



Tiverton Neighbourhood Plan 2020 to 2033 Consultation Statement



Submission Version (Regulation 16)

November 2021

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1 INTRODUCTION

- 1.1. It was in 2014 that Tiverton Town Council originally decided that it would like to develop a Neighbourhood Plan.
- 1.2. A training event was held for local councillors to learn about the purpose of neighbourhood planning and the process involved. This was followed a community-wide meeting to launch the project and begin to gather views about what people liked about the parish, what they did not like and what might be improved.
- 1.3. Efforts were made to establish a Steering Group to lead the project, however, interest was limited, and the group struggled to make headway. The process was therefore put on hold.
- 1.4. In early 2018, partly inspired by the progress that neighbouring Cullompton Parish had made on its neighbourhood plan, there was renewed interest in the idea of a neighbourhood plan for Tiverton. A Steering Group was established, and the Town Council agreed to fund a part-time Co-ordinator to administer the project. Several meetings took place, which captured the attention of a wider range of members of the community than previously, and an initial project scope was put together. Unfortunately, a few months into the project, the Co-ordinator decided to step back and there was a concern that the work might come to a halt again. Two of the volunteers on the group, however, decided to take on the role of Chair and Co-ordinator. Despite this, at that point the Town Council ceased to fund the Co-ordinator role.
- 1.5. The new Chair and Co-ordinator, supported by a group of volunteers from the community, have put in many hours of voluntary time to overseeing the project. The Town Council has been supportive of the work, but in a limited capacity. For that reason, a planning consultant was recruited to assist with the work, acting as a critical friend and helping to design and progress activities.
- 1.6. An application¹ to designate Tiverton Parish as a neighbourhood area was submitted by the Town Council to Mid Devon District Council (MDDC) in August 2018. Following a six-week consultation (required at the time), on 12 November 2018, MDDC designated² the Tiverton Neighbourhood Area, which would share its boundary with the wider parish.
- 1.7. This Consultation Statement sets out the story of how the Tiverton Neighbourhood Plan has been developed and, in accordance with regulation 15(2) of Neighbourhood Planning Regulations 2012:

¹ <https://www.middevon.gov.uk/media/352240/tiverton-neighbourhood-plan-area-application-20180821.pdf>

² <https://www.middevon.gov.uk/media/352457/designation-letter.pdf>

- details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- how they were consulted;
- a summary of the main issues and concerns raised by the persons consulted; and
- how these issues and concerns have been considered and, where relevant, addressed in the proposed Neighbourhood Plan.

2 SUMMARY OF ENGAGEMENT AND CONSULTATION ACTIVITIES, ISSUES AND OUTCOMES

2.1. A high-level summary of the engagement and consultation activity is shown below.



Date	Milestone	Key activities
2018	Current NP project launched	<ul style="list-style-type: none"> Steering Group established Plan area designated Launch event
2019	Engagement and evidence gathering	<ul style="list-style-type: none"> Working Groups established and volunteers recruited Vision and Objectives agreed with community Local Housing Needs Assessment prepared Ongoing engagement with community Press and communications
2020	Engagement and evidence gathering Consultation on Informal Draft Plan	<ul style="list-style-type: none"> Neighbourhood Plan Design Codes for a Sustainable Town published Ongoing engagement with community Informal Draft Plan consultation held Autumn 2020 Presentation to Town Council
2021	Pre-Submission Plan consulted on and Submission Version submitted to MDDC	<ul style="list-style-type: none"> How Green is Your Plan Workshop Plan screened for SEA/HRA purposes Finalising Pre-Submission Version Plan and Town Council sign-off Regulation 14 consultation
Late 2021	Finalising the Plan	<ul style="list-style-type: none"> Finalising Submission Version Start Regulation 16 consultation
2022		<ul style="list-style-type: none"> Examination Referendum Making of the Plan

2.2. The sections below describe, in fuller detail, the engagement and consultation process which took place during the Plan's preparation. This is divided into four stages:

Stage I: Engaging the local community to understand main issues

Stage II: Developing and testing the emerging planning policies

Stage III: The Pre-Submission (Regulation 14) Draft Neighbourhood Plan

Stage IV: Finalising the Submission (Regulation 16) Neighbourhood Plan

Stage I: Engaging the local community to understand main issues

- 2.3. Work to engage the community on the future of Tiverton coincided with the preparation associated with the emerging Mid Devon District Council (MDDC) Local Plan, which was adopted in July 2020. Plans for an urban extension to Tiverton were being progressed as well as a masterplan for Tiverton town centre itself. The Tiverton Neighbourhood Plan (TNP) would not seek to duplicate these issues, rather to add value to them.
- 2.4. The Chair and Co-ordinator met with the independent planning consultant to set out a project plan for the work. An initial task was to (re)launch the project and an event was organised to take place on 17 October 2018 at the Town Hall to introduce the concept of neighbourhood planning and to encourage people to volunteer to take part. A leaflet was prepared to promote the event; this was distributed to all households via the local magazine, with additional leaflets hand-delivered to businesses and organisations. Emails were sent to a database of local contacts around the town and wider parish and articles were placed in the Tiverton Gazette, who were also invited to attend and report on the event.



Tiverton Gazette article promoting the launch event, 2018

- 2.5. Furthermore, the Chair promoted the TNP and launch event via the Tiverton Community Radio³, and displays (including TV screen) were set up in the central Pannier Market and in the Town Hall foyer. An initial website for the neighbourhood plan was set up and hosted on the MDDC pages, due to the Town Council website being upgraded at the time. A dedicated email was also set up, monitored by the Co-ordinator.

³ <https://www.mixcloud.com/TCRadioProductions/tiverton-neighbourhood-plan-ian-johnson-discusses-with-caro-bushnell-tcr-radio/>

2.6. The launch event was well attended and included a presentation on the Plan and opportunities for those present to ask questions and sign up for further information.



The launch event, October 2018

2.7. Several organisations and individuals expressed an interest in getting involved, including the Civic Society, the National Trust, Sustainable Tiverton and the District Community Transport Association. The Chair met with each, and five Focus Groups were set up to explore aspects of the work in more detail:

- Housing, including design
- Local facilities, recreation and open space
- Retail and business
- Tourism
- Travel and transport

2.8. The themes were based on issues that had been raised during the public event and the experiences of other neighbourhood planning groups. An initial meeting for the Focus Groups was convened to set out their tasks and to agree deliverables. This included an overview of neighbourhood planning and examples of what might be considered under each of the themes, with examples from neighbourhood plans from other similar areas. The lead for each of the Focus Groups joined the Steering Group, so that progress could be reported more effectively. A Dropbox site was set up to enable everyone to access and share documents.

2.9. A Parish Profile was prepared, setting out important features and facts about Tiverton. This was updated throughout the process and is included as an Appendix to the Submission Version Plan. Furthermore, the Co-ordinator assembled a comprehensive list of local people and groups to engage with and a communications detail.

- 2.10. The Steering Group felt it important to make sure that the information collated in 2014, during the first attempt to prepare a Plan, should not be forgotten. Using this and drawing on local knowledge from the members of the Focus Groups, a draft Vision and Objectives was drawn up to be shared with the community for comment.
- 2.11. During 2019 and much of 2020, the Focus Groups undertook a great amount of work in progressing their areas, building up an evidence base and talking to the community about this.

Housing Group

- 2.12. The TNP was not seeking to allocate sites for housing, as the Eastern Urban Extension strategic allocation was considered to meet required housing numbers⁴. This position had been agreed with officers at MDDC. It was considered important, however, to develop an in-depth understanding of housing needs at the local parish level and, in particular, the situation regarding affordable housing. A Local Housing Needs Survey was commissioned in 2019 using Locality funding. Prepared by AECOM, the final document was published in September 2019⁵. The report exposed the large gap between average local incomes and average local house prices, demonstrating the need to carefully consider affordability within the TNP. In consultation with CHAT (Churches Housing Action Team) the Housing Group investigated this further, and the findings were included in the Parish Profile and translated into policy in the TNP itself. The advent of the First Homes policy is seen as a positive way of influencing this provision.
- 2.13. The Group maintained a dialogue with MDDC officers throughout, not only on the issue of affordability but also on how to unlock housing above shops and the need for sustainable and safe design within developments. A Neighbourhood Plan Design Codes for a Sustainable Town was drawn up by AECOM, using Locality funding. The Housing Group spent much time discussing the content for this, seeking to ensure that sustainable design, to mitigate the impacts of climate change, was embedded within this. Equally the need for safe design was discussed with the local police inspector (November 2019).

Local facilities, recreation and open spaces

- 2.14. This Group was keen to ensure that the parish landscape and its features were enshrined in the TNP. A report was prepared by the Devon Biodiversity Record Centre⁶ to set out the designated and non-designated sites in Tiverton parish,

⁴ A position discussed and agreed with MDDC

⁵ <https://www.tivertonneighbourhoodplan.org.uk/wp-content/uploads/2020/03/HNA-Tiverton-Final.pdf>

⁶ The report has not been made public due to the sensitive data it contains on species and habitats.

along with information about biodiversity. This has enabled the mapping of the 'green and blue infrastructure' of the area, which should be conserved and, where possible, joined up and enhanced.

- 2.15. An investigation of potential Local Green Spaces within Tiverton was prepared, with a survey issued to gather prospective nominations (Appendix A). Each space was visited and carefully considered against the NPPF criteria.
- 2.16. In addition, important viewpoints that should be safeguarded from inappropriate development were explored. This latter point was considered particularly important following the construction of the Premier Inn in the town centre, which took away a greatly valued viewpoint from the town. The identification of views formed part of the work of AECOM, in the preparation of the Design Guidance for the town. Views were also sought from the community via the newsletter articles and during the consultations on the TNP as it emerged. The National Trust had already identified significant viewpoints in and around their estates, which was also utilised in this work.
- 2.17. The Group also received input from the National Trust (notably the Knightshayes Estate) in identifying key features of the landscape and the need to safeguard trees, in particular, as a feature of Tiverton. This latter point coincided with the findings of the Travel and Transport group, who proposed the route for a Tree Trail in Tiverton, a project that chimes with the forthcoming Jubilee Celebrations.
- 2.18. Agriculture has played a role in the shaping of Tiverton's landscape over many hundreds of years. In line with the desire to support sustainable activities in the parish, the local farming sector was engaged to explore how the TNP might support them most effectively. This led to the inclusion of a policy supporting the diversification of farming, which could assist in viability of businesses.
- 2.19. On the local facilities and recreation theme, the Chair met with a series of facility owners and leisure providers around the town, to update them on the emerging TNP and to gain their views on key issues. This included Petroc College of Further and Higher Education (September 2019), Tiverton High School (September 2019), and Tiverton Museum (October 2019).
- 2.20. Heritage aspects of the parish were also explored within this Focus Group. The Civic Society helped to prepare an audit of heritage assets in the parish that were not nationally Grade I/II listed but which were considered important from a local historical perspective. This, in combination with the work undertaken on the Design Guidance – which also identified Local Character Areas - informed the list of assets included within the corresponding policy of the TNP. This work was supported by the Chair who met with the last remaining person to have had responsibility for the town leat. A full map of the Leat's route was established.

Retail and Business

- 2.21. This Group initially comprised representatives from the local traders' association as well as the National Trust. It was agreed early on that since MDDC was developing a masterplan for Tiverton Town Centre, this work should not be repeated in the TNP.
- 2.22. To inform discussions, the SG Chair convened meetings with local businesses and business forums and a survey was issued in July 2019, with the support of the Business Forum Mid Devon, to understand challenges faced. A copy of the survey can be found in Appendix B.
- 2.23. Local agents (Welden Edwards, Hilton Smythe and Greenslade Taylor Hunt) were also contacted to understand issues of demand and supply in relation to local business need. Tiverton Museum also provided information about their plans to provide workspaces on site, which contributed to the evidence to justify the need for additional flexible space in the parish.
- 2.24. Tourism was considered to be an important sector for the town and wider parish and the National Trust were heavily involved in co-ordinating information and engagement on this. Local attractions, for instance the museum, were approached for visitor figures as were the Devon Tourist Board at a strategic level (September 2019).

