

Tiverton Neighbourhood Plan Comments Received at Pre-Submission (Regulation 14) Consultation and Proposed Responses from the Steering Group

The below gives a summary of representations and responses by serial number, omitting those that are simply noted, but retaining their serial numbers.

Ref.	Page/ Para	Rep.	Summary of comment	Response
General comments				
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 NDP)	Amend 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	<p>The earmarking of this site is included in the Mid Devon Local Plan – the Tiverton NDP must be in general conformity with that and therefore it is beyond the scope of the NDP to insist on the withdrawal of sites allocated/reserved for allocation at the strategic level.</p> <p>It is the hope that the policies in the NDP will provide greater influence on future planning decisions, which may assist in ensuring that the objectives for development are met.</p>

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			with protecting our heritage, another stated objective of the plan?	
9	Climate change	10	<p>All our planning should based on our climate change principals.</p> <p>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.</p> <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 a major feature of the aims and ambitions for the NDP.</p> <p>Agreed – see comments relating to Policy T9.</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>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 NDP policies are used in</p>

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			<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>practice, in order to evaluate their effectiveness in achieving the aims, as signed up for by the parish.</p>
11	Disability issues	14	<p>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>	<p>Disability issues were raised significantly by a local councillor during the consultation stages.</p> <p>Any views on this?</p>
12	General	15	<p>Fantastic stuff</p> <p>Much appreciated all this work you have done</p> <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>Noted.</p> <p>Both issues fall outside the remit of the NDP, but could be considered as actions outside the plan itself.</p>

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			<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>Scope to speak to this resident in more detail – might he be interested in the 'next steps' implementation?</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 farmers market once a month. Temporary barriers could be installed at the rivers edge. This</p>	<p>One of the purposes of the NDP 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 involvement (including in local democracy) – which can act as the catalyst to enabling these sort of community ideas.</p>

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			<p>would knit together both West Exe, Angel Hill, and Fore Street</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 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.</p>
		30	<p>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</p>	<p>Noted – there is a need for greater community engagement generally.</p>

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			<p>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 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.</p>	
17		30	<p>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.</p>	<p>Noted and included in the Sustainable design section, although some of these ideas fall beyond what can be Required in policy.</p>
18		30	<p>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.</p>	<p>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.</p>
<p>Introductory Chapters</p>				

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19	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 insert.
20	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.
21	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.	Amend paragraph.
22	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.	Include here (there is some reference to this in Section 6 too.
23	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.

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25	3.2 Objectives	5	<p>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).</p> <p>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.</p>	Noted and amend both to ensure the full scope is included.
27	Objectives	9	<p>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!</p>	Noted. This is a national (international) issue and it is considered important that the NDP firmly states its intention to contribute to carbon neutrality.
Spatial Strategy				
29	4.2	5	<p>Could identify the frequent synergy between green space and corridors and archaeological and historic landscape, as well as biodiversity.</p>	Noted and expand paragraph to mention include this.
	4.8	8	<p>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</p>	Noted. As acknowledged by the respondent, the NDP is not seeking to allocate sites, for reasons provided in the

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			the site at Land off Tumbling Field Lane, Tiverton for residential use.	document. Nevertheless, the representation is helpful.
31	4.9	5	<p>The conversion of farm buildings needs some caveats. Buildings with 'architectural merit' may have also have high historic significance. 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>Noted - amend the text and Policy T1 B(iii) as suggested.</p> <p>Potential to change beneficial to optimal (check NPPF wording)</p>
Housing				
34	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</p>	<p>Future ways of working?</p> <p>First Homes/ AH %</p> <p>Community Land Trust.</p>

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			<p>housing policy needs to be ‘homes’ not investment, and affordable to support a rural life.</p> <p>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>Until affordability of housing is tackled, the rental market has been forced to follow this high pricing as it is also market-led.</p>	

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			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.	
35	Housing section	30	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.
		30	Providing genuinely affordable housing, with costs related to median wage levels in the area, is vital for the town's future	Agreed.
37		30	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	Group to discuss – I think we felt this wasn't achievable.

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			in north Devon. However the major benefit would be for the people of Tiverton themselves – a safe, clean way to reach Exeter	
38		30	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.....	Noted - include further information on what this is in an appendix.
Design and Heritage				
42	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 harm (and consideration of public benefits and securing optimum viable use).	Check and refer to NPPF here.
46	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.	Suggest add this to T5 making reference to T6 and T9 where relevant.

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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 – group to discuss.
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 agree to remove last sentence. Agree to include reference to this.
54	Policy T7	4	Devon County Council as the Lead Local Flood Authority (LLFA) supports reference to the historical significance of watercourses within the Neighbourhood Plan area. <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. The LLFA would want to see a clear preference for daylighting any culverted sections of the town leat and other watercourses	Noted. AE has contacted County Historic Environment Manager about this. Noted and include this with the supporting text and policy.

