Ministerial Statement which requires planning applications for such development should only be granted if areas of suitable for wind energy development are identified in Local or Neighbourhood Plans. Following consideration of the evidence commissioned, the Council has concluded that it does not propose to identify such areas at a district level. This does not preclude suitable areas for wind energy development to come forward in Neighbourhood Plans.

4.7 These developments, especially when they are of a commercial scale, have the potential to cause significant harm through degradation of landscape character or heritage, impact to local residents and loss of productive agricultural land and biodiversity. Development proposals will be required to demonstrate that impacts are or can be made acceptable, through supporting studies and surveys as appropriate. As a starting point, development proposals should have reference to the Mid Devon Landscape Character Assessment (2011), the Landscape Sensitivity Study (2013) and the Government's Planning Practice Guidance for Renewable and Low Carbon Energy (July 2013). Depending on the proposal, Policies DM4 (pollution), DM25 (heritage assets), DM27 (protected landscapes) and DM28 (other protected sites) may also have a bearing on whether planning permission is granted.

4.8 In some cases, Devon County Council will act as the Local Planning Authority in dealing with an application for planning permission. For instance, renewable and low carbon energy proposals that use waste materials originating from outside the site as the fuel will normally be determined by Devon County Council as the waste planning authority.

Policy DM3

Transport and air quality

Development must ensure safe access to the transport network. Development proposals that would give rise to significant levels of vehicular movement must be accompanied by an integrated Transport Assessment, Travel Plan, traffic pollution assessment and Low Emission Assessment. The traffic pollution assessment must consider the impact of traffic-generated nitrogen oxides on environmental assets including protected sites listed in Policy DM28, and propose mitigation measures where appropriate. The Low Emission Assessment shall include the following:

a) Assessment of the impact on existing Air Quality Management Areas, or an impact likely to result in the declaration of an additional Air Quality

Management Area, in cases where a demonstrable negative impact on ambient concentrations of air pollutants is considered likely;

b) Modelling of local residual road transport emissions from the development without mitigation measures; and

c) Onsite mitigation measures to reduce negative impacts on local air quality.

4.9 A Transport Assessment is a comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies what measures will be required to improve accessibility and safety for all modes of travel, particularly for alternatives to the car such as walking, cycling and public transport and what measures should be taken to deal with the anticipated transport impacts of the development.

4.9a A Transport Statement is similar to a Transport Assessment but is less detailed and can be used in some cases where transport issues arising from the development proposals do not require a full Transport Assessment. Where a Transport Statement in lieu of a Transport Assessment is considered acceptable this will be agreed by the planning authority in consultation with Devon County Council as the highway authority. All major applications will require a Transport Assessment unless advised by the planning authority.

4.10 A Travel Plan is a long-term management strategy for an organisation or site that seeks to deliver sustainable transport objectives. Travel plans should encourage the use of alternatives to single-occupancy car use by prioritising pedestrian and cycle movements through the site, providing appropriate facilities, and implementing initiatives that encourage sustainable travel. Clear outcomes should be set out that link to an appropriate package of measures which should where suitable, include the promotion of:

- Walking and cycling
- Rail services
- Eco-driving such as low emission vehicles
- Car clubs
- Public transport
- Car sharing
- Motorcycle safety
- Flexible working practices

Travel plans should include details of how the progress of the travel plan will be monitored and reported.

4.11 Applicants are advised to engage in pre-application discussions with the Council and Devon County Council as Highway Authority if the development is likely to generate significant levels of vehicular movement, to discuss the scope and detail of the information required. Whether or not an application's traffic impact is considered 'significant' will depend on a range of factors such as the location of the development, its relationship to an Air Quality Management Area, its intended use and the capacity of the road network. The requirement will not usually apply to small-scale development, but occasionally a development not classed as 'major' may still have a significant impact. Where an integrated assessment is required, the Council will usually require an analysis of traffic flows at key periods and the 'mass emissions' or total emission footprint to be expected from the development. Where criterion (a) of the policy applies, the assessment should also focus on key road links. The Council will require development proposals to demonstrate that they will not cause significant harm to people or the environment through an increase in traffic-related pollutants. A traffic pollution assessment should consider the effects that additional emissions from vehicles will have on any environmental assets, including important wildlife habitats. This may be combined with an

assessment under Policy DM4, if appropriate. In particular, development that increases traffic along the A361 may have an impact on the Special Area of Conservation at Rackenford, which adjoins the Mid Devon boundary. Where a development would cause significant harm to this site and adequate mitigation would not be possible, planning permission will be refused.

4.12 Developments affecting the Special Area of Conservation could include:

- Intensive farming
- Commercial riding stables
- Employment development
- Tourism
- Gypsy and traveller sites
- Any other developments that increase cross-traffic along the A361

4.13 The Transport Assessment should identify the boundaries of the Low Emission Assessment, which evaluates the effect of the development on local air quality. The main routes of travel will be assessed for their residual road transport emissions after development, with and without mitigating measures to reduce emissions. The Low Emission Assessment must also take account of existing Air Quality Management Areas (Cullompton and Crediton), and include air quality exposure modelling for specified residential properties or other sensitive properties either within or adjoining an Air Quality Management Area or in a location at risk of being designated as one if a demonstrable harm has been identified. There are a number of standard models used for air quality exposure modelling, which should be carried out by a suitably qualified person. Procedural guidance for carrying out a Low Emission Assessment is contained in Annex 2.

4.14 Tiverton is at risk of being designated an Air Quality Management Area. Any relevant development proposal in or adjoining Tiverton, Cullompton and Crediton should consider the significance of its impact on the most congested routes within the town and the properties most directly affected by the development. Where mitigation measures are necessary, these should be designed to reduce both the direct impacts to nearby properties and an Air Quality Management Area, and indirect impacts to local road transport.

4.15 Mitigation measures might include:

- Use of low-emission vehicles and fuels during construction
- Onsite infrastructure for charging and fuelling low emission vehicles
- Parking management (differential rates, priority or dedicated parking for low emission vehicles)
- Low emission vehicle or bicycle rental/purchase schemes
- Car clubs
- High quality public transport services

4.16 Some measures to reduce emissions and encourage sustainable modes of travel may be designed and built into the development. Other measures are less straightforward and refer to activities and choices made by residents. To ensure that the measures included in a Low Emission Assessment and Travel Plan are implemented and continued in the long-term, the Council may require the applicant to enter into a planning obligation under Section 106 of The Town and County Planning Act 1990. The obligation would require the

establishment of a management company which would administrate differential charging levies, rental/purchase schemes or car clubs, as appropriate.

Policy DM4

Pollution

Applications for development that risks negatively impacting on the quality of the environment through noise, odour, light, air, water, land and other forms of pollution must be accompanied by a pollution impact assessment and mitigation scheme where necessary. Development will be permitted where the direct, indirect and cumulative effects of pollution will not have an unacceptable negative impact on health, the natural environment and general amenity.

4.17 When the location or characteristics of a proposed development give rise to concern that the development would cause pollution or nuisance to surrounding people, properties or the environment, the Council will require an appropriate impact assessment to be undertaken by a suitably qualified person so that the potential effects can be properly understood. This may include cases where the site is already unstable or contaminated due to its former use, requiring mitigation or remediation to be carried out so as not to harm the health and wellbeing of future occupiers of the development. The Council will also have regard to the River Basin Management Plan (RBMP) and, where appropriate, seek to achieve measures which will achieve the objectives of the RBMP and the Water Framework Directive (WFD). Under the WFD there should be no deterioration in the status of a water body. If planning permission is granted, a planning condition should be used to ensure that any mitigation measures set out in the assessment are implemented.

4.18 The subject and scope of assessments will vary depending on the scale and type of development being proposed. For instance, where there is concern regarding the effect of additional traffic emissions on nearby residential properties, a Low Emission Assessment should include air quality exposure modelling for affected properties, and any mitigating measures that would reduce the impact. In this case the Council would discuss with the applicant or agent the level of information required and the methodology to be used.

- Assessments required under this policy include:
- Contamination and subsidence reports
- Noise assessments
- Low Emission Assessments
- Hydrological or drainage reports
- Any other technical assessment required to enable sustainable development

Policy DM5

Parking

Development must provide an appropriate level of parking, taking into account:

a) The accessibility of the site, including the availability of public transport; and
b) The type, mix and use of development.

Design must enable and encourage the maximum use of sustainable modes of transport, including provision for cyclists and low-emission vehicles. Within the towns of Tiverton, Cullompton and Crediton, infrastructure for electric vehicles should be built into development. The Council will seek parking provision and infrastructure for electric vehicles according to the following standards, the variation of which must be justified on a case-by-case basis.

Residential					
Use class	Description	Location	Minimum car parking standard	Minimum cycle parking standard	Electric vehicle infrastructure (Tiverton, Cullompton, Crediton)
C3, C4	Dwellings	General	1.7 per dwelling	1 or 2 beds – 2 per dwelling 3+ beds – 4 per dwelling	1 charging point per 10 units
Non-residential					
Use class	Description	Location	Minimum car parking standard	Minimum cycle parking standard	Electric vehicle infrastructure (Tiverton, Cullompton, Crediton)
			Per sqm gross floor area unless otherwise stated		
A1	Non-food retail	General	1 per 20	1 per 200	2 charging points per 200
A1	Food retail	General	1 per 14	1 per 140	2 charging points per 200
A2	Financial and professional	Within Tiverton, Cullompton & Crediton	1 per 30	1 per 300	2 charging points per 200
		Elsewhere	1 per 20	1 per 200	N/A
Non-residential					
A3	Restaurants	General	1 per 5.5sqm of eating area	1 per 55sqm of eating	2 charging points per 200

				area	
A4	Public houses	General	1 per 3sqm of drinking area	1 per 20sqm of drinking area	2 charging points per 200
B1, B2	Business and general industry	General	1 per 30	1 per 300	2 charging points per 200
B8	Warehousing and distribution	General	1 per 46.5	1 per 46.5	2 charging points per 10 parking spaces (employees/ visitors)
C1	Tourist accommodation	General	1 per bedroom	1 per 10 bedrooms	2 charging points per 30 rooms or per 10 parking spaces
C2	Residential institutions	General	1 per bedroom	1 per 10 bedrooms	2 charging points per 30 rooms or per 10 parking spaces
D1	Non-residential institutions (exc. Schools and health facilities)	General	1 per 40	1 per 400	2 charging points per 200
D2	Indoor and outdoor sports	General	1 per 2 players and 1 per 10 spectator seats	1 per 20 players and 1 per 100 spectator seats	2 charging points per 200
	Indoor entertainment	General	1 per 5 seats	1 per 50 seats	2 charging points per 200

4.19 Road transport accounts for over a third of end-user carbon emissions in Mid Devon, at a time when European and national policies set increasingly challenging targets for reduction of carbon emissions. However, research by the RAC in 2009 showed that, while car usage is reducing, this does not correspond to a reduction in car ownership. Research carried out on behalf of the Department of Communities and Local Government in 2007 forecast an increase of approximately 18% in car ownership between 2001 and 2026. In view of local levels of car ownership and the rural nature of the district, there is clearly a need for development in Mid Devon to provide sufficient parking.

4.19a Policy DM5 applies a minimum residential parking standard of 1.7 spaces per dwelling based on car ownership levels in Mid Devon. This figure will be used to calculate the

minimum number of parking spaces for the whole development site, with a minimum of one parking space to be allocated for the sole use of each property. The remaining parking provision (and more if preferred) should be distributed appropriately throughout the development, in accordance with principles set out in the Council's Supplementary Planning Document (SPD) on the provision of parking in new development. Other principles in the SPD should also be adhered to when drawing up development proposals, including the allocation of appropriately located motorcycle, visitor and disabled spaces with sufficient manoeuvring space. For developments comprising one or two dwellings the standard will be rounded up to two spaces per dwelling. It is always preferential to locate the parking in close proximity to the property it services. For houses, car parking should ideally be provided adjacent to the property, either within the residential curtilage or in well-designed on-street parking. Spaces within parking courts are much less frequently used, and can be perceived to be inconvenient and insecure. Large, isolated and rear parking courts should be avoided. For non-residential development, parking should be provided in accordance with Policy DM5 except where alternative provision can be justified on the basis of existing parking provision or other factors.

4.20 Accepting that people will continue to own cars, there is a need to make the transition to a low carbon economy through the promotion of low emission transport. Policy DM3 also refers to transport and low emissions.

~~4.21 Policy DM5 applies a minimum residential parking standard of 1.7 spaces per dwelling based on car ownership levels in Mid Devon. This figure will be used to calculate the minimum number of parking spaces for the whole development site, with a minimum of one parking space to be allocated for the sole use of each property. The remaining parking provision (and more if preferred) should be distributed appropriately throughout the development, in accordance with principles set out in the Council's Supplementary Planning Document (SPD) on the provision of parking in new development. Other principles in the SPD should also be adhered to when drawing up development proposals, including the allocation of appropriately located motorcycle, visitor and disabled spaces with sufficient manoeuvring space. For developments comprising one or two dwellings the standard will be rounded up to two spaces per dwelling. It is always preferential to locate the parking in close proximity to the property it services. For houses, car parking should ideally be provided adjacent to the property, either within the residential curtilage or in well-designed on-street parking. Spaces within parking courts are much less frequently used, and can be perceived to be inconvenient and insecure. Large, isolated and rear parking courts should be avoided. For non-residential development, parking should be provided in accordance with Policy DM5 except where alternative provision can be justified on the basis of existing parking provision or other factors.~~

Residential development

Policy DM6

Rural exceptions sites

The development of a site for predominantly affordable or low-cost housing, including self-build housing, to meet proven local need in rural areas will be permitted where:

a) There is up-to-date evidence of housing need secured through a housing need survey or, in the case of a self-build proposal, evidence of eligibility for shared ownership housing through 'Help to Buy' or an equivalent scheme;
b) The housing will be occupied by at least one person with a strong local connection to the parish;
c) The site adjoins a settlement and is in a suitable location which takes account of the potential for any visual impact and other relevant planning issues;
d) The type and scale of affordable or low-cost housing is appropriate to the proven need;
e) The affordable or low-cost housing will remain affordable for and available to local people in perpetuity, limited to no more than 80% of its market value upon resale.

The inclusion of a proportion of market housing within exception sites will be permitted where the proportion of market housing will be less than the provision of affordable or low-cost housing and the market housing will be at the lowest level necessary to ensure that the development is deliverable.

4.22 To encourage the delivery of affordable and low-cost housing in rural areas, exceptions can be made to the normal restrictions on housing development outside defined settlements. Exception sites must adjoin a settlement, which for the purposes of this policy will usually mean one of the settlements defined as suitable for limited development in Policy S13. However, some parishes do not contain a defined settlement but may have an affordable housing need, in which case a broader interpretation of 'settlement' will be appropriate, as long as there would be reasonable access to local services and infrastructure. Isolated sites in the countryside are not considered sustainable locations for new housing even under the exceptions policy.

4.23 Affordable and low-cost housing is reserved for those who cannot afford open market housing and have a connection to the local area. The definition of a 'local connection' is kept under review and as such it is appropriate that is contained in supporting guidance rather than determined through a Local Plan policy. In broad terms there should be a long-term residential, family or employment connection to the parish where the housing will be located. The criteria will be operated in a cascade to ensure those with the strongest connection are considered first. A planning obligation will be required to ensure that the affordable or low-cost housing remains available for local people in perpetuity.

4.24 Self-build housing will be permitted under this policy where at least one of the occupiers has an established housing need, assessed against appropriate officially published criteria. The Government's Help to Buy scheme applies eligibility criteria. Successful applicants:

- Cannot afford to purchase a home suitable for their housing needs within a reasonable travelling distance of their work place and have a household income not exceeding £60,000;

- Have savings or sufficient funds to pay, if required, a deposit (which may be 5% or more of the purchase price), legal fees, stamp duty and other costs of moving;
- Can sustain home ownership in the longer term;
- Are not already a home owner or named on a home mortgage;
- Have a good credit history.

4.25 Self-build housing will constitute low-cost housing rather than affordable housing, as it will not be rented or part-owned by a housing association. In the event that the Help to Buy scheme is discontinued or the Council identifies a more appropriate way of assessing eligibility, the Council will consider whether suitable criteria for assessing housing need exist elsewhere that can be applied to self-build proposals. Whilst low-cost housing does not meet the definition of affordable housing in terms of tenure, the Council will require the same controls over the housing to ensure that it remains available for people with a local connection who cannot afford open market housing in their area.

4.26 Affordable and low-cost housing must be appropriate to the needs of the people occupying it. For instance, if a housing need survey identifies a need for one or two bedroom dwellings, this is what should be provided. Self-build proposals will be tailored to the needs of the applicant, but will be expected to be of a modest size that reflects the principles of affordability for those in housing need.

4.27 National policy allows for some 'cross-subsidy' of affordable housing by market housing. This allows for sites which would not otherwise be viable for affordable housing to come forward, with market housing limited to the minimum level necessary to ensure delivery. Consistent with the overall principle of exception sites, the proportion of affordable housing must always be greater than that of market housing, and developers will be expected to submit evidence to demonstrate that the level of market housing proposed is the lowest level needed to deliver significant affordable housing. Evidence of local need for affordable housing will be required, as for any rural exception scheme. The Council will have regard to any up-to-date local housing need surveys and information from Devon Home Choice.

Policy DM7

~~Gypsy and traveller accommodation~~ Traveller sites

Planning applications for gypsy and traveller pitches, ~~including pitches~~or plots for travelling showpeople, will be permitted where:

~~a) The need cannot be met on another suitable site in Mid Devon which has consent or is allocated for gypsy and traveller pitches;~~
~~b) Local services can be accessed without the use of a car;~~
a~~c~~) Suitable onsite facilities will be provided including space for children's play;
b~~d~~) The proposal will have suitable environmental quality for residents including non-isolating boundary treatments; and

ce) Occupation will be limited to those who meet the Government's published definition of gypsies and travellers, including travelling showpeople;.

Where development proposals are considered under ~~S12 or~~ [PL1]S13 local services can be accessed without the use of a car.

Where development proposals are considered under S14, the need cannot be met on another suitable site in Mid Devon which has consent or is allocated for gypsy and traveller pitches.

Sites with associated employment or storage elements may be permitted where there is specific justification and the location of the proposed development will not have harmful impacts on local amenity or the local environment. Gypsy and traveller accommodation may be included as part of the affordable housing requirement.

4.28 To ensure that sites will meet the needs of the travelling communities and the settled community a criteria based policy will be operated as set out above to determine applications for traveller sites. In order to ensure that users of sites will have access to facilities, national policy indicates that local planning authorities should very strictly limit new traveller site development in countryside that is away from existing settlements or outside allocations in the development plan. Sites will therefore only be permitted where facilities will be accessible without recourse to a car either by walking, cycling or utilising public transport. However, sites must also be in locations where the local environment is of satisfactory quality, so locations adjacent to noisy or polluting land uses or in areas of floodplain will not be suitable.

4.29 The need for gypsy and traveller accommodation is identified to be in the region of 25 pitches across the plan period. These are to be included within allocated developments at Tiverton Eastern Urban Extension, North-West and East Cullompton, and Pedlerspool in Crediton. Where gypsy and traveller pitches are provided on housing allocations, these are to be counted against the affordable housing targets for that site. There are also existing consented sites in Mid Devon. Proposals for gypsy and traveller accommodation will not be permitted in other locations unless it is demonstrated that the existing consented or allocated sites will not be available to the prospective occupiers in a reasonable timescale.

Policy DM8

Rural workers' dwellings

Applications for rural workers' dwellings will be permitted where:

a) It can be demonstrated that the nature and demands of an existing rural business are such that a full time worker has an essential need to be permanently resident at or near their place of work so they are available at most times;
b) The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site;

c) The size and scale of rural workers dwellings will be commensurate with the scale of the operation and designed to reflect the location and setting of the proposed site; and
d) The rural enterprise has been established for at least three years, is currently financially sound, and has a clear prospect of remaining so.

Where a rural business is not yet established a mobile home may be permitted for a temporary period, on the basis of criteria b) and c) above, and evidence of:

- **(i) An essential need for one or more workers to be readily available at most times**
- **(ii) A firm intention and ability to develop the enterprise**
- **(iii) Sound financial planning**

Permissions for rural workers dwellings will be subject to an occupancy condition. Removal of such a condition will only be permitted where there is clear evidence that there is no need for the condition to remain in place.

4.30 With the majority of Mid Devon's population living outside its main towns the contribution of rural areas is a very important part of the district's overall economy. Therefore, it is important that the Council's planning policies support rural enterprises. To promote sustainable patterns of development rural workers will usually be expected to find housing in existing rural communities. However, an exception to this approach can be justified where it can be shown that a rural worker has an essential need to be available at most times as part of the operation of a rural business in accord with national policy. Essential need means a specific management activity or combination of activities which require the ready presence of a worker at most times if the proper functioning of an enterprise is not to be prejudiced and which cannot be achieved by any other practical means such as electronic surveillance. Such need would relate to any particular event or combination of events that could lead to adverse animal welfare, crop or product quality, or health and safety consequences which might threaten the stability and economic well-being of an enterprise. In all cases, these would be events which could not be properly managed within normal working hours. Security concerns on their own will not be sufficient to justify a new dwelling. On working family farms, the Council recognises that retired farmers may continue to live on the farm and there could be a need for additional accommodation to meet the needs of the next generation. In these cases the existing dwelling will not be treated as available alternative accommodation pursuant to criterion b) of the policy, though the Council may require a Section 106 Agreement (planning obligation) to ensure the existing dwelling remains occupied by agricultural workers.

4.31 Applications for rural workers' dwellings will need to be accompanied by evidence which conclusively demonstrates the essential nature of the need and that suitable accommodation can only be provided through the construction of a new dwelling. In order for such dwellings to remain affordable for rural workers and to protect the intrinsic beauty of the countryside proposed dwellings will need to be of a size which matches the scale of the operation and other buildings on the site. As such development will take place in areas where the development of new houses would not normally be permitted, it will also be important to ensure that its design reflects its immediate context and its wider rural setting. Permitted development rights may be removed to prevent further enlargement of the dwelling without planning permission, to keep the dwelling at a size and value that will be affordable for rural workers.

4.32 Where a rural business is not yet established, the Council will consider granting a temporary mobile home, subject to appropriate evidence of essential need, a firm intention to develop the enterprise and sound financial planning. A 'firm intention' and sound financial planning might be demonstrated by a combination of measures such as the construction of new buildings; the purchase of stock needed to operate a rural business; appropriate agricultural or rural business training and qualifications; work experience; and evidence of sufficient finances to establish the enterprise.

4.33 Consent is granted for rural workers' dwellings as an exception to normal policy to support the rural economy. Therefore such planning permissions will be made subject to an occupancy condition which ensures the dwelling remains tied to the agricultural or other appropriate occupational use and is not sold or rented to unsuitable occupants. To prevent abuse of the exception for rural workers dwellings the removal of such conditions will need strong evidence to show that the occupancy by a rural worker is no longer justified, such as evidence of marketing at an appropriate price for a period of at least 18 months and an assessment of the demand for rural dwellings in the area.

4.34 In appropriate circumstances the Council will also seek Section 106 Agreements to ensure that a temporary dwelling is not put in place until associated development or infrastructure has been completed, and to tie the rural workers' dwelling to the operation and associated land which has the essential need to prevent the splitting of the dwelling from the operation.

