

# West Devon Borough Council

Assessing the Impact of New Retail  
Development in West Devon  
Supplementary Planning Document

## Statement of Consultation

April 2013 - Committee Version



West Devon  
Borough  
Council

# 1. Introduction

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- 1.1 This Statement of Consultation sets out how the Council consulted on the draft South and South West of Tavistock Masterplan Supplementary Planning Document. This Statement also addresses the requirements of Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2 The purpose of this statement is to clearly set out details of the consultation that has taken place. The Statement sets out:
- Who was consulted.
  - How they were consulted.
  - Summary of the main issues raised.
  - How these issues have been addressed in the SPD.

## What consultation has taken place?

- 1.3 Work on this Supplementary Planning Document (SPD) began with a consultation on the findings of the *“Okehampton and Tavistock Town Centre and Retail Study”* which was published in 2012. The aim of this consultation was to:
- Share information about the findings of the Study;
  - Gather feedback and ideas from the community and stakeholders about shopping and leisure provision in the towns; and
  - Learn more about local aspirations for the future of the towns.
- 1.4 The consultation ran for a period of seven weeks from Thursday 4<sup>th</sup> October to Friday 23<sup>rd</sup> November 2012. A series of exhibitions, workshops and drop-in surgeries were held as follows

### Community Exhibitions:

- Saturday 13<sup>th</sup> October – 10am till 3pm  
2 Eastside Stores (formerly Georgi M), Pannier Market, Tavistock.
- Saturday 20<sup>th</sup> October – 10am till 3pm  
40 Red Lion Yard (formerly Honey Bea), Okehampton.

### Drop-In Surgeries:

At Okehampton Customer Service Centre, St James Street, Okehampton or WDBC Offices, Kilworthy Park, Tavistock on:

- Wednesday 7<sup>th</sup> Nov – 10am till 1pm
- Wednesday 14<sup>th</sup> Nov – 10am till 1pm

### Business Workshop

- Tuesday 23<sup>rd</sup> October from 7pm at Okehampton Business Centre, Okehampton
- Thursday 8<sup>th</sup> November from 7pm at Kilworthy Park, Tavistock

- 1.5 Summaries of the consultation can be viewed on the Council’s website – [www.westdevon.gov.uk](http://www.westdevon.gov.uk).

- 1.6 Following this consultation, the Council considered it necessary to prepare some guidance in the form of a Supplementary Planning Document (SPD) around assessing the impact of new retail development proposals in West Devon. A Supplementary Planning Document was subsequently drafted and was taken to the meeting of the Community Services Committee on 26<sup>th</sup> February 2013 to seek approval for its consultation.
- 1.7 Following Member approval, the SPD was subject to a statutory four week consultation period that enabled all interested parties including statutory organisations to comment on the draft SPD. The consultation process started on 7 March 2013 and ran until 8 April 2013.
- 1.8 Two drop-in surgeries were held at Okehampton Customer Service Centre on:
- Tuesday 12<sup>th</sup> March from 2pm to 4pm.
  - Wednesday 20<sup>th</sup> March from 10am to 12 noon.

### **Who was consulted?**

- 1.9 The Council aimed to give all those who wish to comment on the SPD the opportunity to do so. The Council specifically consulted:
- Parish and Town Councils within West Devon
  - Statutory consultees
  - Development industry contacts
  - Other non-statutory groups
  - Neighbouring parishes outside of West Devon
  - Community contacts
  - Local interest groups
  - Local councillors

1.10 A full list of consultees is provided in Appendix 1.

### **How were they consulted?**

- 1.11 The Council notified people of the consultation by a range of means including:
- Direct mail/email
  - The Council's website at [www.westdevon.gov.uk](http://www.westdevon.gov.uk)
  - A press release in the Tavistock Times and Okehampton Times
- 1.12 Copies of the draft SPD and response forms were available to view at:
- WDBC Offices, Kilworthy Park, Tavistock, PL19 0BZ
  - WDBC Customer Service Centre, St James Street, Okehampton, EX20 1DH
  - On the Council's website
- 1.13 A summary of the consultation responses and the Council's comments about these are provided in Appendix 2.

