

Local Plan Review 2020-40 – Part 1



PlanTeignbridge

LOCAL PLAN REVIEW 2020-2040

Statement of Consultation

March 2020

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Part 1

1.0 Introduction

1.1 This Consultation Statement has been prepared to meet the requirements of Regulation 22 (1) (c) of the Town and Country Planning (Local Planning) (England) Regulations 2012 and to show conformity with the Council's Statement of Community Involvement adopted in June 2019. The Consultation Statement is submitted alongside the Draft Teignbridge Local Plan 2020-2040 Part 1.

1.2 This Consultation Statement sets out:

Part 1

- Early Engagement Activity
- Representations made pursuant to Regulation 18 including:
 - What we consulted on
 - How we consulted
 - Who we consulted
 - How representations have been taken into account (Part 2 of the Statement).
- Engagement following Regulation 18 Consultation
 - Planning Cafes
 - Officer Workshops
 - Local Plan Working Group

Part 2

- How representations have been taken into account

2.0 Early Engagement Activity

2.1 In order to be as best informed about how the current adopted Local Plan 2013-2033 has worked in practice and, how it has helped to meet other corporate objectives, an internal review was been undertaken in Spring/Summer 2017. This took the form of meetings between various members of the Spatial Planning team and other services of the council. The meetings gave an opportunity for an open and honest conversation about the successes and limitations of the existing Plan and have highlighted areas for improvement.

2.2 The exercise involved meetings with the following specialisms:-

- Development Management, including Major Projects team
- Biodiversity
- Conservation and Heritage, including Archaeology
- Trees
- Landscape
- Urban Design
- Housing
- Economy
- Town Centres
- Green Spaces and Active Leisure including Parks/Open Space
- Environmental Health
- Neighbourhood Planning
- Custom and Self Build
- Flooding, Drainage and Estuaries
- Finance
- Community Safety
- Legal
- Spatial Planning and Delivery

2.3 It is worth noting that, with regard to the Teignbridge Ten Super Projects set out in the Council's 10 year Strategy, meetings were held with the Lead Officers of the following:-

- A roof over our heads
- Going to town
- Great places to live & work
- Health at the heart
- Out and about and active
- Zero heroes
- Moving up a gear

2.4 The overall feedback on the Local Plan 2013-2033 was very good. The fact that the Council has an up-to-date and NPPF compliant Plan was highly praised /welcomed and, it was clear that this has helped to achieve the Council's objectives, particularly from the implementation of the Plan through Development Management decisions based on robust policies.

2.5 The overall length and structure of the Plan was considered about right and the policies, on the whole, to be well written, clear and easily understandable. The balance of policies and content were also considered to be good.

2.6 The feedback received highlighted that, whilst performing well and, with the exception of minor tweaks to policy wording, there were some common areas where the Local Plan Review could achieve improvements. It also highlighted some areas of work that would have resource implications, whether that be financial, timing or staffing.

2.7 In addition to internal consultations, the following consultation was undertaken with Neighbourhood Planning Groups and Members of the Council.

- Adopted Neighbourhood Plan Groups, February 2018 (Abbotskerswell, Bishopsteignton and Exminster attended)
- Internal Services Briefing, 14 March 2018 (Estates, Environmental Health, Cleansing & Markets, Housing, Development Management, Leisure, Community Safety and Finance attended)
- Members' Briefing Session, 24 March 2018 (11 attendees)
- Gypsy and Traveller Forum, 24 March 2018
- Overview and Scrutiny Committee, 9 April 2018 (24 attendees).
- Town Council, Parish Council and Neighbourhood Planning Groups Workshops, 10 April 2018 and 11 April 2018
- Executive Committee 1 May 2018

3.0 Representations made pursuant to Regulation 18

3.1 What we consulted on

3.2 The Local Plan Review 2020-2040 Issues Papers were published for public consultation on 21 May 2018 under *Regulation 18 of the Town and Country Planning (Local Planning)(England) Regulations 2012*. The public consultation period exceeded the minimum 6 week requirement, running for 8 weeks between 21 May 2018 and 16 July 2018. The papers included:

- **Local Plan Review Issues Paper** - set the scene of the main issues facing the district now and up to 2040 to generate discussion and debate. The paper was divided into topics and contained specific questions for comment. Topics includes: homes, jobs & prosperity, town centres, environmental stewardship, climate change & energy and, communication, movement & infrastructure.
- **Settlement Boundary Review** – a desktop review of existing settlement boundaries, based on a methodology and using a combination of aerial photos and planning applications to ascertain changes in land use since the last review of the settlement boundaries, approximately 20 years ago.
- **Settlement Hierarchy Review** – a review of services within settlements. Parish and Town councils were asked to complete a settlement facilities survey, which was supplemented through online research, to produce a set of definitions of role and function of urban area/towns/main villages/defined villages.
- **Statement of Community Involvement** – sets out what consultation will take place with the community on planning policy documents and planning applications. The Statement of Community Involvement was adopted by the Council in June 2019.
- **SA/SEA scoping**
 - Sustainability Appraisal required by Planning and Compulsory Purchase Act 2004, and updated by the Planning Act 2008)
 - Strategic Environmental Assessment required by European Directive and Environmental Assessment of Plans and Programmes 2004
- **HRA screening** – HRA not required as no policies or allocations were proposed

3.3 The Consultation also included a Call for Sites, inviting landowners to submit details of their land that would be available for development.

3.4 How we Consulted

- **Hard copies** of the above papers and questionnaires were available for inspection at Teignbridge District Council Forde House offices and at all libraries (Newton Abbot, Dawlish, Chudleigh, Kingsteignton, Kingskerswell, Teignmouth, Bovey Tracey and Devon Mobile Library).
- **Dedicated Webpages** on the Council's website
 - Downloadable copies of all documents
 - online questionnaire
 - Roadshow exhibition boards
 - FAQs
 - Call for Sites form
- **Social Media**
 - 22 Facebook posts (21, 23, 29, 31 May 2018, 1, 4, 6, 7, 11, 13, 15, 19, 21, 22, 26, 27, 28 June 2018 and 6, 11 July 2018)
 - 19 Tweets (23, 24 May 2018, 1, 4, 5, 6, 7, 11, 13, 15, 18, 19, 21, 26, 27, 28 June 2018 and 6, 9, 10, 11 July 2018)
 - Facebook post and/or Tweet prior to each roadshow
- **Media**
 - Online and printed press 7 times:-
 - Mid Devon Advertiser - 27 May 2018 & 8 June 2018
 - Herald Express - 27 June 2018
 - Devon Live - 3 May 2018, 24 May 2018, 21 June 2018
 - The Breeze website- 5 June 2018

- **Eleven Consultation Roadshows**

Consultation roadshows were held where people were able to view exhibition boards, discuss issues, get hard copies of the documents, comments cards and contact details.

- Newton Abbot – Old Forde House and Highweek
- Kingskerswell
- Kingsteignton
- Teignmouth
- Dawlish
- Chudleigh
- BoveyTracey
- Exminster
- Ipplepen
- Tedburn St Mary

- **Posters**

Posters were produced to advertise the consultation Roadshows. Town and Parish Councils were contacted and asked to display these posters. This letter can be found at **Appendix 1**.

In total, 851 people visited the consultation roadshows and, 123 comment cards and 144 Formal Responses were received.

3.5 Who we Consulted

3.6 The Council maintains a database of all individual persons and organisations who have expressed an interest to be kept informed of consultations by the Council on planning policy documents. These persons and organisations were all notified of the consultation by letter or email. All statutory consultees (including town and parish councils), district councillors and adjacent parish councils were also notified. The Consultation Letter is included at **Appendix 2**.

There was targeted engagement with:-

- Teignbridge Affordable Housing Partnership

- Neighbourhood Planning Groups (3 of 5 attended)
- Town and Parish Councils
- Members
- Internal departments
- Gypsy & Traveller forum
- Teignbridge Association of Local Councils

A list of all people notified is attached at **Appendix 3**.

3.7 How the Responses received have influenced the Draft Local Plan

3.8 The table contained in Part 2 of this Consultation Statement sets out how comments have informed the preparation of the Draft Local Plan 2020-2040.

4.0 Engagement Following Regulation 18 Consultation

4.1 Planning Cafes

4.2 Following on from the Regulation 18 public consultation, a series of six Planning Cafes were held to engage with Town and Parish Councils and Members. The Planning Cafes were held in March, July and September and each time were duplicated at both Newton Abbot and Exminster/Kenton. The sessions took the form of presentations and workshops and included the following topics:

- Making sense of our plans
- Housing number
- Teignplanning (Teignbridge Neighbourhood |Planning Consultancy)
- Consultation comments – you said...we're doing
- Understanding the planning application process and how your comments can help
- Custom and Self Build in Teignbridge - Past, Present and Future

- Update on our current projects
- Housing Exception Sites
- Valuing our Landscape
- Tackling climate change through planning
- Town Centres
- Achieving good design

4.3 The planning cafes were well attended and good feedback on the sessions was received. The workshop sessions helped to inform the drafting of the policies of the Local Plan 2020-2040 Part 1.

4.4 Officer Workshops

4.5 Following the initial drafting of the Local Plan 2020-2040 Part 1, further internal consultation was undertaken. These workshop sessions examined the detail and wording of policies and resulted in many changes to the initial draft version of policies.

4.5 Meetings have taken place with:

- Development Management
- Housing
- Environmental Health
- Ecology
- Green Infrastructure/Leisure
- Landscape
- Heritage
- Community safety
- Economic Development
- Estates
- Devon Building Control Partnership
- Devon County Council
- Greater Exeter Strategic Plan team

4.6 There has also been liaison with Action for Climate in Teignbridge (ACT) in relation to the climate change and energy chapter of the Plan, due to the lack of in-house expertise.

4.7 Local Plan Working Group

4.8 A series of Member Local Plan Working Groups have been held. Membership of the Group has comprised of 9 councillors as follows (with deputies permitted if necessary):

- Portfolio Holder for Planning
- Portfolio Holder for Housing and Climate Change
- Chair of Planning Committee
- Vice Chair of Planning Committee
- Chair of Overview and Scrutiny
- 4 other Members nominated by the council's political groups to bring the Working Group into political proportionality overall

4.9 The meetings have been an open forum for all District Councillors to attend if they wish and all Members have been notified when meetings are held. However, the 9 named Members have been the primary advisors.

4.10 The purpose of the Local Plan Working Group has been to provide cross-party Councillor involvement in the preparation of the Local Plan. It has acted in the capacity of an informal 'sounding board', giving opinions, advice and guidance to officers to progress the draft Local Plan. Meetings were held on 21 October 2019, 28 November 2019, 19 December 2019, 13 January 2020 and 5 February 2020. The entire draft Local Plan was discussed at these sessions and numerous changes have been made as a result. Notes of each session were made available to the Working Group at the following to session to ensure that the main points had been understood and taken on board.

5.0 Part 2

.1 How the Responses received have influenced the Draft Local Plan

4.2 The table below sets out how comments received during the Regulation 18 Consultation have informed the preparation of the Draft Local Plan 2020-2040.