Policy DM9

Conversion of rural buildings

The conversion of redundant or disused rural buildings of substantial and permanent construction which positively contribute to an area's rural character for residential, tourism or employment uses will be permitted where:

a) A suitable access to the building is in place or can be created without damaging the surrounding area's rural character and the road network can support the proposed use;
b) The building can be converted without significant alteration, extension or rebuilding;
c) The design will retain the original character of the building and its surroundings; and
d) The development will retain any nature conservation interest associated with the site or building, and provide net gains in biodiversity where possible.

4.35 The buildings within Mid Devon's countryside are an essential part of its character and when they become redundant or disused they can provide a useful resource to allow the delivery of sustainable economic or residential development. In many cases the conversion of a rural building to an alternative use will be permitted development, requiring only a prior notification to the Local Planning Authority rather than a full planning application. However, if the relevant criteria for permitted development do not apply, planning permission is still

required and it is important to ensure that such conversions take into account their rural setting and the need to deliver good design.

4.36 National policy supports the sustainable re-use of rural buildings for economic and residential uses, requiring development to be sustainable and recognise the intrinsic beauty of the countryside. Development must be well designed and achieve a good standard of amenity for all existing and future occupants of land and buildings. Specifically in relation to residential conversions national policy states that they should lead to an enhancement to the immediate setting.

4.37 To ensure a conversion does not have a detrimental impact on the countryside and is sustainable, it is important that its development does not involve works that will have a harmful impact. The building should retain its original character in order that the converted building continues to positively contribute to the area's rural character. It is therefore important that any changes to the buildings are kept to a minimum, as reflected in the policy. Negative impacts could include the creation of a new access across an open field or light pollution in areas away from existing development. In order to ensure highway safety it is also important that a suitable access can be provided and the road network can support the proposed use. The rural nature of Mid Devon's highway network means that traffic intensive uses such as distribution or the movement of heavy and or bulky goods will not be appropriate in many locations. Further, rural buildings' role in the character of the countryside means that buildings in a ruinous state should not be re-used, the visual impact of the converted building should be no greater than that of the original building and local vernacular architecture should be retained. The Council will require a structural survey to be submitted to demonstrate that the building can be converted without significant alteration, extension or rebuilding, and may impose a planning condition which restricts permitted development rights for subsequent extensions and alterations.

4.38 Redundant rural buildings often serve as bat roosts or habitats for other protected species. The Countryside and Rights of Way Act 2000, the UK Biodiversity Action Plan and a number of other Regulations and Directives designate 'protected species' with legal protection. It is an offence recklessly or deliberately to kill, injure, capture or disturb protected species, which includes carrying out works which obstruct, damage or destroy access to that species' habitat. The Council will require a habitat survey to accompany any planning application for the conversion of a rural building, to identify protected species within the application site, set out any mitigation measures where appropriate and include recommendations for the enhancement of biodiversity.

4.38a Policy DM9 refers to the conversion of existing buildings to a residential, tourism or employment use. Proposals for new-build employment and expansion of existing businesses will be assessed against DM18. Other policies in the Local Plan will also be applied as appropriate.

Policy DM10

Replacement dwellings in rural areas

The construction of replacement dwellings outside defined settlement limits will be permitted where the replacement dwelling's floorspace will be no greater in size than the existing dwelling, taking into account any unspent permitted development rights.

4.39 Situations can arise where a replacement dwelling is sought because the cost of repairing or altering an existing building exceeds the cost of its total replacement. As the principle of development is established by the existing dwelling its replacement will generally be acceptable. However, to ensure that the character and amenity of the area are not harmed, and the rural dwelling stock remains affordable for local residents, the size of the new dwelling should be restricted to that of the previous dwelling except where there are any unspent permitted development rights. In all circumstances, the permitted development rights for the replacement dwelling will be removed. The relocation of a building within a plot will generally be acceptable provided it is in keeping with the placement of nearby houses in their plot. Policy DM10 refers to the replacement of existing dwellings, the use of which has not been abandoned.

Policy DM11

Residential extensions and ancillary development

Extensions to existing dwellings and other ancillary development will be permitted provided that they:

a) Respect the character, scale, setting and design of existing dwelling;
b) Will not result in over-development of the dwelling curtilage; and
c) Will not have a significantly adverse impact on the living conditions of occupants of neighbouring properties.

4.40 Rather than moving house to gain extra space many people extend their existing property and permitted development rights allow many extensions to be built without the need to apply for planning permission. However, there are still situations where planning permission is required and where extensions needing planning permission are proposed. It is important that the design of the extension is suitable for the building it will extend and for its immediate surroundings. For example it would not be acceptable for an extension to dominate the existing dwelling or to block light into principal rooms in an adjacent dwelling. The living conditions of neighbours should not be significantly harmed, and the Council will have regard to a number of factors affecting living conditions, such as light, privacy and overbearing or over-dominating effects. However, there is no right to a view across someone else's land, so the loss of a view will not in itself be a reason for refusal of planning permission. There are also occasions where ancillary development to a dwelling may need planning permission and in such cases it will also be important to ensure that the design and location of ancillary development is acceptable.

Policy DM12

~~**Design of housing**~~**Housing Standards**

New housing development should be designed to deliver:

~~a) High quality local places taking into account physical context, local character, density and land use mix;~~

a~~b~~) **Adequate levels of daylight, sunlight and privacy to private amenity spaces and principal windows;**

b~~c~~) **Suitably sized rooms and overall floorspace which allows for adequate storage and movement within the building together as set out in the Nationally Described Space Standard with external space for recycling, refuse and cycle storage;**

~~d) Adaptable dwellings that can accommodate a range of occupiers and their changing needs over time which will include the provision of a stairway suitable for stairlift installation or space for the provision of a lift in homes with more than one storey;~~

e~~c~~) **Private amenity space that reflects the size, location, floorspace and orientation of the property; and**

~~f) Sustainable forms of development that maximise the natural benefits of the site through design, materials, technology and orientation;~~

g~~d~~) **On sites of 10 houses or more the provision of 30% of dwellings built to Level 2 of Building Regulations Part M 'access to and use of dwellings'~~; and~~.**

~~h) Car parking in accordance with Policy DM5.~~

4.41 National policy states that planning should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. This is particularly important for the design of the homes that people live in and the spaces that surround those homes. The aim in Mid Devon is to deliver high quality buildings and spaces that meet the needs of users, taking account of an aging population whilst ensuring compatibility with surrounding development and uses. Though compliance is delivered through building regulations, criterion (g) will be implemented through a condition attached to the planning permission.

~~Policy DM13~~

~~Dwelling sizes~~

~~**Newly constructed dwellings should meet or exceed the following minimum internal floorspace requirements (measured in gross square metres, 'sqm'). The internal Design Standard requires that:**~~

~~a) Every dwelling provides at least the gross internal floor area and built-in storage area set out in the below table;~~

~~b) Every dwelling with two or more bedspaces provides at least one double (or twin) room;~~

~~c) In order to provide one bedspace, every single bedroom has a floor area of at least 7.5sqm and is at least 2.15m wide;~~

~~d) In order to provide two bedspaces, every double (or twin room) has a floor area of at least 11.5sqm;~~

~~e) One double (or twin bedroom) is at least 2.75m wide and every other double (or twin) bedroom is at least 2.55m wide;~~

f) Any area with a headroom of less than 1.5m is no counted within the Gross Internal Area (GIA) unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1sqm within the GIA);

g) Any other area that is used solely for storage and has a headroom of 900-1500mm (such as under eaves) is counted at 50% of its floor area, and any lower than 900mm is not counted at all; and

h) The minimum floor to ceiling height of the main living space is 2.5m for at least 75% of the GIA;

Minimum gross internal floor areas and storage (sqm)

Number of bedrooms	Number of bedspaces	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
Studio	1 person	39 (37)*			1.0
1	2 person	50	58		1.5
2	3 person	61	70		2.0
	4 person	70	79		
3	4 person	74	84	90	2.5
	5 person	86	93	99	
	6 person	95	102	108	
4	5 person	90	97	103	3.0
	6 person	99	106	112	
	7 person	108	115	121	
	8 person	117	124	130	
5	6 person	103	110	116	3.5
	7 person	112	119	125	
	8 person	121	128	134	
6	7 person	116	123	129	4.0
	8 person	125	132	138	

Notes: GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with 5 or more bedspaces. *Where a studio has a shower instead of a bathroom, the floor area may be reduced from 39sqm and 37sqm, as shown bracketed. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Built in storage areas are included within the overall GIA and include an allowance of 0.5sqm for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

4.42 Homes should be designed to have sufficient space based on the expected number of occupants, in order to avoid problems of lack of privacy, insufficient areas for moving around the house and not enough storage space. National and local research has demonstrated that homes have not been built to a sufficient size to meet the needs of the occupants. In recent years, it has also been the case that some market housing has been built to a smaller standard than would be deemed acceptable for affordable housing. In response to local concerns about unacceptably small dwelling sizes Mid Devon has previously operated a space standard which set agreed minimums which applied across all tenures.

4.43 The Government has subsequently proposed a new national space standard, to replace all existing size standards being used. In order to continue to ensure that houses of a sufficient quality continue to be built within the district, the Local Plan incorporates the Government standard into planning policy. Should changes be made to the Government standard, the application of the policy will be amended to align it with the latest approach.

Retail, business and tourism

Policy DM14

Town centre development

The Council will promote the sustainable growth and regeneration of Tiverton, Cullompton and Crediton ~~and Bampton~~. Within defined town centres, development proposals for ~~retail, leisure, commercial, office, tourism, cultural~~main town centre uses, community and residential development will be supported where they:

a) Retain or enhance the town centre's historic character and appearance, vitality and viability;
b) Sustain or enhance diverse town centre uses and customer choice, incorporating residential accommodation above ground floor level where possible; and
c) Are readily accessible by public transport, walking and cycling.

Within defined primary shopping areas, the shopping function will be safeguarded and enhanced. Development and change of use of ground floor premises to alternative uses will not be permitted where:

i) The primary retail role and character is undermined, causing unacceptable fragmentation and isolation of the remaining shops;
ii) The proposed use would harm the vitality and viability of the primary shopping area; and
iii) There would be a detrimental effect on the visual character and amenities of the surrounding area.

Within primary shopping frontages, at ground floor level the proportion of A1, A2 and A3 ~~retail~~ uses will not be permitted to fall below ~~65~~85% of all units.

4.44 The town centre is at the heart of a market town's community. The Local Plan distributes development according to the location, role and function of the towns of Tiverton, Cullompton and Crediton, with Cullompton expected to expand considerably over the plan period. Other Local Plan policies will also apply as appropriate, such as Policy DM1 on high quality design.

4.45 Retail markets change quickly and it is important that local planning policies are flexible enough to respond to rapid change. For this reason, Policy DM14 sets out a wide range of permissible uses in town centres, seeking to diversify customer choice while protecting and enhancing the viability of the town centre, its historic character and its accessibility by the most sustainable modes of transport. This applies to change of use applications as well as new-build development.

4.46 Primary shopping frontages have been defined within Tiverton and Crediton town centres, showing where retail development is concentrated. The primary shopping frontage (identified on the Policies Map) should include a high proportion of retail uses which may include food, drinks, clothing and household goods. These are the core town centre retail uses and should be protected, while other uses such as takeaways and professional services may be located elsewhere in the town centre.

4.47 Planning applications within the primary shopping areas will be not be permitted if any of criteria i-iii of Policy DM14 apply. The assessment of such applications will include consideration of:

- The location and prominence of the premises within the shopping frontage
- The floorspace and length of frontage of the premises
- The number, distribution and proximity to other premises within use classes A2-A5, or within planning permissions for such use
- The particular nature and character of the use proposed, including the level of pedestrian activity associated with it
- The level of vacancies in ground floor properties
- Whether the proposed use would give rise to noise, smell or other environmental problems

Policy DM15

Development outside town centres

Within Tiverton, Cullompton and Crediton ~~and Bampton~~ the Council will apply a sequential approach to planning applications for main town centre uses, according to the following descending order of preference:

a) Town centre
b) Edge of town centre
c) Out of town centre

Edge of centre and other out of centre proposals must be well related to the town centre and accessible by public transport, walking or cycling. Proposals in these locations must

also demonstrate that no suitable sites are available in a more sustainable location according to the order of preference given above.

The Council will require an impact assessment to be submitted for any proposals for retail, ~~and~~ leisure and office development outside of town centres, where the ~~proposed~~ total gross floorspace would exceed 500 square metres. The impact assessment must include an assessment of:

- **i) The impact of the proposal on existing, committed and planned public and private investment in the town or other centres in the catchment area of the proposal; and**
- **ii) The impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and wider area, up to five years from the time the application is made, or ten years in the case of major development, taking into account the cumulative impact of recently completed developments, planning permissions and development plan allocations.**

4.48 National policy requires local authorities to apply a sequential approach to ~~retail development in towns~~main town centre uses, to ensure the vitality and viability of town centres are not harmed by out-of-centre development. A proportionate, locally set threshold may be applied to retail, leisure and office floorspace proposed outside of town centres, over which an impact assessment should be required. The Mid Devon Retail Study recommends a threshold of 500 square metres gross floorspace. The need for an impact assessment will be considered in the context of each application and will be required where the development will result in total gross floorspace of over 500 square metres, either itself or cumulatively with other existing or proposed development of a similar type.

4.49 In considering development proposals in edge of centre or out of centre locations, the Council will assess whether there are suitable sites in a more sustainable location according to the order of preference and apply a flexible approach where justified. The nature, scale, car parking requirements and market demands of the proposal will be taken into account.

4.50 National policy defines 'edge of centre' as follows:

For retail purposes, a location that is well connected and up to 300 metres of the primary shopping area. For all other main town centre uses, a location within 300 metres of a town centre boundary. For office development, this includes locations outside the town centre but within 500 metres of a public transport interchange. In determining whether a site falls within the definition of edge of centre, account should be taken of local circumstances.

4.51 A retail impact assessment submitted in accordance with Policy DM15 should have regard to the findings of the Retail Study 2012. The assessment should consider the effect on existing stores and centres of committed and allocated developments and the development being proposed, based on:

(i) the turnover of existing facilities in the catchment area (including any completed since the Retail Study 2012)

(ii) the expected trade diversion from these facilities to any retail sites under construction, with planning permission or allocated for development

(iii) the trade diversion resulting from the proposed development

Applications for leisure development over 500 square metres floorspace should use a similar approach based on the Tourism Study and any other appropriate evidence.

4.51a Where specific allocations of this plan contain proposals for uses which are subject to the sequential test, a proportionate approach to the application of the test will be required, reflecting the strategic decisions already made through the local plan process. However, the local planning authority will still fully consider the potential impact on town centre vitality and viability to ensure that the primary role of the town centres in meeting such development needs is maintained.

4.51b Where proposals are predicted to have a likely adverse impact (including cumulative) on town centre health, planning permission should be refused. The Mid Devon Retail and Tourism Studies are available on the Mid Devon District Council website~~at http://www.middevon.gov.uk/evidence~~.

Policy DM16

Fronts of shops and business premises

Proposals for the alteration, replacement or construction of fronts for shops or business premises must be well proportioned and suited to the character of the building, adjacent buildings and the surrounding street scene. Where security measures such as grilles or shutters are proposed, these should be designed as an integral part of the building's front, maintaining the visibility of the building's interior and minimising visual impact. Independent ground floor access to the upper floors must be retained.

4.52 The fronts of shops and business premises visually dominate town centres and have a considerable impact on the town centre's character and appearance. Attractive shop fronts that respect their surroundings have a positive effect on the overall quality and attractiveness of a town centre. This policy should be read in conjunction with Policy DM1 on high quality design and Policy DM25 on heritage assets.

4.53 National policy emphasises the importance of residential development in bolstering the vitality of town centres. Policy DM14 therefore promotes residential development in town centres where possible, and Policy DM16 supports this further by ensuring that access to accommodation above ground floor commercial units is not lost through redevelopment of the building's ground floor front.

4.54 Advertisements including fascia and projecting signs often go hand-in-hand with the design of shop fronts and other business premises. Applications for Advertisement Consent are determined outside of the Development Plan, under the 'Control of Advertisements' regulations. Such applications are determined on the basis of public amenity and highway safety. National policy provides additional guidance.

Policy DM17

Rural shopping

Retail development will be permitted within defined villages, where it will meet local needs and is accessible by a range of transport modes.
Adjacent to defined villages and elsewhere in the open countryside, proposals for retail development must demonstrate that:

a) The location and scale of the development would not harm the vitality and viability of town centre or village shopping facilities;
b) The development would not lead to an unacceptable impact on the local road network; and
c) There would not be an unacceptable adverse impact to the character and appearance of the countryside.

4.55 Policy S13 defines the villages in Mid Devon that are considered suitable for limited growth, due to their physical characteristics and the availability of a range of facilities and services. The Council supports the sustainable growth and expansion of business and enterprise in rural areas, while protecting the predominance of town centres for meeting the district's retail needs. Policy DM17 refers only to retail development, while Policy DM18 will be applied to non-retail business development. Policy DM1 (high quality design) also applies.

Policy DM18

Rural employment development

In countryside locations, planning permission will be granted for new-build employment development or expansion of existing businesses, provided that the development is of an appropriate use and scale for its location. Proposals must demonstrate that:

a) The development would not lead to an unacceptable impact on the local road network;
b) There would not be an unacceptable adverse impact to the character and appearance of the countryside; and
c) There are insufficient suitable sites or premises in the immediate area to meet the needs of the proposal.

4.56 The Council recognises the importance of retaining and providing rural employment opportunities outside settlement limits as a means of ensuring a diverse and healthy rural economy. There is a range of employment activities, particularly those associated with tourism, recreation and rural diversification that can be accommodated in countryside locations, without any adverse effects upon the character of Mid Devon's rural areas or existing development. It is important that the various indirect consequences of employment development such as security fencing, lighting, advertising material, open storage and vehicle parking and manoeuvring provisions do not harm the visual environment. It is also important that development outside settlement limits only occurs where there are insufficient alternatives available otherwise such development would not be sustainable. The policy is not intended to relate to large scale strategic development which would be contrary to Policy S2.

4.57 Policy DM18 refers to new-build developments and expansion of existing businesses. Proposals for conversion of existing buildings to an employment use will be assessed against Policy DM9. Other policies in the Local Plan will also be applied as appropriate.

Policy DM19

Protection of employment land

Non-employment use or development of employment land or buildings, including sites that are established, allocated or have planning permission, will be permitted where it can be demonstrated that there is no reasonable prospect of the site being used for employment purposes. Alternative uses will be permitted where it is demonstrated that:

a) Firstly, there is a sufficient range of suitable and available employment sites in the local area; then

b) There is no commercial interest in the re-use of the site for employment, demonstrated by suitable marketing at an appropriate price for at least 18 months; and

c) A sequential viability test has been applied following the unsuccessful marketing of the site, based on the following sequence of testing:

i) Mixed use of the site that incorporates an employment-generating use, then

ii) Non-employment use.

4.58 One of the Council's five key objectives is a thriving economy. The Local Plan allocates commercial land sufficient to meet the district's future needs to 2033, but many people in the district will continue to commute to other areas and it is important to protect the sites that are currently providing jobs in Mid Devon. Employment land is a scarce and valuable resource which needs to be retained to ensure that the Council can deliver one of its key objectives.

4.59 National planning policy discourages the long-term protection of allocated employment sites where there is no reasonable prospect of a site being used for that purpose, and requires local planning authorities to have regard to market signals. Policy DM19 sets out local requirements that help to establish whether individual sites can provide employment. In assessing the range of suitable and available alternative employment sites in the local area (criterion a), the Council will have regard to the specific and wider conclusions of the Employment Land Review (2013), which describes a shortage in small employment allocations in Mid Devon. For the purposes of Policy DM19, the 'local area' means the Mid Devon district and, if an application site is in a parish adjacent to the district's boundary, a neighbouring district.

4.60 Applicants will also be required to demonstrate that there is no commercial interest in the re-use of the site for employment purposes. In view of the on-going fluctuations in the national economy, an 18 month marketing period is considered appropriate and will be kept under review in subsequent local plans. In relation to the appropriate price referred to in criterion (c) the price should reflect the price of similar employment sites or buildings which have been marketed within the previous two years or result from an independent assessment of the value of the land or buildings where this is not feasible. If there is no interest in the site as a result of marketing, the potential of the site for mixed use development including employment must be considered in preference to the total loss of employment. This will involve determining whether the site still has the potential to be developed viably for mixed use development or can only be viable if the whole site is developed for non-employment

uses. In all cases, the proposed use must not significantly harm any other existing uses in the area, or be harmed by those uses. For example, housing development may not be acceptable in close proximity to general industry, depending on the nature and scale of the industrial use.

Policy DM20

Agricultural development

Agricultural development will be permitted where:

a) The development is reasonably necessary to support farming activity on that farm or in the immediate agricultural community;

b) The development is sensitively located to limit any adverse effects on the living conditions of local residents and is well-designed, respecting the character and appearance of the area;

c) The development will not have an unacceptable adverse impact on the environment; and

d) The development will not have an unacceptable traffic impact on the local road network.

4.61 Agriculture is an important element of the Mid Devon economy. Agricultural development is essential to support modern farming and ensure a sustainable rural economy. This policy permits new agricultural development outside of the defined settlements, whilst seeking to balance the needs of modern farming with protecting the countryside and residential amenity.

4.62 Proposals for the development of new buildings for livestock need to take account of waste product storage or removal, and the effect this can have on the amenity of local residents and the environment. Such proposals will need to be accompanied by a Waste Management Plan, which sets out how the development limits any adverse effects. Where the development is likely to cause demonstrable harm to the environment, for instance where drainage from the site threatens the ecological integrity of a water body, a hydrological or drainage report will be required in accordance with Policy DM4 (pollution). A planning condition may be imposed to ensure that appropriate mitigation measures are implemented.

Policy DM21

Equestrian development

Horse-related facilities and equestrian enterprises in the countryside will be permitted where they are well integrated with their surroundings, being of appropriate location, scale, design and materials so as not to harm the character and landscape of the rural area or the amenity of nearby residents.

Equestrian development must not result in an unacceptable increase in traffic on the local highway network.

4.63 The use of land for horse keeping is a common feature of the Mid Devon landscape. Equine activities are an established part of the rural economy, providing opportunities for recreation and employment. Equestrian activities are typically located in the open countryside, away from settlements, where most forms of development are restricted.

4.64 New equine facilities can have a negative impact on the rural nature of an area, adversely affecting landscape character and natural beauty, by their appearance, scale, materials or design. Individually, equestrian developments may seem inconsequential, but cumulatively they may, over time, significantly alter the character of an area. It is therefore important that any new developments are designed and located as to minimise their impact, taking account of local character and landscape. Where proposals are part of an existing agricultural development, any new facilities should be integrated with, or located near to existing farm buildings or structures.

4.65 Commercial establishments or large scale domestic operations including racing stables, horse riding centres and liveries will have a greater impact on a local area, through their size, associated traffic generation and greater use of local roads for exercising of horses. Such establishments should demonstrate how they will not result in an unacceptable increase in traffic on local roads.