Tourism

- 2.25. Unfortunately, this Group was slow to start and made little progress. However, some Non-Policy Community Actions on Tourism have been included in the TNP.

Travel and Transport

- 2.26. This Group spent a great deal of time, in parallel with the AECOM design code work, in researching the desire among the community for enhanced connectivity – by foot and bike – between various locations in the town and in the wider parish. Those with knowledge of and an interest in walking and cycling, including a local cycling instructor, were brought together to identify the key movement routes within the town, areas where improvements could be made and where extensions to the routes would be helpful.
- 2.27. A series of new/extended routes were identified following meetings, including with the smaller hamlets surrounding Tiverton. In addition, the group spent time considering how the existing walking and cycling network might link to the emerging eastern urban extension.
- 2.28. A Tree Trail, a long-standing aspiration, was plotted, with the aim of safeguarding and showcasing special trees in the town, while connecting up particular facilities.

This has gained interest from the Woodland Trust as a project and further dialogue continues to take place.

2.29. To inform the work of the Focus Groups, the Chair met personally with a great number of local individuals, groups and organisations in the parish, including each of the smaller settlements around Tiverton, to discuss the TNP and its contents and gain input into the emerging policy themes. A list of the meetings is included in Appendix C. There have also been regular meetings with MDDC officers, both on the emerging TNP but also on MDDC-led issues such as the Devon Design Guide, the Tiverton Town Centre Masterplan and the Local Plan Review.

2.30. The Co-ordinator prepared regular reports to the Town Council to update them on progress and the financial situation. This was supported, on occasions, by presentations to the Council by the Chair. Reports can be found on the TNP website. Public bulletins were also prepared, which were hosted on the website and emailed to those wishing to be kept informed of progress.

2.31. Regular communications provided to the local press including Tiverton Gazette, the Tivvy Talk newsletter, and Devon Live.



Example report to the Town Council and those on the TNP email list



Coverage in Devon Live, September 2019

2.32. In October 2019, the Co-ordinator approached suppliers to develop dedicated branding and a website for the TNP. The site went live in March 2020 and has become the depository for all TNP documents. It can be viewed at: www.tivertonneighbourhoodplan.org.uk. The television screen originally set up in the Pannier Market was used to promote the website, with a scrolling presentation about the TNP generally.



The front page of the TNP website

2.33. As the emerging document evolved, the Steering Group considered that it would be helpful to establish some underlying principles that each policy and action should seek to address. This became known as the 'Tivvy Test':

- **T**ackle the climate emergency, protect the natural environment and promote sustainable living;
- **I**ncrease in access to housing, urban and rural facilities for people of all ages;
- **V**alue our heritage;
- Ensure a **V**ital and living town and respect the special design features in our parish; and
- **Y**ield improved health and wellbeing for all residents and visitors.

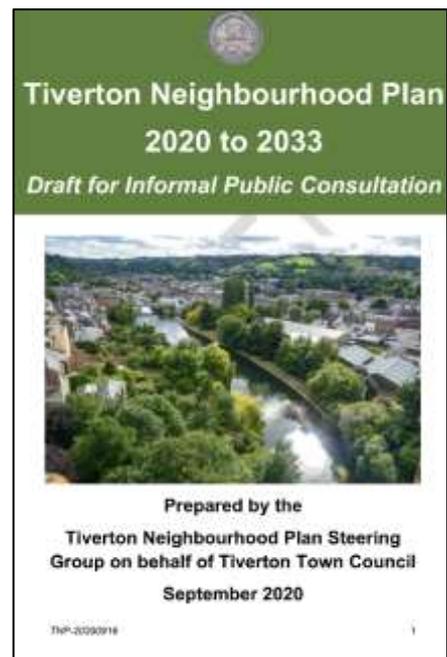


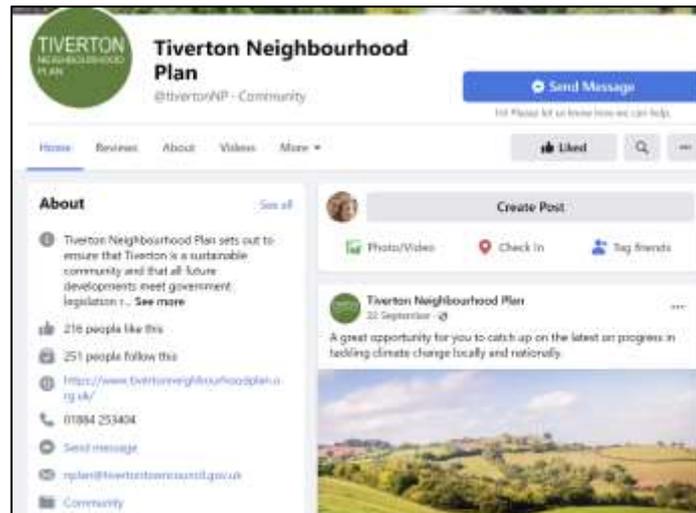
Stage II: Developing and testing the emerging planning policies

2.34. The first half of 2020 was spent drafting the TNP and an informal document was ready by the Summer. There remained several areas, however, where local input was required and therefore, it was felt prudent to run an Informal Consultation to gain feedback.

2.35. The Informal Consultation took place between September and November 2020 and encompassed the following:

- Presentation to the full Town Council – September 21st 2020 via Zoom
- Copies of the document sent to all local organisations and the mailing list of individuals
- Presentations to local organisations where requested, including the Community Partnership
- Articles in the Tiverton Gazette and Tivvy Talk
- Article available via the Mid Devon Messenger, a registered charity bringing recordings of local news and current events to blind and partially-sighted members of the community
- A dedicated informal consultation page on the TNP website
- An online survey to enable people to share their comments on the Plan. There were also options to write or email the dedicated email address
- Contact was made with the neighbouring Parish Councils, to share the document and seek feedback
- A Facebook page created, to ask regular questions on specific parts of the TNP, to prompt discussion and feedback





The TNP Facebook page

- Meeting with the Adventure Playground in Tiverton to gain feedback from young people in the town
- Writing to the landowners of the proposed Local Green Spaces to alert them to the intention to designate their space and to seek feedback

2.36. Several 'in-person' presentations to the community were planned to take place in Centre Space, a community hall in the centre of Tiverton, but these had to be cancelled due to the COVID-19 lockdowns. In their place, a public zoom meeting was held.

2.37. The Informal Draft Plan was sent to the planning team at MDDC, who undertook a healthcheck of the document. At this point, they also undertook the Screening of the Plan, to determine the need for a Strategic Environmental Assessment and/or Habitats Regulations Assessment.

2.38. The feedback gathered was collated and carefully analysed by the Steering Group. There was strong support for the Vision, Objectives, the Tivvy Test and each of the policies proposed in the TNP.

2.39. The consultation highlighted the need for further input from younger people (youth) in the parish. A poll was run using social media targeting this group and further meetings took place with the manager of the Adventure Playground, which convened groups of younger people.

2.40. A few comments related to the theme of climate mitigation. There was a concern that some potential opportunities to input into this important agenda may have been missed. It was agreed therefore that the Centre for Sustainable Energy (CSE) would be approached to offer advice about how potential gaps might be identified. The CSE recommended using their guidance 'How Green is My Plan'⁷

⁷ <https://www.cse.org.uk/downloads/reports-and-publications/policy/community-energy/planning/renewables/how-green-is-my-plan-urban-suburban.pdf>

to enable a workshop to explore the issues further. The workshop was held on 10 February 2021 via Zoom and invites were issued to those in the parish with a particular interest in sustainability issues (advice on the invite list was sought from the Sustainable Tiverton group). Each attendee was sent the Informal Draft TNP along with a short questionnaire informed by the CSE guidance sheet. The answers were collated and used to inform a discussion on each of the topics contained in the sheet. The minutes of the Workshop can be found in the Appendix of the Sustainability Statement, which accompanies the Submission Version Plan. The findings led to the strengthening of several policies including:



- Policy T6: Energy Efficiency and Design – the inclusion of additional support for community-led energy schemes
- Policy T7: Minimising the risk of flooding – this was a new policy, seeking to address flood issues in the town. Discussions took place with the Flood Team at Devon County Council, to assist in gathering the evidence required and shaping the policy.
- Additional actions – the inclusion of actions to assist in, for instance, improving biodiversity.

2.41. The informal comments received from MDDC assisted the Steering Group in ensuring that the policies were in conformity with the strategic policies, which had been formally adopted in July 2020.

Stage III: Pre-Submission (Regulation 14) Draft Neighbourhood Plan Consultation

2.42. The Steering Group finalised the Pre-Submission draft in February 2021 and it was formally endorsed by the Town Council at their meeting of 22 March 2021.

2.43. The Regulation 14 consultation was held from 13 April 2021, initially for eight weeks, to 11 June 2021. This extended period was to take account of the ongoing Covid-19 pandemic, which was impacting the ability to host in-person meetings and presentations.

2.44. The Plan and supporting evidence were uploaded onto the TNP website and the consultation was advertised to the local community:

- An online survey was created to enable people to provide feedback. Hard copies of the survey (and the Plan itself) were available on request
- A summary pamphlet⁸ providing an overview of the Plan was printed and Royal Mail was commissioned to deliver this to every household in the Parish. Further copies were available at the Town Hall.
- A formal public notice was issued to the Tiverton Gazette along with 'nuggets' on the Plan content to maintain interest throughout the period
- All Town, District and County Councillors were sent a Bulletin
- The Facebook page was updated regularly with snippets of the TNP to encourage engagement
- Letters were sent to all proposed Local Green Space owners
- Letters were sent to all owners of the properties identified as Non-Designated Heritage Assets
- A two-page spread about the TNP was included in the Tiverton Gazette
- A meeting with Sunningmead's Youth Club
- A public Zoom meeting to provide an overview of the Plan and address key points

**Tiverton Town Council Public Notice
TIVERTON NEIGHBOURHOOD PLAN -
REGULATION 14
PUBLIC CONSULTATION**

In accordance with Neighbourhood Planning (General) Regulations 2012, Part 5, 14(a)-(c), notice is given that a formal pre-submission public consultation on the draft Tiverton Neighbourhood Plan will start on **13 April 2021 for an 8 week period, closing at 5.00pm on 11 Jun 2021.**

About the Plan
The Tiverton Neighbourhood Plan (the Plan) has been created through listening to the views of residents and businesses. The Plan contains a range of policies that would be used to guide, promote and enable sustainable development within the Parish whilst protecting its unique natural and historic environment.

Tiverton Town Council invites comments on the draft Plan. All responses received will be considered by the Neighbourhood Plan Steering Group and the Town Council to produce a revised version of the Plan which will then be submitted to Mid Devon District Council for a further round of consultation, followed by an examination by an independent examiner.

Viewing the Draft Plan and Commenting on it
The draft Neighbourhood Plan along with other evidence base documents are signposted at:
www.tivertonneighbourhoodplan.org.uk/public-consultation/
Hard copies of the Plan and Comment Form are available by post upon request for those without online access. To request a hard copy please contact the Tiverton Town Council by email to nplan@tivertontowncouncil.gov.uk or leave a message on: 01884 253404.

You may comment on the Plan either by:
Completing a comment form **online**:
www.tivertonneighbourhoodplan.org.uk/contact-us
Completing an **online survey**:
www.surveymonkey.co.uk/r/Tiverton-Reg14
Emailing your comments to: nplan@tivertontowncouncil.gov.uk
Writing to: Tiverton Neighbourhood Plan, Town Hall, St Andrew St, Tiverton EX16 6PG
If emailing/writing, please include your name and contact details.

All comments, with personal details redacted, will be publicly available and identifiable by organisation (where applicable). All comments should be received by **5.00pm on 11 Jun 2021**. Any person, business or organisation requiring more time to comment in view of the current coronavirus pandemic should inform the Town Clerk in writing as soon as possible.

