

Non-allocated town sites

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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