

## Town allocations

Policy/para	Summary of main issues raised	Comments made by (customer ID in brackets)	Response
<b>TIV6 Farleigh Meadows</b>	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.
<b>TIV7 Town Hall / St Andrew Street</b>	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.
<b>TIV8 Moorhayes Park</b>	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.
<b>TIV9 Howden Court</b>	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.
<b>TIV10 Roundhill</b>	Policy should be deleted as is unsuitable and subject to significant local opposition.	Tiverton Town Council (98)	Not agreed. The site has been assessed as being suitable through the Strategic Housing Land Availability Assessment (SHLAA). Comments in relation to specific objections are set out below.
	Objection as site is former clay pit/landfill and is unstable/would be expensive to redevelop.	Tiverton Town Council (98); Individual (2484, 5259, 5291, 5300, 5262, 5339, 5322, 5500)	The policy requires investigation of ground stability and implementation of appropriate remediation works. A panel of housing industry experts (the SHLAA panel) believe the site to be viable. An application is anticipated to be submitted in time to allow building on site from 2017/18 indicating that the site viable for redevelopment.

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

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

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

<b>TIV13</b> <b>Tidcombe Hall</b>	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.
<b>TIV14</b> <b>Wynnards Mead</b>	Supports policy.	Historic England (1170)	Support noted.
	Policy currently unsound, advises reference to Cottey Brook be given, and requests unobstructed public open space buffer, at least 7m wide to allow for future maintenance of watercourse.	Environment Agency (943)	Insufficient developable land remaining following Historic Environment Appraisal. Allocation is proposed for deletion from the plan.

	<p>Objects to inclusion of site.</p>	<p>Tiverton Civic Society (1410);  Individual (5363, 5364, 5325,  5324, 5349, 5333, 5332, 5329,  5327, 5354, 5355, 5372, 5373,  5374, 5375, 5376, 5746, 5669,  5668, 5670, 5668, 5567, 5566,  5565, 5554, 1235, 5583, 5585,  5584, 5890, 5745, 5744, 5743,  5742, 5741, 5740, 5739, 5730,  5731, 5732, 5733, 5734, 5735,  5736, 5737, 5738, 5721, 5722,  5723, 5210, 5894, 5725, 5726,  5727, 5728, 5729, 5718, 5720,  5719, 5851, 5560, 5558, 5551,  5971, 5970, 5969, 5968, 5967,  5966, 5965, 5964, 5963, 5962,  5961, 5960, 5959, 5958, 5957,  5996, 5995, 5994, 5992, 5991,  5989, 5988, 5987, 5986, 5985,  5984, 5983, 5982, 5981, 5980,  5977, 5976, 5975, 5974, 5973,  5972, 5978, 5944, 5943, 5942,  5941, 5940, 5939, 5938, 5937,  5936, 5935, 5934, 5933, 5932,  5931, 5930, 5929, 5928, 5927,  5926, 5925, 5924, 5923, 5922,  5921, 5920, 5919, 5918, 5917,  5916, 5915, 5914, 5913, 5912,  5911, 5910, 5909, 5908, 5907,  5906, 5905, 5904, 5903, 5902,  6045, 5901, 5900, 5899, 5897,  5896, 6038, 6037, 6036, 6035,  6034, 6033, 6032, 6031, 6030,  6029, 6028, 6027, 6026, 6025,  6024, 6023, 6022, 6021, 6020,  6019, 6018, 6017, 6015, 6014,  6013, 6012, 6011, 6010, 6009,</p>	<p>The planning merits of objections are the important factor which would affect any planning proposal. Comments in relation to specific objections are set out below.</p>
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	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.
<b>TIV15 Tiverton Infrastructure</b>	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.
<b>CU1-CU6 North West Cullompton</b>	See separate table.		

<b>CU7-CU12 East Cullompton</b>	See separate table.		
<b>CU13 Knowle Lane</b>	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.
<b>CU14 Ware Park &amp; Footlands</b>	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.
<b>CU15 Exeter Road</b>	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.
<b>CU16 Cummings Nursery</b>	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.
<b>CU17 Week Farm</b>	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.
<b>CU18 Venn Farm</b>	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.



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

<b>CU19 Town Centre Relief Road</b>	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.
<b>CU20 Cullompton Infrastructure</b>	Requests additional criterion stating 'provision of works to reduce flood risk'.	Environment Agency (943); Individual (3588)	Agreed. Cullompton is a Critical Drainage Area which requires measures to reduce flood risk (over and above those expected elsewhere). An amendment to the policy is proposed.
	Requests completion of sport and recreation evidence base and devise strategy for delivery of sport and recreation land and buildings; amend policy accordingly.	Sport England (169)	There is no specific requirement within national policy to follow Sport England guidance, which is therefore merely advisory. It will be for the Council to decide whether to invest in new or improved indoor sports facilities through its normal capital programme decision making.