Tiverton Town Council, April 2021

Tiverton Gazette, April 2021

⁸ <https://www.tivertonneighbourhoodplan.org.uk/wp-content/uploads/2021/08/TNP-Summary-Pamphlet-v12.pdf>

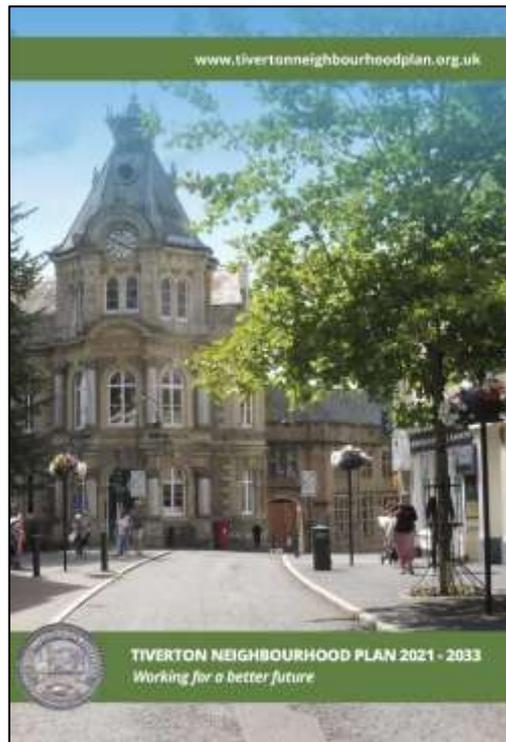
2.45. During the consultation, it emerged that there had been an issue regarding the delivery of the pamphlet, with some people reporting that they had not received one. While discussions took place with Royal Mail to resolve this, a decision was taken to extend the consultation period to the end of July 2021, to ensure that everyone had a full opportunity to take part if they wished. An article was published in the Tiverton Gazette⁹ to make this clear, alongside other communications including further bulletins and emails.

2.46. In addition to consulting with the local community, the Steering Group wrote to statutory consultees and other organisations who might have an interest in the Plan. A list of the consultees contacted is contained in Appendix D and responses were received from the following:

- Mid Devon District Council
- Natural England
- Historic England
- Devon County Council – Planning, Transportation and Environment
- Devon County Council – Archaeology and Historic Environment
- The Woodland Trust
- National Trust
- Tetlow King Planning

2.47. The Environment Agency were written to on two occasions, but no response was received.

2.48. Each representations received at the Pre-Submission Consultation was recorded by topic/policy and carefully considered by Steering Group members. A summary of the comments, and responses from the Steering Group, is set out in Appendix E. The following paragraphs provide a summary, by topic area, of the comments received during this process and how these were integrated into the Submission Version Plan.



The summary pamphlet

⁹ <https://www.devonlive.com/incoming/tiverton-neighbourhood-plan-close-getting-5730995>

- 2.49. **General comments:** Overall 125 individual comments were received at the Regulation 14 consultation. The online survey provoked 26 responses from residents, who were asked to what extent they supported the individual policies and invited to submit any additional free text comments.
- 2.50. Many supportive statements were made by those making representations, including congratulating the hard work of those involved and agreeing with the sustainability aims underpinning much of the Plan. The National Planning Policy Framework (NPPF) was amended while the Plan was out to consultation and these updates have been reflected in the Submission Version.
- 2.51. There were concerns raised by some residents and business owners in Westexe, suggesting that the shops and businesses in this area of the town had not been given adequate coverage within the TNP pamphlet, distributed to promote the consultation. An article about this appeared in the Tiverton Gazette¹⁰. The Chair of the Steering Group contributed to the article, stating that businesses across Tiverton had been actively engaged via the various groups, such as the town centre partnership. In the context of the emerging Town Centre Masterplan, the TNP did not seek to duplicate that work, therefore the focus had been on the other issues raised by local businesses, such as the desire to promote sustainable tourism and the need to encourage flexible space suited to start-up businesses. In addition, the Chair noted that the pamphlet was intended to provide a high-level summary of the TNP document only; it was important that the full Plan itself should be read and commented upon as this is where the detail lies. The Chair offered to meet with businesses in Westexe to discuss the policies further.
- 2.52. **Vision, Objectives and underlying principles:** The vision was strongly endorsed as were the underlying principles of the Tivvy Test. The objectives have been very slightly amended to take account of the importance of heritage within the wider landscape. This had always been the intention, but it was considered that the wording could be strengthened to emphasise this.
- 2.53. **Spatial Strategy:** The approach was supported.
- 2.54. **Housing:** The policies in this section were largely supported and have been amended only to take account of the First Home policy, which was adopted nationally in the period after the Regulation 14 consultation. The topic of housing received many mixed comments from the community. Some made the point that housing should be affordable, echoing the findings of the Local Housing Needs Assessment. Concerns were also expressed, however, about the number of homes being delivered in the parish – in particular via the Eastern Urban Extension – and whether these were required. As this is a strategic allocation,

¹⁰ <https://www.yumpu.com/news/en/issue/96746-tiverton-gazette-2021-05-25/read?page=7>

this falls outside the remit of the TNP, which itself does not seek to allocate additional housing sites.

- 2.55. **Design and heritage:** The policies in this section were very much supported. Policy T7 (Minimising the Risk of Flooding) had been added following the Informal Draft consultation and received helpful comments from both MDDC and the DCC Flood Team to help strengthen it and tailor it to the local level.
- 2.56. Policy T8 was slightly recrafted to encompass both local buildings and structures of merit and embed the topic of local heritage assets at risk, on the advice of the DCC Archaeology and Historic Environment Team. Furthermore, feedback from the community highlighted the need to consider an additional non-designated heritage asset, Beechwood (former police station). This was researched by the Steering Group and advice was sought from both the Civic Society and the Devon Historic Buildings Trust. It was agreed that the asset should be included, and a letter was immediately sent to the owners to notify them and explain what it would mean in planning terms. No response was received.
- 2.57. Support for maintaining and improving the leat – including access to it – has spurred much comment in the community. A group is being established to lead on this, therefore it is felt opportune that it is included prominently within the TNP policy.
- 2.58. **Natural environment** – The policies in this section of the Plan were strongly supported. The DCC Archaeology and Historic Environment Team suggested that the links between the natural and historic environment could be more strongly stated, and this was incorporated. Natural England provided helpful feedback in clarifying preferred wording within the policy and the supporting text, for instance relating to biodiversity net gain. The Woodland Trust advised adding additional information about the importance of trees, which chimes with the amendments to the NPPF. Trees are considered an important natural feature of Tiverton's landscape and the suggested recommendations were incorporated.
- 2.59. The proposed Local Green Spaces received support overall. Only two spaces received comments:
- Original Area 14 (Green space to the opposite of 1 – 4 College View): DCC noted that the proposed green space designation is adjacent to Bolham Road Roundabout. Design work for this improvement has not yet taken place and it is therefore not known how much of this space will be required to undertake the works. The designation of this space within the Neighbourhood Plan as green space will make the undertaking of any improvements to the roundabout very difficult; it would therefore be helpful to make note of this potential future requirement within the document and, should the land be designated, include a clause that allows for some or all of the area to be used for the improvement of the roundabout should this be forthcoming. **The space**

has been retained with this additional information provided. Such works are considered to be in accordance with NPPF Green Belt policy.

- Original Area 23 (Open fields): DCC noted that this site relates to land on which there is a medium to long-term aspiration to relocate Tiverton High School depending on securing significant external funding. The designation of this area as greenspace would make the use of this land for the relocation of the school very difficult and would likely add an additional financial burden to the project. The County Council therefore objects to the designation of site 23 as Green Space. Additionally, the site is described as ‘open fields on flood plains near the High School’. This description is misleading as the Environment Agency Flood Mapping only shows a small part of the field as being in flood Zone 2 or 3. **The site has been removed from the TNP.**

2.60. Policy T11 (Significant Local Views): Further detail about why the identified views are significant to the parish has been provided, alongside further information about how potential impacts might be mitigated on a practical level.

2.61. **Community facilities:** Few comments were received about the policies in this -- section. They were largely supported and considered to be in conformity with strategic policy.

2.62. **Transport and movement:** The policies were supported, with some residents asking for additional routes to be implemented in the future, notably a link between Tiverton and Exeter. This had been discussed with Sustrans, who suggested that it would be very challenging to action at present due to land ownership issues. Nevertheless, the aspiration has been included in the Submission Version TNP. Many comments raised concerns about transport issues outside the scope of the TNP, for instance speeding, congestion, and air quality. Where relevant, these have been added to the action table in Section 11 of the TNP.

2.63. **Tiverton town centre and the wider local economy:** The two policies in this section were supported. There has been some feedback about needing to ensure that Tiverton’s manufacturing sector is fully appreciated; the Steering Group discussed this and considered that the introductory sections set this out, but support in policy terms for that sector is adequately addressed at the strategic level. The findings of the research during the development of the TNP highlighted tourism and flexible working spaces as particular focal points where a more local policy could add value.

Stage IV: Final Neighbourhood Plan Submission

2.64. Following the amendments made to the Plan as a result of the Regulation 14 consultation, the Submission Version was formally submitted to MDDC in early December 2021.

- 2.65. Once satisfied that the correct set of documents has been received, MDDC will undertake the Regulation 16 consultation for a minimum of six weeks.
- 2.66. The TNP will then proceed to Examination and, assuming a favourable outcome, to Referendum.

3 STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATION ASSESSMENT

Strategic Environmental Assessment

- 3.1. The Plan, and the process under which it was prepared, conforms to the Strategic Environmental Assessment (SEA) Directive (EU 2001/42/EC) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
- 3.2. In accordance with Regulation 9 of the SEA Regulations 2004, MDDC, as the responsible authority, determined in April 2021 that a Strategic Environmental Assessment (SEA) of the Neighbourhood Plan is not required as it is unlikely to have significant environmental effects.
- 3.3. A copy of the body of the report of the Screening Statement is contained in the Evidence Base alongside the Neighbourhood Plan.

Habitats Regulations Assessment (HRA)

- 3.4. Under Directive 92/43/EEC, also known as the Habitats Directive¹¹, it must be ascertained whether the draft Plan is likely to breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017. Assessments under the regulations are known as Habitats Regulation Assessments ("HRA"). An appropriate assessment ("AA") is required only if the Plan is likely to have significant effects on a European protected species or site. To ascertain whether or not it is necessary to undertake an assessment, a screening process is followed.
- 3.5. MDDC, as the responsible authority, determined in April 2021 that the Neighbourhood Plan is unlikely to have significant impact on European sites and therefore does not require a full HRA to be undertaken.
- 3.6. In addition to conforming to its EU obligations, the Plan does not breach and is not otherwise incompatible with the European Convention on Human Rights.
- 3.7. A copy of the body of the report of the Screening Statement is contained in the Evidence Base alongside the Neighbourhood Plan.

¹¹ Directive 92/43/EEC 'on the conservation of natural habitats and of wild fauna and flora': <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31992L0043>

4 CONCLUSION

- 4.1. The Steering Group and Focus Groups have undertaken a thorough engagement and communications programme to develop the Neighbourhood Plan. They have prepared a vision and objectives and guiding principles. In developing the policies to achieve these, the team has actively engaged with a wide range of stakeholders and the Plan has evolved accordingly.
- 4.2. Feedback from the Regulation 14 consultation has enabled the Plan to be shaped into its final version, to submit to Mid Devon District Council.
- 4.3. This report fulfils the requirements for the Consultation Statement, set out in Regulation 15(2) of the Neighbourhood Planning Regulations 2012.
- 4.4. Gratitude is extended to everybody who has contributed to the Plan's development, either as a valued member of the Steering Group and Focus Groups, as well as those who have taken the time to contribute their views and opinions. This has been invaluable in helping to shape the scope and content of the Neighbourhood Plan.