## Appendix 1: List of Consultees

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### Town and Parish Councils

Beaworthy	Belstone	Bere Ferrers	Bondleigh
Bratton Clovelly	Brentor	Bridestowe	Broadwoodkelly
Buckland Monachorum	Burrator	Chagford	Dartmoor Forest
Drewsteignton	Exbourne and Jacobstowe	Germansweek	Gidleigh
Gulworthy	Hatherleigh	Highampton	Horrabridge
Iddesleigh	Inwardleigh	Kelly	Lamerton
Lewdown	Lifton	Lydford	Mary Tavy
Meeth	Milton Abbot	Monokehampton	Northlew
North Tawton	Okehampton	Okehampton Hamlets	Peter Tavy
Plasterdown	Sampford Courtenay	Sourton	South Tawton
Spreyton	Sticklepath	Stowford	Sydenham Damerel
Tavistock	Throwleigh		

### Statutory Consultees

British Gas	Cornwall Council	Dartmoor National Park Authority	Devon and Cornwall Constabulary
Devon County Council	English Heritage	Environment Agency	Exeter City Council
Highways Agency	Heart of the South West Local Enterprise Partnership	Homes and Communities Agency	Marine Management Organisation
Mid Devon District Council	Mobile Operators Association	Natural England	Network Rail
NHS Devon	Plymouth City Council	Secretary of State for Transport	South West Water
Teignbridge District Council	Torridge District Council	Wales and West Utilities	Western Power Distribution

## Notified Organisations

Active Devon	Age UK	Airport Operators Association	Barn Owl Trust
Bere Alston Action Group	British Chambers of Commerce	British Geological Survey	British Toilet Association
BT	Campaign to Protect Rural England (CPRE)	CAMRA	Canal and Rivers Trust
Care and Repair	Centre for Ecology and Hydrology	Chemical Business Association	Church Commissioners and Diocesan Board of Finance
Churches Together in Devon	Civil Aviation Authority	CLA	Commission for Rural Communities
Community Council of Devon	Cornwall and West Devon Mining Heritage World Heritage Site	Council of Devon County Agricultural Association	Creating Excellence
Crowndale Recreation Association	Crown Estate Office	Dartmoor Partnership Ltd	Dartmoor Preservation Association
Dartmoor Railway	Department of Communities and Local Government	Design Council CABE	Devon and Somerset Fire and Rescue Service
Devon Archaeological Society	Devon Countryside Access Forum	Devon Disability Network	Devon Early Years Development and Childcare Service
Devon Gardens Trust	Devon Heartlands	Devon Local Access Forum	Devon Playing Fields Association
Devon Racial Equality Council	Devon Rural Transport Partnership	Devon Wildlife Trust	Devon Youth Network
Disabled Persons Transport Advisory Committee	Eco-nomic Ltd	Equality and Human Rights Commission	Federation of Small Businesses
Forestry Commission	Friends of the Earth	Friends, Families and Travellers	Gypsy Council
Gypsy Traveller Liaison Service	Hatherleigh Community Centre	Hatherleigh Market Town	Homestart
Inland Waterways Association	MABRAKE	National Federation of Gypsy Liaison Groups	National Grid
OCRA	Officers of the Crowndale Recreation Association	Okehampton Argyle Football Club	Okehampton and District Chamber of Trade
Okehampton Medical Centre	Okehampton RFC	Planning Inspectorate	Play England – South West
RenewableUK	RSPB	Rural Innovation	South Devon and Dartmoor Community Safety Partnership