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

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

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

	Lack of capacity within local healthcare system to accommodate pressure from development/lack of detail about how this will be addressed.	Individual (5621, 5615, 5613, 5611, 5698, 3209, 5561, 1681, 5811, 2046)	NHS England and the local Clinical Commissioning Groups have been consulted throughout the local plan process. Neither organisation has raised an objection to the development proposals nor sought funding for premises. The NHS typically provides its own funding to upgrade or expand GP facilities. Surgeries in Mid Devon have recently successfully applied to this in order to enable expansion.
	Pleased to see safeguarding of land for expansion of secondary school.	Individual (5211)	Support noted.
	Lack of capacity within local schools to accommodate pressure from development/lack of detail about how this will be addressed (suitable land should be allocated at master planning stage for secondary school expansion or amend f to include expansion of 6 <sup>th</sup> form facilities).	Individual (5615, 5613, 5611, 5698, 3209, 1860, 2160, 734, 5561, 3588, 1681, 5811, 2046)	The capacity of local schools was assessed by Devon County Council and a report forms part of the evidence base underpinning the Local Plan Review. A new primary school is to be provided as part of the NW Cullompton allocation (and in the first phase of development). The East Cullompton allocation includes two primary schools. Land at Cullompton Community College is safeguarded to allow for expansion of the secondary school in order to accommodate the additional pupils. Devon County Council has stated that there are no strategic plans for the provision of 6 <sup>th</sup> form education in Cullompton. They state that generally speaking the existing 6 <sup>th</sup> 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.
<b>CU21 Colebrook</b>	Policy should include protection of the floodplain and associated wetland habitat. Paragraph d) to be revised to remove specific reference to 1.1ha as the area at risk requires more detailed appraisal than current maps suggest.	Environment Agency (943)	The 1.1ha figure refers to the provision of green infrastructure, rather than specifically the size of the floodplain. Retaining the policy as written ensures a minimum level of provision of green infrastructure but the extent of the floodplain will be determined by hydraulic modelling as part of the Flood Risk Assessment which accompanies any application.
	Considers policy sound, legally compliant and prepared in accordance with duty to cooperate.	Individual (2160)	Support noted.

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

	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.
<b>CRE1 Wellparks</b>	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.
<b>CRE2 Red Hill Cross</b>	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.
<b>CRE3 Cromwells Meadow</b>	Requests dual use footpath (as part of CRE2) but which could also serve CRE3/alternatively amend 3.162 to state 'An all purpose path for safe access by cyclists and pedestrians needs to be constructed'.	Crediton Town Council (678); Sustainable Crediton (2689); Crediton Neighbourhood Plan Steering Group (1734)	An amendment is proposed to Policy CRE2 and CRE5 regarding improvements to the pedestrian and cycle network.
	Policy currently unsound - no work in evidence base to assess impact on Shobrooke Park; appraisal needed, if concludes harm set out mitigation measures, if cannot be mitigated need to justify allocation as per NPPF para 133 and 134.	Historic England (1170)	Historic Environment Appraisal has been prepared. The appraisal states that there is less scope for harm than the CRE2 allocation given the backdrop of existing development. Mitigation in the form of landscaping along eastern boundary will address this issue.

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

	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.
<b>CRE4 Woods Group</b>	Supports policy.	Historic England (1170)	Support noted.
	Supports building on brownfield sites first, such as this site, before greenfield sites.	Individual (366)	Support noted.
<b>CRE5 Pedlerspool</b>	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.



	<p>Supports policy but requests policy be revised to state 200 dwellings is a minimum and that the affordable housing of 28% is a maximum and is subject to viability.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>Not agreed. The dwelling numbers within any policy are a target, and different numbers may be achieved and justified following more detailed design work undertaken during the preparation of a planning application. It would be inappropriate with the information currently available to state the dwelling number as a minimum, as the site requires a significant quantity of mitigation planting and landscaping given its proximity to the registered historic park of Creedy, the provision of which could be undermined by the proposed policy change. Viability evidence has also indicated that 28% affordable housing is achievable for sites within the towns. This figure is also a target, and is subject to viability whether it is stated or not, in accordance with paragraph 173 of the NPPF. No specific circumstances are set out to justify why the policy wording should be amended. No change is proposed as a result.</p>
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	<p>Objects to requirement to provide gypsy and traveller pitches; Gypsy and Traveller Accommodation Assessment does not justify allocations on particular sites, nor is there justification or comparison of options in Sustainability Appraisal; states not a suitable site given other proposed uses; states CRE1 Wellparks more suitable site being associated with commercial development.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>The Gypsy and Traveller Accommodation Assessment sets out the need for sites within the district, rather than assessing the suitability of specific sites. Provision of 5 pitches was a requirement when the site was allocated within the AIDPD. Guidance states that gypsy sites should be located within or adjacent to existing communities where facilities are available for health, education and employment. Larger sites are generally more likely to be able to support the delivery of gypsy and traveller accommodation so, combined with the fact that the AIDPD contingency site already included this provision, Pedlerspool is considered the most suitable allocation within which to make this provision. Siting considerations should be identical to those for the settled community. If Pedlerspool is acceptable for housing then it is also considered suitable for some traveller pitches.</p>
	<p>Supports inclusion of 25 extra care units in lieu of employment but provision of these cannot be linked to delivery of housing, which could be hindered if so; policy should be amended to consider positive reception to larger facility.</p>	<p>MJ Gleeson c/o Bell Cornwell LLP (3775)</p>	<p>Following the request from Devon County Council for a school on the site which is seen to be a higher priority. This is to be included in lieu of the extra care provision and an amendment is proposed accordingly as this provides an employment generating use. Development management policies would be supportive should the developer wish to also proceed with the extra care facility.</p>

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

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

	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.

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

	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.
<b>CRE6 Sports fields, Exhibition Road</b>	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.
<b>CRE7 Stonewall Lane</b>	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.
<b>CRE8 Barn Park</b>	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.
<b>CRE9 Alexandra Close</b>	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.

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

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



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

	<p>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.</p>	Sandford Parish Council (64)	<p>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.</p>
	<p>Concern about capacity of schools to accommodate housing growth.</p>	Individual (5417)	<p>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.</p>