Appendix A – Local Green Space Survey, August 2019

Tiverton Neighbourhood Plan – Green Spaces survey – August 2019

In order to complete the Green Spaces section of the neighbourhood plan we would appreciate some ideas, thoughts and concerns from people throughout the area. Please could you answer the questions below and send them back to [name redacted] by the 31st of August. Thank you

- Are there any green spaces near to where you live or that you know of in the neighbourhood plan area that you feel ought to be protected. We are especially interested in spaces that are not currently protected in any other way.
- Do you know of any areas in Tiverton that you feel are lacking in green space or easy access to green spaces locally?
- Can you suggest any allotment sites in the area that ought to be protected
- Can you suggest any open spaces that may be suitable for allotment sites
- We would like to recommend a vehicle free route that runs around Tiverton and possibly also extends to some of the outlying villages. Is this something that you feel would benefit local people? Can you suggest possible routes or sites that this route ought to take in on its way.
- What would be your main concerns about Tiverton green spaces
- Any other thoughts on the subject?

Appendix B - Business Survey, July 2019

Tiverton Neighbourhood Plan - Business Survey – July 2019

Help us help your business!

This short survey will only take a few minutes of your time.

To ensure that the policies in the new Tiverton Neighbourhood Plan support and grow local businesses over the next 20 years, we would really like to hear from businesses operating in the town and wider parish – a map is shown on the last page of this survey. By telling us about your commercial plans and needs, you can help us to help you.

This survey will only take a few minutes to complete.

**Note: Details you provide will only be used for the purpose of developing the Tiverton Neighbourhood Plan and for the Town Council to contact you should you wish to be contacted. The information you provide will not be passed on to any third parties or used for marketing purposes, in accordance with the Data Protection Act/GDPR.*

1. Name and address of business (optional):

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2. Length of business operation (please tick)

New business (under 6 months)	<input type="checkbox"/>	3 – 5 years	<input type="checkbox"/>	10+ years	<input type="checkbox"/>
6 months – 3 years	<input type="checkbox"/>	6 -10 years	<input type="checkbox"/>		

3. What sector does your business fall into? (please tick)

Agriculture	<input type="checkbox"/>	Financial / Insurance	<input type="checkbox"/>	Retail	<input type="checkbox"/>
Arts & Entertainment	<input type="checkbox"/>	Health and Social Care	<input type="checkbox"/>	Scientific / Technical	<input type="checkbox"/>
Business / Marketing / Professional Services	<input type="checkbox"/>	Hotels and Food	<input type="checkbox"/>	Tourism / Heritage	<input type="checkbox"/>
Construction	<input type="checkbox"/>	IT Services	<input type="checkbox"/>	Transport	<input type="checkbox"/>
Education & Training	<input type="checkbox"/>	Manufacturing	<input type="checkbox"/>	Wholesale Trade	<input type="checkbox"/>
Other (specify)					

4. Please provide us with a brief description of your business

--

5. Please tell us how many people are employed in your business (please tick)

Sole trader/1 self employed		6 – 10		20 – 50	
2 – 5		11 – 20		50+	

6. Approximately how many of these live in Tiverton parish (see map on page 4) (please tick)

0 – 20%		41 – 60%		81 – 100%	
21 – 40%		61 – 80%			

7. Where do your customers come from? (Tick all that apply)

Tiverton parish residents		Regional (Bristol, South-West)	
Visitors to Tiverton parish		Online (Internet sales and services)	
Surrounding villages		National	
Devon-wide		International	

8. If your customers are visitors to Tiverton parish is there anything you think should be done to further attract or support them?

--

9. In your view, what are the advantages of running your business in Tiverton parish? List up to 3

10. In your view, what are the main challenges in running your business in Tiverton parish? List up to 3

11. Are you a home-based business? Yes No

*(*If 'yes' please go to Q12; otherwise go straight to Q14)*

**12. If you are home-based, are there any facilities that would be useful to you?
 (please tick)**

Co-working and collaboration space	<input type="checkbox"/>	Business meeting space	<input type="checkbox"/>	Access to superfast broadband	<input type="checkbox"/>
Storage	<input type="checkbox"/>	Other (please specify)	<input type="text"/>		

13. If you are home-based, are you planning to expand your business beyond your domestic space

Yes (please explain):
 No

14. What are your future business plans? (Please tick one)

Expansion - recruitment	<input type="checkbox"/>	Expansion – merger/partnership	<input type="checkbox"/>	Reduction	<input type="checkbox"/>
Relocation	<input type="checkbox"/>	Closing / retirement	<input type="checkbox"/>	No change	<input type="checkbox"/>
Other please specify:	<input type="text"/>				

15. If you ticked relocation, reduction or expansion above, please tell us why and by what percentage?

16. Have you any suggestions for how the business environment/opportunities in Tiverton parish can be improved?

17. Please tell us of any other issues affecting your business that you would like to raise.

If you wish to be kept informed about the Neighbourhood Plan, please provide us again with an email or postal address and we will ensure you are notified at key stages of the plan. We will store your details securely and not share them beyond the purposes outlined at the start, as required by the Data Protection Act.

THANK YOU

Prepared by the Tiverton Neighbourhood Plan Steering Group

Chair: The Rev. Ian Johnson

If you have any questions, please contact: nplan@tivertontowncouncil.gov.uk

Please return completed surveys to Tiverton Town Hall

Appendix C – Chairman’s Meetings

The following meetings took place to inform the emerging TNP:

- Attendance at the Local Plan hearings Phoenix House
- Presentation to the town centre trades people about the TNP
- Meeting to discuss self build housing, with MDDC
- Open meeting at Chevithorne village - 37 attended
- Follow up meeting at Chevithorne village – 19 attended
- Open meeting at Withleigh village – 22 attended
- Meeting with the Business Forum Managing Director
- Meeting with business leaders from Swallow Court
- Meeting re: Junction 27 and implications for Tiverton
- Three meetings with local business groups
- Meetings with MDDC regarding Tidcombe House development
- Meeting with the head of Tiverton High School regarding consultation with young people
- Meeting with the head of Petroc.
- Meeting with the local police sergeant regarding crime figures and planning to reduce crime
- Meeting with the Tourist Centre to discuss tourism numbers in Tiverton
- Meeting with cycling enthusiast
- Five meetings with the Town Centre Manger
- Regular presentations to the Town Council
- Tiverton Almshouse Trust
- Meeting with the U3A
- Meeting with the Acting General Manager Knightshayes and the South West Regional Development Officer of the National Trust.

Appendix D – List of consultees contacted at Regulation 14

County and District Contacts
Mid Devon District Council
Devon County Council
Parish Councils adjoining the neighbourhood area
Washfield Parish Council
Stoodleigh Parish Council
Bampton Parish Council
Huntsham Parish Council
Uplowman Parish Council
Halberton Parish Council
Bickleigh Parish Council
Cadeleigh Parish Council
Cruwys Morchard Parish Council
Templeton Parish Council
Loxbeare Parish Council
Statutory Bodies / other organisations
Coal Authority
Homes and Communities Agency
Natural England
Environment Agency
Historic England
Network Rail
Highways Agency
Marine Management Organisation
South West Water
UK Power Networks
British Gas
British Telecom
Sport England

Woodland Trust
Devon Wildlife Trust
CPRE
Devon Communities Together
Devon Local Nature Partnership
Devon Playing Fields Association
Devon Ramblers Association
AgeUk Mid Devon
The National Trust

Appendix E Summary of Regulation 14 representatives and response from Steering Group

Tiverton Neighbourhood Plan – Comments received at Pre-Submission (Regulation 14) Consultation and proposed responses from the Steering Group

Representations (reps) received from the following, with the full text included in the Evidence Base for the Plan:

1. Mid Devon District Council
2. Natural England
3. Historic England
4. Devon County Council – Planning, Transportation and Environment
5. Devon County Council – Archaeology and Historic Environment
6. The Woodland Trust
7. National Trust
8. Tetlow King Planning
9. Resident_1
10. Resident_2
11. Resident_3
12. Resident_4
13. Resident_5
14. Resident_6
15. Resident_7
16. Resident_8
17. Resident_9
18. Resident_10
19. Resident_11
20. Resident_12
21. Resident_13
22. Surveymonkey responses

Comments are listed by paragraph number / policy, with general comments at the end. Summaries have been taken from responses, and typos within them have not been corrected.

Ref.	Page/ Para	Rep.	Summary of comment	Response
General comments				
1.	Supportive comments	1	Fully supports Tiverton Neighbourhood Plan Steering Group with its preparation of a Neighbourhood Plan. We recognise the hard work that has been put in by the Steering Group and are pleased to see the progress made to date in developing the Tiverton Neighbourhood Plan.	Noted.
2.	Supportive comments	2	Particularly welcome the reference to Nature Recovery Networks in statement 7.6. The emphasis given to safeguarding green spaces, conserving and enhancing biodiversity and the strong promotion of green and blue infrastructure is essential when developing policy that contributes to sustainable development.	Noted.
3.	Supportive comments	3	This is an impressive Plan in its scope of themes and issues which it covers, and impressive in its understanding of the area's locally distinctive character and the range of proposals and policies identified for its protection and enhancement.	Noted.
4.	Supportive comments	5	It is a thorough and well presented document and the Steering Group is to be congratulated for pulling it together.	Noted.
5.	Supportive comments	6	Supportive of the Plan.	Noted.
6.	Supportive comments	7	The Trust has been engaged in the process both formally and informally and welcomes the work completed to date. We congratulate the Town Council on the community-based work and in achieving this formal Regulation 14 Stage of consultation. We provided comments to the draft consultation and are pleased that our thoughts have been included in the Regulation 14 Consultation version of the Neighbourhood Plan.	Noted