South West Ambulance Service Trust	South West Lakes Trust	South West Tourism	Sport England
Sustrans	Tamar Belle Heritage Group & Tamar Valley Tourism Association	Tamar Estuaries Consultative Forum	TAVI Development Forum
Tavistock Area Support Services	Tavistock BID	Tavistock Chamber of Commerce	Tavistock Community Sports Club
Tavistock Forward	Tavistock Hospital League of Friends	Tavistock Learning Community	Tavistock Rugby Club
Tavistock Taskforce	Tavistock Youth Cafe	The Gypsy Council	The National Trust
The Ramblers Association	The Senior Council for Devon	The Tavonians	The Theatres Trust
Transition Tavistock	United Reform Church South West Synod	West Devon Branch of Small Businesses	West Devon CVS
West Devon Children and Young People's Partnership	Women's National Commission	Woodland Trust	Yelverton Surgery
Young Devon	Tamar Valley AONB	Local Primary and Secondary Schools	

## Neighbouring Parishes

Black Torrington	Bow	Broadhempston	Broadwoodwidge
Buckland Filleigh	Calstock	Cheriton Bishop	Coldridge
Dolton	Dowland	Halwill	Hittisleigh
Huish	Landulph	Lawhitton	Lezant
Petrockstowe	Saltash	Sheepwash	St Dominic
St Giles on the Heath	Stoke Climsland	Winkleigh	Woodland
Zeal Monachorum			

## Appendix 2: Summary of Responses

### Where a Retail Impact Assessment is required

Rep number	Section	Comment	Council response	Changes required?
6, 18,28, 45	3a	Support.	The Council welcomes the support for this section.	N
30 (The Co-operative Group)	3a	The respondent considers that this section requires more clarity and suggests that the box below paragraph 3.4 needs better explanation on what the 'centre' is in terms of these definitions with regards to the definitions in the NPPF for Sequential Assessments.	<p>The Council notes the comments and considers that a footnote is needed to clarify the centre for the purposes of defining edge of centre locations.</p> <p>The Council proposes to insert the following footnote within the edge of centre description under paragraph 3.4 as follows:</p> <p><i>"The NPPF defines edge of centre locations as up to 300m from the Primary Shopping Area. The Councils current development plan (2005 Local Plan and 2011 Core Strategy) does not define Primary Shopping Areas. However, in both Okehampton and Tavistock, there are defined core shopping frontages. For the purposes of this SPD, where these frontages exist, these will constitute the "centre" for the purposes of measuring the distance to edge of centre locations (until superseded by subsequent amendments to the Proposals Map). In other areas of the Borough where there are no identified core shopping frontages, the centre should be regarded as the area where there is a concentration of key town centre uses."</i></p>	Y
30 (The Co-operative Group)	Policy Guidance Box 1	The respondent suggests that Policy Guidance Box 1 needs amended to read <i>"When assessing applications for retail development outside of town centres, which are not in accordance with an up-to-date Local Plan, local planning authorities should require an impact assessment over the threshold set by this SPD."</i>	<p>The Council notes the comments made and proposes to clarify paragraph 1.2 bullet point one as follows:</p> <ul style="list-style-type: none"> <li><i>"To provide clarity to the development industry in respect of applications for retail development which are not in accordance with an up-to-date Local Plan."</i></li> </ul> <p>Policy Guidance Box 1 applies to where Retail Impact Assessments (RIA) will be required and therefore it is considered that the wording is appropriate subject to the changes proposed in the footnote relating to paragraph 3.4 and the definition of edge of centre.</p>	Y

30 (The Co-operative Group)	3.3	The respondent considers that this list is not exhaustive enough and should also make reference to proposals to vary conditions and legal agreements (under Sections 73 106a) and the insertion of mezzanine floors.	<p>The Council notes the comments raised and proposes to clarify the scope of when and where RIAs will be required. It is considered most appropriate to do this after paragraph 3.1 as follows:</p> <p><i>“This SPD will apply to applications for retail units in relation to new build developments, change of use applications for A1 food and non-food use, and extensions and alterations to existing units e.g. the variation of conditions and legal agreements and the addition of mezzanine floors.”</i></p> <p>The Council also considers that the following text should be included to ensure the SPD is in line with the NPPF:</p> <p><i>“This SPD will not apply to applications for small scale rural offices, or other small scale rural development”.</i></p>	Y
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### When a Retail Impact Assessment is required