	Q1. How can the Council best ensure that Neighbourhood Plans are reflected through the Local Plan Review?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
Homes	164, 408 410, 190 288, 359 365, 368 399, 405 406, 411 415, 375 419, 401 153, 192 387	<p>The Review should take account of policies and proposals in emerging and adopted neighbourhood plans, specific reference made to:</p> <ul style="list-style-type: none"> • Cross-referencing NP policy with those of the Local Plan • Including latest version of NP's into the Local Plan, including commonly supported policies • Referencing NP policy in the Review and ensure it is a material consideration in decision-making and plan-making • Feature each adopted NP individually in planning issues • Establishing key aims and ambitions/concerns for each plan area • Rely on NP's to deliver housing with a local plan fall back policy if they fail to progress 	<p>Draft Local Plan Policy SP4: Neighbourhood Plans contains encouragement for the preparation of Neighbourhood Plans and sets out how emerging Neighbourhood Plans will also be given weight, depending on the extent of unresolved objections.</p> <p>Adopted neighbourhood plans are development plan documents and hold the same weight in the determination of planning applications as the current local plan. Therefore all currently adopted neighbourhood plan policies are material considerations in decision-making and plan-making.</p> <p>The Council's neighbourhood planning officer works closely with communities preparing neighbourhood plans and this work will inform the preparation of the LPR and aims to reflect communities key aims, ambitions and concerns.</p>

		<ul style="list-style-type: none"> Identify a minimum housing requirement for NP areas Ensuring the sustainability of NP areas is improved Allow time for NP's to be submitted before the Review is finalised 	<p>NP's will have the opportunity to identify and allocate for development in their plans, including for housing. These allocations will be reflected within the LPR where they are sustainable, deliverable, developable and viable. NP areas do not cover the entire district and there is no statutory requirement to undertake these plans or timescales in which they should be completed. The Council are required to plan for the development in which its residents require and relying on NDP's to deliver the entire housing requirement would not deliver the fully identified objectively assessed housing need (OAN). Therefore it is not possible to rely solely on neighbourhoods to deliver the local plan's housing requirement or to delay the LP{R until all current NDP's are completed.</p> <p>Any neighbourhood plan area wishing to allocate for residential development can request a minimum housing requirement for their area after the publication of the strategic housing distribution in the Greater Exeter Strategic Plan (GESP).</p> <p>Various references have been made throughout the Draft Local Plan (Part 1) to any specific requirements within adopted neighbourhood plans (e.g. SP2 Settlement Limits and the Countryside; CC6 Renewable and Local Carbon Energy; DW1 Quality Development; EN4 Landscape). The Local Plan (Part 2) will also reflect specific neighbourhood plan policies/ambitions within site specific allocations or policies.</p>
195 396 162	Clarification sought on:	<ul style="list-style-type: none"> Whether the Review will reflect all made NP's or just those which are up-to-date 	All Made NDP's are currently considered up-to-date and they will be reflected in the LPR wherever possible.

		<ul style="list-style-type: none">• How a NP can stand in general conformity with GESP considering its consultation is scheduled for 2020• Examples on where NP's have influenced the local plan	<p>A currently adopted or emerging neighbourhood plan has no statutory requirement to stand in conformity with GESP as it is still at very early stages of its preparation. The GESP is a strategic document which will provide the strategic direction for growth and infrastructure across four local authority areas once adopted.</p> <p>Various references have been made throughout the Draft Local Plan (Part 1) to any specific requirements within adopted neighbourhood plans (e.g. SP2 Settlement Limits and the Countryside; CC6 Renewable and Local Carbon Energy; DW1 Quality Development; EN4 Landscape). The Local Plan (Part 2) will also reflect specific neighbourhood plan policies/ambitions within site specific allocations or policies.</p>
359, 195 210, 359 378, 384 413, 408 410, 385 185, 289 192, 178 417	<p>The Review should:</p> <ul style="list-style-type: none">• Not agree any areas outside of NP's• Provide basis to encourage NP groups to consider allocating suitable small housing sites• Address the strategic needs of a neighbourhood area when not addressed in a NP• Reflect NP boundaries through local plan expansion areas• Reiterate importance of NDP's in providing a local context on planning issues• Comply with the policies set out in NDP's• Ensure support for NDP's to be reviewed quickly should other guidance and policy change	<p>All communities in the district are encouraged and supported to produce neighbourhood plans for their own areas, which includes the allocation of housing sites. Central government provides additional technical support and funding to further assist communities wishing to allocate for housing.</p> <p>All current neighbourhood plan area boundaries follow current Parish boundaries and all settlement boundaries currently reflect the existing settlement boundary in the adopted local plan. Parish boundaries are not amended through a local plan and settlement boundaries are currently being revised in consultation with communities, including neighbourhood plan groups. Revised settlement limits will be consulted on alongside the Draft Local Plan (Part 1) consultation.</p>	

		<ul style="list-style-type: none"> • Provide full, strong justification, strongly based in evidence for deviation from provisions of an NDP and as to why there is no altering of details in the local plan review • continue to encourage and work with NDP groups and constructively support their emerging plans • clearly set out the relationship between NDP's and the Review and accord with national policy and guidance • conduct a display in each parish on a Saturday • Include local green spaces, village greens and Protected Coastal Area 	<p>The Council's neighbourhood planning officer provides full time support to communities preparing neighbourhood plans including those wishing to review their already adopted NP's. In addition central government provide funding for communities groups wishing to undertake a review of their adopted NPs.</p> <p>Whilst community engagement and information sharing is of the utmost importance in the preparation of the LPR, undertaking a display on a Saturday for each of the 25 parishes (in the planning area) would be a disproportionate use of Council resources and officer time. This would also significantly delay the production of the LPR.</p>
	195	Neighbourhood Plans should be kept up to date and any changes in both strategic and national policy should be responded to in order for policies to remain relevant	NPs are voluntary and whilst the Council encourages neighbourhood plan groups to keep their adopted NPs under review, this cannot be a requirement.
	210, 176 186, 192 213, 212	No requirement for the Local Plan review to reflect the content of made or emerging Neighbourhood plans and will likely require full or partial reviews themselves to ensure conformity with the local plan review and GESP	Various references have been made throughout the Draft Local Plan (Part 1) to any specific requirements within adopted neighbourhood plans (e.g. SP2 Settlement Limits and the Countryside; CC6 Renewable and Local Carbon Energy; DW1 Quality Development; EN4 Landscape). The Local Plan (Part 2) will also reflect specific neighbourhood plan policies/ambitions within site specific allocations or policies. However, if neighbourhood plans wish to ensure ongoing conformity with the Local Plan or GESP then neighbourhood planning groups will need to keep their neighbourhood plans under review.
	176, 186 187, 188	Neighbourhood plans should:	

	208, 179 383, 212 213, 359 381, 162	<ul style="list-style-type: none"> • Not act as a constraint on land allocations in emerging plans • Not be used to add additional onerous policy burdens which may impact on viability, infrastructure and housing delivery • Be reviewed immediately to reflect emergence of new local plan policy • Stand ancillary and complementary to an up to date local plan • support the strategic development needs set out in the Local Plan and plan positively to support local development • ensure any additions are clearly identified and are referred back to parish/town councils for review and consultation • be given an alternative vision to enable the community to have a shared vision for the future of their village without getting into the detail of identifying sites and determining housing needs • be consulted more to ensure strategic policies do not erode local wishes expressed through these plans 	<p>Neighbourhood plans have statutory weight in the planning system and if policies which have viability, infrastructure, land allocation or housing delivery implications are successfully examined and adopted then they will be material considerations in the determination of a planning application. However, neighbourhood plans can only amend non-strategic policies of the Local Plan which should limit any conflict. The LPA will also comment on the plan during its various stages of preparation and inform the examiner of any concerns relating to their impact on the delivery of Local Plan objectives and allocations.</p> <p>Neighbourhood plans do not have to include allocations or address any specific policy areas.</p>
	417, 370 380, 366 413	Neighbourhood plans which reflect the views/ambitions of local communities should take precedence and not be overridden by higher order plans such as the local plan or GESP	<p>The relationship of NPs to higher order plans such as the local plan and GESP is clearly established through legislation and national policy. The Neighbourhood Planning Regulations 2012 (and subsequent amendments) state:</p> <p><i>“priority will be given to the most recently adopted document or the neighbourhood plan where all of the following apply:</i></p>

			<p>i) <i>The Local planning authority has a demonstrated housing land supply under 5 years but above 3 years; and</i></p> <p>ii) <i>District-wide housing delivery was at least 45% of that required over the previous 3 years; and</i></p> <p>iii) <i>The neighbourhood plan was made within the last 2 years; and</i></p> <p>iv) <i>The neighbourhood plan allocates for housing.”</i></p>
192, 377 380, 390 391, 396 198, 360 373, 413 397, 198 288, 363 368, 385 402, 287 355, 364 369, 413 357, 365	Through extensive pro-active consultation/communication/support with Parish/Town Councils, NP groups and local people including:	<ul style="list-style-type: none"> • providing clear, concise details of housing targets in each settlement (or indicative if not possible) in line with NPPF • encouraging pro-development attitudes in suitable settlements • provide help and guidance to prevent undue delays or issues with NP or Local Plan progress • Regular and public updates from the start • Encouraging more neighbourhood watch to pass on information • Engage with and take notice of local residents ideas/views/wishes/feelings • Ensuring consultation is transparent • Ensure consequential amendments to NP's are properly consulted on locally • Advise applicants of NP policy and how it relates to their application and ensure they are applied in the consideration of applications 	<p>Any neighbourhood plan area wishing to allocate for residential development can request a minimum housing requirement for their area after the publication of the strategic housing distribution in the Greater Exeter Strategic Plan (GESP).</p> <p>Consultation is undertaken in line with statutory requirements established through the Local Plan Regulations 2012 and the provisions of the adopted Statement of Community Involvement.</p> <p>Consequential amendments to neighbourhood plans require consultation if a minor change is proposed but full examination and referendum if a significant amendment is to be included. Either a minor or significant change to an adopted NP will require consultation with the local community.</p> <p>All pre-application enquiries will include reference to relevant neighbourhood plan policies which are material to the application at hand and must be applied as material considerations in the determination of planning applications.</p>