Ref.	Page/ Para	Rep.	Summary of comment	Response
7.	NPPF	1, 2	Update references to accord with the most recent version of the National Planning Policy Framework (published July 2021 – post the Reg. 14 publication of the draft TNP)	Amended throughout.
8.	Development	9	Your document starts with a picture of the Grand Western Canal, and its importance as a major tourist attraction is mentioned elsewhere. Yet the site at Tidcombe Hall has been earmarked as a contingency for 100 homes. This, in spite of your own statement, that housing should be in appropriate locations, protecting green spaces, with no ribbon development, and no risk of flooding. This site is totally inappropriate on those counts, and it will also create massive stop-start traffic congestion on a minor road, greatly increasing pollution. If the current planning application is approved, Tidcombe Bridge will be closed to traffic, thus creating long detours for existing residents, and even more pollution. Your plan also suggests that new housing should be of low impact, when near green spaces. Yet the Tidcombe Hall plan contains 3-storey properties within sight of the canal. How does that comply with protecting our heritage, another stated objective of the plan?	The earmarking of this site is included in the Mid Devon Local Plan – the TNP must be in general conformity with that and therefore it is beyond the scope of the TNP to insist on the withdrawal of sites allocated/reserved for allocation at the strategic level. It is the hope that the policies in the TNP will provide greater influence on future planning decisions, which may assist in ensuring that the objectives for development are met.
9.	Climate change	10	All our planning should based on our climate change principals. We should be looking at saving as many woodlands with its biodiversity. These sites will be beneficial to not only wildlife but our quality of life and well-being now and in the future. Eg mental health.	Noted – this is a major feature of the aims and ambitions for the TNP. Agreed – see comments relating to Policy T9.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			<p>Our houses should be eco friendly and not necessarily the latest big companies offerings as they are not interested in brown fill sites due to their large profit margins.</p> <p>Surely we can solve this dilemma with the right community spirit</p>	<p>Noted – This is considered and addressed in Policy T6.</p>
10.	Concerns	13	<p>"working for a better future" I am, so i can permanently leave this town. a town with a far worse town centre than it was 35 years ago when i was a kid, a town with ever increasing development that brings no benefit, a town that cry's about climate issues yet are in the process of building thousands more houses creating busier roads and destroying green belt and wildlife habitats, oh the hypocrisy.</p> <p>"A thriving town centre" you say, a town centre with ever increasing vacant shops, no, small businesses are not part of the plan is it? Lower business rates, no can't do that can we. Just more deceit that many will believe because its want they want to hear.</p> <p>"New development using local materials" utterly laughable, explain how you are going to achieve that? Not possible, another lie.</p> <p>No, this push for Agenda 2030 is about more control, climate is the next fear mongering campaign being used, only one side of the story is allowed to be told, many climate experts silenced because their view does not fit the narrative, no different to the "pandemic"</p> <p>Going to be hard to get Tiverton "carbon zero" by 2030 with a population that is looking to increase hugely by then when you also want more "industry and business" maybe by then when driving a vehicle with a combustion engine is deemed a crime I'll be grateful for the new cycling lanes due to not being able to afford an electric car to get to work to pay my new carbon taxes.</p>	<p>The concerns are understood. Many of the items noted are beyond the scope of what can be addressed through neighbourhood plan land-use and spatial policy – for instance business rates. Other areas – for instance the use of local materials – are included in the local policy, alongside a detailed local design guide. There is government support for such guidance at the local level. The challenge will be to monitor how the TNP policies are used in practice, in order to evaluate their effectiveness in achieving the aims, as signed up for by the parish.</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response
11.	Disability issues	14	I would be interested to know if any people with disability were consulted during the development of the plan. As a wheelchair user I find Tiverton frustrating, unsupportive and at time dangerous.	<p>Disability issues were raised significantly by a local councillor during the consultation stages. The Transport group included a wheelchair user.</p> <p>Vision 3.1: 4th para – ‘accessible’ has been added to this sentence.</p> <p>Objective 8 amended to include reference to ‘accessible’.</p> <p>Chettiscombe / Chevithorne footpaths should be improved to enable wheelchair access – amended within 9.11.</p> <p>Include in non-policy action 3, that the link road is a physical barrier to people enjoying the footpaths that run north.</p>
12.	General	15	Fantastic stuff Much appreciated all this work you have done	Noted.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			<p>Now would love to know more about planning ... Re what we can stop or not and what builds the planners are going to do .. not 5000 red brick houses with out a single tree ... horrific as is on the way to Exeter that you see another side of the road there's not a single tree anywhere in sight.</p> <p>Also I'd like to know a bit more about Tiverton centre and that is it possible to make the whole lot pedestrianised also need to look at and how come there's so many empty shops I've heard of the landlords rent a very very high what is the future of Tiverton High Street.</p> <p>I think we have to look at the future of Tiverton - With all these new houses being built has Tiverton got the capacity to take on board doctors dentists schools.</p>	<p>Both issues fall outside the remit of the TNP, but could be considered as actions outside the plan itself.</p> <p>TNP SG to contact to discuss implementation of the plan in more detail.</p>
13.	General	16	<p>There's always a plan, there's always a meeting, there's always a pamphlet, but there appears never to be any action, it's all hot air, and folk attempting to look busy. Having lived and worked here for 9 years, I can't see anything has been achieved.</p> <p>We did have street furniture, that was painted, ridiculed, and removed, a Gorilla rocked up, again this was ridiculed and removed. We've had a change of pavement surfaces, which has allowed those who are infirm not to trip, hopefully, this will be done in West Exe, as it's practically a weekly occurrence to pick some poor person off the floor. What I do I see, is great planting schemes from MDDC, guided I believe by TTC, as well as the hanging baskets, the team who keep on top of the upkeep of the verges and roundabouts, do a thankless task, which tends to go ignored by a few. I see great street cleaners who take pride in their work. Let's hope something is done. The river walk is so under used, it's screaming for a pop up market at weekends, or a</p>	<p>One of the purposes of the TNP is to – for the first time – have amore active involvement in planning at the very local level.</p> <p>Lots of good ideas here, which could be picked up as part of the implementation of the plan.</p> <p>A benefit of neighbourhood planning is the increase in local</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response
			farmers market once a month. Temporary barriers could be installed at the rivers edge. This would knit together both West Exe, Angel Hill, and Fore Street 🙋	<p>involvement (including in local democracy) – which can act as the catalyst to enabling these sort of community ideas.</p> <p>The potential for a market is now included in Section 11.</p>
14.	General	19	<p>The document looks fine.</p> <p>I had one niggling thought that I should raise which may be already covered.</p> <p>The buildings, amenities, views,etc.,is not a comprehensive listing and others may well arise during the consideration of new proposals</p>	<p>Buildings (if historic is the focus) will be covered by the Historic Environment Record and details in the introduction and the text to support Policy T8.</p> <p>The views were compiled by the working groups, using local knowledge and from feedback gained from the local engagement. The informal draft plan included these and specifically asked for any additional views to be nominated, but none came forward.</p> <p>Amenities – it is very difficult to list all and in any case, these tend to</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response
				change. The importance is to identify where there are deficits or gaps in provision and such information has been used to inform in particular Policy T13, T14 and T15.
15.	Healthcare	21	<p>Can we support better healthcare provision in the plan.</p> <p>Can we seek improvements to the education provision?</p>	<p>This would fall outside the remit of planning; it is the responsibility of the Primary Care Trusts to plan for GP services.</p> <p>This would fall outside the remit of planning; it is the responsibility of Devon County Council, as the Education Authority.</p>
16.	General	22	An excellent piece of work. It needs to be supported by some co-ordination of the other public services which underpin much of the plan, ie health, social care and education. Eg adult education has a role in developing an understanding of the value and importance of Tiverton's history and heritage.	Noted.
17.		22	The plan will only work if there are people in post who can and want to make a success of the town. One final example of the ineptitude of the powers that be is the awful renovation of the town wishing well. Whoever 'designed' and approved that should not be in that post. What an appalling waste of money and a missed opportunity. Two stone curved walls that completely obstruct the well and completely	Noted – there is a need for greater community engagement generally.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			close down that vista to the hills beyond. And, whoever decided to plant the premiere inn at the bottom of that view is similarly to blame. Such shocking planning and complete lack of sympathetic design and building work. That area needs opening up, it needs areas of planting and colour. It could be beautiful. The council needs to operate very differently in Tiverton if it wants the town to be a success.	
18.		22	New homes: provision must be made for trade vehicles, as many people need to park them in residential areas. New homes need spaces for water butts on all downspouts, or some sort of built in provision. Can we force builders to adopt much better low carbon standards NOW, rather than waiting for future developments? I.e. all remaining houses in the TEUE must be built to a higher standard. No excuses.	Noted and included in the Sustainable design section, although some of these ideas fall beyond what can be Required in policy.
19.		22	All these things will not provide any benefit for most people who live here. It's a vanity project supported by councillors who believe they speak for the town, when really they don't. This will end up being an additional cost to the council tax payer. When you talk about housing, people want you to provide more parking spaces, instead you will use this plan as an excuse for less parking, which is already causing a number of problems around the town.	Noted, the Plan is not seeking to erode parking, but it is seeking to encourage shorter journeys to be taken using more sustainable modes of transport.
Introductory Chapters				
20.	1.9	4	A site to the east of Tiverton is included within the Minerals and Waste Plan due to the significant opportunity for use of the heat and power from an energy recovery facility to supply the new development within the large urban extension proposed by Mid Devon District Council. It would be helpful for reference to be made to the allocation in paragraph 1.9 alongside reference to the waste plan.	Noted and inserted into Para 1.10.
21.	2.4	5	Clarification - It is a Roman fort, not a marching camp. This has been proven by excavation. The fort is a Scheduled Monument.	Amended.

Ref.	Page/ Para	Rep.	Summary of comment	Response
22.	2.5	5	If not originating in the Roman period, with settlement beside the river prompted by the Roman fort and road network, the settlement was certainly in existence in the early medieval/Saxon period - by the 10 th century, it was a royal manor and hundred centre.	Amended paragraph.
23.	2.5	5	Worth mentioning, here or elsewhere, the range of nationally significant designated heritage assets in Tiverton - Cranmore Castle and the Roman fort (Scheduled Monuments) along with Knightshayes (Registered Park & Garden) and numerous Listed buildings, Grades I, II* and II.	Noted and amended.
24.	2.23	7	Amend to read: 'Tiverton has a number of tourist attractions including: Knightshayes Court, which attracts approximately 185,000 to the house and gardens annually drawn from local people and more widely...'	Amend.
25.	Vision	7	We endorse the 6 key vision elements of the NP, and fully support the priorities identified for a zero-carbon parish by 2030, the emphasis on active travel and importance to heritage protection.	Noted.
26.	3.2 Objectives	5	Objective 4 refers only to the built historic environment. This should be expanded to cover the whole historic environment including Tiverton's rich archaeological heritage and historic landscapes (rural as well as built streetscapes). Objective 5 refers to only the biodiversity of the rural environment and open spaces. Including the rural historic environment (archaeology and landscape as well as buildings) in Objective 4 would ensure that opportunities to conserve and enhance heritage in a rural setting and heritage open space are covered.	Noted and Objective 4 has been amended to reflect this.
27.	Objectives	7	Support the 9 objectives and the overarching TIVVY test with the recognition of the climate emergency and value of heritage. We feel the plan identifies the right priorities in supporting the further	Noted.

Ref.	Page/ Para	Rep.	Summary of comment	Response
			development of high-quality sustainable heritage tourism attractions that feel relevant and necessary and will help Tiverton to develop a sustainable visitor economy.	
28.	Objectives	9	Objective 5: A worthy aim, but impossible to achieve, if the stated housing targets are to be met. The size of the TEUE alone will require occupants to fill it, who work outside of Tiverton, probably mainly in Exeter or Taunton. These people will not spare the time to commute by public transport, even if a good service were created for them. They will drive to work, and their consequent additional pollution will in no way be offset by a walk of 100 trees!	Noted. This is a national (international) issue and it is considered important that the TNP firmly states its intention to contribute to carbon neutrality.
Spatial Strategy				
29.	Policy T1: Location and Scale of Development	1	The policy is in general conformity with local plan policy.	Noted.
30.	4.2	5	Could identify the frequent synergy between green space and corridors and archaeological and historic landscape, as well as biodiversity.	Noted and added into para 4.2.
31.	4.8	8	We note at paragraph 4.8 of the Pre-Submission Draft that the Neighbourhood Plan will not seek to allocate sites for development. However, we would like to take this opportunity to present to the Steering Group, the sustainable attributes of the site at Land off Tumbling Field Lane, Tiverton for residential use.	Noted. As acknowledged by the respondent, the TNP is not seeking to allocate sites, for reasons provided in the document. Nevertheless, the representation is helpful.
32.	4.9	5	The conversion of farm buildings needs some caveats. Buildings with 'architectural merit' may have also have high historic significance.	Agreed – the supporting text has been amended

Ref.	Page/ Para	Rep.	Summary of comment	Response
			<p>They may be nationally or locally Listed assets, or part of the setting of a Listed asset, or be undesignated heritage assets. They may therefore either not have the capacity to be sustainably converted, conversion causing significant harm to their traditional appearance and fabric, or their heritage significance may require particularly sensitive treatment. Buildings with less 'architectural merit' may actually have greater capacity for conversion. A balance is needed between retaining a valued building in use and protecting its character.</p> <p>Caveat policy text with: Where relevant and not causing unacceptable harm to historic character or significance ...</p>	<p>and Policy T1 B(iii) improved as suggested.</p> <p>The word 'optimal' in terms of 'use' has been added in line with the amended NPPF.</p>
Housing				
33.	Policy T2: Meeting Local Housing Needs	1	<p>The policy is in general conformity with local plan policy. Update to reflect most recently amended NPPF and the progress on First Homes.</p>	<p>Agree. Text has been added to reflect the First Homes policy that was introduced after the Regulation 14 plan went to consultation. Policy T3 has been amended to support the delivery of First Homes in Tiverton and, in particular, an uplift to the minimum 30% discount required, in order to address the affordability gap evidenced in the Housing Needs Assessment.</p>
34.	Policy T3: Providing Lifetime	1	<p>The policy is in general conformity with local plan policy.</p>	<p>Noted.</p>