Rep number	Section	Comment	Council response	Changes required?
2, 5, 6, 18, 28, 30 (The Co-operative Group), 45	3b	Support.	The Council welcomes the support for this section.	N
44 (Mercian Developments Ltd), 46 (Marchfield Properties Ltd)	3.6	The respondents object as they do not accept the findings of the Town Centre and Retail Study 2012 and in particular consider that the Study has significantly underestimated the capacity for additional convenience floorspace in the Tavistock because of the errors the Study has made in its assessment.	<p>The Council notes the objection. The Study was carried out in accordance with government guidance on how to assess future leisure and retail needs. The Council is satisfied that the methodology used is robust and that the conclusions drawn have been based on sound evidence.</p> <p>The Council has confirmed its support of the study through the Position Statement.</p>	N
46 (Marchfield Properties Ltd)	3.6	Considers that the Retail Study does not provide any evidence to support the statement that new retail development is likely to have an impact on the town centre, because it did not	As per national policy, local planning authorities are able to set a local threshold given that there is a national requirement to test that there are no significant adverse effects of new retail proposals on existing town centres. As such, it is important that	N



		<p>assess impact of new out of town centre retail floorspace in Tavistock. It is therefore inaccurate to state that the evidence has shown that further out of centre retail floorspace will lead to significant adverse impacts on the town centre, as no such assessment has been undertaken in the Retail Study. An absence of capacity does not itself mean that significant adverse impacts will occur.</p>	<p>the Council takes steps to ensure that this can be achieved in practice and that the policy guidance is relevant to the local context.</p> <p>The SPD enables sufficient flexibility to discuss the scope and content of Retail Impact Assessments on a case by case basis.</p>	
<p>32 (Sainsburys Supermarkets Ltd) , 44 (Mercian Developments Ltd)</p>	<p>Policy Guidance Box 2</p>	<p>Respondents object to the threshold of 250 sq m for the following reasons:</p> <ul style="list-style-type: none"> <li>• note that it is significantly below the default threshold set out in the NPPF.</li> <li>• Consider that the draft SPD and Retail Study do not provide sufficient evidence to justify such a low threshold and without such necessary evidence, the threshold should be 2,500 sq m;</li> <li>• The respondent considers that requiring all retail development above 250 sq m to submit a RIA places an unreasonable burden on smaller retail development which could unnecessarily act as a deterrent to sustainable economic growth;</li> <li>• Proposals of such small scale will not give rise to impact concerns in either Okehampton or Tavistock; and</li> <li>• Suggest a more appropriate threshold would be 1,000 sq m</li> </ul>	<p>The Council notes the concerns raised by the respondent but considers that there is sufficient justification for the 250m<sup>2</sup> threshold. It is considered that this is adequately demonstrated within paragraphs 3.6 and 3.7 on the basis that:</p> <ul style="list-style-type: none"> <li>• Recent evidence in the Town Centre and Retail Study 2012 showed limited capacity for further retail development which suggests that additional retail units could have a greater impact on the town centres than if there was capacity for retail growth; and</li> <li>• The town centres have a unique offer as retail and tourist destinations and their future vitality and viability needs to be protected.</li> </ul>	<p>N</p>