		<ul style="list-style-type: none"> • Sending all council tax payers a survey to gauge their opinions • Closely involving Parish/Town Councils in the Review process • Providing landowner details of sites submitted as part of GESP and Review • Publishing and posting plans to each household to ensure no one misses a consultation deadline • Don't rely on generic advice from larger corporations • Publicising consultation on social media and newspapers with all locals invited to attend • Listen to minority views with as much attention as the majority, particularly the younger generation 	<p>The draft Local Plan and GESP site allocations will be directly informed by the Housing Economic Land Availability Assessment (HELAA) which catalogues and assesses submitted sites across the district for their developability and deliverability. The details of the results of the HELAA process for GESP and the draft Local Plan are scheduled for publication in late 2020.</p> <p>The publishing and posting of hard copy plans to each household would be a disproportionate use of council resources. The Council must carefully balance the most efficient use of resources within a limited budget with its commitment to be transparent and ensure our communities are informed and involved. To ensure our communities have the access to development proposals and the plans and policies on which their determination is based, the council ensures these are available and accessible on our website as well as hard copies being available to view on request at the Council Offices.</p>
	287	Ensure business have valid input from the start	Each individual neighbourhood planning group is responsible for their community engagement on the plan. However, there are statutory requirements for consultation established through the Local Plan Regulations 2012 and the provisions of the adopted Statement of Community Involvement.
	365	<p>Concerns raised over the impact of GESP on adopted and emerging NP's including:</p> <ul style="list-style-type: none"> • Uncertainty raised may put off communities preparing a NP 	The Council's Neighbourhood Planning officer will be able to advise individual groups thinking of preparing a neighbourhood plan about the relationship with other plans and how their own plan may or may not be affected by them. In most cases, neighbourhood plans deal with non strategic issues and can therefore be prepared to address

			much more local details than the GESP or Local Plan will influence.
	206, 207	Concerns raised over the lack of a Kingskerswell NP	Whilst the planning authority considers the production of neighbourhood plans a very useful mechanism to engage local communities in planning for their area, it is a voluntary process which can only be instigated by a Parish Council (where one exists). It is for the local community of Kingskerswell to lobby their Parish Council to undertake a neighbourhood plan if they wish to.
	399, 405 406, 415 411, 407 392, 417 217	<p>The role of District and County Councillors is addressed including:</p> <ul style="list-style-type: none"> • Councillors reflecting the views of voters and reflect the objectives and policies in adopted NP's, even if they stand against other higher policies • Present to the Council views express through NP's rather than those of political parties or central government • Planning committee sticking to what has been decided on planning applications • Adopt the cooperate agreement of parishioners • Through Councillor organised workshops 	This is a matter for individual District and County Councillors to respond to rather than anything the Local Plan can influence. Once adopted, Neighbourhood Plans form part of the Development Plan for the District and have equal weight to the Local Plan. Through the process of preparing a neighbourhood plan, the Council will work closely with the neighbourhood planning group to ensure that the plans are in conformity with one another and as such there should be limited scope for conflict at the planning application stage.
	381	NDP process may not be suitable for small settlements (such as Doddyscombsleigh) and can be divisive	It is appreciated that NPs may not be suitable for all settlements however the Council would encourage all interested parishes in the district to discuss the support and resources available to them to aid in the production of a NP for their Parish.
	287	The plan will benefit everyone so need to focus on what the plan will bring for you-the people rather than long documents no one will read	The Local Plan is a technical document which has to be sufficiently long to address all relevant planning issues and provide clarity to those submitting planning applications. However, it is appreciated that there are lengthy and often

			confusing and as such we will publish a summary/plain English document alongside the Draft Local Plan during the consultation.
	365	A potential conflict between TDC and communities for example Ide NDP's promotion of land at the A30 (based on evidence of community wishes and environmental value of the land) could be overridden by a potential park and ride- the NDP should be given significant weight if this decision is debated. The Council overriding a NDP policy would significantly undermine the NDP process by discouraging communities planning for a future NDP and undermine the Councils reputation.	There are some instances where neighbourhood plan ambitions conflict with higher level strategic policies, allocations or objectives. In such circumstances, the Council will work with the neighbourhood planning group to discuss the conflict and seek opportunities for this conflict to be minimised. Neighbourhood plans have statutory weight in the planning system and therefore, once adopted, will be material considerations in the determination of a planning application. As such, neighbourhood planning groups should not be discouraged from preparing NDPs as they can still have a significant influence on the planning issues that affect their area.
	192	The Review doesn't provide any onus on Neighbourhood planning being a mechanism to deliver growth	Neighbourhood plans do not have to include allocations, make provision for growth, or address any specific policy areas.
	413	Difficult for neighbourhood plans to be updated should local or national policy change to dictate something different	Neighbourhood plans in general tend to focus on non strategic issues which are not always affected by changes in local or national policy. However, there are statutory review mechanisms in place for neighbourhood plans should groups wish to update them.
	396	Wording of completed NPs are a waste of time and money if they are to be superseded by any later Local plan or GESP	The Local Plan or GESP cannot suspend NPs as they have statutory weight in the decision making process as defined by national legislation.
	375	Appropriate Executive holders and TDC officers must attend local council meetings to listen to and seek to address any expressed conflicts between NDP's and the local plan which would encourage debate and enhance transparency.	The Council's Neighbourhood Planning officer will seek to attend any meetings to which they are asked to come to where particular issues are to be discussed. Neighbourhood Planning Groups can also request their

			Ward Members or members of the Executive to also attend if they wish to.
	153	Dartmoor National Park Authority provides a protocol for NP's which straddle the national park boundary which aims to provide certainty around what they can expect in working with DNPA and TDC.	This is an agreed joint working protocol between DNPA and TDC which directly informs the relationship between the two authorities and Neighbourhood plans. This protocol will remain in place during the Local Plan review preparations.
Homes	Q2. Do you agree that the Local Plan Review should focus on allocating for small to medium sites to encourage smaller builders and increase housing delivery?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	164, 288 357, 360 362, 367 384, 403 412	Agree, the Review should focus on allocation of small to medium sites	This will be addressed through the draft Local Plan (Part 2).
	391, 287	Don't agree that the review should focus on allocation of small to medium sites	This will be addressed through the Local Plan (Part 2).
	179/383 203/287 391	Disagree/objection to small-medium site focus because: <ul style="list-style-type: none"> • Infill and Brownfield sites already provide opportunities for sites of this size • Small-scale development should be welcomed on an ad-hoc basis whilst strategic housing growth continues to be allocated to major sites • plan must include strategic development options in line with the 2017 White paper- "fixing our broken housing market" • cannot be the focus if it is to meet its identified need • the approach would slow delivery and not speed it up 	Infill and brownfield development opportunities will be identified and explored through an urban capacity assessment with allocations focused on these sites where possible. However this is unlikely to meet the overall housing requirement the district must meet. Rural Exception Sites to meet local affordable housing need on unallocated sites is supported through national policy and revised policies are included in the Draft Local Plan (Part 1) (see policies H6 and H7). The Draft Local Plan (Part 1) is also consulting on a Local Needs Housing in Rural Areas policy (H8) which proposes to provide opportunities for self and custom builders to develop on small sites on the edge of rural villages where they have a local connection to the village.

		<ul style="list-style-type: none"> • Smaller house builders are extremely volatile and unpredictable in their delivery • Build and labour costs are substantially more • No conformity to standard house types and efficiency in build process • Lower build rate than a PLC builder • Increased uncertainty in financing • Forces a LPA to allocate countless small sites regardless of their deliverability or sustainability to accommodate this requirement • Unable to offer on-site infrastructure and affordable housing to meet requirements • Larger builders can construct homes very fast and enable the establishment of large estates in a short space of time. • Small contractor industry capacity is not great 	<p>National policy now requires 10% of the local plans housing requirement to be identified on sites of 1ha or less. Strategic development options will be explored through the Local Plan (Part 2) and GESP which will form part of the overall mix of small, medium and strategic sites to meet the needs of the District.</p> <p>A range in the mix of site sizes and locations is considered necessary to speed up housing delivery and provide a greater choice and range in product choice.</p> <p>All site allocations regardless of their size are required to pass the test of soundness as part of the examination of the Local Plan which includes sites being deliverable and the most sustainable option when compared against the reasonable alternatives.</p>
162, 176 185, 210 418, 369 375, 380 382, 390 392, 395 396, 398 413, 209 217, 399 405, 406 411, 415	Agree because:	<ul style="list-style-type: none"> • Increased loyalty and use of small building companies and local services • Able to provide for a higher proportion of affordable homes • Meet local-assessed need • Diversify supply and increase delivery rates • Provides choice for consumers • Allows places to grow in sustainable ways • Creates opportunities to diversify the construction sector 	<p>These advantages are noted and reinforces central government's aim to diversify the housing market in part through the provision of a range and mix of site sizes to provide real choice for consumers.</p> <p>Rural Exception Sites to meet local affordable housing need on unallocated sites is supported through national policy and revised policies are included in the Draft Local Plan (Part 1) (see policies H6 and H7). The Draft Local Plan (Part 1) is also consulting on a Local Needs Housing in Rural Areas policy (H8) which proposes to provide opportunities for self and custom builders to develop on</p>

		<ul style="list-style-type: none"> • Less impact on the community/Strengthens communities • Smaller developers are under resourced and struggle to get developments passed planners and pressure groups • Break-up large swathes of featureless suburban housing • Supports local builders/small building firms • Employment of more workers and apprentices • Money would stay local • Large developments tend to ignore the needs of local communities • Large developments tend to lack knowledge of the local environment • Retains the character of the area • Create buildings with more character, improved design • Less environmental and amenity impact than larger sites • Shorter turn-around from consent to completion • A clear market for an increase in small house builders • Best option for Teignmouth & Bishopsteignton • Large builders have a monopoly with Councils held to ransom over viability despite huge profits nationally • Objections to the 2014 local plan raised that smaller site provision was a sensible 	<p>small sites on the edge of rural villages where they have a local connection to the village.</p> <p>National policy now requires 10% of the local plans housing requirement to be identified on sites of 1ha or less. Strategic development options will be explored through the Local Plan (Part 2) and GESP which will form part of the overall mix of small, medium and strategic sites to meet the needs of the District.</p>
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		<p>approach to development rather than overextended urbanisation</p> <ul style="list-style-type: none"> • Small sites have historically allowed communities to grow and prosper organically and allow sustainable development to be well managed • Large developers get plans passed where councils do not have the financial strength to challenge them. 	
	<p>374, 373 375, 377 385, 390 195, 192 358</p>	<p>Concerns raised on the following grounds:</p> <ul style="list-style-type: none"> • Reduced levels of affordable housing • Affordable housing requirements may not be viable • Affordable housing quota could be made up of 100% affordable sites delivered by housing associations • Big developers will break up their sites into smaller parcels • Not certain it will increase housing delivery • Smaller builders can't cope with upfront CIL payments before they've sold a house • Capital requirements and complex planning process are stumbling blocks for smaller firms • Maintaining village communities and settlement identify • Would place greater pressure on larger allocations to delivery infrastructure and affordable housing • Large sites deliver substantial amounts of affordable housing and key infrastructure 	<p>Whilst smaller sites do not generate as much capital as larger sites, their additional costs in relation to infrastructure, access and service provision are likely to be much less, thus balancing their viability in terms of providing affordable housing. A viability assessment will be undertaken of the whole plan, looking at a range of nominal housing sites, to identify appropriate affordable housing percentage targets for different sizes of sites and different locations within the plan area.</p> <p>Self and custom builders do not have to pay CIL, although individual developments may be required to make S106 payments towards any infrastructure required in association with the development.</p>