Policy DM22

Tourism and leisure development

Proposals for new or expanded tourism, visitor or leisure facilities will be supported within or adjacent to defined settlements. Elsewhere, the nature of the proposed development must justify a countryside location and minimise environmental impacts, avoiding an unacceptable traffic impact on the local road network. Development proposals must:

a) Respect the character and appearance of the location;
b) Where ~~possible~~appropriate, involve conversion or replacement of existing buildings; and
c) Demonstrate that the need is not met by existing provision within nearby settlements.

4.66 Tourism plays an important role in generating income for local residents. Devon is a very popular tourist destination, providing leisure and recreation activities for its own residents and those visiting the county. Despite a number of small scale attractions and places to stay across Mid Devon, tourism is less developed than within other parts of the county, partly reflecting the district's inland location and distance to the coast.

4.67 Tourism and leisure development is generally welcomed, providing employment and a means of supplementing rural incomes. However, it can have negative impacts on the surrounding area if located insensitively, being out of scale with its context or by failing to take account of local character and appearance. The policy seeks to locate most development within or close to defined settlements, where local shops and facilities are most accessible and stand to benefit the most. Sustainable development will be approved in accordance with Policy S1.

4.68 Applications for tourism and leisure development in the countryside will need to be justified by the applicant. The Council will require a marketing strategy and business plan to be submitted, to explain how the development will achieve a high quality tourism product that meets demand. Proposals must demonstrate that their benefits outweigh any harm and that they do not cause an unacceptable impact to traffic on the local road network. Tourism and leisure development should benefit local businesses, the environment, communities and visitors in the long-term, so the Council will seek the right form of development in the right location, with evidence that the need is not already being met by existing provision. In demonstrating unmet need for tourism proposals outside settlement limits, applicants should have regard to the Council's Tourism Study, available ~~at~~ on the Mid Devon District Council website ~~http://www.middevon.gov.uk/evidence~~.

4.69 Evidence supporting a countryside location should be proportionate to the scale and nature of the tourism proposal being considered. For instance, the conversion of a barn to tourist accommodation is permissible in principle under Policy DM9 (conversion of rural buildings) and is often dependent on an agricultural character which would not be found in a nearby town or village. Larger tourism attractions such as animal sanctuaries, museums, outdoor activity centres or hotels may have a significant impact on the countryside and the local road network, so in these cases more comprehensive supporting evidence will be required.

Community facilities

Policy DM23

Community facilities

The development of new community facilities providing a local community benefit or environmental enhancement will be permitted where they are easily accessible by the local community and well related to a settlement. Proposals for the redevelopment of existing community facilities that enables them to modernise, remain viable and continue to be retained for the benefit of the community will be supported.

Proposals involving the loss of community facilities such as local shops, public houses, allotments, cultural and recreational facilities and other important local services will not be permitted where this would damage the settlement's ability to meet its day to day needs or result in the total loss of such services to the community. Only in circumstances where the facility is proven to be no longer economically viable, including for alternative community uses, will applications for alternative use be considered acceptable.

4.70 Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. They include pubs, post offices, shops, village halls, allotments, places of worship and various recreational facilities. National policy seeks to retain and develop local services and community facilities and guard against their unnecessary loss, while the vision for this Local Plan recognises the importance of providing safe, healthy and crime free neighbourhoods. Policy DM23 therefore builds on

this guidance and seeks to protect those existing services whilst permitting some redevelopment where it is necessary to ensure viability.

4.71 The Council will guard against the unnecessary loss of valued community facilities and services. In circumstances where a community facility is proved to be no longer economically viable in a particular location, the Council will consider an alternative use. Assessment of viability will require the submission of detailed evidence relating to trading accounts, valuation considerations and the marketing of the business or property at a reasonable price for a minimum of 12 months.

4.72 Local communities can nominate buildings as 'assets of community value' to be added to a register held by the Council. Once on the register the owners of a facility will need to notify the Council if they intend to sell the asset, at which point the community will be offered the opportunity to purchase it. Mid Devon District Council will compile this list as community assets are brought forward. Applicants should contact the Council for further advice should they wish to apply for planning permission or change of use on a community facility that has been included on the register. The Council cannot refuse planning permission purely on the basis that a community asset is on the register.

Policy DM24

Protection of Local Green Space and recreational land/buildings

Open space, sports and recreational buildings and land, including playing fields, will be protected from alternative development unless:

a) An assessment has been undertaken which demonstrates that the site is surplus to requirements, including requirements within the parish for alternative forms of open space, sports or recreational use; or

b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location, prior to the commencement of the development; or

c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

Designated areas of Local Green Space will be protected from development unless the development meets the criteria set out in national policy for the protection of Green Belts.

4.73 This policy aims to protect open space, sport and recreational land or buildings from redevelopment, with the exception of any sites allocated for alternative use.

4.74 The Open Space and Play Area Strategy (2014) identifies sites of public open space, sports and recreational land in the district. Where the strategy shows a surplus of play areas or other open space according to the standards set out in Policy S5, the Council will consider which open spaces are most important for long-term maintenance and retention. Those which include a flexible mix of uses such as equipped play space, sports and informal recreation land will normally be considered a priority for retention, and also those which are an integral and well-functioning part of an existing housing estate. Proposals for redevelopment of surplus open space must demonstrate that the site is less preferable for public recreational

use than the alternative open spaces within an accessible distance of the development. If this is not the case, criteria b) or c) of the policy apply.

4.75 Sites which are particularly important to local communities may be designated as Local Green Space, through the preparation of local or neighbourhood plans. The Local Plan designates Local Green Space at the following locations:

- Millenium Green, Bampton
- ~~Church Green, Bickleigh~~
- Joan's Orchard, Bickleigh
- Recreation Ground, Bickleigh

- Nick's Farm Field, Bradninch
- Millenium Green, Sandford
- Millennium Green, Thorverton
- Sports Field, Witheridge

4.76 Neighbourhood plans produced by local communities may designate further areas in addition to the above list. Local Green Space must be reasonably close to the community it serves; have demonstrable local significance and interest; be local in character and not cover an extensive tract of land. National policy applies a level of protection equivalent to Green Belts.

Environment

Policy DM25

Development affecting heritage assets

Heritage assets and their settings are an irreplaceable resource. Accordingly the Council will:

a) **Apply a presumption in favour of preservation in situ in respect of the most important heritage assets;**

b) **Require development proposals likely to affect heritage assets and their settings, including new buildings, alterations, extensions, changes of use and demolitions, to consider their significance, character, setting (including views to or from), appearance, design, layout and local distinctiveness, and the opportunities to enhance them;**

c) **Only approve proposals that would be likely to substantially harm heritage assets and their settings if substantial public benefit outweighs that harm or the requirements of paragraph 133 of the National Planning Policy Framework are met;**

d) **Where a development proposal would lead to less than substantial harm, that harm will be weighed against any public benefit, including securing optimum viable use; and**

e) **Require developers to make a proportionate but systematic assessment of the impact on setting as set down in the guidance from ~~English Heritage: "The Setting~~**

~~of Heritage Assets"~~Historic England: 'The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning:3'.

4.77 The historic environment is an asset of great cultural, social, economic and environmental value. It is a non-renewable resource that contributes significantly to our quality of life and to the character of the district. Heritage assets are defined as those parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest over and above their functional utility and covers both designated and non-designated assets.

4.78 A heritage asset is defined as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. This includes designated heritage assets such as listed buildings, scheduled monuments, registered parks and gardens and conservation areas, and undesignated sites that can include archaeological sites, locally listed assets and any asset included on the Devon County Historic Environment Record.

4.79 Where proposed development will have the potential to impact upon a heritage asset or its setting, the Council will require the applicant to submit sufficient information to enable a description of a heritage asset affected and a consideration of the impact of the development upon it. This may take the form of an appropriately detailed desk-based assessment and, where necessary, a field evaluation. The level of detail required should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance. If physical preservation of a heritage asset in situ is not appropriate or feasible, "preservation by record" may be acceptable and implementation required by a condition attached to planning permission. Non-designated heritage assets of archaeological interest that are of equivalent significance to a scheduled monument, will be considered subject to the policies for designated heritage assets.

4.80 Proposed development that would lead to substantial harm or total loss of significance of a designated heritage asset will be assessed against national policy, which requires that such proposals should be refused unless there are substantial public benefits that outweigh the harm, or all of the following considerations apply:

- The nature of the heritage asset prevents all reasonable uses of the site
- No suitable viable use of the heritage asset can be found in the medium term through appropriate marketing
- There is no possibility of conservation as a result of grant-funding or charitable or public ownership
- The harm or loss would be outweighed by the benefit of bringing the site back into use

4.81 Balancing the importance of conservation with the challenge of tackling climate change represents a priority for the district. Proposals for measures to mitigate the effects of climate change that affect listed buildings or buildings in a conservation area can sometimes conflict negatively with the principles of conservation. Therefore prior to determination, the Council will work with applicants to identify feasible solutions that deliver climate change mitigation with less or no harm to the significance or setting of the heritage asset. Where conflict is unavoidable, the public benefit of mitigating the effects of climate change will be weighed against any harm to the significance of the heritage assets affected.

4.82 Further background information in relation to Mid Devon's historic environment can be found within the Town and Village Character Assessment and Conservation Area Appraisals. Where these are available, applications should make reference to how the proposed development contributes towards the priorities set out in these documents. Specific studies may also be relevant to development proposals depending on their location. For instance, where development would affect the setting of Knightshayes Court or Killerton Park, the Council will have regard to The Setting of Knightshayes Park and Garden: A Historic Landscape Assessment (The Parks Agency; Sept 2007), or the Killerton Park Setting Study (Land Use Consultants; final report, April 2013), as appropriate. These documents are available on the Council's website and will be a material consideration when planning applications are determined. Applicants are encouraged to contact the Council to check if their site falls within the setting study areas surrounding Knightshayes or Killerton, and consider the implications of this at the design stage. It should also be noted that the areas covered by setting studies do not represent a finite limit of setting.

4.83 Details of Mid Devon's non-designated heritage assets are on the register of heritage assets, which is available on the Council's website ~~at www.middevon.gov.uk/heritageassets~~. ~~The Council's online Public Access system at www.middevon.gov.uk/online-applications has a property address search facility that identifies where heritage assets are present~~. Further details of heritage assets are ~~also~~ available from ~~English Heritage~~Historic England and the Historic Environment Service at Devon County Council, which holds the Devon County Historic Environment Record. The Council will publish a local register of non-designated heritage assets.

4.84 Existing registers of heritage assets are not an exhaustive list of heritage assets. The Mid Devon local list is regularly reviewed to take account of new information. A development proposal might draw attention to a heritage asset that had not previously been identified or assessed. The absence of an asset from the heritage asset register at the time an application is submitted does not indicate that the asset has no heritage value.

Policy DM26

Green infrastructure in major development

Major development proposals must demonstrate that green infrastructure will be incorporated within the site as follows:

a) Biodiversity mitigation, resulting in a net gain in biodiversity;
b) Flood and water resource management;
c) Green corridors and public rights of way to link the site to the wider GI network, provide walking and cycling opportunities and avoid habitat fragmentation; and
d) New green infrastructure such as the creation of native woodland where possible.

Where evidence demonstrates that meeting these criteria in full would render the development unachievable, the Council will balance the benefits of the development against the objectives of this policy. Where appropriate, the Council will seek

contributions toward off-site green infrastructure where on-site green infrastructure is unfavourable.

4.85 Green infrastructure is a network of multi-functional green space with recreational, visual and ecological value. It includes:

- Natural and semi-natural green spaces such as grassland and nature reserves
- Green corridors such as hedgerows, verges and public rights of way, or 'blue infrastructure' such as watercourses and other water bodies
- Public or private spaces such as gardens, parks, village greens and allotments

4.86 Biodiversity is in long-term decline, with habitats becoming increasingly fragmented and degraded as a result of changing land use and agricultural practices. National policy seeks to reverse this trend, halting overall biodiversity loss and reintroducing well-functioning and coherent ecological networks for the benefit of all. There is an opportunity for development in Mid Devon to play its part in improving the quality and connectivity of green infrastructure. Green infrastructure in some cases can also serve the purpose of protecting or enhancing heritage assets.

4.87 Major applications (defined in the glossary) should be accompanied by a habitat survey describing what flora and fauna are present on the site, with particular regard to protected species. In permitting the development, the Council must be satisfied that onsite biodiversity mitigation, where required, is sufficient to make the development acceptable in planning terms.

4.88 Green infrastructure provided within major development sites should normally serve a variety of purposes such as flood attenuation, leisure and recreation, provision of natural habitats, and shading and cooling of buildings and public areas. Green infrastructure functions can co-exist in one place, so the land coverage does not have to be extensive in every case. Green infrastructure within the site should be achieved as part of the broader objectives for high quality design set out in Policy DM1 (high quality design). Applicants should have regard to the Town and Country Planning Association document, Biodiversity by Design, and should explore opportunities for green infrastructure to deliver wider environmental measures, such as those set out in the SW River Basin Management Plan.

4.89 This policy should be considered alongside Policy S5, which sets local standards for the provision of public open space in new development.

Policy DM27

Protected landscapes

Development proposals within or affecting the Blackdown Hills Area of Outstanding Natural Beauty, Dartmoor National Park, Exmoor National Park and the North Devon Biosphere Reserve must demonstrate that:

a) Cultural heritage and the character, appearance, setting and other special qualities of the landscape will be conserved or, where possible, enhanced; and

b) Biodiversity will be conserved and enhanced where possible through improved linking of habitats, appropriate landscaping and habitat creation.

Major developments within or adjoining the Area of Outstanding Natural Beauty and Dartmoor or Exmoor National Parks will only be permitted in exceptional cases.

4.90 National policy accords the highest status of protection to the landscape and scenic beauty of Areas of Outstanding Natural Beauty (AONB) and National Parks. The Mid Devon district incorporates a very small part of Dartmoor National Park in the Cheriton Bishop parish, for which Dartmoor National Park Authority is the Local Planning Authority. The district shares boundaries with both Dartmoor and Exmoor National Parks.

4.91 The Blackdown Hills Area of Outstanding Natural Beauty (AONB) is a nationally important landscape designation, aiming to preserve and enhance the natural and historic landscape features, flora and fauna of the AONB. The Blackdown Hills Management Plan outlines measures for the protection and management of this landscape. Development should not in any way undermine the special qualities that led to the designation of this landscape as AONB.

4.92 Part of the western side of the district falls within the transition area for the North Devon Biosphere Reserve. Biosphere Reserves are areas nominated by national governments and designated under UNESCO's 'Man and Biosphere Programme.' These areas are recognised for their high biodiversity value combined with sustainable use of natural resources for the benefit of local communities. The purpose of the biosphere reserve is to reconcile the conservation of biodiversity with human development needs. The part of the reserve within Mid Devon is known as a 'transition area'. This does not benefit from the very high level of environmental protection found in the 'core area' at Braunton Burrows, but contains agricultural activities and local communities that are recognised for their progress towards achieving this environmental and economic balance.

4.93 Further information on the cultural heritage, character, appearance and setting of the district's landscapes may be found in the Mid Devon Landscape Character Assessment, the Devon Landscape Character Assessment and Devon County Council's Historic Environment Record, which the Council may use as a background to decision-making. Where a development proposal would have potentially significant landscape impact, a Landscape and Visual Impact Assessment and ecological report will be required. For applications not supported by specific studies, such as small-scale proposals with no likely significant effects on the landscape or biodiversity, the requirements of the policy should be met through the Design and Access Statement where one is required.

4.94 Where major developments are proposed within or adjoining protected landscapes or adjoining the National Parks, it must be demonstrated that they are sufficiently in the public interest to overcome any detriment to the landscape in question. National policy criteria will be applied, including an assessment of the need for the development, consequences of approval or refusal, opportunities for an alternative location and the extent to which any detrimental effects on the environment could be mitigated. The impact of light pollution should also be considered with particular regard provided for the Dark Sky Reserve status of Exmoor National Park.

Policy DM28

Other protected sites

Where development proposals would lead to an individual or cumulative adverse impact on Sites of Special Scientific Interest, ancient woodland, ancient trees, Regionally Important Geological Sites, County Wildlife Sites, Local Nature Reserves or priority habitats defined under the UK and Devon Biodiversity Action Plans, the Council will balance the overall benefits of the proposal against the impact. Sufficient information must be provided for the Council to assess the significance of the impact against the importance of the protected site and the species which depend upon it. Planning permission will be granted where:

a) **The benefits of and need for the development clearly outweigh the direct and indirect impact to the protected site and the ecosystem services it provides;**

b) **The development could not be located in an alternative, less harmful location; and**

c) **Appropriate mitigation measures have been put in place. Where mitigation measures are not possible compensatory measures in some cases may be considered appropriate.**

Where development proposals would lead to an individual or cumulative adverse impact on Natura 2000 sites, planning permission will be refused unless the proposal complies with criteria b) and c) above, and the fundamental integrity of the features of the Natura 2000 site would not be affected.

4.95 Natura 2000 sites include habitats protected under European Legislation, such as Special Areas of Conservation and Special Protection Areas for birds. There are no sites in Mid Devon that are designated at European level for wildlife protection or special conservation. However, there is a European-designated Special Area of Conservation (SAC) adjacent to the district's boundary on the A361 road near Rackenford, within North Devon district. While the policies in this plan incorporate counter-acting measures to reduce effects on SACs, the protection of European sites is of the utmost importance. Development that would adversely affect a Natura 2000 site will not normally be permitted, given the stringent tests applied in Policy DM28 and the National Planning Policy Framework.

4.96 Within the Mid Devon district, the Council accords the highest degree of importance to Sites of Special Scientific Interest, as these are sites of national importance with regard to flora, fauna, geological and physiographical (landform) features. They are statutorily protected from harmful operations under the Wildlife and Countryside Act 1981. Proposed development that has an adverse effect on a Site of Special Scientific Interest, whether individually or in combination with other developments, will not normally be permitted. Paragraph 118 of the National Planning Policy Framework will be applied.

4.97 Ancient woodland will be accorded the same level of importance as Sites of Special Scientific Interest, as it comprises a number of woodland habitats that are a national priority for improvement under the UK Biodiversity Action Plan. Ancient woodland and trees are irreplaceable. As such, the opportunities for mitigation under criterion c) of the policy are limited, and planning permission is likely to be refused for development that would result in

the loss of ancient woodland or trees unless the need for, and benefits of, the development in that location clearly outweigh the loss. Where the Council becomes aware of ancient trees not previously identified and under threat from development, a Tree Preservation Order will be considered.

4.98 Regionally Important Geological Sites, being of regional significance, are also accorded a high degree of importance. Mid Devon only has six such sites, within the parishes of Crediton, Crediton Hamlets, Zeal Monachorum, Kentisbeare and Uffculme. More information is available in the glossary. Any development proposal that impacts upon one of these sites would need to be extremely well justified.

4.99 County Wildlife Sites are undesignated sites selected because of the presence of important habitats or species. There are over 200 such sites in Mid Devon, representing a variety of habitats. Development proposals adversely affecting a County Wildlife Site will be considered on a case-by-case basis, according to the amount of information available about the site and its significance, relative to the type, scale and benefits of the development being proposed. The same position will be taken on proposals that impact on Local Nature Reserves and priority habitats (other than ancient woodland) defined in the UK and Devon Biodiversity Action Plans.

4.100 Priority habitats include certain classifications of grassland, heathland, woodland or marsh. While the loss of irreplaceable habitats will not normally be permitted, the Council will seek the replacement of a priority habitat where it is significantly affected and its replacement can be achieved, through a planning obligation as appropriate.

4.101 The Countryside and Rights of Way Act 2000, the UK Biodiversity Action Plan and a number of other Regulations and Directives also designate particular 'protected species' with legal protection. It is an offence recklessly or deliberately to kill, injure, capture or disturb protected species, which includes carrying out works which obstruct, damage or destroy access to that species' habitat. These provisions are set out in law and apply in addition to relevant policies in the Local Plan. The Council will require a protected species survey to be carried out in support of any relevant planning application, including when the application site is not a protected site under Policy DM29 but may affect protected species such as bats and birds.

4.102 Policy DM29 affords protection to sites of significant wildlife or geological importance. Where adverse impacts are likely, planning permission will be refused unless there is particular justification that clearly outweighs the impact in that case. The Council will consider the wider implications of any adverse impact to a protected site, such as its role in providing a vital wildlife corridor, attenuating flood risk or ensuring good water quality in a catchment. National policy criteria will be applied. Where development is permitted and would lead to an adverse impact, appropriate mitigation measures should be put in place. Compensatory measures in some cases, where mitigation measures are not possible, may be considered appropriate. Compensatory measures are not possible in cases and will depend on the context of the protected site. In the case of Natura 2000 sites, compensatory measures may only be considered if the proposal is deemed to be of overriding public interest and would involve engagement with both Central Government and European Commission.

4.103 The protected sites listed in Policy DM29 are identified on the Policies Map where they are within or adjoining a defined settlement. Larger sites are also identified on the

district-scale map. Up-to-date mapping and information for County Wildlife Sites are held by Devon Biodiversity Record Centre (DBRC). Applicants are advised to contact DBRC when the full extent of a County Wildlife Site is in question.

Enforcement

Policy DM29

Planning enforcement

The Council will investigate unauthorised development, acting proportionately to the scale of the suspected breach of planning control. Enforcement action will be taken where it is appropriate to do so and in the public interest.

4.104 Investigating suspected breaches of planning control is an important function of a Local Planning Authority. Unauthorised development can be detrimental to the local environment and be a source of social tension. Failure to enforce planning conditions or address unauthorised development can reduce the effectiveness of a Local Planning Authority and undermine public confidence in the planning system.

4.105 When undertaking investigations, the Council will act in proportion to the scale of the suspected breach to which it relates. The Council will then take enforcement action where it deems such action to be appropriate, having regard to the scale of the breach and the impact on public amenity.

4.106 To ensure that enforcement is managed proactively and in a way that is appropriate to Mid Devon the Council will publish a Local Enforcement Plan. This document will set out the Council's approach to enforcement, including timescales for action and stating in detail how the Council will respond to suspected breaches of planning control.

5.0 Monitoring

5.1 Monitoring is important to understand the characteristics of the local area, assess the impact of policies and whether the strategy is delivering sustainable development so that the policies can be reviewed as appropriate. The Council is required to produce a Monitoring Report at least annually to provide information on the following matters:

- Progress of local plans including the timetable for completion, stage reached and reasons for any delays;
- Any local plans or supplementary planning documents that have been approved or adopted, including relevant dates;
- Decisions not to implement any Local Plan policy including reasons and steps to implement the policy in the future;
- The number of market and affordable dwellings built in the reporting period and since the relevant Local Plan policy target was introduced;
- Any neighbourhood plans or development orders made in the district;
- Progress on the implementation of the Community Infrastructure Levy, if any; and
- Actions taken to ensure cooperation with other local authorities and prescribed organisations under the 'duty to cooperate'.

5.2 The Local Plan contains local indicators and targets where appropriate to inform this process and to measure the Council's performance against relevant policies and legislation.