## The criteria a Retail Impact Assessment should consider

Rep number	Section	Comment	Council response	Changes required?
6, 18, 45	All	Support.	The Council welcomes the support for this section.	N
2	All	Priority should be given to retail development on brownfield sites to provide local job opportunities.	The NPPF (para 17) and the Council's adopted Core Strategy (SP1) encourage the reuse of previously developed land. The SPD is clear in paragraph 1.5 that this guidance should be read alongside these higher tier policies. As such, the Council recommends no amendments to this comment as the issue is sufficiently covered in existing policy.	N
30 (The Co-operative Group)	Policy Guidance Box 3, Section B	The respondent is broadly supportive of the impact assessment requirements but suggests it would be appropriate to consider existing and future retail expenditure capacity levels in the local area. This is a useful material consideration when examining how much expenditure is available to support existing and proposed retail floorspace.	The Council notes the suggestion and considers that it would be appropriate to include reference to capacity levels as suggested. This formed a key part of the conclusions of the Town Centre and Retail Study as capacity can affect impact on the town centre. Therefore it is appropriate that RIAs take this into consideration.  It is proposed to include the following bullet point in Policy Guidance Box 3, Section B: <ul style="list-style-type: none"> <li>• <i>"A consideration of existing and future retail expenditure capacity levels in the local area"</i>.</li> </ul>	Y
30 (The Co-operative Group)	Policy Guidance Box 3, Section B	The respondent considers that the fourth bullet point is not clear and needs revising.	The Council proposes to amend the wording to reflect the respondent's suggestion. It is proposed to amend the final bullet point in Policy Guidance Box 3, Section B as follows: <ul style="list-style-type: none"> <li>• <i>"The proposed mix of convenience and comparison floorspace and how this will impact on the town centre"</i>.</li> </ul>	Y
30 (The Co-operative Group)	Policy Guidance Box 3, Section B	The respondent considers that the theme of financial impact on town centres needs to be better explained. Suggests that Box 3 should be clear that a financial impact assessment for all types of proposed retail floorspace should be provided. It should also be the requirement that impact assessments thoroughly assess the current and financial performance of town centres and assess in detail how trade diversion from the town centre will affect the	The Council notes the suggestion and proposes to include a new bullet point in Policy Guidance Box 3, Section C as follows: <ul style="list-style-type: none"> <li>• <i>"The impact of the proposal on the turnover of existing provision within the local area and the possible effects of trade diversion."</i></li> </ul>	Y

		viability of key retail sectors in the town centre as a whole.		
30 (The Co-operative Group)	Policy Guidance Box 3, Section B	The respondent questions the lack of reference to cumulative impact and suggests that this should be rectified. Recent developments, floorspace under construction and unimplemented permissions with the same town or over-lapping catchment areas with the proposed development, should be required to be included in cumulative assessments.	The Council notes the suggestion and proposes to include a new bullet point in Policy Guidance Box 3, Section C as follows: <ul style="list-style-type: none"> <li>“The impact of the proposal on other known commitments, taking into account the cumulative impact of retail developments in the local area.”</li> </ul>	Y
28	Policy Guidance Box 3, Section C	The respondent questions the logic in requiring an assessment of a supermarket application more than five years in the future.	This criterion is in line with the National Planning Policy Framework (paragraph 26). There is sufficient flexibility within the wording to ensure that this is only requested in exceptional circumstances.	N
28	Policy Guidance Box 3, Section D	The respondent objects to this section on the basis that the criteria go beyond the retail policy based implications of an application.	The Council notes the objections and considers that it may be more appropriate to remove bullet points 1, 2, 4 and 5 of Policy Guidance Box 3 section D, as they are sufficiently covered in higher tier policy and other validation requirements.  Bullets 3 and 6 should be moved to section C as these are considered to relate to direct impacts of the proposal and therefore should be considered as part of the RIA.  With regards to the community aspirations that have been identified through previous consultations, these will be taken into consideration by the Borough Council when considering applications in accordance with the approved Retail Position Statement (February 2013). This is clarified in paragraph 3.14 of the SPD.	Y
44 (Mercian Developments Ltd), 46 (Marchfield Properties Ltd)	3.11 Policy Guidance Box 3	Respondents consider the policy guidance should be omitted from the document as it is overly prescriptive and goes beyond the requirements of the NPPF. At most, reference should be made to the NPPF and to the consideration of factors set out in the accompanying Good Practice Guidance.  Any new guidance produced should be factual	The comments are noted. The Council considers that the majority of the guidance included in the draft version is necessary but taking into consideration these and other comments that have been made, some amendments will be made to Policy Guidance Box 3. The Council is mindful that should the Practice Guidance be revoked, there needs to be sufficient guidance in local policy to inform the content of Retail Impact Assessments. The Council does not consider that the SPD or the evidence base pre-judges a decision - their purpose is to set a planning framework in which	N

		and not influenced by broad subjective judgments that essentially pre-determine the Council's approach to future applications. Generalised and fundamentally misjudged statements on the likelihood of significant adverse impacts occurring are wholly inappropriate.	appropriate decisions can be made which are in line with the NPPF and contribute to the overarching aim of achieving sustainable development.	
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## Sequential Assessments