		<p>that is not delivered on the same scale through small sites as such there is unlikely to be reasons to go beyond the minimum expectations of national policy</p> <ul style="list-style-type: none">• Would result in a higher number of developments contributing to meeting market housing need, but not affordable housing need , creating greater reliance on a smaller pool of larger sites, including infrastructure• Critical larger allocations are not subject to unnecessary burdens and can be viably delivered	
209, 419 289, 355 364, 365 366, 368 370, 378 397, 399 405, 406 411, 415 401, 413 377, 359 217	<p>Agree on the proviso:</p> <ul style="list-style-type: none">• neighbourhood plans are fully considered• they are not seen as components to a future agglomeration into a larger whole• building would be the same as what is currently there• there is an infrastructure focus to support all housing• consideration of affordable housing through provision or cash contribution• Housing is suitable for the local area• On safeguards on character, appearance, design and quality- particularly in the rural area• existing residents are not adversely affect in terms of infrastructure burdens• negative consequences are fully considered at application stage	<p>NPs are a material consideration in plan-making and will inform policy and allocation in the Local Plan.</p> <p>Individual developments may be required to make S106 payments towards any infrastructure required in association with the development. This would be determined on a site by site basis with infrastructure requirements being identified through the Local Plan process and legal agreements signed during the planning application process.</p> <p>Issues of landscaping, design, biodiversity, heritage etc. are all managed through the policies of the Local Plan. Site specific allocations (made through Part 2 of the Local Plan) are also likely to contain site specific requirements in relation to these matters. Any relevant neighbourhood planning policies would also be a material consideration in the determination of planning applications.</p>	

		<ul style="list-style-type: none"> • It forms part of delivering the overall plan • They are in different locations and not linked • Landscaping is carefully considered • Design is relevant to the area • It is achieved locally and for local people • Located on the edge of small-medium sized settlements • They are only allocated through NDP's 	Any allocations for small or medium sized sites will be addressed through the Local Plan (Part 2).
	195/398 407/377 208	<p>The distribution strategy/Review must have regard to:</p> <ul style="list-style-type: none"> • The likely cross over between allocations and windfall sites and ensuring the windfall allowance is adjusted to prevent double counting • The key role small to medium sized sites play in housing delivery, particularly in light of the increase in housing delivery requirements • The very limited suitable space for sustainable development in the Bishopsteignton Parish • The uniqueness of the Teign Estuary and underlying geology which makes Bishopsteignton parish sensitive to major housing developments • Considering each site on its own merit and the potential benefits a scheme could bring • how to increase housing delivery rates to ensure the OAN is planned for and met throughout the plan period 	<p>The current method for calculating the 5 year housing land supply and the housing delivery test takes account of permissions and allocations and ensures no double counting. This will continue through GESP and the Local Plan.</p> <p>A significant focus of the Local Plan and GESP is to ensure enough available land to meet the Districts objectively assessed need prescribed through the standard method and to meet this requirement through improved delivery rates to ensure the housing delivery test is met.</p> <p>The draft Local Plan will be subject to a whole plan viability assessment to ensure chosen allocations are deliverable and viable.</p> <p>Any allocations will be addressed through the Local Plan (Part 2).</p>

		<ul style="list-style-type: none">the viability of the approach or find ways to share costs over a wider pool of sites	
211/185 208/418 210/153 398	A mix/balance of options/site sizes will be required to: <ul style="list-style-type: none">deliver the full market and affordable housing needs effectivelyappeal to a range of developersassist in short term deliverabilityprovide a continued supply of sites with a longer lead-in timeensure all types of housebuilders have access to suitable land to offer the widest possible range of productsdiversify the marketIncrease and maintain delivery	Noted. It is increasingly accepted that to enhance the affordability of housing we need to open up the market to a wider range of small and medium sized housebuilders. This will be addressed through allocations made through the Local Plan (Part 2).	
153, 396 192,359 373	Alternative suggestions include: <ul style="list-style-type: none">More than 50% of housing should be on sites of less than 5 hectaresIncrease building height on brownfield sitesMaintain a focus on medium sites (9-200 units) as they've successfully been shown to encourage a range of builders, increase housing supply and deliverychallenging central government targets as they are not statutory provisions and ask them to show local need	Noted. These suggestions will be explored through the Local Plan (Part 2).	
208	Large sites in sustainable locations will play a significant role in ensuring increased housing targets are met	Noted. A combination of site sizes is likely to be required in order to meet the district's housing need. Sites and allocations will be explored through the Local Plan (Part 2).	

	417	If any sites come forward for residential in Bishopsteignton they will be small, encouraging development by local builders	Noted.
	417	Large sites around Bishopsteignton would decimate an already harmed village and should not be contemplated	Noted. This will be considered through the Local Plan (Part 2).
	369	Larger developers get plans passed where councils do not have the financial strength to challenge them	The Council will refuse any applications that do not accord with the adopted Development Plan unless material considerations indicate otherwise. The Council has recently defended a few appeals on large housing sites where this has been the case.
	407	Bishopsteignton NP recognises need for small site development in limited locations adjacent the boundary to meet local housing needs	Noted.
	387	Encourage small builders but don't agree with increased housing delivery	Housing numbers are now prescribed to us through national policy using the 'standard method' and are effectively non-negotiable. Local Planning Authorities are required to plan to meet the amount of homes which are calculated using this standard method. The current figure for Teignbridge is 760 homes per year.
	410/411	A mix approach should be taken with a focus on building new communities searching across the whole GESP area to find most appropriate sites and prevent inappropriate development of existing communities and landscapes	Noted. The allocation of sites will be explored through GESP and the Local Plan (Part 2).
	195	This requirement is not yet formally introduced	The revisions to the NPPF in 2019 include the requirement to accommodate at least 10% of our housing requirement on sites no larger than one hectare.
	212/213	Highly likely GESP will be responsible for identifying the largest sites within Teignbridge, which will continue to make up the majority of the	Yes, the GESP will identify strategic sites for development (500+) in Teignbridge. The Local Plan (Part 2) will identify smaller sites to accommodate the remainder of the district's housing need.

		District's housing land supply across the plan period.	
	153	Despite GESP, the remaining housing requirement may be of a scale that one or more additional large sites may need to be allocated	This will depend on the outcome of the GESP work but it is likely that most strategic sites will be identified through GESP.
	179 & 383	2480 dwellings (20% of 620 dwellings pa x 20 years) would be required on 138 new small independent allocations (based on 18 dwellings per site) which is totally unrealistic.	This calculation is based on our previous housing number which has since increased from 620 to 760. It is acknowledged that it would be very difficult to identify such a large amount of small sites and therefore a mix of small, medium and large sites are more likely going to be required to accommodate the need. This will be explored through GESP and the Local Plan (Part 2).
	287	Impossible to determine site capacity without understanding developers margins and build costs (which change daily). Capacity would be better encompassed through a net developable area to provide a more accurate figure. Site capacity is potentially affected by: <ul style="list-style-type: none"> • Poor ground conditions • TPO's on site • Sewers, cables or watercourses running through the site • Lower densities affecting returns 	Detailed work is undertaken at the allocation stage to identify all site constraints and how this affects site capacity. This will explored through the GESP and Local Plan (Part 2) which will make allocations for development.
	414	The use of local materials and local firms maintains money within the community to strengthen the economy	Noted. It is agreed that using local materials and firms helps to support the local economy.
	414	Such sites within the heart of a community would maintain the balance of a settlement much better than a larger edge of settlement development	Noted.

	210	This approach should not become the focus at the expense of continuing to consider larger sites required for larger developers	It is acknowledged that it would be very difficult to identify such a large amount of small sites and therefore a mix of small, medium and large sites are more likely going to be required to accommodate the need. This will be explored through GESP and the Local Plan (Part 2).
	398	Large sites still required and should be encouraged to strengthen the role of key towns including Newton Abbot and Kingsteignton to support the range of existing services and role of the town centres	It is acknowledged that it would be very difficult to identify such a large amount of small sites and therefore a mix of small, medium and large sites are more likely going to be required to accommodate the need. This will be explored through GESP and the Local Plan (Part 2).
Homes	Q3. Do you think the Council should consider providing additional support for modern methods of construction as a way to speed up housing delivery?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	162/164	Agree/yes on the proviso;	<p>Policy H4: Homes Suitable for All provides in principle support for innovative and sustainable methods of construction, such as modular homes or Tiny Homes.</p> <p>The policy requires the construction to be sustainable and Policy C2: Carbon Statements requires development to be Carbon Neutral. Any development would also be subject to the suite of design and wellbeing policies introduced into the Plan, to ensure quality development, layouts, design and materials that reinforce local character and compatibility with landscape.</p> <p>The support for modular construction may provide business for local companies and help to support the local economy.</p> <p>The Local Plan does not allocate tax monies.</p>
	288/355	<ul style="list-style-type: none"> It is of appropriate high quality design and materials to its surroundings 	
	358/364	<ul style="list-style-type: none"> They are sustainable or is a greener option 	
	366/370	<ul style="list-style-type: none"> They retain quality 	
	373/390	<ul style="list-style-type: none"> They are economical 	
	392/396	<ul style="list-style-type: none"> Easy to maintain 	
	397/401	<ul style="list-style-type: none"> They reduce environmental impact 	
	402/405	<ul style="list-style-type: none"> Energy saving 	
	406/408	<ul style="list-style-type: none"> Increased speed is not at the expense of quality 	
	410/385	<ul style="list-style-type: none"> Will have a greater lifespan than current housing 	
	399/411	<ul style="list-style-type: none"> There is quality control before, during and after construction 	
	217	<ul style="list-style-type: none"> Local companies are used to keep employment in the area Quality given priority over quantity 	

		<ul style="list-style-type: none"> • Standards are not compromised and fire and building regulations are met • Tax payers money is not spent • Density is not excessive • The post-war prefab experience is not repeated • The slums of tomorrow are not created. 	Other legislative requirements, such as fire safety, are not controlled through the Local Plan.
	395/398 377/380 365/162	<p>Yes due to the following benefits:</p> <ul style="list-style-type: none"> • Reduces need for scarce construction skills • Greater possibility for automation in a factory environment • Better standard of weather proofing from greater precision and tighter tolerances • Better, safer working environment in factories • More systematic quality control possible • Less disruption to neighbours • Less weather dependent • Services and finishes can be installed and tested in a factory environment • Many forms of prefabrication • Does not preclude custom design due to automated systems driven from systems like CAD • Construction time reduced where off site building systems include services and finishes • Supplements traditional builds 	Comments recognising the benefits of modern methods of construction are noted. Such support is contained within Policy H4: Homes Suitable for All, which provides in principle support for innovative and sustainable methods of construction, such as modular homes or Tiny Homes.