Indicator	Relevant Policies	Target	Implementation Agencies	Comments
Housing				
Housing trajectory showing net additional dwellings from 2013-2033	S2; S3; S4; S10; S11; S12; S13	Annual completions of ~~360~~ 393dwellings	Development industry, MDDC	
Affordable housing completions; number of dwellings	S1; S3	Annual average completions ~~100~~ 124 per year.	MDDC, development industry, registered providers, Housing and Communities Agency	
Affordable housing on rural exception sites	S3; DM6	>50% affordable housing	MDDC, development industry, registered providers, Housing and Communities Agency	Proportion of market housing on rural exception sites should be lower than that of affordable housing.
Net additional gypsy and traveller pitches	S3; DM7		MDDC	
Self-build completions	S3	5% on sites of 20+ dwellings	MDDC, development industry	
Sizes and types of dwellings completed	S1; S3; DM13	No target	MDDC, development industry	

Net density of new residential development	S9; DM1	None	MDDC, development industry	Policies do not set minimum housing densities but promote the efficient and effective use of land.
Indicator	Relevant Policies	Target	Implementation Agencies	Comments
Housing				
Availability of land for housing	S3; S4	>105% housing supply against requirement	MDDC, development industry	Target applied to whole district. Target will be revised to >120% if persistent under-delivery of housing is proven.
Development of housing on allocated sites	S3; S4 All housing allocations	>50% of completions	MDDC, development industry	
Total amount and percentage of housing development (including conversions) on previously developed land.	S1	No target	MDDC, development industry	
Number of parking spaces provided in new residential developments	DM5	≥1.7 car parking per dwelling	MDDC, development industry	
Commercial				
Total amount of additional commercial floorspace for the whole district and individually for Tiverton, Cullompton, Crediton and rural areas	S2; S6; S10; S11; S12; S13; DM14; DM15, DM18	Average annual completions (square metres) Mid Devon ~~7700~~7350 Tiverton ~~1540~~1470 Cullompton ~~3850~~3675 Crediton ~~770~~735 Rural Areas ~~1540~~1470	MDDC, development industry	Monitoring reports will break down the provision of use classes A1-A5, B1-B8, C1-C2, D1-D2 and sui generis uses.
Development of employment on allocated sites	S6; All commercial allocations	>50% of completions	MDDC, development industry	
Losses of commercial land in local authority area	S6; DM14; DM15; DM19	No Target	Mid Devon District Council, development industry, businesses	Loss of commercial land will be broken down according to use class.
Number of active businesses	S1; S2; S6	Maintain or increase number of active	MDDC, Heart of the South West Local Enterprise Partnership, private sector	

		businesses.		
Job Seekers Allowance as a proportion of working age population each April	S1; S6	Remain below regional average	MDDC, development industry, business sector	Gives indictor for deprivation and employment.
Total amount of floorspace for town centre uses, in total and within town centres (Classes A1, A2, B1a and D2)	S6; S7	No target	MDDC, development industry, retail business sector, leisure industry.	
Indicator	Relevant Policies	Target	Implementation Agencies	Comments
Total amount of floorspace for town centre uses out of town centres (Classes A1, A2, B1a and D2)	S6; DM14; DM15	No target	Mid Devon District Council, development industry, retail business sector, leisure industry.	To monitor edge-of-centre and out-of-centre development, mainly retail.
A1 shops in primary shopping frontages.	S7; DM14	>65%	Mid Devon District Council, development industry, retailers	
Total amount and percentage of commercial floorspace on previously developed land.	S1	No target	MDDC, development industry	
Infrastructure				
Community Infrastructure Levy. Monitor annual receipt of CIL.	S8	No target.	MDDC, development industry	
Public open space provision and accessibililty. Applications complying/failing to comply with quantity and access standards in Policy S5	S1; S5; S8	No target	MDDC, development industry, town and parish councils, Sport England, private and voluntary organisations.	Policy S5 sets out standards for open space provision. Smaller sites may provide financial contributions in lieu of onsite open space, with these funds being directed to the provision or improvement of public open space elsewhere.
Strategic Housing and Commercial Land Availability	S3; S4; S6	To review SHLAA/SCLAA when the Local	MDDC, development industry, infrastructure providers	

Assessment		Plan is reviewed		
Services available in towns and rural areas	S8; S10; S11, S12; S13; S14	No reduction in services	MDDC, Devon County Council, other organisations	Services include: Public transport, educational facilities, convenience stores, community halls
Loss of community facilities	S1; DM23	No total loss in settlement	MDDC, development industry	
Environment				
Number of Conservation Area Appraisals and Conservation Area Management Plans	S9	1 new or updated CAA/MP per year	MDDC	
Habitat surveys (where applicable) for consented developments demonstrate no loss in biodiversity.	S1; S9	100%	Natural England, MDDC, development industry	No loss may be achieved through avoidance, mitigation and compensation of impacts.
Developments permitted on protected sites (habitats)	S1; S9; DM28	No target	MDDC, Natural England, development industry	Policy directs development away from protected sites subject to criteria, so the number of consents should be low.
Indicator	Relevant Policies	Target	Implementation Agencies	Comments
Ecological status of water bodies	S1; S9; DM4	No target	MDDC, development industry, Environment Agency.	Target in South West River Basin Management Plan is to achieve good ecological status for water bodies and protected areas by 2015. The Environment Agency monitors water quality.
Consented renewable energy development by type and megawatts.	S1; S9 DM2	No target	Mid Devon District Council, development industry.	
Number of heritage assets added to the local register	DM25	No target	Mid Devon District Council, development industry, English Heritage	
Air Quality Management Areas	S1; S11; S12; DM3; DM4	Reduction in air pollutants within AQMAs	MDDC, development industry, Devon County Council, Highways Agency	
Enforcement				
Number of planning enforcement cases,	DM29	No target	MDDC	

notices and prosecutions				

This page is intentionally left blank

Annex 1

Glossary

Adopted Policies Map (Proposals Map):

A map showing the areas or sites to which local plan policies and proposals apply. It will contain Inset Maps, showing particular areas in more detail.

Affordable Housing:

Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.

Allocations:

Proposals that a certain site or area of land should be developed for particular uses and/or buildings. They are shown on a Policies Map, contained within the Local Plan or Local Development Framework. There will be a related policy setting out any parameters and criteria for the site, contained within the local plan.

Assets of Community Value:

A property or place that has been nominated by the local community and included on the Council’s list of Assets of Community Value. If a registered property is to be sold, the local community is given the opportunity to bid for it before it is released for sale on the open market.

Building Research Establishment Environmental Assessment Method (BREEAM):

An environmental assessment method and rating system for buildings, to evaluate a building’s specification, design, construction and use.

Car Club:

An organisation that owns cars that are shared by its members. People arrange in advance when they want to use a car, and pay to use it. The advantage is that members do not have to pay the whole cost of owning a car, but are able to use one when they need to.

Community Facilities:

Community facilities provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community. They include pubs, post offices, shops, village halls, allotments, places of worship and various recreational facilities.

Community Infrastructure Levy:

A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Curtilage:

The extent of the land around a property (particularly a dwelling) that often, but not always, delineates the amount of land associated with the property. For larger, particularly country properties, the curtilage may often only refer to an immediate cultivated garden and associated forecourt, rather than any other land included within the overall 'planning use'.

Devon Biodiversity Record Centre (DBRC):

An online database of over two million wildlife records, hosted by the Devon Wildlife Trust.

Ecosystem services:

The products of natural systems from which people derive benefits, including goods and services, some of which can be valued economically and others which have a non-economic value. Ecosystem services include: provisioning services (products from land and water); regulating services (processes such as pollination; water purification and climate regulation); cultural services (heritage, recreation, health and wellbeing); and supporting services (essential functions such as soil formation and nutrient cycling).

Embodied carbon:

The amount of CO_2 emitted during a product's entire lifecycle, including raw material extraction, transport, manufacture, assembly, installation, maintenance, disassembly or demolition and decomposition. A complete assessment of embodied carbon is often termed 'cradle to grave', while an assessment limited to the early phases (up to the point the product leaves the factory) is called 'cradle to gate'.

Green Infrastructure:

A network of multi-functional green space with recreational, visual and ecological value.

Local Development Scheme:

A project plan for the preparation of local plans.

Local Green Space:

The designation of locally important land for special protection, ruling out development other than in exceptional cases. Local Green Space is designated when a local or neighbourhood plan is prepared or reviewed. It must be reasonably close to the community it serves; have demonstrable local significance and interest; be local in character and not cover an extensive tract of land.

Low Carbon technologies:

Includes energy for heating and cooling as well as generating electricity. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Main Town Centre uses:

Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreational uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotel and conference facilities).

Major development:

Applications for residential development with a minimum of 10 dwellings or a 0.5 hectare site area, and planning applications for non-residential development with a minimum of 1000 square metres gross floor area, or a 1 hectare site area.

Minor development:

Planning applications which are not any of the following types: a major application, a change of use application or a householder application.

Neighbourhood plans:

Plans and Development Orders produced by parish councils or other designated neighbourhood forums with the support of the local community, including Community Right to Build Orders.

Planning obligation:

A legal agreement or undertaking under Section 106 of The Town and Country Planning Act 1990. Planning obligations provide a means of ensuring that developers contribute towards the infrastructure and services that are necessary to facilitate proposed development. The use of Section 106 Agreements is affected by the Community Infrastructure Levy Regulations.

Primary shopping area:

Defined area where retail development is concentrated (generally comprising the primary and secondary shopping frontages which are adjoining and closely related to the primary shopping frontage).

Primary and secondary frontages:

Primary frontages are likely to include a high proportion of retail uses which may include food, drinks, clothing and household goods. Secondary frontages provide greater opportunities for a diversity of uses such as restaurants, cinemas and businesses. Mid Devon towns do not have defined secondary frontages but these are generally located within the primary shopping area, outside of the primary shopping frontage (see Policies Maps).

Priority habitat/species:

Priority species and habitats are those that have been identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan.

Public Rights of Way (PRoW):

Give you the right to walk, ride a horse or cycle along certain routes and are legally protected in the same way as roads.

Recreational Trail:

A corridor, route or pathway, generally land or water based, primarily intended for recreational purposes, including walking, hiking, cycling, canoeing and horse-riding.

Regionally Important Geological Sites (RIGS):

These are the most important sites for geology and geomorphology outside of statutorily protected land such as Sites of Special Scientific Interest. They are designated according to criteria set at regional or county level. The following table details the six Mid Devon RIGS:

Grid_Ref	Parish	Description
SS789022	Crediton Hamlets	Quarry with exposures of Permian volcanic lava
SS714032	Zeal Monachorum	Quarry with exposure of Upper Carboniferous Bude formation
SS820005	Crediton	Road cutting with exposure of Crediton Breccia
SS817002	Crediton Hamlets	Exposure of Newton St.Cyres Breccia on the sides of a deeply sunken lane
ST096090	Kentisbeare/Uffculme	Scarp hillside covered in bracken & woodland
SX823985	Crediton Hamlets	Quarry with volcanic lava resting on soft reddish Knowle sandstone

Renewable energy:

Includes energy for heating and cooling and electricity generation. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat.

River Basin Management Plan (RBMP):

A plan produced by the Environment Agency in order to meet the requirements of the EU Water Framework Directive. Each plan sets out the environmental objectives for all water bodies in the region and how they will be achieved. The South West RBMP can be downloaded from the Department for Environment, Food & Rural Affairs and Environment Agency website. ~~The South West RBMP can be downloaded at http://www.environment-agency.gov.uk/research/planning/125027.aspx.~~

Rural workers:

are people whose place of work is located within the countryside, typically comprising farm workers, forestry workers and others involved in rural-based enterprises.

Self-Build and Custom Housebuilding:

Homes built by individuals, associations of individuals or developers working with or for those individuals, to be occupied by those individuals. Homes that are built wholly or mainly to plans or specifications decided or offered by a developer/seller are excluded.

Sites of Special Scientific Interest (SSSI):

SSSIs are the country's very best wildlife and geological sites. SSSIs are important as they support plants and animals that find it more difficult to survive in the wider countryside. The protection of SSSIs is a shared responsibility between landowners, local authorities and Natural England.

Statement of Community Involvement:

a statement within the Local Development Framework that sets out the Council's policies for the public involvement in the preparation of Local Development Documents and planning applications.

Supplementary Planning Document:

a document within the Local Development Framework that sets out more detailed policies in support of those contained in a local plan. It does not form part of the Development Plan, but is a material consideration on planning applications.

Sustainable Development:

is development which meets the needs of the present while not preventing future generations meeting their own needs. The sustainability of local plans must be assessed through Sustainability Appraisals and Strategic Environmental Assessment (SA/SEA).

Telecommunications development:

Operational development and change of use of land to provide buildings, instrumentation and other equipment necessary for telecommunications (telegraph, cable, telephone, radio, or television). The National Planning Policy Framework sets out the requirements for decision-making on telecommunications proposals.

Water Framework Directive (WFD):

European Union legislation that requires all countries throughout the EU to manage the water environment to consistent standards.

Zero carbon:

A set of standards prepared by the Government for the construction of new homes which are intended to ensure zero net carbon emissions from on-going use and maintenance from the building. Regulated emissions such as a building's energy efficiency and onsite renewable or low carbon heat and power supply will be controlled through the Building Regulations, while any remaining emissions may be offset through 'allowable solutions' (to be determined by Government).

Annex 2

Low Emission Assessments (LEA): Procedural guidance

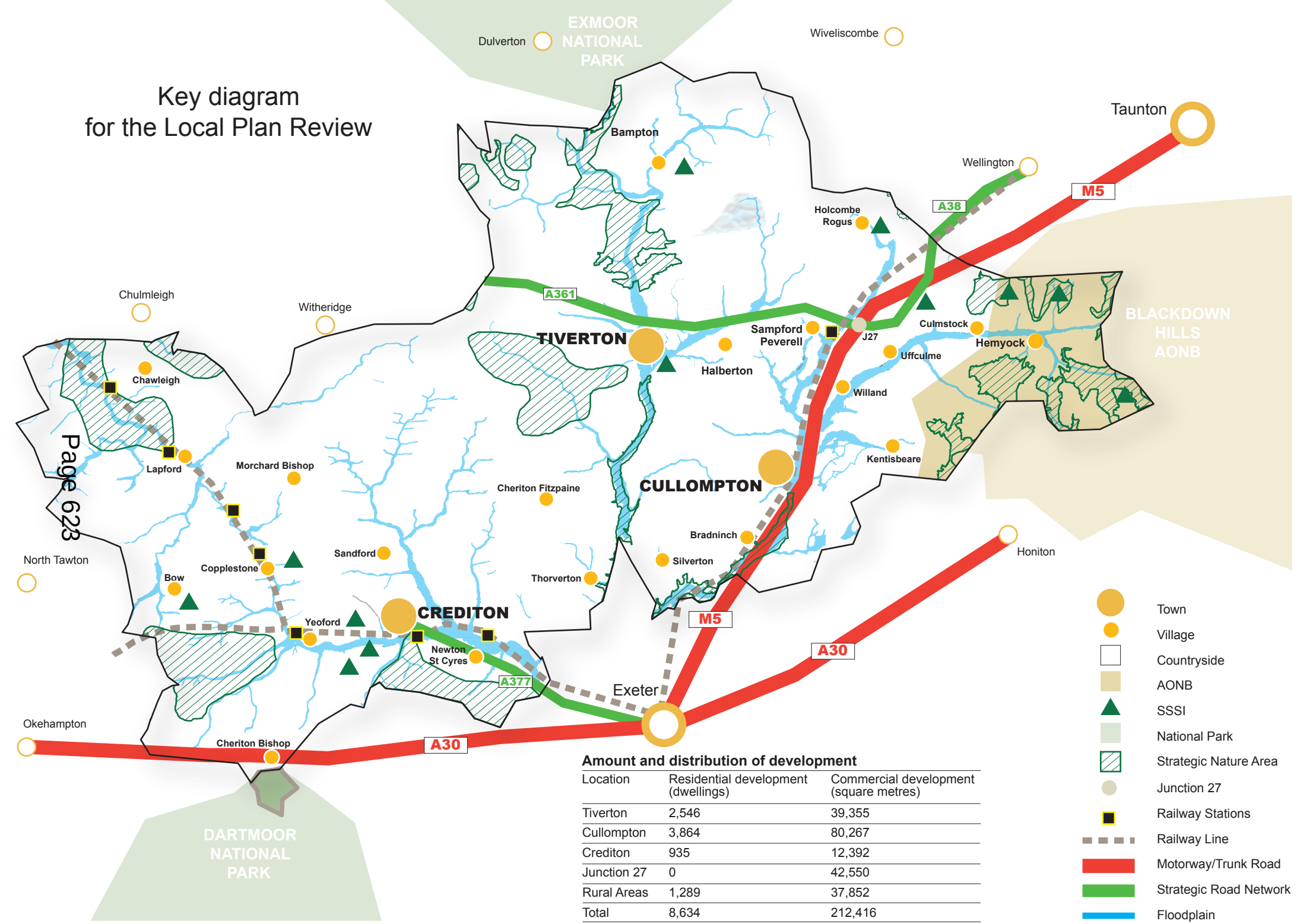
Steps	Information required	Notes
Step 1	• Overview of development proposal. • Summary of pre-application discussions. • Identify boundaries of the assessment according to the proximity to an Air Quality Management Area, expected routes of travel, properties most affected and years of interest, to determine whether a concentrations-based air quality assessment is required under Policy DM6 criterion a). • Set out the assessment methodology used to comply with criterion a) of Policy DM6 if necessary, including sources of data and assumptions used.	Years of interest will be influenced by the anticipated operational commencement and lifespan of the development; the timescale to achieve specified national targets for emissions; and the availability of robust emissions data projected forward to 2020 or beyond.
Step 2	• Using the Low Emission Toolkit (or equivalent), calculate the baseline residual road transport emissions from the development, for the first operational year and specified future years after development trips have been reduced as far as possible. The calculation should be based on a 'without measures' scenario, i.e. not including any low emission mitigation measures. • If an air quality assessment has been identified as necessary under Step 1, summarise: all impacts (during and post-construction) on identified properties or other local receptor locations; any exceedences of the air quality objectives resulting from the development; any effect on the delivery of the relevant Air Quality Action Plan; the significance of the results; and the options for measures to reduce, mitigate or compensate an air quality impact.	Display data as annual emissions.
Step 3	• Consider whether additional trip	Steps 2 and 3 may be

Steps	Information required	Notes
	reduction measures can be incorporated. • Using the Low Emission Toolkit (or equivalent), evaluate the impact on residual road transport emissions of applying low emission mitigation measures, both on and offsite, against 'business as usual' baseline levels, for the specified years of interest. • Evaluate any trade-offs that occur as a result of mitigation measures, for instance where one pollutant would decrease but another increase, or where there is a net increase in the road traffic emissions in Mid Devon but a decrease within the Air Quality Management Area. • If an air quality assessment is included (see Step 1), summarise the effect that mitigation measures will have on: identified properties or other local receptor locations; any exceedences of the air quality objectives resulting from the development; and any effect on the delivery of the relevant Air Quality Action Plan.	combined as a site emissions mitigation plan, with clear links to the Travel Plan.
Step 4	• Calculate the remaining residual road transport emissions after mitigation measures have been incorporated, using a 'mass emissions' approach (Low Emissions Toolkit) and in addition a concentrations-based approach in cases where criterion a) of Policy DM6 applies (see Step 1).	The Local Planning Authority may wish to negotiate further/alternative mitigation measures, requiring a revised LEA to be submitted.
Step 5	• Translate the calculated remaining residual road transport emissions into damage costs for the pollutants of concern. (Information on calculating damage costs is available from DEFRA: http://www.defra.gov.uk/environment/quality/air/air-quality/economic/damage/)	If damage costs are significant, the Local Planning Authority will consider whether a Section 106 Agreement is required and feasible to make the development acceptable in planning terms, to deliver a cost-equivalent

Steps	Information required	Notes
		air quality improvement identified in the relevant Air Quality Action Plan. In this case the identified project would be excluded from the Council's list of infrastructure funded by the Community Infrastructure Levy (CIL). CIL would remain payable for all other generic offsite infrastructure. The Council may take legal advice before deciding on this approach, where a Section 106 Agreement would deliver off-site infrastructure.

This page is intentionally left blank

Key diagram for the Local Plan Review



Amount and distribution of development

Location	Residential development (dwellings)	Commercial development (square metres)
Tiverton	2,546	39,355
Cullompton	3,864	80,267
Crediton	935	12,392
Junction 27	0	42,550
Rural Areas	1,289	37,852
Total	8,634	212,416

This page is intentionally left blank

CENTRAL AREA INSET

Heathcoat Factory

Council Offices

North Devon Link Road

Lea Road

Bolham Road

Leisure Centre

Longdrag Hill

Heathcoat Way

Business Park

Blundells Road

Great Western Way

Canal Hill

River Lea

A396

Golf Coutse

Grand Western Canal

TIV6

TIV15

TIV8

TIV14

TIV10

TIV11

TIV9

AL/TIV/9

AL/TIV/11

AL/TIV/18

AL/TIV/17

AL/TIV/10

TIV1 - TIV5

GI

TIV13

14000

13000

12000

94000

95000

96000

97000

Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

Scale 1:14,000

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

October 2016

N

- Settlement Limit
- Proposed Residential Allocation
- Proposed Contingency Housing Site
- Proposed Mixed Use Allocation
- Proposed Green Infrastructure (GI)
- Conservation Area
- Ancient Monument
- Ancient Woodlands
- County Wildlife Site (2007 data)
- Local Nature Reserve
- National Register of Historic Parks and Gardens
- Local Register of Historic Parks and Gardens
- Tidcombe Lane Fen Catchment Area
- Site of Special Scientific Interest
- Priority Habitats
- Safeguarded Areas for School Expansion
- Proposed Deleted Sites
- Floodplain

PROPOSED CHANGES

- *Proposed Deleted Site* (TIV14)
- *Proposed Residential Allocation*

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map

(Proposed Submission)

Tiverton

This page is intentionally left blank

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map

(Proposed Submission)

Cullompton

GI
CU1 - CU6
CU13
CU14
CU21
CU18
CU17
CU16
CU19
CU20
CU7 - CU12
CU15
AL/CU/9
AL/CU/10
AL/CU/12
Kings Mill Industrial Estate
Cemetery
Rugby Club
Sports Centre
Golf Course
Tiverton Road
Honiton Road
Swallow Way
Pedrosp Hill
Willand Road
Duke Street
Higher Street
A373
B3181
M5
Bere
109000
108000
107000
301000
302000

Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

Scale 1:11000

October 2016

N

- Proposed deleted/partially deleted sites
- Settlement limit
- Proposed amendment to settlement limit
- Conservation area
- Proposed residential allocation
- Proposed contingency housing site allocation
- Proposed mixed use allocation
- Proposed commercial allocation
- Proposed green infrastructure
- Town centre boundary
- Primary shopping area
- Safeguarded area for railway station
- Safeguarded area for school expansion
- Area for town centre relief road
- Ancient monument
- County wildlife site (2007 data)
- Priority habitats
- Floodplain

PROPOSED CHANGES

- *Proposed mixed use*
- *Boundary amendment*
- *Proposed green infrastructure*
- *Proposed extension to town centre relief road*

