

## Junction 27

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

	<p>J27 proposal should be included in local plan.  <i>* Many mention Westwood/Eden commercial proposal by name, some refer to housing proposal)</i></p>	<p>GL Hearn (3781); Harcourt Kerr (1090); Petroc (3528); Culm Valley in Business Executive Committee (3618); Richard Thorne Consulting (5773); Taste of the West (5828); Individual (5218, 5666, 5663, 5658, 5657, 5656, 5655, 5654, 5653, 5652, 5651, 5650, 5649, 5645, 5644, 5643, 5640, 5758, 5676, 5659, 5880, 5885, 5886, 5947, 5946, 5945, 5887, 6044, 6043, 6042, 5484, 5483, 5482, 5481, 5480, 5479, 5478, 5477, 5476, 5475, 5474, 5473, 5472, 5471, 5470, 5469, 5468, 5467, 5466, 5465, 5464, 5463, 5462, 5461, 5460, 5459, 5458, 5457, 5456, 5455, 5454, 5453, 5452, 5451, 5416, 5415, 5414, 5413, 5412, 5411, 5410, 5409, 1681, 5820, 6059, 6064, 6060, 6061)</p>	<p>Noted. On 22<sup>nd</sup> September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.</p>
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	<p>Commercial [<i>and housing</i>] development should be allocated at J27 [<i>and north of Willand representation (4386)</i>].</p>	<p>G L Hearn (3781); Hallam Land Management (4386)</p>	<p>On 22<sup>nd</sup> September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4<sup>th</sup> September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs &amp; pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. The Council's proposed J27 allocation unlike the option proposal, no longer includes B8 storage/distribution/logistics.</p>
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	<p>J27 is a better option for development than east of Cullompton, better road and rail links, more certainty over delivery. J27 excellent links to motorway system and North Devon. J27 has Tiverton Parkway railway station, close by.</p>	<p>G L Hearn (3781); Hallam Land Management (4386); Harcourt Kerr (1090); Culm Valley In Business Group c/o Templar Strategies (3618); Individual (5561, 5835, 5820, 3748, 5759, 5648, 4641, 5886)</p>	<p>On 22<sup>nd</sup> September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4<sup>th</sup> September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs &amp; pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. Any significant development at Junction 27 will require improvements to the motorway junction to enhance capacity. However, the scale of such improvements is considered less with the absence of housing from the Council's proposed allocation.</p>
	<p>An allocation should be made at J27 to provide additional/alternative employment land, [<i>and housing land (representation 4386)</i>] removes uncertainty for growth. Not all allocated land can be delivered. (TIV 1 to TIV6 and CU1 to CU7 and CU13, CU17, CU18)</p>	<p>G L Hearn (3781); Harcourt Kerr (1090); Hallam Land Management (4386)</p>	<p>The Council is confident in the deliverability of its allocations as supported by the plan's evidence base including findings of the SHLAA panel, masterplanning activity, commercial interest and planning applications.</p>
	<p>An insufficient level of employment land has been provided to significantly increase local employment provision and reduce the high levels of out commuting. (Policy S1, S2, S6.)</p>	<p>G L Hearn (3781)</p>	<p>Not accepted. The Local Plan evidence base supports the Council's position on the level of allocations included in the plan. On 22<sup>nd</sup> September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 to fulfil a primary purpose of leisure and tourism with enabling retail. The Council understands that the promoters (represented by 3781) are no longer pursuing a warehousing/logistics employment element.</p>

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

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

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

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

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

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

	<p>J27 and land north of Willand has;</p> <ul style="list-style-type: none"> <li>• Good public transport links</li> <li>• Cycle path linking to station, Tiverton, Willand and Uffculme runs through site .</li> <li>• Has existing road infrastructure capacity and capable of being improved.</li> <li>• Attractive location in market terms</li> <li>• Close to Uffculme Secondary school and services in Willand.</li> <li>• Retention</li> </ul>	<p>Hallam Land Management (4386)</p>	<p>On 22<sup>nd</sup> September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. However, housing is not being pursued in this location. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4<sup>th</sup> September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs &amp; pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. The Council acknowledges the good transport links at Junction 27 within the context of its proposed tourism/leisure allocation including reference to a travel hub and proposes accessibility for all modes including paths for pedestrian and cycle links.</p>
	<p>Sustainability Appraisal Fails to adequately assess J27, is inconsistent in its weightings, fails to have regard to the sustainability credentials of J27.</p>	<p>Hallam Land Management (4386)</p>	<p>The approach of the Sustainability Appraisal to the sustainability credentials of J27 in the context of the options assessment is considered appropriate; however, the Council's approach to development at J27 has now changed with the decision to make a different and smaller allocation. The Sustainability Appraisal update will form part of the Council's documentation available at major modifications consultation stage.</p>