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			<p>where appropriate, as it is considered beneficial for watercourses to remain open wherever possible for both flood defence and environmental purposes.</p> <p><u>SuDs</u></p> <p>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. 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>	<p>Do we want to take them up on this offer? It may be useful in terms of either strengthening the policy and/or for use in putting tougher information about the implementation and ongoing monitoring of the plan.</p>
56	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 – amend.
57	Policy T8	5	<p>This refers to nationally Listed buildings, Mid Devon’s Local List and three additional strictures/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 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.</p>	<p>AE has asked County Historic Environment about this - if they see merit in including the assets in the HER in the policy – or simply referencing them.</p>

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58	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 – suggest we add an additional clause to the policy specifically setting this out.
59	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!	This is an interesting point – should we include something about it in the action table? AE to raise this with the Historic Environment Manager.
60	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 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	Suggest that this be included in a broadened out Policy T8 – to include a section heritage at risk and the CA – the Action could be deleted in preference to this.

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			<p>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 in this respect, thereby also giving more formal status and weight to the provisions it already contains.</p>	

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61	Overall	30	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	Discuss.
Natural Environment				
64	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 – expand the text to make this synergy clearer.
65	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 include within Policy T9.
66	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?	Amend to clarify that this refers to Tidcombe Lane Fens and Bickleigh Wood Quarry.

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67	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>Amend as described and make reference to MDDC Policy S9.</p> <p>Agree and amend.</p> <p>Amend</p>
68	7.12	2	<p>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).</p>	<p>Amend as suggested.</p>

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70	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> . Amend wording to add clarity.
71	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 and agree that the policy should be expanded to make this point.
72	Policy T9	6	Text provided that could be included within the justification for this policy.	Include.
73	T9 / or new policy	6	Either here, or separately, recommend including a policy to protect ancient woodland and veteran trees.	AE has contacted the Woodland Trust to seek advice on wording, as they have suggested they have a model policy for this. Also need to understand the extent to which this might be seen as simply duplicating national policy.
74	Policy T9	7	We welcome the inclusion of policy T9 in relation to Green and Blue infrastructure and delivering biodiversity net gain. We	Noted – see comments from Natural England on this, which

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			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 board reference to the new Biodiversity Metric 3.0 and ongoing consultation on delivery of net gain (currently within para 7.10).	propose appropriate rewording to 7.10.
77	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.	Check that the space is named correctly in both places. Retain the space but add this detail to the Appendix. Note that the NPPF does allow for ‘appropriate development’ to take place on Green Belt land (which is what the local green space designation would elevate the site to) – its designation, therefore, would not preclude these works (as necessary) from taking place.
78	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.	This needs checking – if it is, indeed, the site earmarked for the school, then it would be prudent to remove it. I had thought though that it was only part of the site earmarked – perhaps the boundary is wrong

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			<p>The County Council therefore objects to the designation of site 23 as Green</p> <p>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.</p>	<p>and should only be related those parts in the flood zone 2/3?</p>
79	Policy T10	11	<p>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.</p>	<p>Group to discuss – we can include this, but do you know who owns it as we'd need to contact them ASAP.</p>
80	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>Expand on Appendix E to set out the methodology and additional text to set out what would constitute a significant harmful impact.</p> <p>Noted – amend.</p>

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Community Facilities				
93	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 their importance is helpful to add to the justification.
Transport and Movement				
97		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). Should we include speed enforcement within our action table at the end as a non policy community action?
99	Policy T16	17	There is a lot to commend this Plan – in fact it is a big step forward. <u>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</u>	Group to discuss

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			<p>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>	
100	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 revitalise the main shopping area and prosper the poor shopkeepers who somehow have had to weather the financial impact of the pandemic.</p>	<p>Potential to include something on this in the policy and cross-reference to an action?</p>
101	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 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</p>	<p>Interesting idea – has this continued to be a particular issue?</p>

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			<p>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>Non project – digitised timetables at bus stops? Working with bus and train companies for additional co-ordination.</p>
102	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 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>Noted – this will need to be considered in the Implementation and Monitoring of the Plan.</p>

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			<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>Noted – scope to include (check how this fits in with DCC requirements as Highways Authority) and note relevant NPPF criteria.</p>
103	Figure 9.2 (Tree Trail)	4	<p>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 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>Check numbering as in fact this should be Figure 9.3.</p> <p>Ian – can you please on the route and advise on this?</p> <p>The NP 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>Do we want to reference these – or other mechanisms - at any</p>

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				locations? It might go in as an 'aim' rather than policy.
107		30	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!	Noted- discuss
108		30	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
Tiverton Town Centre and the Wider Local Economy				
115	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>Group to discuss.</p>
		30	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.	Action

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		30	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 - actions
Non-policy Actions				
118	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 amend to expand as suggested.
Monitoring and Implementation				
119	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 MDCC Cabinet, 3 December 2020 ¹ 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

¹ [Agenda for Cabinet on Thursday, 3rd December, 2020, 6.00 pm - MIDDEVON.GOV.UK](#)

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				Community Infrastructure Levy given the pending examination in public of the submitted draft charging schedule.
120	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 - no comments				