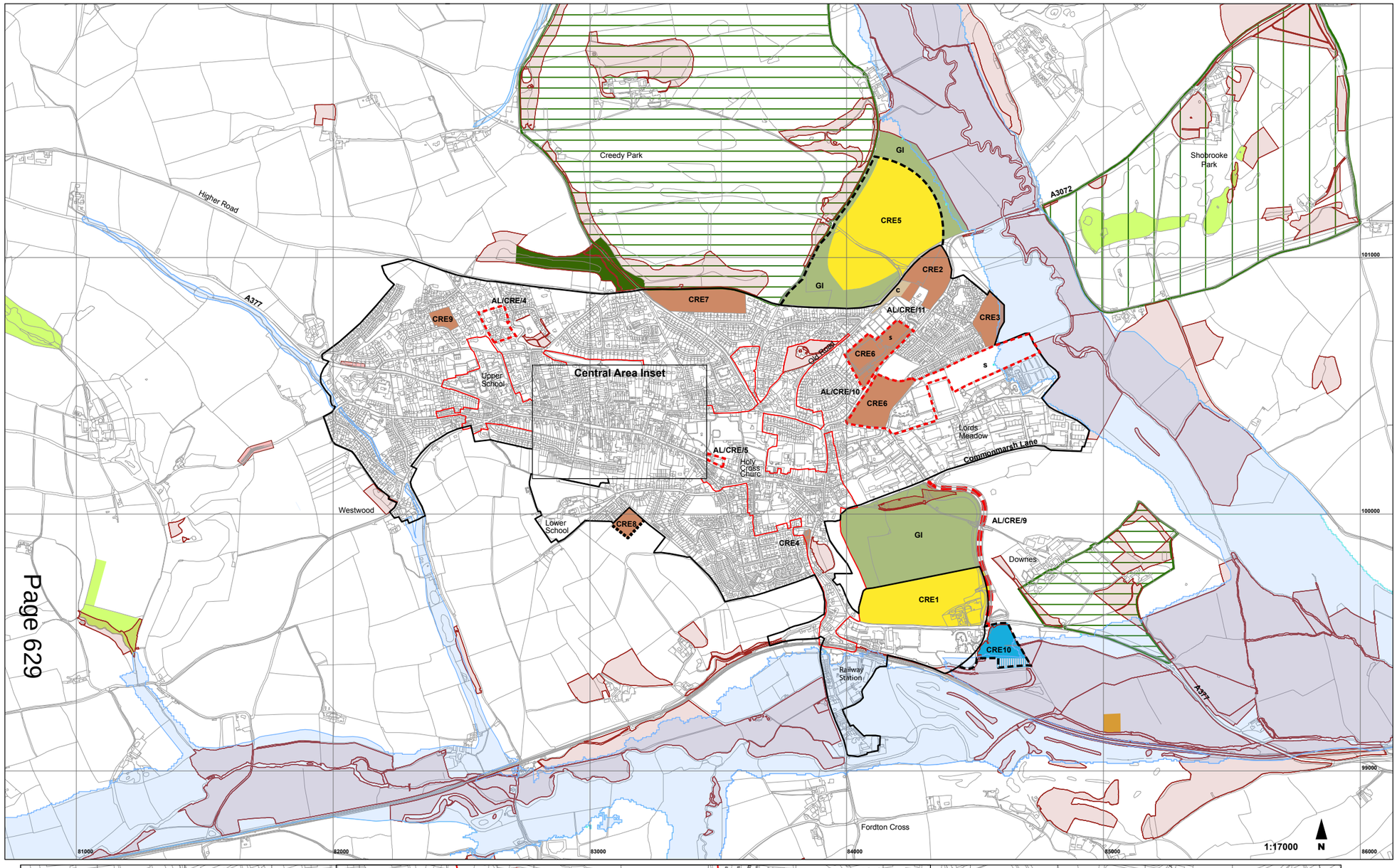
This page is intentionally left blank

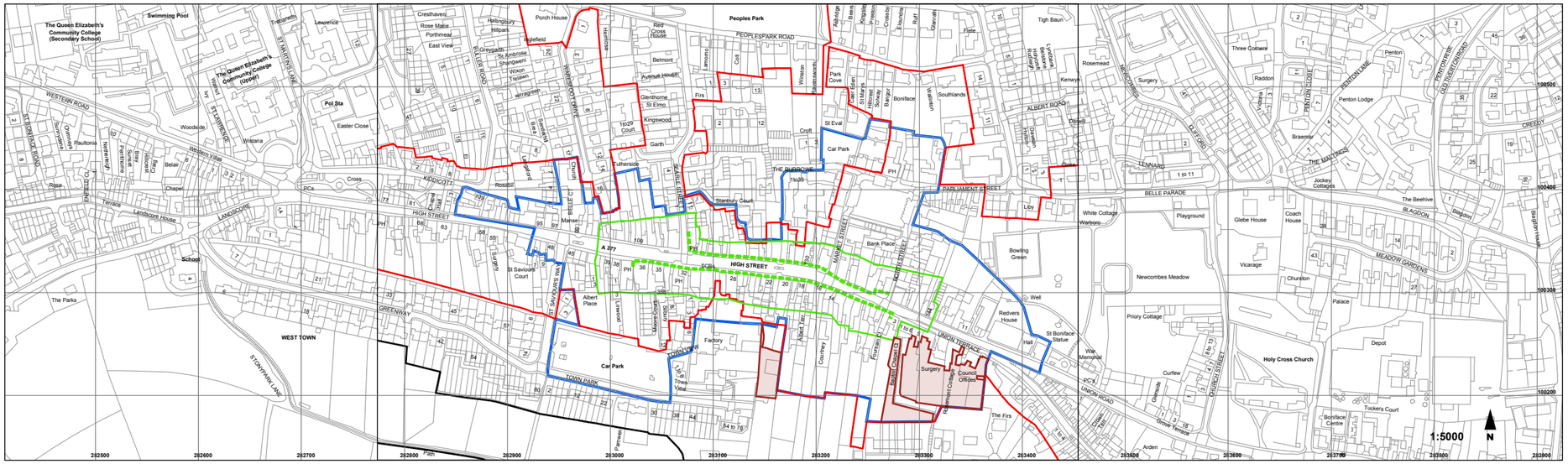
Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map

(Proposed Submission)

Crediton





- Proposed Deleted Sites
- Proposed Deleted School Site (s)
- Proposed Deleted Roads (indicative route)
- Settlement Limit
- Proposed Amendment to Settlement Limit
- Conservation Area
- Proposed Residential Allocation
- Proposed Commercial Allocation
- Proposed Mixed Use Allocation
- Proposed Green Infrastructure (GI)
- Town Centre Boundary
- Primary Shopping Area
- Primary Shopping Frontage
- Ancient Monument
- Cemetery (c)
- National Register of Historic Parks and Gardens
- Local Register of Historic Parks and Gardens
- County Wildlife Site (2007 data)
- Ancient Woodlands
- Regionally Important Geological Sites (RIGS)
- Priority Habitats
- Floodplain

PROPOSED CHANGES

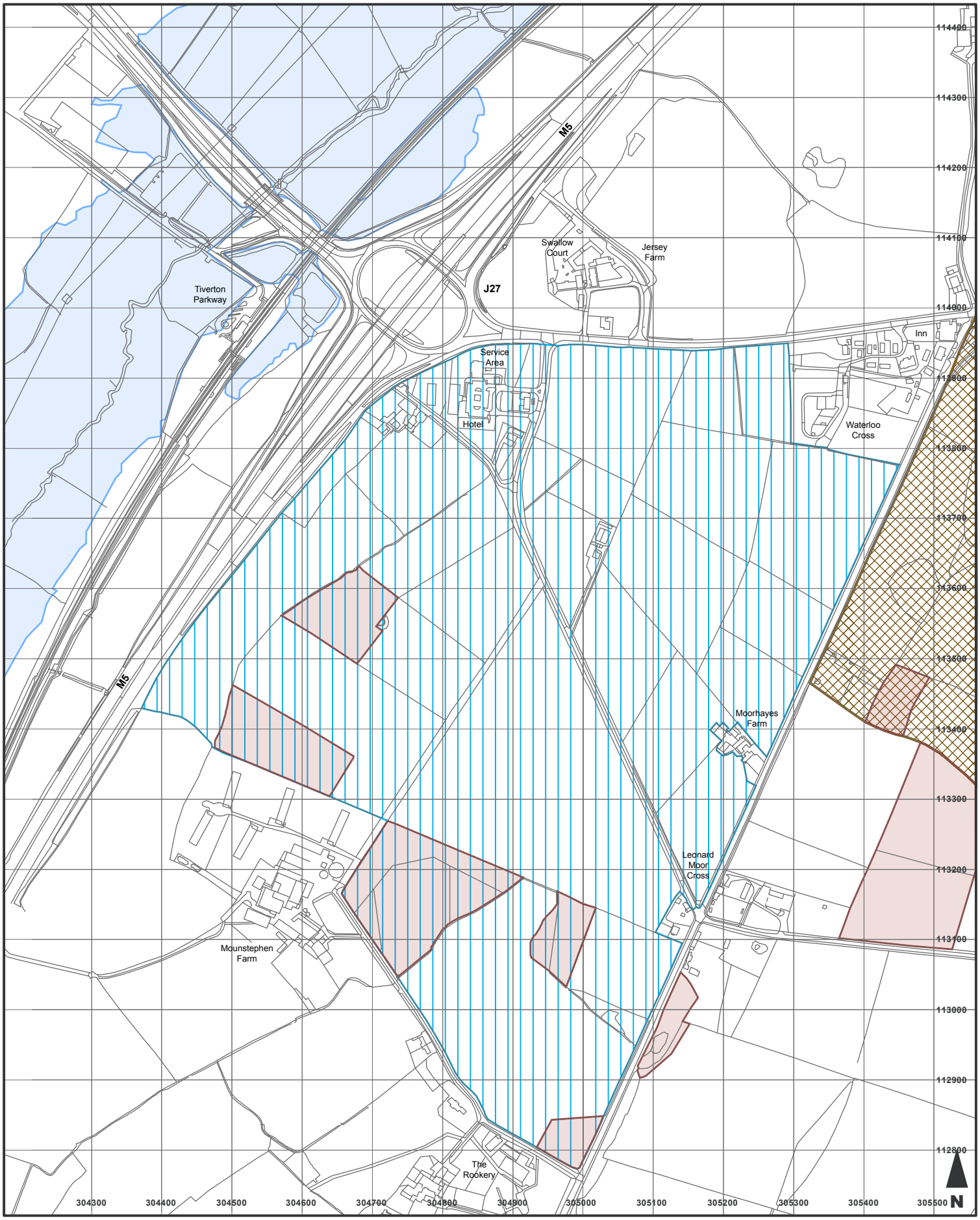
Proposed Commercial Allocation

Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

October 2016

This page is intentionally left blank



Proposed Commercial Allocation

Floodplain

Priority Habitats

Minerals Consultation Area

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Submission)

Junction 27

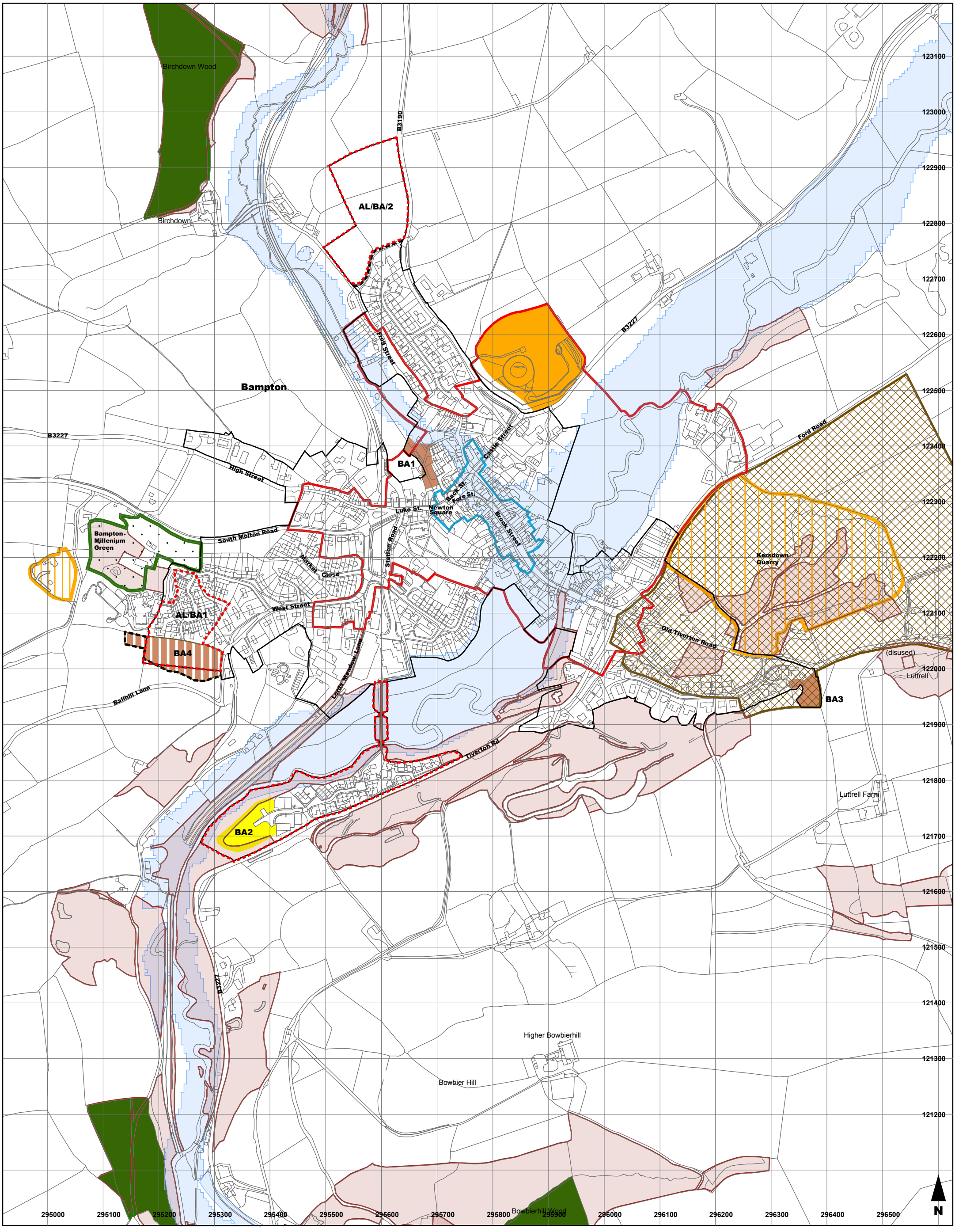
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

Scale 1:7000

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. ©Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

October 2016

This page is intentionally left blank



Settlement Limit

Proposed Amendment to Settlement Limit

Conservation Area

Proposed Deleted Site

Proposed Residential Allocation

Proposed Mixed Use allocation

Town Centre Boundary (proposed for deletion)

Site of Special Scientific Interest

Ancient Woodlands

Minerals Consultation Area

Ancient Monument

Priority Habitats

Floodplain

PROPOSED CHANGES

Proposed Local Green Space

Proposed Residential Allocation

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Bampton

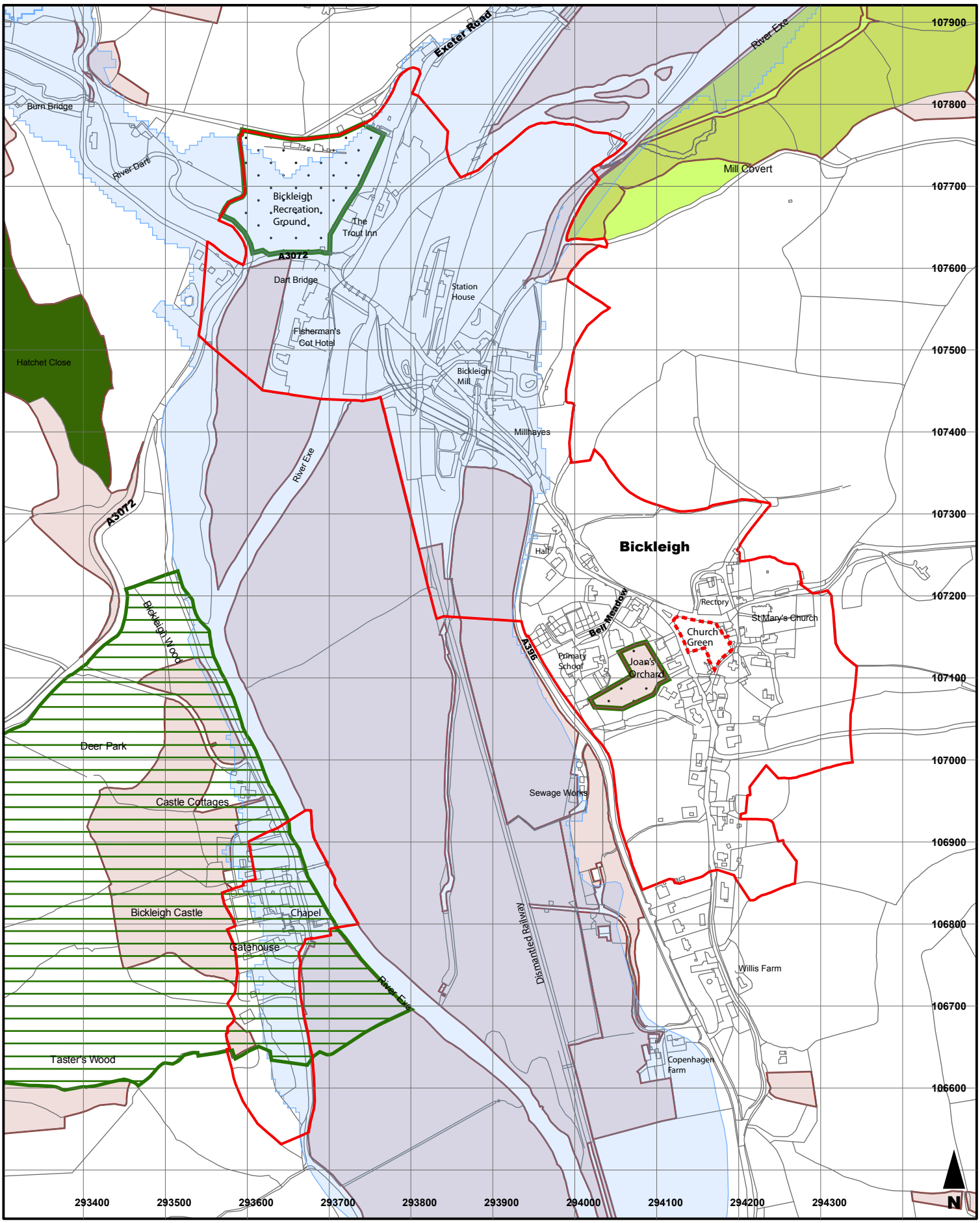
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

Scale 1:6000

October 2016

This page is intentionally left blank



Conservation Area

County Wildlife Site (2007 data)

Local Register of Historic Parks & Gardens

Floodplain

Ancient Woodlands

Proposed Local Green Space

Priority Habitats

PROPOSED CHANGES

Proposed Deleted Site

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Bickleigh

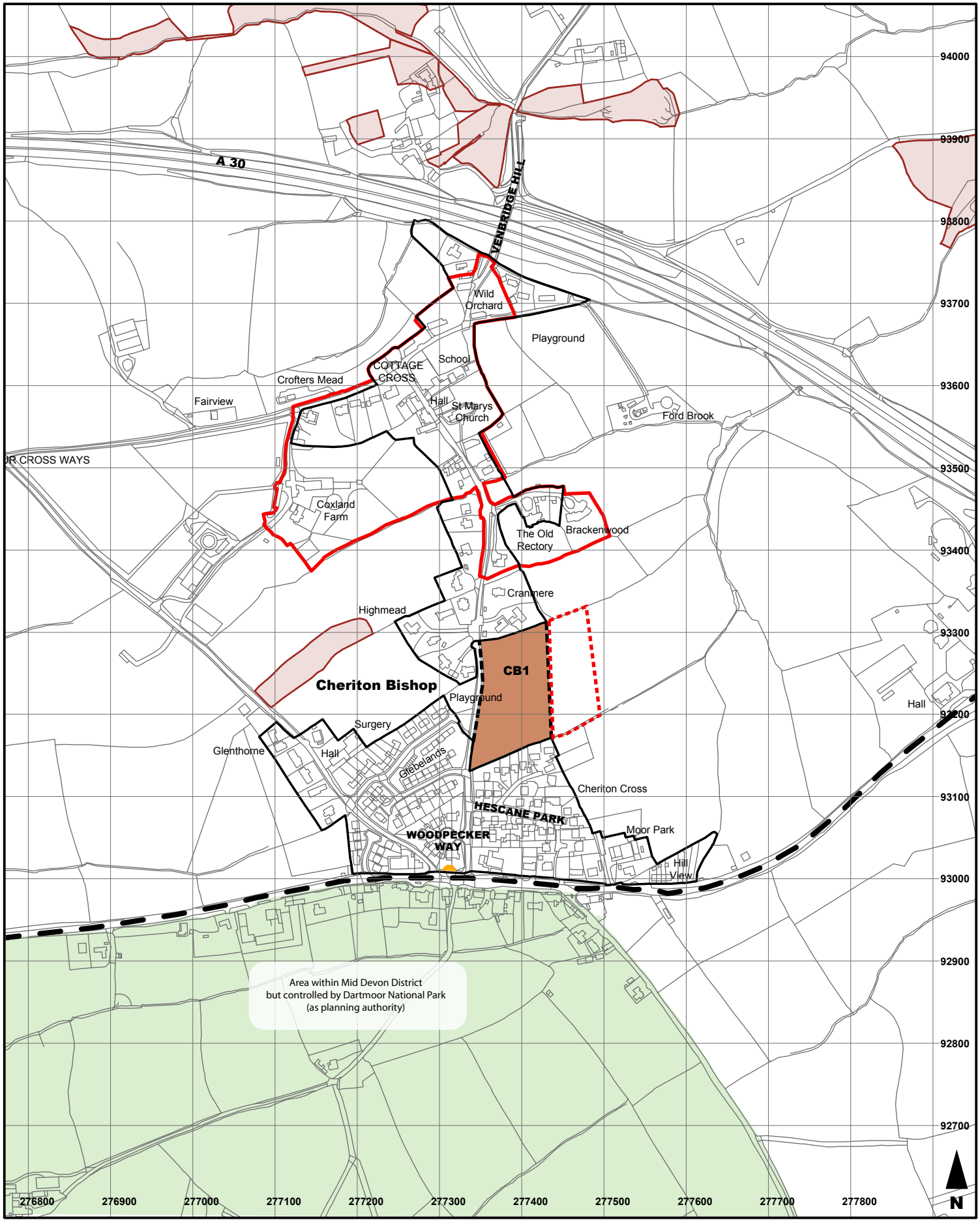
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. ©Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