	<p>Suggest half of Cullompton housing allocation be sited at/near J27 of M5, area has</p> <ul style="list-style-type: none"> <li>• More efficient M5 motorway access</li> <li>• Railway station</li> <li>• Footbridge over M5 and railway</li> <li>• Cycle paths</li> <li>• Good access to Cullompton</li> <li>• Access to A38 and A361</li> <li>• J27 lower grade land</li> <li>• No flooding issues</li> </ul>	<p>Kentisbeare Parish Council (76)</p>	<p>For a development to function effectively in this location there is a critical mass needed. A smaller scale development would not afford the opportunities to enhance local facilities and provide the necessary infrastructure.</p>
	<p>J27 is a better option for development than Hartnoll Farm, accessible to A361 and M5, close to Tiverton Parkway, easy to commute to Exeter/Taunton for employment.</p>	<p>Individual (3954)</p>	<p>No land at J27 or Hartnoll Farm is allocated for residential development. While J27 is close to the M5 and Tiverton Parkway, Hartnoll Farm is closer to the facilities provided by Tiverton. Neither site was considered preferable for a proposed allocation for residential development.</p>
	<p>Westwood Eden proposals would not adversely affect any adjoining centres or put any planned investments at risk.</p>	<p>GL Hearn (3781)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. It is to be noted that the Council is proposing a land allocation, which is capable of being provided by a range of developers rather than being project specific. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. NLP has also advised the Council that the allocation as proposed would not adversely affect any planned investment for town or city centres within the retail study area.</p>