		<ul style="list-style-type: none">• Potentially reduce the impact of development• Can deliver energy savings• Speed up delivery• Reduce housing costs• A range of options to choose from• Local factories would ensure supply• An economical way to drive faster implementation of smaller sites• Provides a range of options from Huf huas to static caravan	
354/357 362/367 368/378 374/403 287/192	Yes		Noted.
395/413	Additional support could be provided in the following ways: <ul style="list-style-type: none">• Design Awards• A good & bad practice guide• Through Council building• Placing conditions on applications which favour off site working (in terms of limiting on site working)• Encouraging high energy efficiency slums which are difficult to achieve with conventional building	<p>The Local Plan is a land use document and is unable to recommend the setting up of a design award, facilitate training or support for manufacturers.</p> <p>Major planning applications either include, or are required to submit through planning condition, a Construction and Environmental Management Plan, which sets out any controls over site working during construction of development.</p> <p>The Council is not currently proposing to build any houses of modern methods of construction.</p>	

		<ul style="list-style-type: none">• Support & encourage training and apprenticeship places to increase the number of skilled construction workers• Support for manufacturers of off-site buildings to expand locally by supporting start-ups with reduced business rates	
206/419 360/369 375/387 391/407	No for the following reasons: <ul style="list-style-type: none">• Additional support requires funding which should be spent on other priorities• Quick prefabs for future degeneration leading to shanty town estates• Post Brexit targets may change• Financial support not required due to lower labour costs• Council are already ahead of housing targets• Would provide employment outside of the district leading to a smaller local skilled workforce• Leads to hastily erected homogeneous sprawling all-encompassing developments with tiny gardens and no chance to individualise the homes• Market is already well developed with sufficient competition in the market• Better to encourage through building regulations	<p>The Local Plan is a land use document and would not allocate funding for sustainable modern methods of construction. The support that it provides is through policy.</p> <p>New development of whatever type of construction will be subject to the suite of design policies contained within the draft Local Plan to ensure quality development.</p> <p>This question was not relating to housing numbers, but to methods of construction.</p> <p>There is no evidence that supporting sustainable modern methods of construction would lead to a loss of a skilled workforce.</p> <p>The government is encouraging diversity of the housing market, which is not considered to contain sufficient competition, with volume housebuilders delivering the majority of new houses.</p> <p>The Building Regulations would not encourage one kind of construction over another, but set out standards to be met.</p>	
383/185 178	All levels of support to new build methods and technologies should be provided as modern methods are only one way to speed up housing delivery	Noted.	

	407	Council should focus on raising and delivering standards and ensuring best quality infrastructure and facilities are provided to make the communities built sustainable	Noted.
	195	Should not become a requirement and should be undertaken in consultation with the development industry	Whilst the draft Local Plan contains support for sustainable modern methods of construction, this form of construction is not a requirement.
	212/213	Support for TDC's proactive approach to escalating housing need in the area	Noted.
	384	No	Noted.
	185/385	The type of support being proposed should be clarified	The support is through planning policy, not financial.
	207	Concerns over where funding will be sourced for extra support	
	207/210 289/363 395/405 413	<p>The following considerations have been highlighted:</p> <ul style="list-style-type: none"> • Quality, durability and design to ensure development blends in with local landscape • Prompt delivery to ensure challenge of housing requirements is met • The use of recycled plastic to fabricate homes which would be strong as existing materials and include a material and environmental cost saving • The use of local surplus straw for load bearing straw bale homes which are eco-friendly and attractive with good design • Uniformity should be avoided • Finishes should be of adequate quality • Consideration of long term adaptability 	<p>Quality development and development that is compatible with local landscape is required through the suite of design policies and through EN4: Landscape Protection and Enhancement.</p> <p>The Local Plan cannot insist on the use of a particular material, such as recycled plastic or straw bale construction.</p> <p>Homes will be subject to Policy H4's requirement to be accessible or adaptable.</p> <p>Reference to Tiny Homes is made within Policy H4.</p> <p>The Highway Authority often require Construction and Environment Management Plans to be agreed when development is approved. This may include the need for swept path analysis of vehicles bringing components to a</p>

		<ul style="list-style-type: none"> • Small scale alternatives such as Tiny house movement should be considered • The requirement for larger vehicles and craneage for component delivery with many locations away from main roads inadequate to allow for this 	site. This would be judged at the time of a planning application on each individual circumstance.
	179	LPA must recognise the need for major builders to standardise their housing product range to produce at scale and pace, especially using off-site construction methods.	This is accepted. Policy H4 provides support for sustainable modern methods of construction, but does not require their use.
	192	Allocation selection should consider the developers expected build programme alongside their preferred mechanism to speed up housing delivery.	Sites will be allocated within Part 2 of the Local Plan.
	192	Polices should be drafted which afford greater weight towards the achievement of the highest standards of design and sustainable construction	The draft Local Plan includes a suite of design and wellbeing polices which amplify the existing Local Plan Policy S2: Quality Development.
	210	Recognition that insufficient housing is being built both locally and nationally	Noted.
	210	Prompt delivery of scheme is essential to ensure the challenge of meeting housing requirements is met	Noted.
	358	Where are they going to be built considering high land values.	Part 2 of the draft Local Plan will allocate sites for development.
	369	Encourage them in principle with building regulations to make them, easier and quicker	The draft Local Plan will not override other legislative requirements, such as Building Regulations.
	383	The LPA must recognise the need for major developers to standardise their product range at scale and pace, especially if they using off site construction methods	Noted. This is accepted. Policy H4 provides support for sustainable modern methods of construction, but does not require their use.

	398	Such methods considered especially important given the current shortage of skilled tradespeople to undertake more traditional building methods	Noted.
	413	Concerns over how the increase pace of housebuilding will be achieved considering shortage of skilled manpower and difficulties getting building materials locally	
General	417	Undeveloped brownfield sites should be considered prior to greenfield areas with several in area (Bishopsteignton) which haven't been properly assessed for viability and impact	The development of brownfield land is supported.
	359	All houses should fit in with their locality	Policy DW1: Quality Development ensures that development integrates with and, where possible, enhances the character of the adjoining natural and built environment.
	399/406 411/217	Brownfield sites should be considered over greenfield with a thorough survey required to establish the extent of potential brownfield sites	The development of brownfield land is supported.
	414	Council should be supporting and encouraging the use of renewable energy to power homes and the use of energy efficient materials to reduce the running costs of new homes	The production of renewable and low carbon energy is supported under Policy CC5: Renewable and Low Carbon Energy and, new development is required to be carbon neutral under Policy CC2: Carbon Statements.
	Q4. Do you think the current spatial strategy's distribution of housing should be maintained through the Local Plan Review?		
Homes	Ref	Summary of Main Points Raised	Response to Main Points Raised
	176/179	Support for current approach/strategy	The distribution strategy will be contained within Part 2 of the Plan, which is yet to be prepared.
	186/187		
	188/192		
	195/208		
	211/288		
	397/414		

	176/188 210	Support the need for proportionate growth to be allocated in main villages	
	199	Concerns raised over further steps towards total urbanisation of the Newton Abbot area and suburbanisation of its surroundings with concerns raised on: <ul style="list-style-type: none"> • The environment • Quality of life of inhabitants • Little to no acknowledgement that agriculture and tourism are principal employers or that retirement pensions are a major source of income 	
	355/395 210/358 361/162 192/207 375/377 384/357 366/362	The current strategy should not be maintained because: <ul style="list-style-type: none"> • Needs to be spread out better • Newton Abbot has been overdeveloped • Investment in infrastructure not matched by level of development • A change in the distribution strategy would address concerns over the long timescales associated with large strategic allocations • Travel times are made longer for those entering Newton Abbot at peak times due to traffic and lack of infrastructure • distribution of housing is biased to urban areas • housing should be directed where there is little growth such as Bickington, Liverton, Broadhempston and Ashburton 	

		<ul style="list-style-type: none"> • smaller distributions of housing could be sustainable in the majority of rural villages with appropriate infrastructure • Presently no evidence to confirm the distribution should be maintained at current levels • The infrastructure of Kingskerswell cannot sustain large scale development (200+ homes) and should be restricted to infill • a more even distribution is needed as many hamlet and villages are becoming enclaves • it misses an opportunity to allocate growth to prevent the risk of unplanned, sporadic development should Teignbridge not deliver on their emerging targets • development should be scattered throughout towns and villages through infill and settlement boundary extensions • it should be reconsidered with growth directed elsewhere • Small housing developments in villages should be considered • every settlement should see some amount of growth proportionate to the settlements size with the following benefits: <ul style="list-style-type: none"> ○ Opportunity to deliver affordable homes 	
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		<ul style="list-style-type: none"> ○ Can provide homes to suit people's needs without having to move to urban areas due to a lack of housing in places they want to live. ○ Allowing settlements to grow would help support local services which are closing in rural areas due to viability ○ Development brings improvements from S106 and CIL ○ If the strategy is continued, rural areas will become too remote, dilapidated and unserved for existing residents ● Newton abbot and its environs is out of proportion to other towns and villages 	
	362/403	No	
	364/370 380/391 407/289 195/287 401/375 212/203	<p>Strategy should be maintained because:</p> <ul style="list-style-type: none"> ● Rural areas should stay rural ● Over-development should not be permitted ● To prevent the elimination of the landscape ● It is line with the essential character of the area and particularly villages ● is more sensible as there is more brownfield land available near existing towns and urban areas ● people can walk, cycle or use local transport 	

		<ul style="list-style-type: none"> • it ensures development is accessible and has good connectivity with existing facilities and amenities • Focusing new development toward isolated rural locations would be poorly served by facilities and amenities and have detrimental impacts on the natural environment • Development of newton abbot is a huge plus and has been well considered • it is important for new development to be in areas with sufficient infrastructure • Given its size and role within Teignbridge, Newton Abbot is clearly a sustainable location for further strategic scale development • Small villages don't have the capacity to accommodate large scale development without costly infrastructure • Large scale development should be focused where the majority of physical, social, community and green infrastructure exists or is planned for- undoubtedly in and around Newton Abbot 	
	188/187 192/203 210/211 418/363 377/396 398/409 413/186	Support for <ul style="list-style-type: none"> • Exminster as a Main Village • Dawlish as a suitable focus for development as it performs highly in terms of the provision of services and facilities 	

		<ul style="list-style-type: none"> • Further allocations in Teignmouth due to its high level of service provision (2nd in District) and significant affordable housing needs • Directing higher levels of growth to Dawlish and Teignmouth through greenfield allocations • Apportioning a broad minimum quantum of development to the highest order towns to meet their needs • Newton Abbot remaining as the principal settlement in the hierarchy, as the most sustainable in the District with continued growth enabled • Considering a higher proportion of growth to most sustainable main villages such as Bishopsteignton (as well placed in terms of access to road network and proximity to employment, services and facilities in nearby towns) • allocating more growth in Newton Abbot, already identified centres and within the new Main village category to seek as many sources of housing supply as possible • Smaller scale, eco-friendly homes such as Straw Bale with lime render in rural areas (where in keeping) • Planned and proportionate growth in the sustainable settlement of Ipplepen • Small additions of affordable housing to villages (no more than a dozen) which 	
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		<p>would help small places keep going and support independent builders</p> <ul style="list-style-type: none"> • identifying opportunities for villages to grow and thrive, especially where this will support local services in line with the Draft NPPF • Development of smaller settlements at an appropriate scale which help maintain and revitalise those settlements and shouldn't be precluded, these shouldn't be limited to self-build or affordable homes and should include a mix to provide an incentive for development and maintain viability • Small development projects which provide housing for local people • Expansion of smaller villages to provide housing for local people to work locally and not available to commuters, particularly within rural agricultural areas 	
	399/415 406/408 410/411 360/368 374/390 378/217	<p>Agree in principle but with consideration to the following:</p> <ul style="list-style-type: none"> • For limited further development elsewhere • Reduced development levels in Teignmouth and Dawlish due to overdevelopment, congestion and loss of character • Discouragement of tourism due to overdevelopment • Quality of development- ensuring slums of tomorrow are not created 	