Scale 1:6000

October 2016

This page is intentionally left blank



Settlement Limit

Proposed Settlement Limit Amendment

Proposed Residential Allocation

Conservation Area

Ancient Monument

Priority Habitats

Plan Boundary

PROPOSED CHANGES

Proposed Deleted Site

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Cheriton Bishop

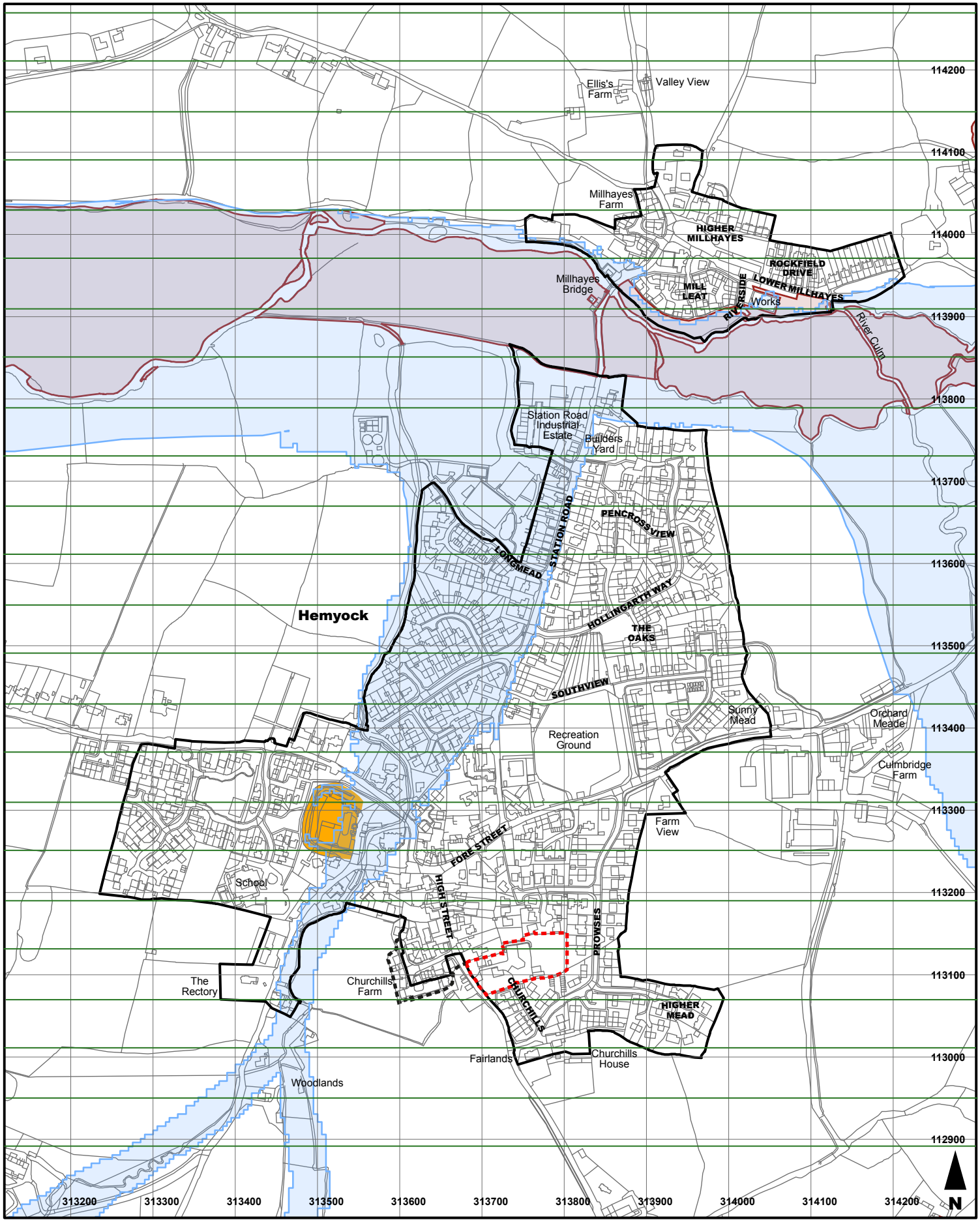
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. ©Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

Scale 1:6000

October 2016

This page is intentionally left blank



Settlement Limit

Proposed Amendment to Settlement Limit

Floodplain

Priority Habitats

Ancient Monument

Area of Outstanding Natural Beauty

PROPOSED CHANGES

Proposed Deleted Site

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Hemyock

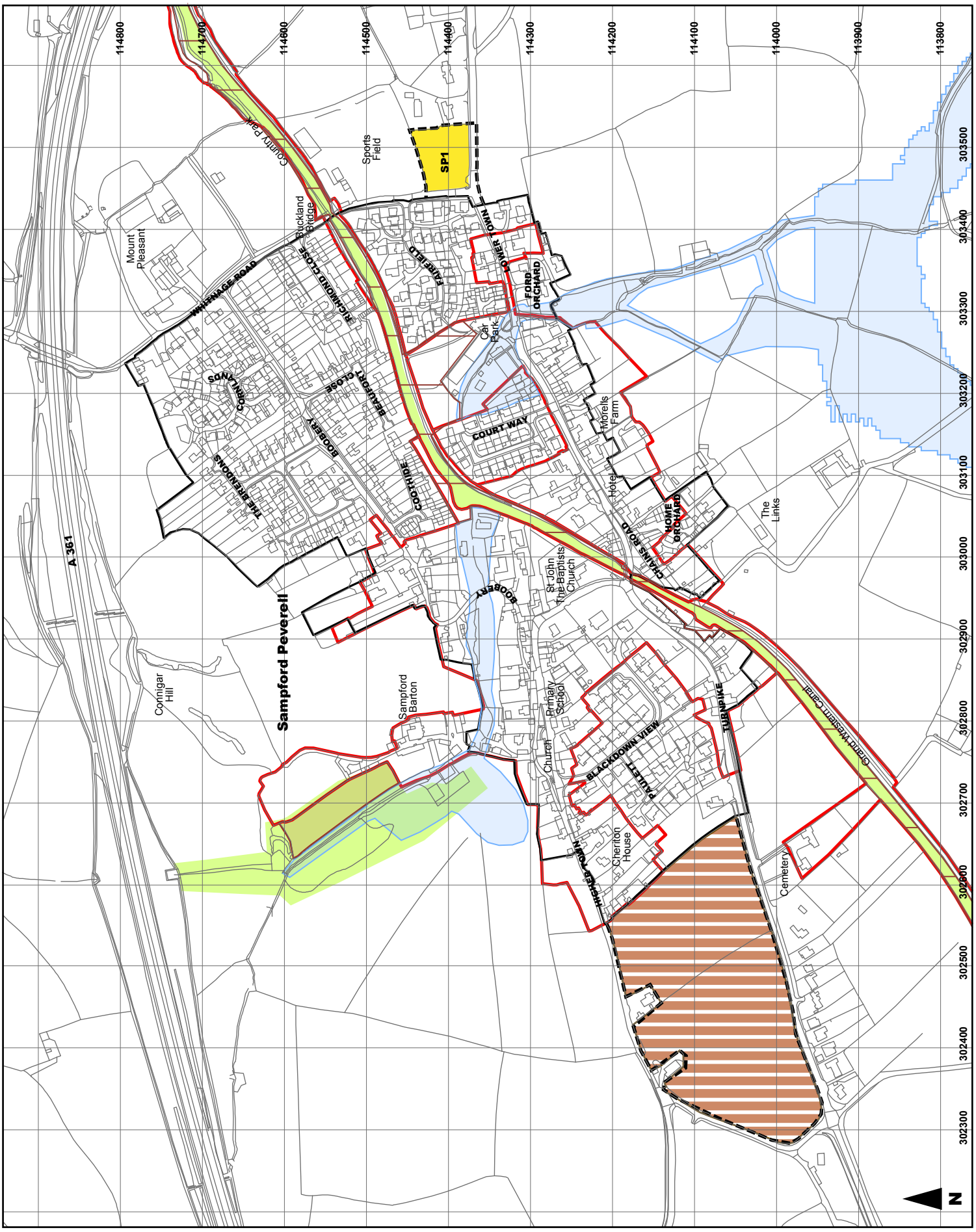
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

Scale 1:6000

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

October 2016

This page is intentionally left blank



Settlement Limit

Proposed Settlement Limit Amendment

Proposed Residential and GP Surgery Allocation

County Wildlife Site (2007 data)

Conservation Area

Local Nature Reserve

Priority Habitats

Floodplain

PROPOSED CHANGES

Proposed Residential Allocation

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Sampford Peverell

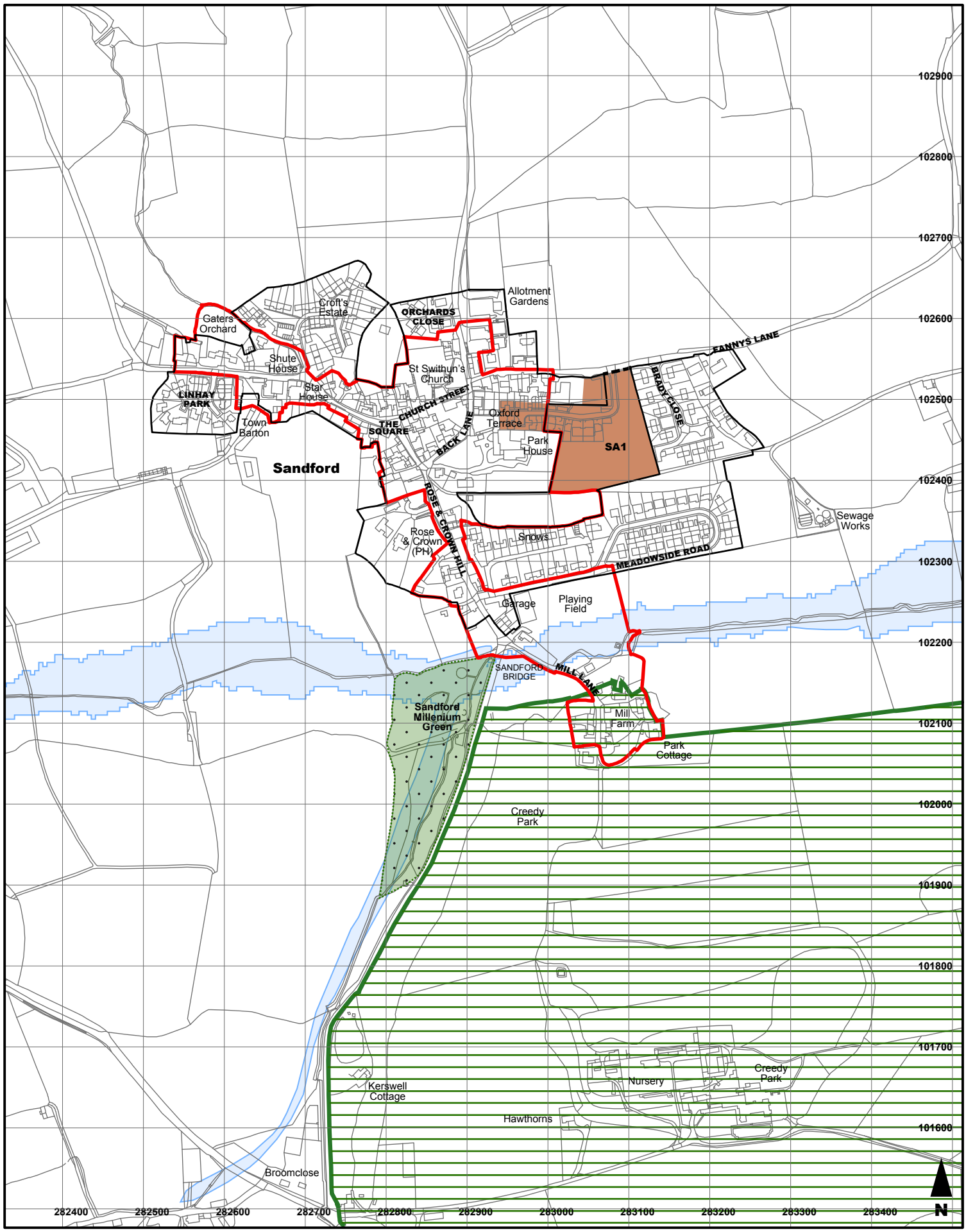
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

Scale 1:6000

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

October 2016

This page is intentionally left blank



Settlement Limit

Proposed Settlement Limit Amendment

Proposed Residential Allocation

Conservation Area

Local Register of Historic Parks and Gardens

Floodplain

PROPOSED CHANGES

Proposed Local Green Space

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Sandford

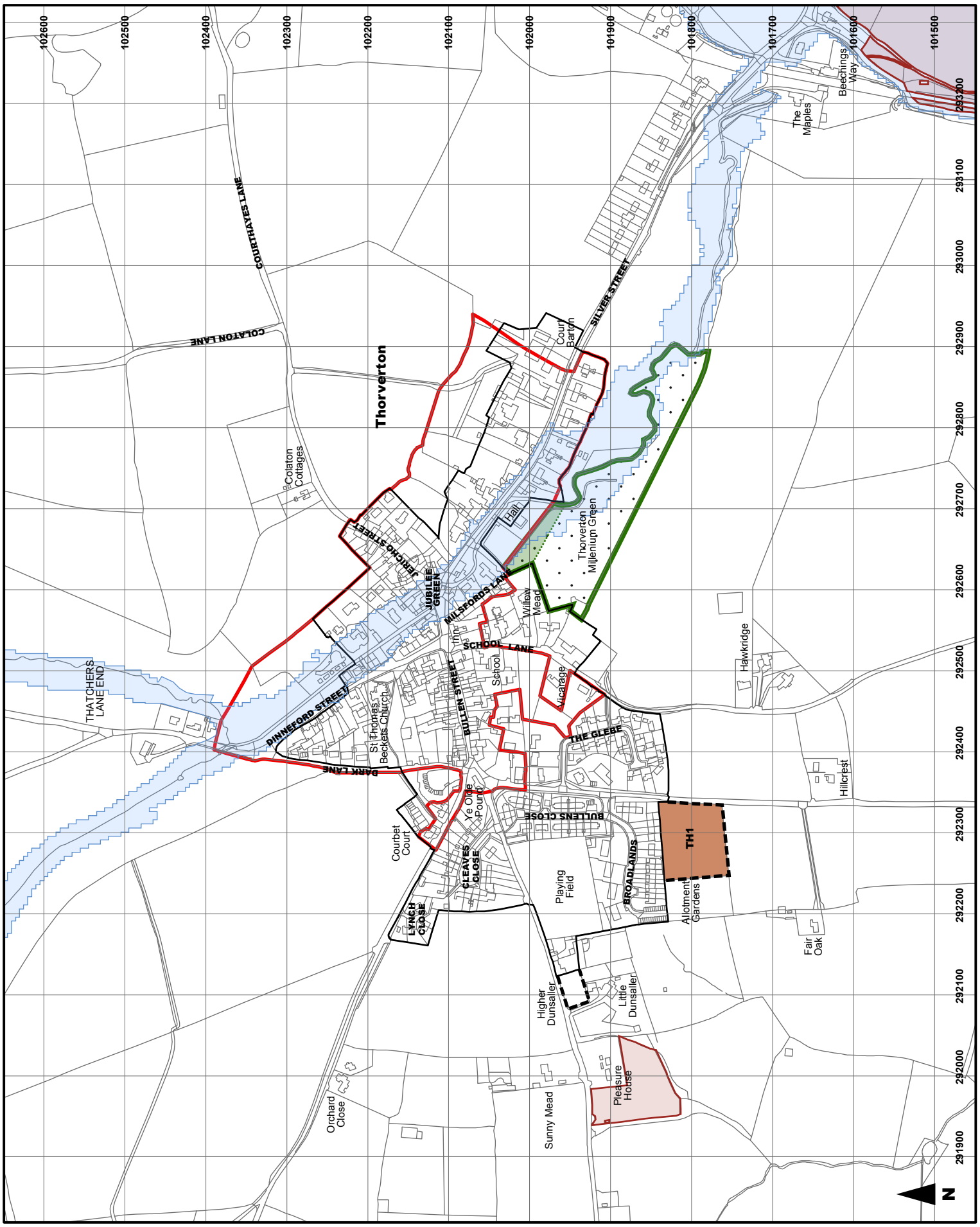
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

Scale 1:6000

October 2016

This page is intentionally left blank



Settlement Limit

Proposed Settlement Limit Amendment

Proposed Local Green Space

Conservation Area

Proposed Residential Allocation

Priority Habitats

Floodplain

PROPOSED CHANGES

Proposed Amendment to Local Green Space

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Thorverton

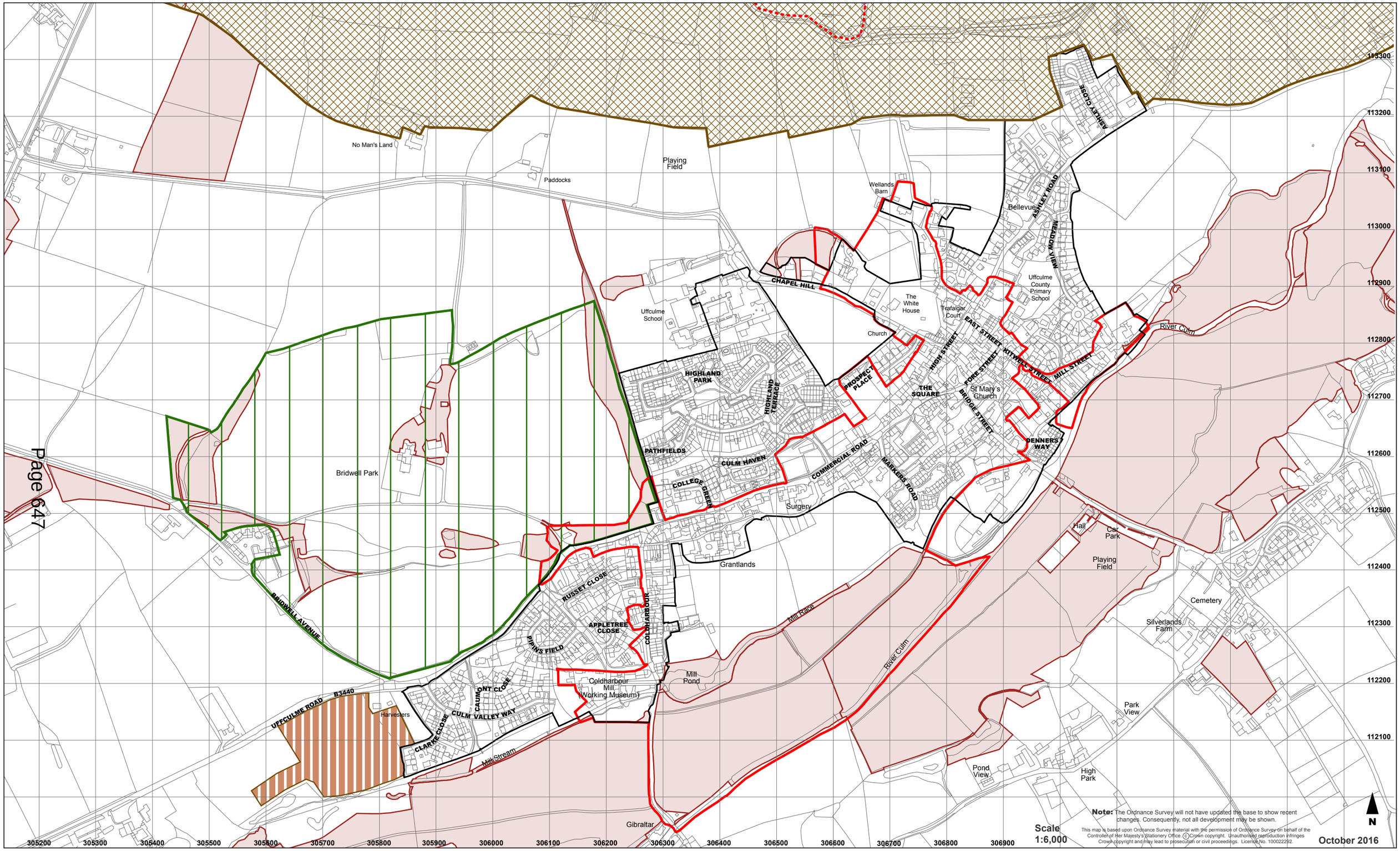
Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

Scale 1:6000

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. ©Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

October 2016

This page is intentionally left blank



Settlement Limit

Historic Park and Garden

Conservation Area

Minerals Consultation Area

Priority Habitats

Floodplain

PROPOSED CHANGES

Proposed Deleted Site

Proposed Residential Allocation

Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

Scale 1:6,000

N

October 2016

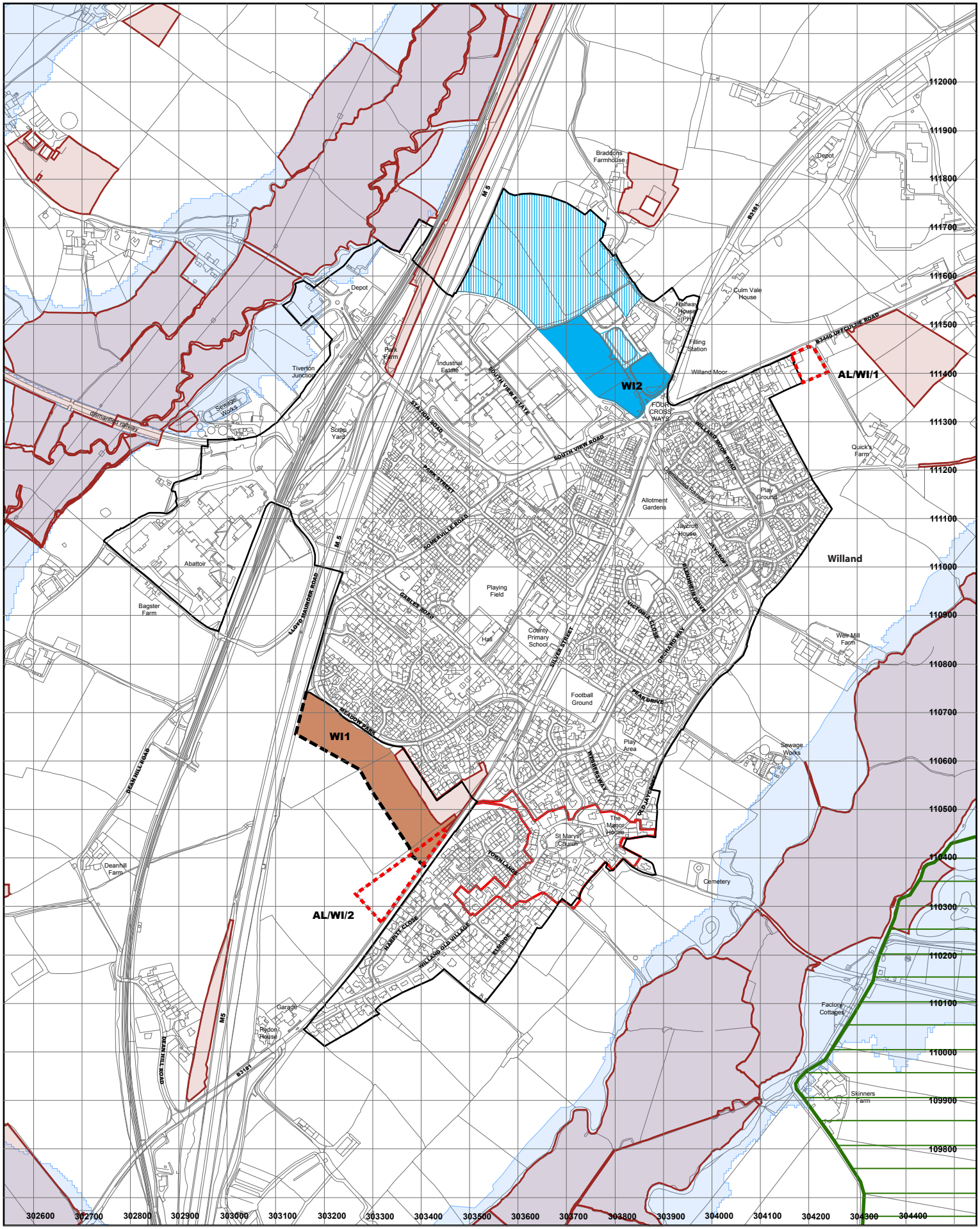
Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map

(Proposed Submission)

Uffculme

This page is intentionally left blank



Settlement Limit

Proposed Settlement Limit Amendment

Proposed Deleted Site

Proposed Residential Allocation

Floodplain

Proposed Commercial Allocation

Local Register of Historic Parks and Gardens

Conservation Area

Priority Habitats

PROPOSED CHANGES

Proposed Commercial Allocation

Mid Devon Local Plan 2013 - 2033

Publication Stage Policies Map (Proposed Submission)

Willand

Scale 1:10000

Note: The Ordnance Survey will not have updated the base to show recent changes. Consequently, not all development may be shown.