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

	<p>Plan does not meet requirements of Paragraph 28 of NPPF in failing to have regard to the Mid Devon Tourism study.</p>	<p>GL Hearn (3781)</p>	<p>The Plan sets out a positive policy on tourism DM22 supporting proposals within or adjacent to defined settlements. This reflects the strategy of the plan which is positive about tourism and leisure facilities. Additionally it permits proposals elsewhere which justify a countryside location and subject to normal environmental and traffic issues. The supporting text of policy DM22 identifies proposals of various sizes, only differing on the level of supporting evidence required to support the larger schemes. This is a positively prepared policy which does not limit, as an allocation might, tourism enterprises to any specific location. On 22<sup>nd</sup> September, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The proposed allocation meets strands 5, 6 and partially strands 2 of the Mid Devon Tourism Study 2014.</p>
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	<p>Opposed to development at/near J27, support its exclusion from the plan.</p>	<p>Uffculme Parish Council (54);  Willand Parish Council (44);  Individual (5240, 5251, 5253, 5257, 5258, 4193, 5361, 3486, 5265, 5360, 5271, 3609, 1680, 4837, 5290, 5292, 5293, 4372, 5301, 4201, 4174, 5307, 5310, 4354, 5313, 5314, 4284, 5316, 5317, 5318, 5321, 5342, 5345, 5346, 5347, 5348, 5337, 5351, 5328, 5717, 5365, 5367, 5369, 5371, 5000, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 3978, 5660, 5667, 5636, 5632, 2804, 5619, 4446, 643, 5618, 5620, 5610, 4362, 4590, 5888, 5706, 5704, 5703, 5700, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 5889, 4625, 5673, 3943, 5555, 5557, 1252, 4251, 3674, 4331, 4219, 5549, 5787, 5852;  5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5784, 5782, 4407, 5775, 4662, 5778, 4289, 5408, 5407, 5401, 5771, 5764, 5834, 5286, 5825, 5839, 5839, 5804, 3614, 4357, 5816, 5822, 5007, 5801, 5824, 4311, 5393, 5392, 5391, 5387, 5390, 5034, 5381, 5388, 5382, 3842, 5383)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The rationale for which is set out within the report considered by Council on that date.</p>
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	<p>Welcome lack of retail/leisure development at J27 Believe retail/leisure development at J27 could have a negative impact upon vitality and viability of Exeter.</p>	<p>Exeter City Council (141)</p>	<p>On 22nd September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail. The rationale for which is set out within the report considered by Council on that date. The Council's retail consultant NLP advises there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres (including Exeter) is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. Potential impact of the proposed allocation on Exeter, together with retailing in other local authority areas has been the subject of Duty to Cooperate meetings. The Council considers it has fulfilled its Duty to Cooperate obligations. There is no equivalent offer in Exeter and accordingly, impact is not considered to be significant.</p>
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	<p>Support plan proposals for development at main towns Cullompton, Tiverton etc. Development at Cullompton more appropriate supported by local council.</p>	<p>Uffculme Parish Council (54); Individual (5360, 1680, 4284, 5313, 5317, 5318, 5342, 5345, 4120, 5265, 5290, 5314, 5347, 5348, 5337, 5351, 5328, 5367, 5371, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5667, 5636, 5619, 4446, 643, 5618, 5620, 5610, 4590, 5888, 5706, 5704, 5703, 5695, 5694, 5693, 5692, 5691, 5690, 5689, 5688, 5687, 5686, 5685, 5892, 5684, 5683, 5682, 5681, 5680, 5679, 5678, 5677, 5675, 5674, 5889, 4625, 5673, 4251, 3674, 4219, 5787, 5852, 5853, 5854, 5855, 5856, 5857, 5858, 5859, 5860, 5872, 5873, 5874, 5875, 5876, 5877, 5878, 5879, 5418, 5881, 5882, 5883, 5884, 5956, 5955, 5954, 5953, 5952, 5951, 5950, 5949, 5948, 6041, 6040, 6039, 5784, 4407, 5775, 4662, 4289, 5408, 5407, 5401, 5825, 5804, 3614, 4357, 5816, 5822, 5007, 5801, 5824, 4311, 5393, 5392, 5387, 5034, 5381, 5382)</p>	<p>Support noted. Housing is not being pursued at Junction 27. Following the options consultation in 2014, and based on representations received, a report was submitted to the Council on 4<sup>th</sup> September 2014 which considered the strategic options and overall strategy where it was decided that there would be a strategic focus on Cullompton in preference to a strategic allocation at Junction 27 for housing and B use employment. Cullompton has good road links, good bus service, shops, sports facilities, clubs &amp; pubs. It has library, schools and leisure centre and a site is allocated for a new railway station in the plan. On 22<sup>nd</sup> September 2016, Mid Devon District Council resolved to propose an allocation of land at Junction 27 for mixed use leisure, tourism and associated retail.</p>
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	<p>J27 proposal incompatible with MDDC policy of concentrating housing and employment allocation at or near existing centres of population.</p>	<p>Uffculme Parish Council (54);  Individual (2512, 5230, 4042, 5361, 3486, 5360, 5270, 3609, 5290, 5293, 4201, 5307, 4284, 5345, 5350, 5365, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5660, 5787, 5782, 4407, 5778, 5825, 5804, 3614, 5816, 5824)</p>	<p>Comments noted. The Council's proposed allocation at Junction 27 does not include housing or traditional B class employment uses.</p>
	<p>Adverse economic impact on existing local towns, villages and businesses.</p>	<p>Uffculme Parish Council (54);  Willand Parish Council (44);  Individual (2512, 5230, 5233, 4120, 4042, 5251, 4193, 5361, 3486, 5360, 5270, 4837, 5290, 5292, 5301, 4201, 5307, 4354, 5314, 4284, 5345, 5346, 5347, 5348, 5350, 5337, 5717, 5365, 5369, 5000, 5747, 5716, 5711, 5712, 5713, 5714, 5715, 2318, 5667, 4446, 643, 5618, 5620, 5700, 4625, 4251, 3674, 5549, 5787, 5782, 4407, 5775, 4662, 5778, 5408, 5764, 5825, 5804, 3614, 5816, 5822, 5007, 4311, 5392, 5391, 5387, 5390, 3842, 5383)</p>	<p>The Council's retail consultant NLP advises that there is a regional retail need that can reasonably be met at Junction 27. Advice from NLP is that following analysis, the impact of the proposed designer outlet retailing upon town and city centres is not significant and will be offset by expected increases in retail expenditure. It is proposed that controls will reduce impact on town centres. NLP has also advised the Council that the allocation as proposed would not adversely affect any planned investment for town or city centres within the retail study area.</p>

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

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

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

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

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

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

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

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

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