Rep number	Section	Comment	Council response	Changes required?
30 (The Co-operative Group)	3.12 and 3.13	<p>The respondent is disappointed that the SPD does not provide more guidance on the level of information that the Council wishes to see in relation to the sequential approach to site selection. Strongly recommend that the Council gives serious consideration to broadening the scope of the SPD or producing separate guidance in relation to the sequential approach. This additional information should include</p> <ul style="list-style-type: none"> <li>- The need to incorporate flexibility when assessing alternate sites;</li> <li>- The sequence of locations which should be followed; and</li> <li>- The need to assess the suitability, availability and viability of alternative sites.</li> </ul>	<p>The Council notes the comments made and agrees that section 3a and the Sequential Assessment could benefit from being merged and providing further guidance about what will be required.</p> <p>It is therefore proposed to replace paragraph 3.3 and 3.4 with the following:</p> <p><i>“3.3 National policy requires applications for retail development to demonstrate that the location of the proposal is as well related to the town centre as possible. This ‘sequential’ test is used with the aim of selecting a site for development that is appropriate and as closely related to the existing town centre as possible. Only if town centre sites are not available should other locations be considered.</i></p> <p><i>3.4 A Retail Impact Assessment should therefore be accompanied by a sequential assessment as required by the NPPF and Core Strategy Strategic Policy 12.</i></p> <p><i>3.5 Given this principle, it is understood that the further away from the town centre a retail proposal is, the more impact it is potentially likely to have on the town centre. As such, the Council will require Retail Impact Assessments to be provided in edge of</i></p>	Y

			<p><i>centre, out of centre and out of town locations. The following definitions are provided, as advised by the Town Centre and Retail Study 2012.”</i></p> <p>Delete paragraphs 3.12 and 3.13.</p>	
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## Dealing with applications

Rep number	Section	Comment	Council response	Changes required?
30 (The Co-operative Group)	3.14 and 3.15	The respondent suggests that reference is made in this section for the need to active pre-submission scoping of Retail Assessments in order that ample opportunity is provided to both the Council and the applicant to ensure that all relevant issues are included within the Retail Assessment prior to submission.	The Council notes the suggestion but feels that this is sufficiently covered in paragraph 3.1. However, it is considered that alongside other changes that have been suggested, it may be more appropriate to move paragraphs 3.14 and 3.15 and insert them after paragraph 3.1.	Y

## General

Rep number	Section	Comment	Council response	Changes required?
5	All	The respondent is objecting to the further development of out of town retail sites, particularly on greenfield land.	<p>The Council notes this comment. However, the consultation does not relate to specific development proposals.</p> <p>Any application for out of town retail development will be considered on its own merits in accordance with the NPPF, Core Strategy and this SPD.</p> <p>The Council does not propose to make any changes to the SPD based on these comments.</p>	N
9	All	The respondent is concerned that new supermarket on the Thompson site will 'rip the	These comments do not relate directly to the contents of the SPD but to the application for a new Tesco store in Okehampton. The	N