This map is based upon Ordnance Survey material with the permission of Ordnance Survey on behalf of the Controller of Her Majesty's Stationery Office. © Crown copyright. Unauthorised reproduction infringes Crown copyright and may lead to prosecution or civil proceedings. Licence No. 100022292.

October 2016

This page is intentionally left blank

CABINET **AGENDA ITEM:**
21ST NOVEMBER 2016

REPORT OF THE HEAD OF PLANNING AND REGENERATION

MID DEVON COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE

Cabinet Member Cllr Richard Chesterton

Responsible Officer Mrs Jenny Clifford, Head of Planning and Regeneration

Reason for Report: To consider the Draft Community Infrastructure Levy and associated policies.

RECOMMENDATIONS:

a) **That the Draft Community Infrastructure Levy Charging Schedule (DCS), attached as Appendix 1 to this report, be approved for Consultation;**

b) **That the Draft Infrastructure Plan, Draft Regulation 123 List and Draft Policy on the use of Section 106 Agreements, the Instalments Policy and Payment in Kind Policy be published for consultation with the DCS; and**

c) **The draft Regulation 212(4) Statement be approved with delegated authority given to the Head of Planning and Regeneration in consultation with the Cabinet Member for Planning to agree and submit the final Regulation 212 (4) statement;**

d) **That delegated authority be given to the Head of Planning and Regeneration in consultation with the Cabinet Member for Planning to make minor changes to the documents referred to in a) – c) above and for their submission.**

Relationship to Corporate Plan: The Community Infrastructure Levy (CIL) provides the opportunity to fund infrastructure within the district in a new way, allowing for the significant limitations on the use of Section 106 planning obligations which came in at April 2015. The provision of infrastructure will underpin a number of the corporate plan objectives.

Financial Implications: In April 2015, limitations on the use of Section 106 obligations were introduced, which prevent “pooling” of more than five s106 payments towards one infrastructure project, or one general fund to provide a particular type of infrastructure. The use of CIL is intended to replace this kind of s106 “pooling” by providing a fixed charge for development which can be used flexibly by the local planning authority to support infrastructure provision across the area. In total it is forecast that the introduction of CIL at the rates recommended will produce an income of about £9.5m over the remaining period of the local plan. The

Council is permitted to charge CIL administration costs to the CIL income, up to a maximum of 5% of the income received.

Legal Implications: Before CIL is adopted there is a process of consultation and independent examination, this is the final stage of consultation and the next step following the close of the consultation period will be to submit the Draft Charging Schedule for examination.

Risk Assessment: The key risk is potential change in levy rates following Independent examination. Upon its introduction, the risks relate to the timely provision of infrastructure and the delivery of development, requiring ongoing infrastructure planning on behalf of the Council.

1.0 Introduction

1.1 The first formal phase of CIL preparation is the publication and consultation of CIL preliminary charging schedule. This was undertaken between 13th June and 11th July 2014. There were 22 responses, of which 2 made no comment. A summary of the responses with officer comment was considered by Cabinet in December 2014 and Council in December 2014 and January 2015.

1.2 Taking account of the evidence and these responses a revised CIL Charging Schedule (known as the Draft Community Infrastructure Levy Charging Schedule) was recommended to Council for approval in January 2015. This Draft Community Infrastructure Levy Charging Schedule went out for consultation between the 9th February and the 27th April 2015.

1.3 The proposed rates were based on the recommendations of the Council's consultants, who prepared the evidence on which the preliminary draft charging schedules were based. That evidence published in June 2014 was up to date at the time of the meetings in 14/15. However, changes have occurred over the 22 month period since the report to Council in January 2015 and therefore the Dixon Searle Partnership reviewed their viability evidence in August 2016 to see if changes were required to the Draft Community Infrastructure Levy Charging Schedule.

1.4 The original viability report (2014) and the review and update (2016), the representations and summary, the infrastructure Plan and Regulation 123 list and Draft Community Infrastructure Levy Charging Schedule can be read on the Council's website.

1.5 The executive summary of the Viability Update & Review (Draft Report) August 2016 DSP16400: states:-

'(i) This update report considers changes to key assumptions and inputs used in the previous studies due to changes in development costs, revenue assumptions and national policy changes that warrant revisiting the previous findings. This work also provides background evidence for those policy changes.

(ii) This viability update has been produced in the context of and with regard to the NPPF, CIL Regulations, CIL Guidance and other Guidance applicable to studies of this nature. This study has also had regard to the National Planning Practice Guidance.

(iii) This update assesses the (financial) capacity of development typologies in the District to deliver proposed local and national policies without viability being unduly affected and reviews the relative impact of changes in local and national policy, market conditions and development costs between the date of the original studies and today. This update assesses the (financial) capacity of development typologies in the District to deliver proposed local and national policies without viability being unduly affected and reviews the relative impact of changes in local and national policy, market conditions and development costs between the date of the original studies and today.

(iv) This viability update applies the same principles, methodology and many of the same assumptions as used for the Council's earlier viability work. It uses the residual land valuation principles – in basic terms - subtracting the costs of achieving a development from the revenue generated by the completed scheme with the resultant land value compared to a benchmark on the basis that all other assumptions (including developer's profit) are fixed for the purposes of this exercise. Sensitivity testing is then carried out on key assumptions as part of this process to give a suite of results from which the aims of the study are addressed.

(v) The key findings from this study indicate that the combination of rises in property prices and the reduction in a number of policy cost areas (due to national policy intervention) typically off-set increases in development costs over the period between the original viability studies and this update. This indicates that the net effect of the cumulative impact of changes in market conditions, development costs and national and local policies is positive.

(vi) The results also indicate that if the previously recommended affordable housing policies and CIL rates are maintained, alongside the inclusion of optional elements of national strategy (e.g. nationally described space standards) viability is certainly no worse and would not, in our opinion, jeopardise development coming forward across District.'

1.6 Having taken account of the viability update and review, the representations received and considered, and the proposed modifications to the Local Plan **the only major change proposed to the draft charging schedule is the addition of the "Tourism, Leisure and Retail allocation at J27 (M5)" to Zone 1 of the charging schedule.** As with the strategic mixed use sites at Cullompton and Tiverton this will ensure specific development related infrastructure is provided via Section 106 Planning Obligations. The change is shown in white text on black backgrounds on the attached draft charging schedule at **Appendix 1**. Plans showing the extent of strategic allocations in CIL zone 1 where a zero CIL charge is proposed are included at the end of Appendix 1.

2.0 Proposed minor text changes

2.1 As a result of representations received **there are two minor text changes to the text within the draft Charging Schedule to aid clarity**. These are shown in white text on black backgrounds on the attached draft charging schedule at **Appendix 1** and set out in the Minor Text Modification table below.

Minor Text Modifications to Community Infrastructure Levy Draft Charging Schedule.			
Modification No.	Where	Suggested Change	Reason
1	Definitions	Add after Definitions **"of development types"**	To clarify the type of definitions provided.
2	Definitions of Charging Zones Zone 1	Add after North West "**,**" and delete ~~and~~ After Cullompton East add "**and the Tourism, Leisure and Retail site at J27(M5)**	To provide a zero CIL rate for the allocated site to permit the use of 106 provisions for required infrastructure provision.
3	Definitions of Charging Zones	After "Zone 2 consists of the remainder of the planning authority's area." *Add new line* "***Zone 2 (iii) is land within the defined settlement limits of Crediton, Cullompton and Tiverton but excludes any land within Zone 1***	To clearly define the areas to which Zone 2 (iii) charge is applicable.

2.3 Changes are also proposed to the Regulation 123 list to reflect the addition of Tourism, Leisure and Retail allocation at J27 (M5) to Zone 1 and to address the concerns of Historic England with regards to Conservation Areas and the public realm **(Appendix 4)**.

Transport improvements;	Excluding specific improvements needed to make the development acceptable in planning terms. These exclusions can include (but are not limited to) highways access to the site and local road junctions, deceleration and turning lanes, measures to facilitate pedestrian and cyclist access, lighting and street furniture needed to mitigate the impact of a particular development. They may also include mitigation works remote from the development site where the need for such works is identified in a Transport Assessment or Junction Capacity Study. Excluding any provision required due to the development of Tiverton

	Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton **Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)**
Health and Emergency Services facilities;	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton **Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)**
Library services;	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton
Public realm improvements and enhancements.	**Excluding any provision required due to the development of Tiverton Eastern Urban Extension** **Excluding any provision required due to the development of East Cullompton** **Excluding any provision required due to the development of North West Cullompton** **Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)**
Carbon offsetting and air quality improvements; and	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton **Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)**

2.4 The Infrastructure Plan is also being updated to reflect changes in costs since 2014.

3.0 Additional information

3.1 The following additional information is provided but does not form part of the Draft CIL Charging Schedule.

3.2 As requested in the representations received, the Council has set out an **Instalments Policy** for larger schemes, and a **"Payment in kind"** policy statement (**Appendices 2 and 3** respectively).

4.0 Conclusion

4.1 As the Tourism Leisure and Retail allocation at J27 (M5) is added to Zone 1 a further round of consultation prior the submission of the draft CIL charging schedule for examination is necessary as this is a major change. The consultation will take place at the same time as the consultation on the Local Plan Modifications 3rd January to 14th February 2017. As set out at the beginning of this report the recommendation is that following the consultation period, the draft charging schedule, supporting documentation, evidence, and representations be submitted to the Planning Inspectorate for examination.

4.2 The Examiner has the opportunity to consider the evidence and hear objectors before making changes to the schedule, after which the council can adopt and implement CIL.

Contact for any more information	Adrian Welsh, Forward Planning Team Leader 01884 234344 awelsh@middevon.gov.uk
Background Papers	Cabinet November /December 2014; Council January 2015; CIL evidence base
File Reference	
Circulation of the Report	Councillor Richard Chesterton, Cabinet Member for Planning & Regeneration Management Team

APPENDIX 1

DRAFT CHARGING SCHEDULE

Community Infrastructure Levy Draft Charging Schedule

The rate in pounds per square metre at which Community Infrastructure Levy is chargeable is set out in the following tables.

Uses within Charging Zone 1	Charge per square metre gross internal floorspace
i Any use.	£0

Uses within Charging Zone 2	Charge per square metre gross internal floorspace.
i) Affordable Dwellings	£0
ii) Dwellings (except for an Affordable Dwelling), on a site which falls below the adopted Local Plan threshold for the provision of affordable homes.	£100
iii) Dwellings in Tiverton, Cullompton and Crediton which do not fall into Uses i or ii within this table.	£40
iv) Dwellings which do not fall into Uses i, ii or iii within this table.	£60
v) Convenience based Supermarkets and Superstores and retail warehousing with a net retail selling space of over 280sq. m.	£100
vi) Any other use not included within Uses i, ii, iii, iv, or v within this table.	£0

Definitions of development types.

Affordable Dwellings are dwellings which would qualify for Social housing relief under the Community Infrastructure Levy Regulations 2010 (as amended).

Superstores/supermarkets are shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix of the unit.

Retail warehouses are large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering for mainly car borne customers.

Definitions of Charging Zones

The maps which form part of this schedule define -

Zone 1, consisting of the strategic urban extensions at Tiverton East, Cullompton North West**, ~~and~~** Cullompton East **and the Tourism, Leisure and Retail site at J27(M5)** allocated in the adopted Local Plan.

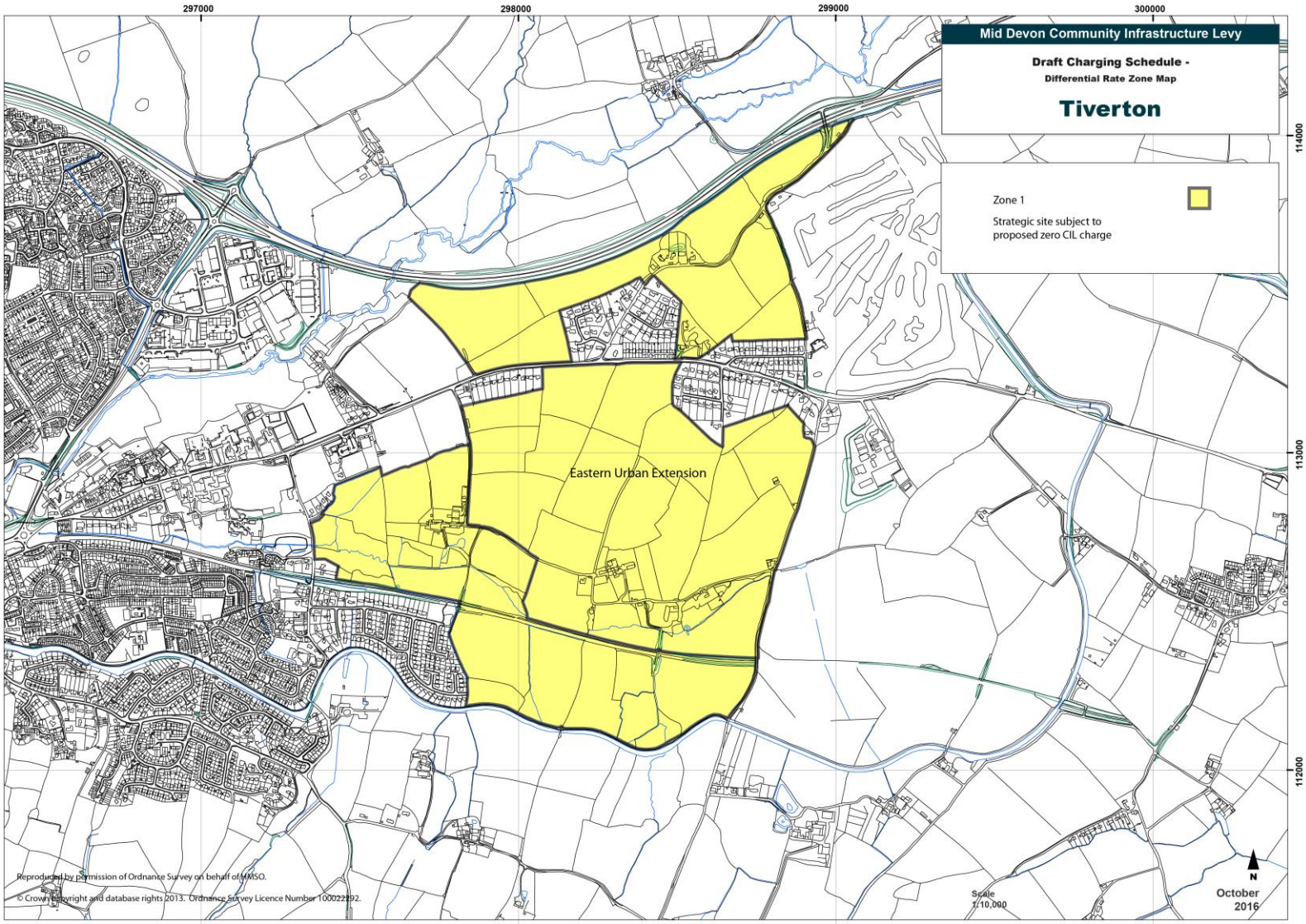
Zone 2 consists of the remainder of the planning authority's area.

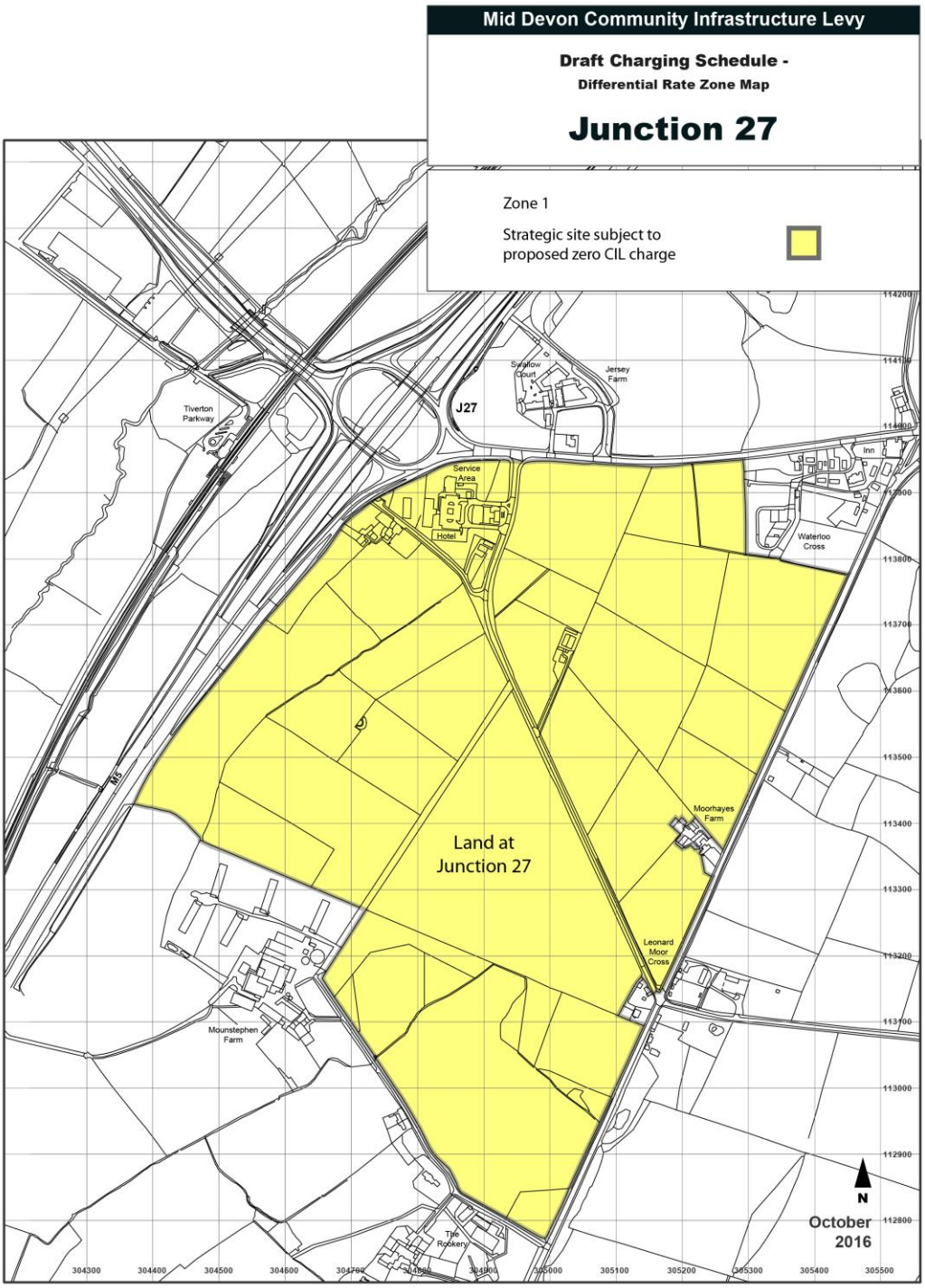
Zone 2 (iii) is land within the defined settlement limits of Crediton, Cullompton and Tiverton but excludes any land within Zone 1

Calculating the Chargeable Amount of CIL
The Council will calculate the amount of CIL payable (the 'chargeable amount') in respect of a chargeable development in accordance with Regulation 40 of the Community Infrastructure Levy Regulations 2010 (as amended).

Statement of Conformity
This Charging Schedule has been prepared in accordance with the requirements of Part 11 of the Planning Act 2008 and the Community Infrastructure Levy Regulations 2010 as amended by the Community Infrastructure Levy (Amendment) Regulations 2011, 2012, 2013 and 2014. The charging schedule has also been prepared having regard to the CIL Guidance, published within the National Planning Guidance.

301000
302000
303000
304000
109000
108000
107000
Mid Devon Community Infrastructure Levy
Draft Charging Schedule -
Differential Rate Zone Map
Cullompton
Zone 1
Strategic site subject to
proposed zero CIL charge
North West
Cullompton
East Cullompton
Reproduced by permission of Ordnance Survey on behalf of HMSO.
© Crown copyright and database rights 2013. Ordnance Survey Licence Number 100022292.
Scale
1:10,000
N
October
2016


297000
298000
299000
300000
114000
113000
112000
Mid Devon Community Infrastructure Levy
Draft Charging Schedule -
Differential Rate Zone Map
Tiverton
Zone 1
Strategic site subject to proposed zero CIL charge
Eastern Urban Extension
Reproduced by permission of Ordnance Survey on behalf of HMSO.
© Crown copyright and database rights 2013. Ordnance Survey Licence Number 100022292.
Scale 1:10,000
N
October 2016



Reproduced by permission of Ordnance Survey on behalf of HMSO.
© Crown copyright and database rights 2013. Ordnance Survey Licence Number 100022292.

Scale 1:7,000

APPENDIX 2

CIL Instalments Policy

In accordance with Regulation 69B of the CIL Regulations 2010 (as amended), The Council proposes to apply an Instalment Policy to all development liable to pay CIL. The discretionary payment of CIL by instalments will help to provide greater flexibility in dealing with certain larger development. The CIL legislation limits the payment of CIL by instalments to given proportions of the total CIL liability that may be paid at 'x' number of days following the commencement of development.

4.3 It should be noted that where an outline planning permission permits the development to be implemented in phases, each phase of the development will be a separate chargeable devolvement for CIL purposes and so the Instalment Policy will apply to each separate phase. The Council's proposed Instalment Policy is set out below:

Total CIL Liability Proportion of CIL liability to be paid within the given period.

Total CIL Liability	**Number of instalments**	**Payment period and amount**
Amount less than £30,000	No instalments	100% payable within 2 calendar months of commencement date
Amounts between £30,001 - £100,000	Payable in 2 instalments	1st instalment of 25% payable within 2 calendar months of commencement date 2nd instalment of 75% payable within 8 calendar months of commencement date
Amounts between £100,001 - £500,000	Payable in 3 instalments	1st instalment of 25% payable within 2 calendar months of commencement date 2nd instalment of 25% payable within 8 calendar months of commencement date 3rd instalment of 50% payable within 12 calendar months of commencement date But the full balance is payable on occupation/opening of the development if this is earlier than the due instalment dates set out above.
Amounts over £500,000	Payable in 4 instalments	1st instalment of 20% payable within 2 calendar months of commencement date 2nd instalment of 20% payable within 8 calendar months of commencement date 3rd instalment of 30% payable within 12 calendar months of commencement date 4th instalment of 30% payable within 18 calendar months of commencement date But the full balance is payable on occupation/opening of the development if this is earlier than the due instalment dates set out above.