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	Affordable Homes			
35.	Policy T3	20	<p>Being able to treat a 'home' as an investment is not something that should ever be used as an economic policy. A 'home' should not be utilised like this by the finance and business sector because ultimately by default all rural areas will become expensive.</p> <p>Tiverton may be one of the lowest costing areas in Devon but eventually all middle and lower income people will get forced to live somewhere were they do not work. Incomes do not need to be high, so pricing themselves out of a living, but the housing policy needs to be 'homes' not investment, and affordable to support a rural life. The income should be enough to live on and if not paying people high wages, the housing prices have to reflect this and not be market led; but [led] by what people can earn in that area.</p> <p>When houses are deemed affordable such as ½ rent and ½ buying on a mortgage, these house prices get inflated as more people can afford them, so the market led aspect of the business of selling the houses make the houses of this kind more expensive than if the same scheme was carried out on a comparable property, that was not built with this criteria; so it has been counterproductive.</p> <p>Also the people ('owners') only own ½ , ¼ or ¾ of the house with a mortgage, but the rental they pay appears not to be used, say, on the upkeep of the whole building, which is necessary to do. So the rent becomes too profit-orientated to work as a sensible solution.</p> <p>What is causing the issue is that national government has to implement a policy that of buying houses for pension-income or buying to rent as an extra income/investment – this is ultimately what has to be dealt with. All that can be done at a local level is to have a vetting system, whereby local people are given priority so they can buy the homes in that area. Can be done if the will is there.</p>	<p>The disparity between income and housing cost in Tiverton is demonstrated in the Housing Needs Assessment. The policy seeks to address this and includes an additional clause supporting the delivery of First Homes, in particular where these can be delivered with an uplift to the minimum 30% discount.</p> <p>The Community Land Trust idea is also supported, which would enable homes to be delivered according to need.</p>

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			Until affordability of housing is tackled, the rental market has been forced to follow this high pricing as it is also market-led. Is there scope to install a fair rent policy (sometimes used by Housing Associations), which would be ideal for Tiverton and which could be run locally.	
36.		21	Includes substantial thoughts on how the housing situation could be improved.	The points raised are very helpful but many fall outside the scope of the neighbourhood plan.
37.	Housing section	22	Developments should have an emphasis on affordable housing for the local community and should be high quality low-or no emission housing to ensure sustainability. Homes also need to be attractive and developments should include green space, and also adequate parking. Current developments are of nasty, unattractive "pseudo" boxes which are likely to be inhabited by people who do not work in the parish, thereby contributing little to the community. This should be stopped.	Agreed and this is included in the Design section.
38.		22	Providing genuinely affordable housing, with costs related to median wage levels in the area, is vital for the town's future	Agreed
39.		22	There is a lot to commend this Plan – in fact it is a big step forward. However I feel that one omission is an explicit undertaking to provide a walking and cycling link from Tiverton to Exeter and hence the Exe Valley Cycle Way. We already have a very large volume of cycle traffic along the A396 – this is remarkable given how dangerous and cycle-unfriendly that route is but it shows the latent demand there would be for a safe route. Such a route exists in the main already due to the old railway line. The argument for such a safe route is not just environmental. The current Exe Valley Cycle Way from Exeter to Dawlish and Exmouth – a very similar distance – generates massive tourist use and revenue. This would be good for Tiverton as a town because it would be the first and only link through to the national cycle network which is so widely used in north Devon. However the major	Conversations with Sustrans allude to the fact that this is not possible at the moment due to land ownership issues. However, include as a long term aspiration – add to 9.11.

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			benefit would be for the people of Tiverton themselves – a safe, clean way to reach Exeter.	
40.		22	What is a Community Land Trust, there was only 1 text box on page 32.. New housing is rarely affordable to people on lower incomes and rent is ridiculous, I am a 44yr old grandmother living in a bedsit as private rent too high, utilities expensive and council tax also very high.....house prices have risen, not in comparison to our wages over the years and as there are more people lending money. there are more people borrowing.....	A definition has been added to the Glossary and a reference to the national CLT site provided in the main body of the text.
41.		22	Not convinced so many houses are needed.	Noted, although this is beyond the scope of control of the Plan as housing numbers are set at the strategic level.
Design and Heritage				
42.	6.1	5	The reference to above and below ground archaeology is welcome.	Noted.
43.	6.7	5	More for information and retrospective. This recent work (AECOM 2020) could have made reference to and use of the earlier Tiverton Extensive Urban Survey (Historic England/DCC/Cornwall Archaeological Unit, 2014 https://archaeologydataservice.ac.uk/archives/view/devon_eus_2017/). AECOM appear to have duplicated certain areas of work, particularly characterisation.	Noted.
44.	Policy T4: Character of Development	1	Consider strengthening. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. The NP policy should reflect the application of NPPF policy in relation to substantial harm (and consideration of substantial public benefits) and less than substantial	This has been discussed, including with the Historic Environment Officer, and it is considered that there is no benefit in repeating the NPPF within the TNP policy.

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			harm (and consideration of public benefits and securing optimum viable use).	
45.	Policy T4	5	Strongly support.	Noted.
46.	Policy T4	7	The Trust supports draft Policy T4 particularly criterion B. (ii.) and (iii.) which seeks to protect locally significant views as set out in the draft Policy T10 and requires development proposals to respect the significance of and context of heritage assets. We support the inclusion of the significant view at Knightshayes within Appendix D (View 12) of the submitted plan.	Noted.
47.	Policy T5: Design of Development	1	The policy is in general conformity with local plan policy. Reflects previous comments made by MDDC.	Noted.
48.	Policy T5	6	Design guidance should incorporate the protection and extension of green infrastructure including support for SuDS in all new developments, and encourage of green links, such as tree lines and hedgerows, to frame residential areas and connect existing habitats.	Reference added to the policy with a read-across to Policy T9 (Network of Green Infrastructure).
49.	Policy T6: Energy Efficiency and Design	1	Support. The policy is in general conformity with local plan policy.	Noted.
50.	Policy T6	7	The build environment is a major source of greenhouse gas emissions. The National Trust has made a strong commitment to achieve net zero carbon by 2030 as an organisation. The Trust supports draft Policy T6 which seeks to make buildings more energy efficient within the Parish. We particularly welcome criterion C which identifies the significant contribution the historic environment can have in reducing carbon emissions through the sensitive retrofitting of energy efficient measures. We also welcome the inclusion of refurbishment and reuse of existing buildings to save carbon.	Noted.

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51.	Policy T6	20	Solar panels should be on roofs of all buildings – and not on green spaces. A wind farm would suit Tiverton.	Noted. We can only 'strongly support' the use of solar panels on rooftops; requirements are set out in Building Regs. Noted re: windfarm.
52.	6.31	6	Welcome this para, which seeks to protect natural drainage networks.	Noted.
53.	Policy T7: Minimising the Risk of Flooding	1	We recognise that a new policy has been added to support the role of the Tiverton Neighbourhood Plan in minimising flood risk. Criterion A states 'only where it is demonstrably unviable will an absence of any on-site SuDS provision be supported in such developments'. The provision of SuDS are necessary to mitigate impact of a development and to manage water quality, water quality, public amenity and biodiversity. The current NP policy currently weaker than Policy DM1 of the Local Plan which is more rigid in terms of SUDs provision. We therefore suggest deletion of the last sentence. We would also suggest including a reference to Devon County Council's SUDs Guidance for Devon.	Noted and agreed to remove the last sentence here. Agreed to include reference to this.
54.	Policy T7	4	The LLFA would want to see a clear preference for daylighting any culverted sections of the town leat and other watercourses where appropriate, as it is considered beneficial for watercourses to remain open wherever possible for both flood defence and environmental purposes. <u>SuDs</u> The County Council is supportive of the design code which promotes the use of SuDS and the retrofitting of SuDS into the plan area as well.	Added to the policy. Noted and included as an action in Section 11 to follow up.

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			<p>If it would be helpful, the Flood Risk Team would be willing to hold separate discussions with the Neighbourhood Plan team regarding the retrofitting of SuDS, including in many of the proposed green spaces put forward for designation in the plan.</p>	
55.	Policy T8	4	<p>Devon County Council as the Lead Local Flood Authority (LLFA) supports reference to the historical significance of watercourses within the Neighbourhood Plan area.</p> <p><u>Town Leat as an NDHA</u> Prior to its inclusion on the heritage asset register, it would be helpful to seek clarification from the County Council's heritage team with regards to what impact the inclusion of further parts of the town leat would have on essential maintenance and remedial works.</p>	<p>Noted.</p> <p>The steering group spoke to the County Historic Environment Manager about this, who recommended that Local Listing does not bring any statutory controls/Statutory consent processes. It does bring additional weight when considering planning applications – so in relation to essential maintenance and remedial works, which would normally not need a planning application, is unlikely to have significant impact. Works to the leat, whatever its status, ought to respect its form and fabric in any</p>

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				case (e.g. use of stone, mortars, etc.). When dealing with Nationally Listed buildings, like for like repairs don't usually require Listed Building Consent as it is.
56.	6.40	6	Welcome the recognition given to the streetscape at Angel Hill and the importance of street trees for their benefits in cooling urban heat islands effects and in improving air quality.	Noted.
57.	Policy T8: Local Buildings and Structures of Local Merit	1	This is currently labelled as T7. Suggest relabelling as T8. No conformity issues. Support changes to criterion B.	Noted – amended.
58.	Policy T8	5	This refers to nationally Listed buildings, Mid Devon's Local List and three additional structures/features. However it should also mention the many undesignated or not locally listed heritage assets – buildings, structures, archaeological features - that also need to be considered on their individual merit or group value. The National Planning Policy	Reference to the assets recorded in the HER has been including in the supporting text and in the policy itself. Also in the

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			Framework refers Plans, planners and developers to the relevant Historic Environment Record (HER). In Tiverton's case this is the Devon County Historic Environment Record (Historic Environment Record (HER) - Devon County Council). This could usefully be referred to as a source of information in this section and also in 11 – Table of Actions .	action table in Section 11.
59.	Policy T8	6	Welcome this policy. Urge a landscape-scale approach to development to be taken, to maximise the benefits for nature and people. Recommend adding in explicit reference to ancient woodland, natural woodland, woodland pasture riparian trees, street trees and hedgerows. Hedgerows and trees outside woods provide vital connectivity between habitats, contribute to shelter, and shade, and assist with water management, among other green infrastructure issues.	Noted and added. Also an additional clause relating to ancient woodland has been added to the policy on Green Infrastructure.
60.	Heritage – The Leat	18	Castle Street – it's some 3+ years since I was able to appreciate one very important aspect of this immediate area in that the town leat does not live up to its name. Part of our local heritage was the flow of water down the middle of the street, and I gather that 'upstream' requires a considerable sum of money to correct fractures etc, this at a time when the pandemic has upset and exacerbated even the most pessimistic of budget forecasts. Assuming that the local Council Tax is already fully committed elsewhere, how about creating a one-off carnival-type monetary collection and, anonymously, I would start it off with a four-figure (£?,000) donation!	As an associated action to the Plan, a working group has already been established to explore revitalising the Leat. There is an aspiration to set up a Trust to continue this work, including in Section 11 of the Plan. The Steering Group has made contact with the individual making this comment.
61.	6.43	3	The Conservation Area has been At Risk since 2011 and a significant contributor to this status originally was the profile, performance and attractiveness of the town centre. We were therefore pleased when the preparation of a masterplan for the town centre was instigated in	A new clause has been added to Policy T8, regarding heritage at risk and in particular the

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			<p>2015 as this exercise had the potential to create and deliver an holistic framework for the regeneration and management of the town centre, hopefully capable of successfully addressing the issues responsible for the Conservation Area being At Risk and securing its removal from the national Heritage At Risk Register.</p> <p>Some years have clearly elapsed since that time and we are not sure where the process of preparing the masterplan might have reached. But we are reassured to learn that your community appears to be in touch with this exercise and to reference it in the Plan as an important complementary initiative in para 10.3 on p91. The Plan therefore does not seek to duplicate the masterplan (whose scope, specific proposals, and intended status, may be still to be revealed) but focuses on the promotion of flexible work spaces and the visitor economy as set out in policies T17 & T18.</p> <p>This is an ambitious and praiseworthy agenda, and combined with other policies in the Plan aimed at the promotion of design quality in the built environment should if successful, and subject to any subsequent inter-dependence with the eventual masterplan, assist in tackling those issues responsible for the Conservation Area being At Risk.</p> <p>In that respect our only observation is on how the Plan makes the connection between these various strands. At present only Non-Policy Action 2: Heritage At Risk (p54) covers any aspect of heritage at risk and doesn't comfortably accommodate the Conservation Area as a <u>designated</u> heritage asset at risk. We wonder whether a formal policy might be drafted and included, catering for the Conservation Area specifically and linking the tackling of its issues to the town centre agenda. An option might be to develop the existing Non-Policy Action</p>	<p>conservation area. The associated actions, in terms of partnership working to address this, has been included in Section 11.</p>

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			in this respect, thereby also giving more formal status and weight to the provisions it already contains.	
62.	Overall	22	All good policies, but some could go further. Eg. Beechwood (old Police Station) in The Avenue should be considered a "Building of Merit" with historic links to the town and repurposed sympathetically.	This has been raised on numerous occasions, including outside the neighbourhood plan setting. Beechwood has been identified within the Plan as an additional non-designated heritage asset.
63.		22	I have lived in Tiverton for 3 years. I know I am not on my own in knowing the potential of the town. It has beautiful buildings, charisma and character, a wonderful history and many local places of interest and yet I haven't yet come across a town where there is so much underinvestment and woeful neglect of all of these things. Something is terribly wrong where a town has all of this and yet none of it is celebrated, nurtured or invested in. The waterfront is magnificent and yet it looks like an abandoned wasteland. There is a huge monstrosity of a new build being erected along the river which seems to go against everything in the plan about preserving local architecture and views. The town Leat has been abandoned. There is a beautiful castle, where is that promoted? The museum and castle could have reduced rates for local people to learn more about their local history. There could be walking tours of Tiverton to help us learn about our town. I keep hearing about Tiverton in bloom and yet the flower bed on angel hill is a pile of mud currently. There are no areas of planting in the market or the town centre. Some greenery in town would make a huge difference to how the town looks. You could encourage local musicians to play in the town on weekends. Bunting on the high street would add colour	Noted.