		<ul style="list-style-type: none"> • Allocating Brownfield sites over greenfield with a survey to establish the extent of brownfield sites • infrastructure as roads are already congested at peak times with more housing making this worse • more infrastructure for Bovey Tracey parish prior to further development • Wildlife and protected species • The capacity of existing infrastructure in Newton Abbot because it cannot sustain high levels of additional growth 	
	185/192 208/210 369/390 399/406 405/415 402/156 164/195 417/179 195/418 428/419 422/202 392/217	<p>The strategy/distribution should:</p> <ul style="list-style-type: none"> • recognise the difficulties facing rural communities, particularly housing supply and affordability • be reviewed in the context of GESP and a higher housing requirement • provide sufficient opportunities to allow identified housing needs to be met in full • meet the needs of both urban and rural communities • consider a different approach to the percentage distribution in Teignmouth and Dawlish due to their sustainability, range of services and unmet housing needs, particularly affordable housing, offering a higher ability to accommodate growth • continue to place South West Exeter at the top of the hierarchy 	

		<ul style="list-style-type: none"> • support development in sustainable locations • support moderate development to supplement village needs such as affordable solutions • maintain the village status of Kingskerswell and Abbotskerswell with encouragement of natural beauty between towns and villages • ring-fence Bishopsteignton as a separate village as its strategic breaks are sacrosanct and need to be preserved • ring fence Bishopsteignton, Shaldon and other villages as separate conurbations with their open areas must be preserved • redevelop disused brownfield sites for extra housing • Direct a lower proportion of development to coastal towns due to poor infrastructure • Distribute development across the plan area in a way which enables communities to become and remain sustainable • be informed by the new Standard Methodology because this will identify where housing need is greatest and where development can be accommodated 	
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		<ul style="list-style-type: none"> • be focused on the sustainable growth and expansion of existing primary settlements • Identify multiple housing allocations of between 350-800 dwellings which are of a scale which enables significant on-site infrastructure and affordable housing delivery • Consider Exeter's urban edge as the most sustainable part of the district • support new development in sustainable locations including adjoining existing main towns • be informed by impacts on ecology and wider environment • consider access to public transport hubs as a primary consideration • preserve the character of Bishopsteignton and not let it get lost in urban sprawl along the estuary • ensure development is done in a manner which causes the least damage to Newton Abbot residents • Identify and recognise the western edge of Exeter for suitable pockets of growth as highly a sustainable location, particularly due to its proximity to transport, social and green infrastructure in addition to South West Exeter • Direct future growth towards defined settlements which need to maintain a degree of sustainable growth, as 	
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		<p>appropriate (by at least) maintaining existing allocations and should not be lost to Exeter</p> <ul style="list-style-type: none"> • Provide smaller communities with smaller schemes • Consider the deliverability of sites • Acknowledged that the rural as well as the urban areas need to sustain communities and should include a community-led and viability sections 	
	192/195 373/398	<p>The review evidence should define the settlement strategy and hierarchy to give full consideration to:</p> <ul style="list-style-type: none"> • Assessing evidence of housing need • Understanding the level of development required to support local services and facilities • Availability of land • Assessing implications of delivery in areas the Framework indicates development should be restricted • Recognising value of the plan to deliver a greater percentage of the overall OAN within the most sustainable communities • The impacts of any housing overspill from Exeter • the needs and function of the Towns which accommodate a significant proportion of the districts population • establishing the local need with more emphasis placed on local provision 	

		<p>rather than attracting buy to let or holiday lets</p> <ul style="list-style-type: none"> the scale of growth appropriate for each settlement and should not preclude development in smaller villages where it helps sustain those communities and is of an appropriate scale 	
	179	Concern regarding the over-reliance on 1000+ dwelling allocations controlled by single landowners/developers. Relying on a small number of extremely large sites to meet housing requirements could potentially lead to increases in house prices, reduced delivery rates and limit developer competition	
	359	Don't agree with rural locations being the target for more building unless amenities and infrastructure are put in place	
	359	Boundaries of rural areas/villages and local plans should be respected with direction given by neighbourhood plans	
	354	The visual aspect of larger developments should be reconsidered with estates near Reign Bridge being decidedly ugly and extremely boring	
	413	Mainly agree but projected growth percentages are skewed with Dawlish having a disproportionate level of growth for its size and lack of infrastructure improvement. Any additional housing requirements should recognise those areas which have suffered from a disproportionate percentage of growth.	

	417	An acceptable policy where infrastructure upgrades are made to meet the needs of new households- housing is currently outstripping infrastructure with adverse impacts on the Towns	
	407	The environment costs of urban sprawl is not acceptable against the backdrop of the districts unique countryside	
	407	A proliferation of suburban housing is not the most effective way of providing more housing and low rise, three or four storey blocks with support facilities is likely to be more cost effective	
	378	The potential to create new communities on the Exeter hinterland and main villages should be used to offset some of the additional growth proposed for Newton Abbot	
	398	Development should be focused on areas capable of providing such development not restricted to those higher up the hierarchy. The majority of larger scale development should be directed to areas in and adjoining the principal towns and settlements	
	369	Large developments in rural locations maybe ok as stand-alone settlements with proper infrastructure but when tacked onto small village's it unbalances existing communities and should be banned.	
	369	Village envelopes should be expanded to deliver more land for local housing	
	195	Support of acknowledgement that greenfield land will need to be considered as it plays an	

		important role in maintaining land supply in the early part of the plan period but development on brownfield land does not automatically make it more sustainable than greenfield land, as the latter may be better connected to existing infrastructure and services	
	384	Development on a few greenfield sites destroys great swathes of farmland and puts significant pressure on local infrastructure, particularly roads which can lead to congestion	
	422	Link road between Ogwell Cross and the A380 should be built before any houses to accommodate the additional traffic and allow new occupants to get to work in Exeter without going through existing parts of town. Building the road afterwards will cause traffic chaos on existing roads for many years and result in deterioration in health from pollution	
	375	The second home blight is becoming more evident	
	375	A large part of Teignbridge stands with Dartmoor national park with TDC councillors who live within the DNP area voting on planning proposals outside of DNP enabling them to vote with impunity where others have to listen to their electorate	
	395	Hele park is too far from the Town Centre with little take-up of the extended bus service. A new or expanded local centre is needed	
	395	Ideally there should be green space and trees separating developments so to create distinct neighbourhoods and a sense of community	

	428	Limits should be dictated by sensitive ecological receptors including avoiding developing land required to functionally support the South Hams SPA and indirect impacts arising from the local residential and visiting population on the Exe Estuary SPA and Dawlish Warren SAC.	
	393	Focus should be around existing urban areas and towns with modest growth in the main villages and villages to facilitate quicker delivery and reflect constraints around some of the larger settlements which affect their ability to expand such as mineral rights	
	354	Infrastructure has lost out and more pedestrian and cycle ways could be included	
	158	DNPA welcome a conversation around Ashburton and Buckfastleigh to support these communities through the provision of new development which is needed locally, is well related to the settlements and constitutes sound planning and place making.	
	155	Denbury has very few facilities with the private car required for most journeys. Denbury's diminutive nature doesn't provide for the services required to sustain extra development and would have a negative environmental effect.	
Homes	Q5. Should the Local Plan Review include a main villages category as an additional tier of the hierarchy?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	215, 153, 164, 202,	Agree/Support for Tier	The distribution of development and settlement hierarchy will be contained within Part 2 of the Local Plan.

	288, 289, 354, 355, 357, 360, 362, 375, 384, 397, 403, 414,		
	195, 210, 361, 377, 392, 396, 398, 395	<p>Agree because:</p> <ul style="list-style-type: none"> • It would offer flexibility in development distribution to meet local need • It would reduce the need to travel • They are sustainable locations • These are places people want to live • Main villages should be apportioned a level of planned growth • This will extend new housing into villages • This proportionate growth will benefit local people • Traffic will be reduced • Local business will be supported • It will spread housing growth within otherwise falls on Newton Abbot • Encourages sustainable development 	The distribution of development and settlement hierarchy will be contained within Part 2 of the Local Plan.
	162, 215, 417, 378	<p>Concerns raised on the following grounds:</p> <ul style="list-style-type: none"> • Primary schools in main villages may not have capacity • School transport implications if local primary schools cannot accommodate extra pupils • Designation labels these villages as targets for development 	The Main Villages tier in the settlement hierarchy has been based on the high levels of sustainability and connectivity in terms of its transport and service provision. Bishopsteignton has the full range of services to qualify for this tier, alongside Ipplepen, Exminster and Starcross. No village identified in lower tiers have the same level of transport connectivity and service provision as the four settlements identified above.

		<ul style="list-style-type: none"> • Little weight given to character, ability to accept development and infrastructure issues • Bishopsteignton suffers lack of parking and narrow lanes • Smaller villages with larger levels of facilities are excluded • Exminster voted to remain a village in 2012 with no more large-scale development • Exminster cannot provide extra space for the increased car parking that would be required • May set precedent for development 	
	215, 162, 164, 179, 188, 363, 365, 366, 367, 368, 373, 383, 385, 393, 401, 195, 413, 176	<p>Agree on the proviso:</p> <ul style="list-style-type: none"> • Secondary schools receive funding for transportation from new developments • A full study on the capacity of settlements to accommodate further housing is carried out. • That Ipplepen becomes a main village • That infrastructure investment is made to meet increased demand in main villages • That Broadhempston and Abbotskerswell maintain their services and are not denied development • There would be provision for substantial housing allocations in these locations • That Exminster accommodates a higher proportion of development than other main villages due to its sustainability 	Communities are encouraged and supported to produce Neighbourhood plans and include housing allocations within them. However it should be noted that only one of the six adopted NP's in the district have chosen to allocate for residential development.