The instalments relate to the amount payable (the chargeable amount) as indicated on the Demand Notice. The commencement date will be the Commencement Notice date as advised by the developer under CIL Regulation 67. A failure of the developer to notify the Council of a commencement date results in an automatic surcharge and removal of the privilege to utilise the Council's Instalments Policy.

Where outline planning permission permits development to be implemented in phases, each phase of the development, as agreed by Mid Devon District Council, can be treated as a separate chargeable development. The approved instalment policy will, therefore, apply to each separate phase of the development and its associated separate chargeable amount.

APPENDIX 3

Mid Devon District Council

Community Infrastructure Levy

Land and Infrastructure (**Payment in Kind**) Policy

Effective from ??????

(Date CIL charging schedule is adopted.)

What is this document?

In the majority of cases, CIL will be paid to the Council in the form of money. The CIL Regulations 2010 (as amended) allow the Council as the CIL charging authority to adopt a policy which details alternatives to cash payments through the provision of land or infrastructure.

The Council may accept full or part payment of a CIL liability by way of the transfer of land or to receive infrastructure as payment. The infrastructure to be provided must be related to the provision of those projects listed in the Council's Regulation 123 list, and land should be used to provide or facilitate (in any way) the provision of identified infrastructure to support the development of the charging authority's area.

Any agreement relating to such a payment must be made before the chargeable development commences.

The value of any land or infrastructure offered by way of payment has to be determined by a suitably qualified independent person to be instructed by the Council, but paid for by the developer/applicant.

The Council is not obliged to accept any offer of payment in kind by way of land or infrastructure. Please see the Community Infrastructure Levy Regulations 2010 (as amended), for the full details relating to payment in kind.

PAYMENT IN KIND: LAND AND INFRASTRUCTURE PAYMENT POLICY

In accordance with Regulations 73, 73A, 73B and 74 of the Community Infrastructure Levy Regulations 2010 (as amended), Mid Devon District Council as the charging authority for the area will allow the payment of CIL by land payments or infrastructure payments.

The infrastructure to be provided must be related to the provision of those projects listed in the Council's Regulation 123 list, and land should be used to provide or facilitate (in any way) the provision of identified infrastructure to support the development of the charging authority's area.

This policy is effective from the day the Mid Devon District Council`s Charging Schedule comes into effect on -------?

Appendix 4 Draft Regulation 123 List

Types of infrastructure to be funded in whole or part by CIL	Specific infrastructure items excluded from the Regulation 123 list to be funded via developer contributions (i.e. s106/s278 agreements)
Education, early years, youth and children's centre facilities;	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton
Home to School Transport (and vice versa)	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton
Leisure facilities (sports facilities defined as publicly owned leisure centres, gyms and swimming pools)	Excluding open space provision (publicly accessible open space, allotments, other green infrastructure and sports pitches with associated changing facilities) Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton
Transport improvements;	Excluding specific improvements needed to make the development acceptable in planning terms. These exclusions can include (but are not limited to) highways access to the site and local road junctions, deceleration and turning lanes, measures to facilitate pedestrian and cyclist access, lighting and street furniture needed to mitigate the impact of a particular development. They may also include mitigation works remote from the development site where the need for such works is identified in a Transport Assessment or Junction Capacity Study. Excluding any provision required due to the development of Tiverton

	Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton **Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)**
Health and Emergency Services facilities;	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton **Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)**
Library services;	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton
Community Care facilities (social care institutions providing for older people and people with mental health or learning disabilities);	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton
Public realm improvements and enhancements.	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton

	Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)
Community facilities and social infrastructure (community centres and meeting places but excluding places of worship; voluntary sector meeting places and centres; and public cultural facilities);	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton
Carbon offsetting and air quality improvements; and	Excluding any provision required due to the development of Tiverton Eastern Urban Extension Excluding any provision required due to the development of East Cullompton Excluding any provision required due to the development of North West Cullompton **Excluding any provision required due to the development of the Tourism, Leisure and Retail site at J27(M5)**

MID DEVON DISTRICT COUNCIL

Planning Act 2008

DRAFT Regulation 212(4)

Statement of Compliance

Community Infrastructure Levy

Draft Charging Schedule

November 2016

1. Background

This statement has been produced to demonstrate Mid Devon District Council`s compliance with the requirements set out in the Planning Act 2008, the CIL Regulations 2010 (as amended) and DCLG guidance (2014).

2. Compliance

Mid Devon District Council hereby declares that:

- as the charging authority, it has complied with the Requirements of Section 212(4) of the Planning Act 2008 and the CIL Regulation 2010 (as amended);
- that the charging authority has used appropriate available evidence to inform the Draft Charging Schedule; and,
- that any other matters prescribed in the CIL Regulations 2010 (as amended) have been dealt with.

Legislation relating to the introduction of CIL is set out in Part 11 of the Planning Act (2008) as amended by the Localism Act (2011). The provisions relating to the examination of a CIL Draft Charging Schedule are set out in the following sections:

Section 211 – setting CIL rate

In setting the rates and preparing the Draft Charging Schedule the Council has had regard to the actual and expected costs of infrastructure; matters specified by CIL regulations relating to the economic viability of development; other actual or expected sources of funding for infrastructure; the actual or expected administrative expenses in connection with CIL and all other aspects of the related Statutory Guidance.

The Council has consulted with a range of stakeholders in preparing the Draft Charging Schedule, with formal consultations as follows:

- Preliminary Draft Charging Schedule: 13th June to 11th July 2014
- Draft Charging Schedule: 9th February 2015 to 23rd March 2015 extended to 27th April 2015
- Modified Draft Charging Schedule: 3rd January 2017 to 14th February 2017.

Section 212 – charging schedule examination

The Council will submit/has submitted the CIL Draft Charging Schedule and accompanying evidence to the Planning Inspectorate (PINs) who will provide an independent inspector to examine the Draft CIL Charging Schedule. PINs are independent of the Council and have appropriate qualifications and experience. All persons who have submitted representations to the consultation on the Draft CIL

Charging Schedule, stating that they would like to be heard by the examiner, will be given this opportunity.

The Planning Act (2008) allows for the production of CIL regulations. These are set out in The Community Infrastructure Levy Regulations 2010 (as amended). The following regulations apply to the process involved in taking the Council's CIL Draft Charging Schedule to examination;

- Regulation 12 - Format and content of charging schedules
- Regulation 13 - Differential rates
- Regulation 14 - Setting rates
- Regulation 15 - Consultation on a preliminary draft charging schedule
- Regulation 16 - Publication of a draft charging schedule
- Regulation 17 - Representations relating to a draft charging schedule
- Regulation 19 - Submission of documents and information to the examiner
- Regulation 20 - Consideration of representations by examiner
- Regulation 21 - CIL examination: right to be heard

The Council has complied with these Regulations as follows:

Reg 12 – Format and content of charging schedules

Mid Devon`s Draft CIL Charging Schedule contains the information required by Regulation 12 including:

(a) the name of the Charging Authority;

(b) the rates in pounds per square metre at which CIL is to be charged in the authority's area; and

(c) an explanation of how the chargeable amount will be calculated.

Reg 13 – Differential Rates

This regulation applies to differential rates. The District Council proposes to set differential rates in relation to the intended use of development for residential development, food retail (supermarket) development, retail warehouse development, and all other uses.

In relation to residential development the Council intends to apply differential rates for different zones in which development would be situated;

In relation to retail the Council also proposes to set differential rates by reference to the intended location and scale of the retail operation as described in the Draft Charging Schedule.

This is set out in the Council's Draft CIL Charging Schedule and supported by evidence contained in the accompanying viability reports.

Reg 14 – Setting rates

In setting its levy rates, the Council has complied with Regulation 14(1), which requires that it, "must strike an appropriate balance between (a) the desirability of funding from CIL (in whole or in part) the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding; and (b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area".

This is set out in the following documents:

• Draft Charging Schedule, February 2015;

• Draft Charging Schedule, Background Paper (including Draft Infrastructure Project List), February 2015;

• CIL Viability Update Study, June 2014, and Addendum December 2014

• Other evidence base documents submitted as part of the examination.

These documents have been available to view and download from the Council's website since February 2015.

Additionally the Council has reviewed its viability evidence in August 2016. This indicates there is no requirement to amend the draft CIL charging schedule that was published and consulted upon in early 2015.

Reg 15 – Consultation on a Preliminary Draft Charging Schedule

The Council issued a CIL Preliminary Draft Charging Schedule (PDCS) for consultation between 13th June to 11th July 2014

The Council complied with Regulation 15 of the CIL Regulations in terms of the requirements for consultation on the PDCS.

Regulation 15 sets out that a charging authority must send a copy of the PDCS to each of the consultation bodies, and invite them to make representations on it. In addition, the Council also invited representations on the PDCS from persons who are residents or carry on business in the district.

The following methods of consultation were used:

• Letters/e mails providing web based links to the PDCS, the PDCS Background Paper, a summary leaflet, the CIL viability studies and other supporting evidence sent to all stakeholder organisations

and individuals that may have an interest to directly notify them of the public consultation on the PDCS and invite representations.

• Similar communication directed to each of the consultation bodies inviting them to make representations on the PDCS.

• Notification via a press release and the Council's webpages to try and reach any other interested persons and/or organisations, particularly those living or carrying on business in the area to enable them to participate;

• Provision of hard copy of Public Notices, summary leaflets and the PDCS and PDCS Background Papers to all libraries and a the Council`s offices;

The Council then published the Representations at PDCS Stage (22). The schedule provides a all representations received and a copy of the summary reported to the Council and its Cabinet in December 2014 and January 2015. That document is available to view on the Council's web page in addition to the PDCS consultation documentation.

Reg 16 – Publication of a draft charging schedule & Reg 17 – Representations relating to a charging schedule

The CIL Draft Charging Schedule was published on the Council website together with a Regulation 16 Statement of Representation Procedure, CIL Viability Studies and other relevant evidence base documents. The Council's CIL web page also gave notice that hard copies of the CIL Draft Charging Schedule and the other documents were available for inspection at the Council's Offices, at local libraries including the mobile library, and on the Council's website.

An email with a Statement of Representations Procedure attached was sent to the community stakeholders on the Council's consultation database. This included all individuals and organisations that were consulted at the PDCS stage and all stakeholders that made representation at PDCS stage. The email also gave a web link to the above information on the Council's web site.

A presentation of the Draft Charging Schedule proposals was also made at a meeting of the Agents Forum which has representatives of local architects, planning consultants and developers.

A public notice was also published February to draw wider public attention to the consultation.

The period for representations on the CIL Draft Charging Schedule was between 9th February and the 27th April 2015. This was announced on through the publication of a formal notice of advertisement in the Tiverton Gazette, a paper circulating throughout the Mid Devon area in order to be compliant with the requirements of Regulation 16 (1) (d) of the CIL Regulations. A total of 18 representations were received.

Following modifications to the Mid Devon Local Plan Review (??????????????) January 2017 and the addition of a significant Tourism, Leisure and Retail allocation at J27(M5) a major modification was made to the CIL Draft Charging Schedule and changes were made to the Regulation 123 list. The modified CIL Draft Charging Schedule went out to consultation between the 3rd January 2017 and 14th February 2017.

A total of ?????? representations were received.

The modified CIL Draft Charging Schedule was published on the Council website together with a Regulation 16 Statement of Representation Procedure, CIL Viability Studies and other relevant evidence base documents. The Council's CIL web page also gave notice that hard copies of the CIL Draft Charging Schedule and the other documents were available for inspection at the Council's Offices, at local libraries and on the Council's website.

An email with a Statement of Representations Procedure attached was sent to the community stakeholders on the Council's consultation database. This included all individuals and organisations that were consulted at the PDCS and DCS stages and all stakeholders that made representation at PDCS and DCS stages. The email also gave a web link to the above information on the Council's web site.

A public notice was also published February to draw wider public attention to the consultation.

Full copies of representations can be found in the Regulation 19(1)(c) Copy of Representations. Details of the consultations including a summary of all representations received, together with individual responses to each of those representations can be found in the Regulation 19(1)(b) Statement of Representations. Both these documents have been available to view on the Councils website since XXXXXXXX. Yet to be published but date will be at time of submission to Inspector

Reg 19 – Submission of documents and information to the examiner

The Council submitted the following documents, in both paper and electronic form, to the Planning Inspectorate on ??????????????? Date to be confirmed:

• The Draft CIL Charging Schedule;

• A Regulation 19(1)(b) Statement of Representations;

• Copies of representations made under Regulation 17; and,

• Copies of the relevant evidence.

Copies of the Draft Charging Schedule and supporting documents were made available at the Council's Customer Service Centre and local libraries on ??????? (in compliance with (19(3) "as soon as practicable after a charging authority submits"). All documents were published on the Council's website together with a statement of the fact that the documents were available for inspection and where they could be inspected.

All persons who submitted responses to the CIL Draft Charging Schedule were notified of its submission on ????????

Reg 21 – CIL Examination: right to be heard

The Council received ?????? requests to be heard by the Examiner within the periods for making representations to the Draft CIL Charging Schedule.

The Council will publish the time and place of the CIL examination and the name of the Examiner on its website, and notify all persons who made representations in accordance with Regulation 17.

The Council will also give notice by local advertisement stating the time and place of the CIL examination and the name of the examiner at least four weeks before the Community Infrastructure Levy Examination takes place.

This statement will be updated to include additional information in compliance within Regulation 21.

CABINET **AGENDA ITEM:**
21 November 2016

REPORT OF THE HEAD OF PLANNING AND REGENERATION

LOCAL DEVELOPMENT SCHEME

Portfolio Holder Cllr Richard Chesterton
Responsible Officer Mrs Jenny Clifford, Head of Planning and Regeneration

Reason for Report:

To propose a revised timetable for the review of the Local Plan in the Local Development Scheme (LDS) for Mid Devon.

RECOMMENDATIONS

1. That the revised Local Development Scheme (as shown at **Appendix 1**) be approved.

Relationship to Corporate Plan: The new LDS, appended to this report, sets out a revised timetable for the delivery of the Mid Devon Local Plan 2013-2033. The new Local Plan will set the strategy for the provision of new development in the district, allocating sites for housing, employment and retail, as well as protection of the environment. This meets the Corporate Plan priorities: 'Economy', 'Homes', 'Community' and 'Environment'.

Financial Implications: The report itself has no direct financial implications, however the preparation of planning policy documents have associated production costs. There is currently a budget for the examination of the Local Plan within the planning service.

Legal Implications: There is a statutory duty to produce and maintain a LDS, as set out by the Planning and Compulsory Purchase Act 2004.

Risk Assessment: The Local Plan Review will be subject to examination in 2017 prior to adoption. It could be subject to challenge during the examination process, if it can be demonstrated that it was not drawn up in compliance with the LDS. The proposed LDS provides an accurate, updated timetable for production of the Local Plan Review.

1.0 Introduction

1.1 Local Planning Authorities are required to prepare and keep up to date a development plan for their area. It is important that the Local Plan is kept up to date to ensure that it reflects recent changes in the planning system, the Council's current corporate objectives and provides a sound basis for decision making. Therefore a project plan needs to be put in place to ensure the review is completed efficiently.

1.2 The Planning and Compulsory Purchase Act 2004 requires the authority to prepare and maintain a LDS for the district. The LDS provides interested people and organisations with the Council's project plan for the preparation of local development documents. The Council's adherence to the LDS is part of the tests of soundness applied to Local Plans at their examinations.

1.3 The purpose of this report is to present a revised version of the LDS which takes account of the delay in reaching the submission stage. This is due to the need to acquire additional technical evidence and the proposed allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.

1.4 During the consultation period of the Local Plan (February – March 2015) 2,429 comments were received by 970 respondees. Comments were received with respect to general policies, allocated development sites and alternative site suggestions. There were comments for and against development proposals, with the larger sites generally attracting more interest. In response to these representations and as a result of ongoing discussions with statutory consultees, additional technical work is now being undertaken prior to submission of the Local Plan to the Secretary of State to ensure that our position is robust.

1.5 This technical work primarily relates to access arrangements to the proposed East Cullompton Urban Extension and related motorway access improvements. This involves a topographical survey, updating of the base flood model, preparation of detailed highway designs and subsequent flood modelling. The Environment Agency is expected to agree the base flood model early in January 2017.

1.6 On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 of the M5 for mixed use leisure, tourism and associated retail. This proposed allocation constitutes a major modification to the Local Plan Review and consequently, a further stage of public consultation is required. The LDS has been revised to take into account the following considerations:

- Amending and rewriting all the inter-related parts of the plan, policies and tables together with amending the Sustainability Appraisal, Habitat Regulations Assessment, Infrastructure Plan, Heritage Impact Assessments and further Duty to Cooperate Meetings;
- Publishing and preparing for consultation;
- A six week period of consultation, which will begin on 3 January 2017, closing on 14 February 2017;
- Representations catalogued and summarised; and
- Submission to Planning Inspectorate at the end of March 2017.

1.7 The Cabinet Report of 9 May 2013 'Planning policy documents for consideration by the Planning Policy Advisory Group, Cabinet and Council' (Agenda Item: 7), states that Cabinet is the only body that needs to give approval to the adoption of a new LDS. There is no longer a requirement for the LDS to be signed off by the Secretary of State. If approved, the new LDS will be made available on the Council's website.

Contact for any more information	Adrian Welsh, Forward Planning Team Leader 01884 234344 awelsh@middevon.gov.uk
Background Papers	Cabinet November and December 2014; Council January 2015; Council 22nd October 2015; Cabinet 15th September 2016; Council 22nd September 2016.
File Reference	
Circulation of the Report	Councillor Richard Chesterton, Cabinet Member for Planning & Regeneration Management Team

Mid Devon District Council
Local Development Scheme 2016

1. INTRODUCTION

1.1 Mid Devon District Council is required to prepare and maintain a Local Development Scheme (LDS) for the district. The LDS provides interested people and organisations with the Council's project plan for the preparation of local development documents. The Planning and Compulsory Purchase Act 2004 states that the LDS must specify:

- The local development documents which are to be 'development plan documents'
- The subject matter and geographical area to which each development plan document relates
- The timetable for preparation and revision of the development plan documents

1.2 Local authorities can update their LDS at such times as considered appropriate. The previous Mid Devon version has been in place since October 2015. Since this time the Council has been undertaking a review of the Local Plan.

2. THE LOCAL PLAN

2.1 The National Planning Policy Framework (NPPF) states that Local Plans are key to delivering sustainable development and that local authorities should produce a Local Plan for their area. The Local Plan can then be reviewed in whole or in part to respond flexibly to changing circumstances.

2.2 Mid Devon's Local Plan is currently made up of three parts, all of which are development plan documents. The three documents are:

Document	Adopted	Scope	Subject matter
Local Plan Part 1 - Core Strategy 2006 to 2026	July 2007	Mid Devon	The Core Strategy is part 1 of the district's Local Plan. It was adopted in accordance with the timetable set out in the Council's first Local Development Scheme. It sets out a spatial strategy and strategic policies for Mid Devon and its settlements.
Local Plan Part 2 – Allocations and Infrastructure Development Plan Document	October 2010	Mid Devon	The AIDPD is part 2 of the district's Local Plan. It allocates sites for housing, retail and employment development, whilst setting necessary infrastructure requirements, with policies on the Community Infrastructure Levy, public open space, affordable housing, education provision, green infrastructure and carbon footprint reduction.

(AIDPD)			
Local Plan Part 3 – Development management policies (LP3)	October 2013	Mid Devon	LP3 is part 3 of the district's Local Plan. It provides the detailed development control policies to deal with the specifics of planning applications

2.3 Supplementary Planning Documents (SPDs) are not part of the Local Plan, nor are they considered to be development plan documents. Therefore, information on their production is not set out within the LDS. Instead, such information can be found on the Mid Devon website at https://new.middevon.gov.uk/planning-policy/supplementary-planning-documents/.

2.4 The former Devon Structure Plan 2001-2016 (adopted October 2004) and the South West Regional Spatial Strategy (draft, never adopted) have both been revoked by the Government so their provisions no longer apply.

3.0 NEW LOCAL PLAN

Local Plan Review (Core Strategy, AIDPD and LP3)
Adoption Target: 2017

3.1 The existing Core Strategy has been in place for nine years and the AIDPD for six years. A review process began prior to the adoption of LP3 in October 2013 to reflect the need to adhere to the provisions of the National Planning Policy Framework. This review process includes all strategic policies and allocations for the district, and incorporates development management policies such as those in LP3. The updated document will replace the existing Core Strategy, the AIDPD and LP3 to produce a single Local Plan for the district (effectively a review of parts 1, 2 and 3 of the current Local Plan). The new document will extend the time period of the plan to 2033.

3.2 The reviewed Local Plan will contain:

- Strategic policies guiding housing, employment and retail distribution across the district;
- The development focus for each of the three towns of Tiverton, Crediton and Cullompton, the villages of the district and the open countryside;
- Site allocations for housing, employment, retail development, community facilities and infrastructure; and
- Development management policies.

3.3 The evidence base for the Local Plan will include a Strategic Housing Land Availability Assessment, Strategic Housing Market Assessment, Open Space and Play Area Strategy, Viability Assessment, Gypsy and Traveller Accommodation Assessment, Renewable and Low Carbon Energy Screening Study, Landscape Character Assessment, Habitat Regulations Assessment, Transport Assessment, Town and Village Character Assessment, Retail Study, Employment Land Review, Infrastructure Delivery Plan and Strategic Flood Risk Assessment.

A Community Infrastructure Levy charging schedule is also being produced alongside the Local Plan review.

3.4 Coverage: Mid Devon

3.5 Conformity: the document will be produced in conformity with the National Planning Policy Framework.

3.6 The following table sets out the timetable for production and adoption of the document:

Stage	**Date**
Sustainability Appraisal Scoping	May 2013 (completed)
Preparation Stage Consultation	January 2014 (completed)
Publication Stage Consultation	February – April 2015 (completed)
Modifications Consultation	January – February 2017
Submission	March 2017
Hearings	September 2017
Adoption	January 2018
Revision	2020

4.0 PROGRESS REPORTING

4.1 The Council produces an Annual Monitoring Report (AMR) in December each year, covering the 'monitoring year' (of the preceding April-March period). The AMR sets out the list of documents that are included within the LDS, their timetable for preparation, the stage they are currently at, and if they are behind schedule the reasons for this.

4.2 The AMR is made available on the Mid Devon website and can be seen at:

https://new.middevon.gov.uk/planning-policy/monitoring/

5.0 REVIEW OF THE LOCAL DEVELOPMENT SCHEME

5.1 The Planning and Compulsory Purchase Act 2004 states that local authorities can revise their LDS at such times as they consider appropriate. The Mid Devon District Council website will be updated to set out if the LDS has been subject to further revision. Proposed changes are subject to ratification by Cabinet.

Appendix 2 – Local Plan Preparation Schedule

Local Plan Preparation schedule	November - December 2016	January - February 2017	March 2017	April – July 2017	September 2017	January 2018
Complete additional technical work and consider modifications						
Modifications Consultation						
Submission to Secretary of State						
Position statements, revise Schedule of Minor Mods						
Examination hearings						
Cabinet and Council for adoption						

NB – Completed stages of the Local Plan Preparation Schedule have been deleted from the schedule.

This page is intentionally left blank