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			and fun. The high street is currently various shades of grey and beige. How does that encourage locals and visitors to shop here? There is a very creative community in Tiverton but how is that utilised? It's is easy to talk in the town plan about plans and ideas but none of the above is rocket science. At some level it seems the council do not really wish to see Tiverton thrive or it would be happening. Despite the pandemic, there are easy ways to get Tiverton on the map, create a colourful and inspiring town to live in and encourage visitors. I lived in London before moving to Tiverton and my council tax in Devon is far in excess of what I paid in the capital. So, something is going wrong. The money is being taken but the council seems to lack creativity, desire to make changes actually happen. Whatever is in the plan is really quite tokenistic without the creativity and will to make it happen.	
64.		22	Although you want us to move away from owning cars, this is unrealistic. You need to provide far more parking with each home.	Noted.
Natural Environment				
65.	General	5	This section would benefit from either highlighting the frequent synergy between the natural and the historic environment or clarification regarding certain sites that are referenced. For example the Grand Western canal is used as an example of a natural asset. Although it is a LNR it is a primarily a human-made and managed feature, a heritage asset and a Conservation Area (designated for heritage value). Similarly the grounds of Knightshayes are a created and managed parkland and a nationally designated heritage asset.	This is a useful point – the text has been expanded make this synergy clearer.
66.	Para 7.1	2	This designated site abuts and is largely surrounded by an area which, due to its inclusion in the settlement boundary, has a presumption in favour of development. To better ensure the protection and conservation of this designated site we recommend including wording within an appropriate policy to ensure that particular attention is paid to any scheme which results in runoff into Tidcombe Lane Fens SSSI.	Noted and included within Policy T9.

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67.	7.3	2	Statement 7.3 advises that “There are two Sites of Special Scientific Interest (SSSI) within Tiverton...”. We recommend clarifying which sites this statement refers to – does this include the Bickleigh Wood Quarry SSSI, which is located within the wider parish boundary?	Amended to clarify that this refers to Tidcombe Lane Fens and Bickleigh Wood Quarry.
68.	7.10	2	<p>The text refers to the Defra Metric specifically but the policy itself references a “measurable net environmental benefit”. Whilst an Environmental Benefits from Nature¹ tool is being introduced to be used alongside the Biodiversity Metric to help developers and planners measure and understand the natural capital of their biodiversity gains, this will be a voluntary measure. Therefore, we recommend that the policy wording is amended to reference only biodiversity net gain. Including wording that states that development will be supported where it accords with Mid Devon Local Plan Policy S9, could also be advisable.</p> <p>We recommend advising that a minimum 10% net gain will be required.</p> <p>Additionally, to afford longevity to the plan, where this statement references BS 42020, we recommend instead referring to ‘the current biodiversity code of practise for planning and development’.</p>	<p>Amended as recommended.</p> <p>Agreed and amended.</p> <p>Amended.</p>
69.	7.12	2	Where it is stated that “In this instance, substantial compensation as quantified by the Defra biodiversity metric will be considered.” We recommend that this is reworded to remove reference to the biodiversity metric, perhaps instead noting that ‘In this instance, appropriate compensation will be considered’. This will ensure this statement more accurately reflects the wording of National Planning Policy Framework 180 (c).	Amended as suggested.
70.	Policy T9: Green and Blue	1	The policy is in general conformity with local plan policy.	Noted.

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	Infrastructure and Delivering Biodiversity Net Gain			
71.	Policy T9	2	We advise that it's slightly unclear whether the 'proposals' mentioned in the opening of Policy T9 are those associated with development, or proposals directly concerned with green/blue infrastructure.	It relates to <u>all development proposals</u> . Wording amended to add clarity, by inserting the word 'Development' at the start.
72.	Policy T9	5	Should refer to heritage/historic environment as an important element of green infrastructure. The Policy references the NPPF regarding the ecological importance of Green Infrastructure, but in the context of Tiverton could make more reference, as discussed above (GW Canal and Knightshayes), to the multifunctional provisions of Green Infrastructure and also the NPPFs requirement for positive strategies for enjoying the historic environment – which can be effectively (and conveniently) delivered through multifunctional Green Infrastructure. Policy T9 Conformity reference could therefore refer to NPPF (2020) 190 (formerly NPPF 185).	This is a helpful point. Additional text has been added at Para 7.5 to acknowledge this.
73.	Policy T9	6	Text provided that could be included within the justification for this policy.	Include.
74.	T9 / or new policy	6	Either here, or separately, recommend including a policy to protect ancient woodland and veteran trees.	New wording added.
75.	Policy T9	7	We welcome the inclusion of policy T9 in relation to Green and Blue infrastructure and delivering biodiversity net gain. We appreciate the timing of the NP which has overlapped between the issuing of consultation guidance and the delivery of biodiversity net gain by Natural England. Policy T9 could usefully be updated to taken on	Noted – see comments from Natural England on this, which propose appropriate rewording to 7.10.

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			board reference to the new Biodiversity Metric 3.0 and ongoing consultation on delivery of net gain (currently within para 7.10).	
76.	Policy T10: Local Green Spaces	1	The policy is in general conformity with local plan policy.	Noted.
77.	Policy T10	5	Welcome reference to historic significance.	Noted.
78.	Figure 7.3 (Local Green Spaces) / Area 14	4	Shows a proposed green space designation adjacent to Bolham Road Roundabout (Area 14 – Green space to the opposite of 1 – 4 College View in Appendix D). Design work for this improvement has not yet taken place and it is therefore not known how much of this space will be required to undertake the works. The designation of this space within the Neighbourhood Plan as green space will make the undertaking of any improvements to the roundabout very difficult; it would therefore be helpful to make note of this potential future requirement within the document and, should the land be designated, include a clause that allows for some or all of the area to be used for the improvement of the roundabout should this be forthcoming.	Agreement to retain the space but add this detail to the Appendix, noting that the NPPF states that some forms of development are not inappropriate in Green Belt locations, including “local transport infrastructure which can demonstrate a requirement for a Green Belt location”.
79.	Local Green Space – Area 23	4	This site relates to land on which there is a medium to long-term aspiration to relocate Tiverton High School depending on securing significant external funding. The designation of this area as greenspace would make the use of this land for the relocation of the school very difficult and would likely add an additional financial burden to the project. The County Council therefore objects to the designation of site 23 as Green Space. Additionally, the site is described as ‘open fields on flood plains near the High School’. This description is misleading as the	The site has been removed from the Plan.

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			Environment Agency Flood Mapping only shows a small part of the field as being in flood Zone 2 or 3.	
80.	Policy T10	11	I believe it is vital to preserve existing green spaces through the Tiverton area, particularly the small spaces around housing areas. I see in the plan that some are mentioned but others are not and this is inconsistent. Please can you add the green areas around the Oaklands development. These are used by children and by families and were particularly useful during recent lockdowns. They are also places where wildlife can develop and they help to break up the housing area.	The spaces alluded to here form part of a development that is not yet completed. Agreed that once built, and assuming the spaces are well-used, this could be considered as part of a future review of the TNP.
81.	Policy T11: Locally Significant Views	1	<p>The policy is in general conformity with local plan policy. However, in this context it is difficult to determine what is meant by 'significant harmful impacts'. Whilst Appendix E provides a description of the identified locally significant views, further evidence is required to establish why these are locally significant, what features contribute to this, and the methodology that has been applied in order to identify these. Further detailed evidence will aid application of the policy for the determination of planning applications.</p> <p>We have also identified a typing mistake – Locally Significant Views Appendix is labelled as D instead of E. It is also said that Appendix E is a separate document however, it is included in the core document. Please amend.</p>	<p>The views have been carefully selected both from local knowledge, work on the Design Guidance and through the informal consultations with the community. The Knightshayes views are included in their documentation.</p> <p>The policy has been amended slightly and further supporting text provided on impacts and how to mitigate them.</p> <p>Labelling amended.</p>
82.	Policy T11	7	The National Trust supports draft Policy T10 which seeks to protect the setting of Tiverton. We particularly support the need for developers	Noted.

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			to consider the key views to and from Knightshayes as set out within the setting study referred to at paragraph 7.19. of the NP and welcome this requirement within the policy wording itself.	
83.	Policy T12: Supporting Local Agriculture and Opportunities for Diversification	1	The policy is in general conformity with local plan policy.	Noted.
84.		21	Can we mention the Mid Devon Show. Suggests including a sentence recognising the lower food miles, animal welfare and environmental protection benefits of locally produced vegetable and livestock.	Mentioned in the introduction. This has been included at 7.28.
85.		22	Tiverton is fortunate in having a good distribution of green open spaces and we need to keep them all.	Noted
86.		22	Maintain the allotments	Noted
87.		22	We need our green spaces!	Noted
88.		22	What is Hay Park?	This is one of the LGS proposals.
89.		22	All views from the canal tow path towards green space are very important	Noted.
90.		22	We need to plant more trees - targeted to take into account the multiple benefits they can provide.	Noted.
Community Facilities				

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91.	Policy T13: Provision of Leisure and Recreation Facilities	1	The policy is in general conformity with local plan policy.	
92.		21	Recognise the need for the 4G all weather football pitch and facilities for combat sports.	The 4G element has been added into the policy. At the moment, there is no significant evidence to suggest that there is a demand for or lack of facilities for combat sports. This could be revisited in a future review of the plan.
93.	Policy T14: Cultural and Community Venues	1	The policy is in general conformity with local plan policy.	Noted.
94.	Policy T15: Allotments and Growing Spaces	1	The policy is in general conformity with local plan policy.	Noted.
95.	Policy T15	20	Allotments need to be safeguarded from development as part of green spaces within a town – valuable source of recreation, social interaction and producing organic fruit and veg and flowers. Plots take time and are to be respected and not deemed disposable to fit the convenience of a developer.	Noted. Policy T15 seeks to safeguard the allotments and allotments are also proposed for Local Green Space designation at Policy T10. The reasons for

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				their importance is helpful to add to the justification.
96.	General	22	Community facilities need to be affordable to groups with limited resources.	Noted.
97.		22	I like the support of natural play, the old railway lines are ideal for this and should be expanded upon, good to see people using the river too	Noted.
98.		22	We will end up paying for vanity projects, that will have limited appeal.	Noted.
Transport and Movement				
99.		12	Post Hill/ Manley Lane - the traffic entering and leaving Tiverton at this point is always very much faster than the required 40mph. Please can we have a speed restriction of 30mph put in place instead of 40mph with a structure that makes vehicles slow down as they travel via Post Hill & Blundells Road. Now that more traffic is using the road due to the housing expansion at Braid Park it is busier than ever. I am unsure why this has never happened previously as people live, walk and cycle in these streets and should not have to contend with walking on a pavement or try to cross the road with traffic including lorries haring past at 50mph! Thank you.	Noted. Speed limits are not within the scope of what can be included within planning and land-use policy. Rather it falls under the remit of the Highways Authority (Highways England / Devon County Council). This has been included in the Action Table in Section 11.
100.	Policy T16: Encouraging Safe and Sustainable Movement	1	The policy is in general conformity with local plan policy.	Noted.