		<ul style="list-style-type: none"> • That this would not detract from importance of developing on the edge of Exeter • Depends on which settlements • Villages be encouraged to produce Neighbourhood Plans and allocate their own sites • That all villages grow • If this provides small affordable rental properties • That main villages don't automatically receive development • That main villages don't become mini towns • Housing is provided for local people • That main villages don't become commuter villages • That substantial housing allocations be made in Main Villages • If infrastructure is adequate to meet need • If identity and vibrancy are protected • That housing numbers are limited to prevent pressure on facilities • That road infrastructure is considered 	
	387	No	The distribution of development and settlement hierarchy will be contained within Part 2 of the Local Plan.
	207, 419, 364, 369, 390, 391, 399, 406, 411, 415,	No because: <ul style="list-style-type: none"> • A village should stay a village • Main villages an excuse for overdevelopment in these villages • Village public transport links are poor 	The distribution of development and settlement hierarchy will be contained within Part 2 of the Local Plan.

	402, 405, 407, 370 380, 217	<ul style="list-style-type: none"> • Each village should be treated on a case-by-case basis • Traffic issues in lanes • It will destroy the character of villages • Schools, GPs and emergency services cannot cope • Those not designated as main villages will see their services and amenities eroded further • Forms a presumption in favour of development • Danger of creating mini towns • Loss of village character • Services cannot cope • Implications of biodiversity • Villages will stop being villages 	
	206, 369 217	<p>Alternative suggestions include:</p> <ul style="list-style-type: none"> • A hierarchy is not required • Each village should be treated on a case-by-case basis • Do not adopt a Main Villages category 	The distribution of development and settlement hierarchy will be contained within Part 2 of the Local Plan.
	179, 185, 359, 378, 380, 408, 410, 210	<p>General</p> <ul style="list-style-type: none"> • Cannot comment until know which settlements included • Intention of additional tier unclear • Settlement hierarchy should provide opportunities for additional housing need to be met • Requires more consideration • Unsure 	The distribution of development and settlement hierarchy will be contained within Part 2 of the Local Plan.

		<ul style="list-style-type: none"> Main villages are where the local young wishing to stay close to home and those wishing to downsize want to live 	
Homes	Q6. Are there any settlements that should be added, removed or moved to a different category? (in the settlement hierarchy)		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	153, 192, 180, 377, 383, 179	Agree with Proposed Hierarchy <ul style="list-style-type: none"> Ipplepen should be main village Appropriate that Bovey Tracey and Heathfield included as a town Agree with Teignmouth and Dawlish as towns in 2nd tier These medium-sized villages should see development without putting a strain on resources Chudleigh and Teignmouth play an important function 	The distribution of development and settlement hierarchy will be contained within Part 2 of the Local Plan.
	195, 362, 361	Yes – should be added: <ul style="list-style-type: none"> Exwick should be recognised as important due to its proximity to Exeter Hacombe with Coombe as village with a boundary to prevent stagnation Ashburton should be added to take housing as market town with good access 	
	198, 402, 405, 407	Yes – should be removed <ul style="list-style-type: none"> Bishopsteignton due to: <ul style="list-style-type: none"> Narrow streets/inaccessibility of Main Street Limited car parking with little scope to improve 	

		<ul style="list-style-type: none"> ○ Pubs are closing or are closed ○ No cycle path ○ No high speed broadband ○ Sewerage, power and water supplies are inadequate ○ Poor public transport links ○ Unable to compete with Dawlish ○ Challenging topography making development unviable ○ No flat fields to develop ○ Can't improve infrastructure without damage to heritage ● Bovey Tracey should be moved down a tier as struggling with current numbers ● Kingskerswell due to current strain on infrastructure 	
	192, 206, 207, 417, 361, 393 399, 406 411	<p>Yes – should be moved</p> <ul style="list-style-type: none"> ● Bovey Tracey and Chudleigh should be moved down to 3rd tier as provide fewer sustainable options for development ● Kingskerswell should be put into villages rather than heart of Teignbridge ● Shaldon should be a main village as it also has a doctors (currently omitted) ● Bickington, Liverton, Chudleigh Knighton, Ashburton and Ide for housing distribution ● Chudleigh Knighton and Ipplepen as main villages to reflect good infrastructure ● Broadhempston should become a main village 	

	162, 288, 289, 357, 391, 392, 414, 415, 368	No	
	396	No because: <ul style="list-style-type: none"> • Bovey Tracey is struggling with numbers of new housing 	
	164, 359, 369, 375, 206	Alternative suggestions include: <ul style="list-style-type: none"> • Include undefined settlements close to Main Villages to accommodate small amounts of growth • Strategy should be based on neighbourhood plans • Villages should make decisions via Neighbourhood Plans • All villages should be de-categorised • All settlement should take new housing to lower the impact 	
	185, 207, 363, 364, 408, 410, 373, 355, 390, 206 385	General/Concerns <ul style="list-style-type: none"> • The categorisation should be considered part of the review • Retain green break between Kingskerswell and Newton Abbot and Torquay • Some villages could take more housing if impacts minimised • Towns should be preventing from merging • Unsure- further evidence required • Denbury no longer has a shop 	

		<ul style="list-style-type: none"> • Highweek traffic is a nightmare • Boundaries should be retained to prevent villages and towns merging • Chudleigh Knighton & Ipplepen have good transport links, capacity, infrastructure and access to employment 	
Homes	Q7. Which of the following options or combination of options would best address meeting the district's additional housing requirements of, up to or around, 6457 dwellings? A: Maintain current strategy of primarily allocating housing sites in urban areas and towns B: Allocate some growth to villages which have a higher level of service provision in addition to urban areas and towns i.e. main villages C: Allocate some growth to all villages with a settlement boundary D: A new settlement		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	370, 391, 397	Agree Option A (no comment)	Part 2 of the Local Plan will contain the strategy for distribution of development and will allocate development sites
	179, 192, 195, 203, 211, 359, 364, 372, 387	Agree with Option A (current strategy) because: <ul style="list-style-type: none"> • Option A should be maintained • Deliverable options exist to facilitate growth in towns • Would best address additional requirement • Due to existing infrastructure • To protect the countryside • Likelihood of using brownfield sites • Would help revitalise town centres 	
	380, 383, 407	Agree with Option A provided that: <ul style="list-style-type: none"> • Ensure current infrastructure is not overloaded • Ensure environment is not destroyed 	

		<ul style="list-style-type: none"> • Large allocations are made adjoining settlements • Development contains low-rise multi-storey blocks • Development is limited to affordable housing 	
	375, 355, 395,	Disagree with Option A because: <ul style="list-style-type: none"> • Visually Newton Abbot, Kingskerswell and Kingsteignton will merge if allocated any more development • Towns already have too much development • Newton Abbot already has enough development and congestion • If Option A was pursued significant infrastructure investment would be required 	
	164, 401 396, 414	Agree with Option B (growth in main villages) because: <ul style="list-style-type: none"> • Ipplepen is capable of supporting growth • Most sensible option 	
	288, 418	Agree with options A & B	
	164, 365	Agree with Option B provided that: <ul style="list-style-type: none"> • There is minimal development • Its supported by community involvement • It is for affordable, self-build, homes for older people or small market housing developments 	
	162, 192	Disagree with Option B because: <ul style="list-style-type: none"> • Infrastructure in Exminster cannot be expanded 	

		<ul style="list-style-type: none"> • Medium and large scale development around Exminster cannot be supported • Poor levels of services/facilities and environmental considerations 	
	366	Agree with Option C (no comment)	
	177, 396	Agree with Option C (growth in all settlements with a boundary) because: <ul style="list-style-type: none"> • All settlements have capacity to grow in proportion to their size • Wider dispersal may reduce impact on landscape and infrastructure • Would help villages survive 	
	358, 363, 392, 407, 393, 396	Agree with Option C provided that: <ul style="list-style-type: none"> • Properties built are affordable • Developments are small and in keeping with village • Developments reflect the size of existing settlement • Allocations come through local communities • In conjunction with allocations around urban areas, towns and main villages 	
	192, 386	Disagree with Option C because: <ul style="list-style-type: none"> • Poor levels of services/facilities and environmental considerations • Services and facilities need to be planned before population growth 	

	207, 360, 375, 388, 413, 390, 178, 206 395	<p>Agree with Option D (new settlement)</p> <ul style="list-style-type: none"> • Villages are saturated • Local infrastructure cannot cope • Additional infrastructure cannot be provided in villages • Development will increase traffic and pollution in villages • New settlement towards Heathfield • Planned infrastructure to better cope with numbers • Newton Abbot, Kingskerswell and Kingsteignton will merge if allocated any more development • Small new developments close to existing villages • Would allow for new infrastructure • A new settlement where facilities could be provided from the start would best • More sustainable than extending existing settlements • Would form a defined place rather than peripheral growth 	
	195, 408, 410, 395, 375, 373,	<p>Agree with Option D provided that:</p> <ul style="list-style-type: none"> • Any new settlement should come through GESP • New settlement should be allocated within GESP area not just Teignbridge • A new settlement be located close to the A38 or A380 close to rail links • Infrastructure be given careful consideration prior to houses being built 	

	190, 192, 195, 210, 393, 398, 407, 164 163	<p>Disagree with Option D because:</p> <ul style="list-style-type: none"> • No proven need for new developments on greenfield sites • Concerns regarding the length of delivery time • Concern regarding impact on spatial strategy • Concern regarding relationship to existing settlements • Concern over cost of providing infrastructure • Cannot identify where new settlement could be located • Complicated and expensive to deliver • A significant risk a new settlement wouldn't be sustainable or self-contained 	
	185, 354, 357, 368, 369, 378, 382, 385, 413,	<p>Agree with a combination of all Options:</p> <ul style="list-style-type: none"> • A combination of all must be considered to avoid over-reliance on one option • All options should be considered • Only effective way to accommodate large growth in numbers • In order to reduce costly proposals and discussions • With particular emphasis on a new settlement • All options have merit 	
	287, 289, 361, 362, 377, 396, 403,395	<p>Agree with a combination of Options B & C:</p> <ul style="list-style-type: none"> • In order to reflect the accessible position of many villages • to maintain family groups 	

		<ul style="list-style-type: none"> • to support village growth • Would help villages survive • Provided developments were small and provided affordable housing • Would reduce further expansion in Newton Abbot 	
	384, 405	Agree with a combination of Options A & C: <ul style="list-style-type: none"> • All existing settlements should take 20-30 houses to boost school numbers 	
	373, 402,	Agree with a combination of A & D: <ul style="list-style-type: none"> • Village road networks do not have capacity 	
	162, 399, 406, 411, 415, 217	Agree with a combination of Options A, C & D: <ul style="list-style-type: none"> • If suitable land can be located 	
	365, 210, 367, 393, 398,	Agree with a combination of A, B & C: <ul style="list-style-type: none"> • Where there are jobs and services • Neighbourhood Plans should bring forward growth in defined villages • Main village growth should be supported by community involvement • All settlements should be considered for affordable, self-build and homes for older people • Providing Option C only delivers affordable housing • Provide accessible, sustainable locations 	
	386	Agree with a combination of A, B & D: <ul style="list-style-type: none"> • Long term sustainability and ability to provide services and facilities 	