		heart and soul' out of the shopping area of Okehampton and suggests that the rates collected from a new supermarket could be used to offset the loss to the smaller businesses in the town. The respondent also suggests that a reduction in business rates for small businesses could be introduced for the first three years of the supermarket opening.	respondent has been contacted and advised to send his comments to Development Management to be considered as part of the application process.	
10	All	The respondent is concerned that more retail development on Plymouth Road would exacerbate traffic problems in the area.	These comments do not relate directly to the contents of the SPD.	N
11, 35	All	The centre of Tavistock should be kept thriving by expanding retail in the town centre and not on the outskirts.	These comments reflect the intention of the SPD which is to ensure applications for retail development outside of the town centre demonstrate their impact on the town centre.	N
19 (WM Morrison Supermarkets PLC)	All	The respondent raises concerns that the SPD is overly prescriptive, complex and does not allow sufficient flexibility. This will place undue additional risk on delivering new retail development and threaten potential new investment, regeneration and job creation.	The Council notes the concerns, however considers it important to balance the positive effects of new retail proposals with the continued viability and vitality of our town centres. This is in line with the NPPF.	N
21 (English Heritage)	All	In relation to Policy Guidance Box 3, section D, the respondent (English Heritage) has provided detailed comments on the design of new retail developments and their impact on the historic areas of Tavistock and Okehampton. In particular, this relates to protecting the historical, architectural and archaeological significance of sites in relation to applications for retail developments. This includes attention to appropriate urban design, scale, massing, local character, layout, materials, historic street patterns and flexibility for future needs. For new retail schemes in existing buildings, a site analysis should be undertaken, the significance of the building should be researched and the architectural and historic integrity of the building should be preserved.	The Council notes the comprehensive comments provided. However, as per other objections raised, the Council proposes to remove bullet points 1, 2, 4 and 5 of Policy Guidance Box 3, Section D as they are sufficiently covered in higher tier policy and other validation requirements.  The additional suggestions provided are currently addressed in higher tier policy and it is not relevant to include this level of detail in the SPD.	N

22 (Devon and Cornwall Police)	All	The respondent suggests that consideration should be given to the impact of new development or change of use on community safety.	The suggestion is currently addressed in higher tier policy and it is not relevant to include this level of detail in the SPD.	N
51	All	The respondent objects to retail development on greenfield sites.	The Council notes this comment. However, the consultation does not relate to specific development proposals.	N
44 (Mercian Developments Ltd)	1.2 second bullet point	The respondent considers that any reference to consideration of impact should adopt the test of the NPPF in paragraph 27, namely “a proposal should not have a significant adverse impact”. The SPD should be amended to make reference to this as the impact test.	The Council notes the comments and considers it is appropriate to amend the bullet point as follows:  <i>“to enable retail schemes to progress where there is no significant adverse impact on the town centre.”</i>	Y
30 (The Co-operative Group)	1.4	The respondent considers that it is appropriate for the SPD to apply to the whole of the Borough.	The Council welcomes the support for the scope of the document.	N
44 (Mercian Developments Ltd)	2.2 and 2.3	The respondent considers that the summary of the guidance of the NPPF fails to make sufficient reference to the paragraphs 24 – 27 of the NPPF. That guidance sets tests against which edge-of-centre and out-of-centre proposals should be judged. Suggests that the SPD should refer to this guidance as it is at the core of assessing new retail proposals.	The Council notes the suggestions and considers it appropriate to include additional information in paragraph 2.2 as follows: <ul style="list-style-type: none"> <li>• <i>“Sequential tests to planning applications for main town centre uses should be applied where they are not in an existing centre and are not in accordance with an up-to-date Local Plan.</i></li> <li>• <i>Only if suitable sites are not available for main town centre uses in town centres, should edge of centre and out of centre sites be considered;</i></li> <li>• <i>When assessing applications for retail, leisure and office development outside of town centres, which are not in accordance with an up-to-date Local Plan, the local authority should require an impact assessment of the development where it is over a proportionate, locally set floorspace threshold.</i></li> <li>• <i>Should an application fail to satisfy the sequential test or is likely to have a significant adverse impact on the town centre, it should be refused.</i></li> </ul>	Y
44 (Mercian Developments)	2.8	Welcome the acknowledgement that in addition to the 2012 Retail Study, the Council	The Council notes the comments and will consider community views at the time any such application is made.	N

Ltd)		will have regard to the views expressed in the public consultation which revealed considerable support for a new foodstore in Tavistock and this is to be welcomed. Greater weight should be accorded to those views than the flawed views of the Retail Study.		
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