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101.	Policy T16	17	<p>There is a lot to commend this Plan – in fact it is a big step forward.</p> <p>One omission is an explicit undertaking <u>to provide a walking and cycling link from Tiverton to Exeter and hence the Exe Valley Cycle Way</u>. We already have a very large volume of cycle traffic along the A396 – this is remarkable given how dangerous and cycle-unfriendly that route is but it shows the latent demand there would be for a safe route. Such a route exists in the main already due to the old railway line.</p> <p>The argument for such a safe route is not just environmental. The current Exe Valley Cycle Way from Exeter to Dawlish and Exmouth – a very similar distance – generates massive tourist use and revenue. This would be good for Tiverton as a town because it would be the first and only link through to the national cycle network which is so widely used in north Devon.</p> <p>However the major benefit would be for the people of Tiverton themselves – a safe, clean way to reach Exeter</p>	<p>Agreed to add in as an additional bullet point to the supporting text.</p>
102.	Policy T16	18	<p>Relating to older people/those with mobility issues -where the pavement width is adequate, how about a much more generous allocation of benches to help accommodate OAP's - it would bring more persons into the town centre and help re-vitalise the main shopping area and prosper the poor shopkeepers who somehow have had to weather the financial impact of the pandemic.</p>	<p>Include benches within the policy and add an additional Action to Section 11 about improving the footpaths for those less mobile.</p>
103.	Policy T16	20	<p>The respondent uses public transport, walks and cycles.</p> <p>1. When the old hospital in Belmont Road was recently developed, the short cut to the town was closed for a long period of time – maybe up</p>	<p>Include in the supporting text.</p>

Ref.	Page/ Para	Rep.	Summary of comment	Response
			<p>to 9 years. Suggestion: where there is such a shortcut, developers should have a minimum time that they can close it than wait till the whole development is complete before opening it again. Safety issues could be overcome if the area was tackled first and seen as a priority for walkers and cyclists.</p> <p>2. Tiverton needs practical cycle routes (as opposed to purely leisure ones). E.g. a cycle path linking the town to Tiverton Parkway via the canal path (without the need to dismount for bridges etc.), although this may not be practical. Therefore a need for public transport links too, that connect with train times – plus that run into the evenings.</p> <p>3. Reconnect Tiverton to the mainline – expensive but would enrich the town. Maybe using volunteer effort to enable this?</p>	<p>Include as an action within Section 11 – better integration and timing between rail and bus providers.</p> <p>Include as an action within Section 11, the potential to explore a community bus link between the town and the railway station – this is considered more realistic an option than the reconnection of the rail line, but would depend on demand and cost.</p>
104.	Policy T16	7	<p>The National Trust supports draft Policy T16 particularly the provision of additional walking and cycling connection in and around Tiverton. We recognise the challenge for many organisations in bringing forward actions to 2030 for this policy area. The Trust is committed to</p>	<p>Noted – this will need to be considered in the Implementation and Monitoring of the Plan.</p>

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			<p>improving the standards of access to all our places and is pleased that the new movement route connecting the north of Tiverton to Knightshayes Court is identified within the draft NP. We welcome the inclusion of the route to Knightshayes within para 9.9 and the ongoing work to improve connectivity. We await with interest the development of actions for policy T16, many requiring partnership working, and considerable implementation resources. Remote connectivity for electric vehicles, electric bikes, pedestrian and cycleway infrastructure will need a concerted effort by all parties to bring forward effective policy to practice and implementation. We await further work on funding and monitoring within the NP area which could potentially help implement many policy areas of the NP including those specifically relating to T16.</p> <p>We welcome the future use of Section 106 Agreements in this area, and potential role for enhancing sustainable links to Tiverton Parkway (eg non policy Action 5 in relation to bus services).</p> <p>We would suggest a new text in relation to Travel Planning and the need for organisations to bring forward individual and collective travel plans to contribute to Policy T16.</p>	<p>Text has been added to the supporting justification, although this would sit outside the policy itself.</p>
105.		21	Unsure about promoting EVs.	Noted and discussed, but this has been retained.
106.	Figure 9.2 (Tree Trail)	4	Appears to suggest a walking route along the A361 North Devon Link Road where there is not currently any pedestrian provision. To encourage pedestrians to use this route would represent a significant safety issue. If this route is instead intended to pass through the trees between the A361 and the existing development, then some text should be included within the	<p>Check numbering as in fact this should be Figure 9.3.</p> <p>Amended to reflect this.</p>

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			<p>document to make this clear, and the physical barrier between the A361 and the proposed route should be maintained to prevent pedestrians or dogs accidentally walking onto the road.</p> <p>Whilst the Neighbourhood Plan makes reference to reducing car trips, it is not clear how this will be achieved. It would be useful to outline some interventions, such as modal filters, within the plan.</p>	<p>The TNP supports shorter journeys to be taken by foot/bike, where possible, which is one way of seeking to reduce car usage.</p> <p>A modal filter is any measure, at a single point in a road, that allows the passage of some modes of transport but not others. One common type of modal filter allows walking, cycling and emergency vehicles to pass through, but stops other types of motor traffic at that point.</p> <p>Agreed to include this within Section 11 as traffic calming measures would fall outside the remit of planning policy.</p>
107.	9.9	6	Support the Tree Trail and can offer advice on implementing this.	Noted.
108.	General	22	Some simple work could be done to improve the siting and clarity of bus stops in the town to encourage use and make buses more accessible to people with limited mobility. Eg siting of stops at southern end of Westexe South and between St Paul Street/Westexe South and the Hospital.	Noted- this is included within an action.

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109.		22	T16-more walking & cycling connections between the the towns and villages, safer cycle routes to schools etc Possibility of including sections of the Leat that are viable.... And a cycle path to Exeter (Exe Valley Way) is in high demand!	This will be picked up by the action (section 11) to support the creation of a Trust to explore the revitalisation of the leat... part of their remit could be to explore walking/cycling opportunities along it, including for residents and visitors.
110.		22	A frequent and affordable bus service to Tiverton Parkway station is needed. And an off road cycle path to Exeter. I think these suggestions are addressed somewhere in the many documents, but I couldn't find them!	Noted – discuss Included in the actions.
111.		22	Tiverton has the opportunity to grasp a green cycle and walking future. Current cycle ways on roads are limited, as is safe/secure/covered parking for cycles in Town. Cycles are still technically not able to cycle along all of Gold Street. Whilst the road quality is not locally determined the current poor state makes cycling hazardous. Likewise the urban extensions have minimum cycle infrastructure/links included - and again, no where to safely lock-up cycles if traveling to the Town centre. Tiverton could be very progressive and even adopt scooter opportunities - linking safe cycle and e-cycle/scooter travel using an extensive/extended, notified cycle lane network for safe, non-carbon travel and access.	Noted.
112.		22	I would like to see more cycle specific infrastructure including properly segregated cycle paths to allow children to cycle to school and families to cycle together for leisure purposes	Noted.

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113.		22	The taxpayer shouldn't be providing free bus passes at the whim of councillors	Noted.
Tiverton Town Centre and the Wider Local Economy				
114.	General	20	Tiverton has potential to have an economy that is highly local, as it has all the right resources: agriculture (reduces food miles). This could provide creative job opportunities and lead to a healthy and balanced community. Locally produced products could also be capitalised upon.	Noted.
115.		21	<p>Would like to see more on the manufacturing role of Tiverton, including encouraging large-scale employers to the town.</p> <p>Would like to explore how the evening economy in Tiverton could be extended. Part of the issue is a lack of footfall – suggests including a sentence stating that the new proposed school should include a sixth form to return A level provision to the town which would help to improve the school's overall performance and bring a cohort of A level students back to the town.</p>	<p>This is considered to be a strategic issue dealt with at the district level as would require land to be allocated to the parish for such uses. The TNP does not seek to allocate sites.</p> <p>This is an interesting point – having reflected on it, the Steering Group do not consider that the TNP is the place to lobby for a sixth form – this would fall within the remit of Devon County Council as the Education Authority, who model the need for additional school places.</p>
116.	Policy T17: Flexible Workspace	1	The policy is in general conformity with local plan policy.	Noted.

Ref.	Page/ Para	Rep.	Summary of comment	Response
117.	Policy T18: Supporting a Sustainable Visitor Economy	1	The policy is in general conformity with local plan policy.	Noted
118.	Policy T18	7	<p>The Trust supports draft Policy T17 which allows the development and expansion of tourism facilities, connected with day and staying visitors and in particular criterion iv. which allows for proposals within accessible sites outside of the settlement boundary where there will be no significant detrimental environmental impacts.</p> <p>We welcome the inclusion of text within para 10.12 relating to Tiverton Town Centre and wider economy but would suggest removal of the text at the foot of page 95 relating to capitalising on the development proposals at Junction 27.</p>	<p>Noted.</p> <p>The group decided to retain this as the development will happen and could potentially draw in visitors as a destination in its own right.</p>
119.		21	Would like to see a reference to country pursuits as something to capitalise on.	Added.
120.		22	The attractions in Tiverton need to be marketed as a package to families with young children and older (retired) adults. Needs to link to a good shopping/facilities offer in the town centre.	Noted- the masterplan for the town centre will be exploring these issues.
121.		22	As commented earlier, Tiverton has it all. Independent retailers, a castle, cute cinema, lovely green spaces and walks but it is woefully underpromoted it's quite shocking. It's not the plan that's needed it's people in post who can and want to make Tiverton a success. Utilise the creativity of people in Tiverton and the passion and people will come and visit. It's not rocket science.	Noted.

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Non-policy Actions				
122.	Action 3	5	(A thriving, healthy countryside) – refers only to the ‘natural’ environment, but the rural heritage/historic environment and community engagement with this contributes significantly to the rural economy and to health and wellbeing.	Noted and amended to expand as suggested.
Monitoring and Implementation				
123.	Community Infrastructure Levy (CIL)	6	CIL allocations should include green infrastructure, including management plans and funding for maintenance. Natural green infrastructure is cost-effective: e.g. trees cost less to maintain than regularly mown turf and have wider biodiversity benefits.	Noted, although the recommended that MDDC Cabinet, 3 December 2020 ¹² recommend: the Mid Devon Community Infrastructure Levy draft Charging Schedule be withdrawn from its examination and no longer progressed. This is due to updated circumstances and in anticipation of reform, there is now a need to decide whether to proceed with the Community Infrastructure Levy given the pending examination in public of the submitted draft charging schedule.

¹² [Agenda for Cabinet on Thursday, 3rd December, 2020, 6.00 pm - MIDDEVON.GOV.UK](https://www.middevon.gov.uk/agenda-for-cabinet-on-thursday-3rd-december-2020-6-00-pm)

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124.	CIL	7	Implementation of the plan objectives and policy is dependent upon resources, with the new set of circumstances brought about in a post coronavirus economy. We await the deliberations by Mid Devon District Council on Section 106 Agreements/Infrastructure funding and note the discussions by MDDC Scrutiny Committee in July 2021 which await Government response to the consultation on Infrastructure funding.	As above.
SEA and HRA Screening Determination				
125.	SEA/ HRA	2	We have received and responded to the Tiverton neighbourhood Plan HRA and SEA screening consultation, as submitted by Mid Devon Council. We will continue to engage with Mid Devon Council to discuss any matters that arise from this consultation.	Noted. The screening Determination Statement concluded that neither an SEA nor HRA was required to accompany the TNP. A Sustainability Statement has, nevertheless, been prepared.