		<ul style="list-style-type: none"> Development must be commensurate with size and location of settlement 	
	355, 395,	Agree with a combination of B, C & D: <ul style="list-style-type: none"> These areas have better capacity to cope Will reduce further expansion of Newton Abbot and provide new infrastructure 	
	212, 210, 190, 393, 395,	Alternative suggestions include: <ul style="list-style-type: none"> Support development in sustainable locations with access to services and public transport Most towns have derelict areas which could accommodate high-rise development Utilise disused accommodation above high-street shops Small-scale affordable housing to meet locally assessed need Brownfield sites should be used Potential to allocate growth to Peamore/Exwick and around all towns and villages The Council should buy a plot of land at agricultural value, develop the infrastructure and sell off serviced plots for development	
	153, 164, 179, 185, 192, 195, 206, 210,	General/Concerns <ul style="list-style-type: none"> Housing growth must be spread across the District 	

	<p>211, 355, 359, 378, 147, 156, 163, 175, 177, 178, 190, 207, 417, 419, 413, 405, 407, 408, 410, 409, 412, 399, 405, 406, 411 415, 399, 406, 407, 411, 415, 390, 386, 387, 383, 396, 384, 380, 374, 354, 287, 156</p>	<ul style="list-style-type: none"> • Local Plan should not rely on large-scale sites alone to provide housing requirement • Scale of development in Ipplepen should not create a town • Developing in urban areas increases strain on facilities • Public transport is difficult to operate with larger estates • Large allocations abutting existing settlements must be favoured • Contingency of 20% requirement should be made to reduce risk of housing numbers not being achieved • Neighbourhood Plans can/should allocate housing • Decision for new settlement should be informed by site availability • Growth must be properly planned with delivery of correct infrastructure • Smaller pockets of development faster to build • Smaller pockets of development put less strain on infrastructure • Kingskerswell has been allocated too much development • Defined villages must currently rely on Neighbourhood Plan to allocate for housing but very few do 	
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		<ul style="list-style-type: none"> • Allocations should be made in defined villages where Neighbourhood Plans are not allocating • The vitality of rural communities should be supported • New settlements take a long time to develop • New settlements are expensive to deliver in terms of infrastructure in contrast to expanding villages • Other options should be considered but Newton Abbot should take the most growth • Far better to develop in those area that have capacity or in new settlements • Housing targets should be challenged • Land adjacent to Dawlish Country Park should not be developed • New developments should be allocated close to infrastructure and employment • Much new build development is not affordable to local people • Not enough scope to build on brownfield sites • Empty properties should be renovated • Limited reference to historic environment • Thorough assessment needed on all sites to determine suitability • Local distinctiveness and character should be protected 	
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		<ul style="list-style-type: none"> • Heritage assets and their setting should be protected • No evidence that master-planning larger sites has worked • Urban sprawl should not be allowed as puts pressure on facilities and damages communities • Tourism will suffer due to urban sprawl • Where is the evidence that there is not enough brownfield land? • Survey of all sites within towns and villages should be commissioned • Towns and roads are saturated • Lack of infrastructure is impacting on Newton Abbot and Kingskerswell • Development should only be carried out in tandem with infrastructure delivery • Housing figures should be viewed with suspicion • Government views large scale house building primarily as a stimulus to the economy • A solution to the housing crisis is unachievable while immigration numbers are so high • Dawlish allocated site too far away from doctors surgery and new surgery that was promised has never materialised. • Need to link development with new infrastructure provision 	
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		<ul style="list-style-type: none"> • Long term damage may be done by development to estuary of national importance • Need methodology and GESP numbers before informed comment can be made • Illsington parish would support some growth within the village envelope • Additional growth must be supported by new infrastructure • Infrastructure and employment must come first, especially water supply and drainage • School, medical facilities and emergency services must come before development • There are enough industrial units in Kingskerswell and Decoy • Services and facilities should be planned at the earliest possible point • Important to engage with service providers at an early point • Secondary schools on new developments should be paid for by Teignbridge out of CIL • Development is focussed on a number of small areas to minimise the numbers of voters that are upset- planning strategy shouldn't be allowed to be influenced in this way • Local housing targets should be developed and take precedence over central government targets 	
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		<ul style="list-style-type: none"> • Bovey Tracey's infrastructure is struggling under current new housing numbers • Developments should be appropriately designed, developer margins sensible and CIL not too onerous • Should be a national unified CIL levy 	
Homes	Q8. A number of principles have been established to determine what should be included and excluded from a revised boundary. Please provide comment on the principles applied to the Draft Settlement Boundary Review		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	162, 208, 177, 357,	Agree with Principles (no further comment)	Noted
	368, 413,	Agree with Principles however: <ul style="list-style-type: none"> • Occasional exceptions may not sit well • Any future extensions should be debated by the public • Urban sprawl must be prevented 	Settlement boundary revisions will be subject to public consultation providing further opportunity for public comment. The settlement boundary revisions have sought to include existing and allocated development and does not include large tracts of unallocated land therefore the boundary revisions will not lead to urban sprawl but instead seek to focus growth within the built up area.
	370,	Agree with Principles because: <ul style="list-style-type: none"> • Boundaries have meant that little unsuitable development has historically been allowed outside 	Noted
	164, 288, 373, 379, 380, 391, 392, 393, 397, 408,	Principles seem logical, sensible or sound	Noted

	410, 413, 414, 374 360		
	417, 405, 406, 415 217	Agree with Principles in relation to Bishopsteignton:	Noted
	359,	Agree with Principles in relation to Teignmouth:	Noted.
	369, 206, 287, 392, 403, 155	Disagree with Principles because: <ul style="list-style-type: none"> • There should not be boundaries • Principles make no sense other than to pre-determine infill planning applications • Current boundaries are a complete nonsense • Boundaries should not be contracted to exclude brownfield land • Boundaries should not bisect gardens • Moving the boundary will open floodgates to inferior development at an unsustainable rate 	<p>Settlement boundaries are a widely understood planning mechanism to focus growth to existing built up areas and define in policy terms which areas are acceptable for different types of development.</p> <p>Principle 2b seeks to include the full curtilages of properties to avoid the boundary bisecting gardens.</p> <p>Boundaries have been expanded and not contracted to include brownfield land.</p> <p>Inclusion within the settlement boundary does not confer planning permission and any application will require full and thorough assessment for its impacts, benefits and overall suitability and sustainability.</p>
	171, 195, 377, 384, 159	Disagree with specific Principle: <ul style="list-style-type: none"> • Including spaces owned by a property without distinguishing between large and small spaces is flawed • Query inclusion of all brownfield sites without consideration as to impacts on landscape and biodiversity 	<p>Inclusion within the settlement boundary does not confer planning permission and any application will require full and thorough assessment for its impacts, benefits and overall suitability and sustainability, even on brownfield land.</p> <p>As noted in the draft Settlement Boundary Review February 2020, para 3.15, sports and recreational facilities on the edge of settlements have been excluded</p>

		<ul style="list-style-type: none"> • Unsure why sports and recreational facilities on the edge of towns are being excluded • Employment sites are included but farmsteads are excluded – this is contradictory as a farmstead is a business and both utilise equipment and machinery. 	from the revised settlement boundary because their open character can provide important views from the built form into the open countryside beyond, linking the settlement with its rural context.
	207, 394,	Principles haven't been applied correctly: <ul style="list-style-type: none"> • KK6 has been removed from boundary when development already agreed • KK5 has been included in the boundary but this will lead to development here • Why is the land at Ford Farm Court now being removed from the boundary? • KENT7 – Why is part of curtilage belonging to The Willows omitted? • Kenton – why has area around boundary of village been removed? 	Noted.
	195, 428, 362, 363, 388, 402, 403, 413	Suggestions for additional Principles: <ul style="list-style-type: none"> • Allocated sites should fall within settlement boundaries • Principle to exclude land required to support ecological assets and wildlife sites • Larger settlements that don't have a boundary should be given one to prevent stagnation and encourage development • Redundant shops and warehouses should be utilised for development 	<p>Under principle 2 allocated site are included within the revised settlement boundaries.</p> <p>The boundary revisions only seek to include existing built development or allocations. Allocations have already been determined to be sustainable in principle through the adopted local plan examination and existing built development is already there. Inclusion within the settlement boundary does not confer planning permission.</p> <p>All large settlements in the District have a settlement boundary.</p>

		<ul style="list-style-type: none">• Small hamlets should be built near existing villages• Locations where Cirl Buntings and bat live should not be built on• Settlement boundaries should protect green spaces• Applications within the boundary should be assessed individually based on their own merits• Boundaries should not mean all green space inside is open to development	<p>The role of settlement boundaries is to define built up areas, some of these areas include green spaces within them. Planning policy seeks to safeguard these spaces, it is not the role of the settlement boundary to protect green spaces. The presence of an area of green space within a settlement does not confer a presumption in favour of its development as it would be subject to other safeguarding local plan policies.</p> <p>All planning applications are assessed individually and on their own merit regardless of their location.</p> <p>Neither the settlement boundary review, nor the draft Local Plan propose to build on cirl bunting or bat habitats.</p>
177, 195, 162, 289, 363, 373, 375, 380, 390, 393, 396, 396, 401, 407, 409, 365 377, 211 370, 394	<p>General comments:</p> <ul style="list-style-type: none">• Reserve the right to object at a later date• Exeter’s boundary should be reviewed• Cut off dates for developments in progress is too early• More information required before response can be made• Great care must be given to impact of new development• Load bearing straw bale houses should be investigated• How are Conservation Areas affected by the proposed changes?• Parish Councils should be asked to redraw their own boundaries• TE3 (255 dwellings on Upper Exeter Road, Teignmouth) should be removed	<p>Exeter does not stand within the district of Teignbridge therefore any amendments to their settlement boundary are outside the remit of Teignbridge District Council.</p> <p>The settlement boundary will be subject to further revisions which include more up to date planning permissions as part of the next round of local plan review consultation.</p> <p>Conservation Area boundaries have not been amended as a result of this Review.</p> <p>Parish Councils have the ability and opportunity to review their own settlement boundaries within a neighbourhood plan. This provides the community a direct opportunity to vote in a local referendum on any changes to a settlement boundary.</p>	

		<p>to reflect large number of objections raised over the outline application</p> <ul style="list-style-type: none"> • Settlement boundaries need to be addressed along with greenbelt by local communities • Deliverability must be considered by combining findings with the HELAA • Boundaries cannot be amended to include GESP as this will not be finalised for several years • Boundaries should be strictly enforced • Boundaries should be reviewed in consultation with local communities • Comments made in Bishopsteignton Neighbourhood Plan should be taken into account • Inclusion of properties at Cummings Cross seems sensible • Have boundaries been provided to Parish Council's for comment? • Unclear why sports and recreational facilities on the edge of towns are to be excluded? • Flexibility should be allowed for development beyond the boundary ahead of the Review process to help enable the delivery of housing of strategic allocations • Boundaries mean very little as unsuitable development has historically been allowed 	<p>There is no greenbelt land designations within Teignbridge.</p> <p>Boundaries will be amended to include GESP allocations where agreed.</p> <p>Parish/Town Councils have been provided the opportunity to review and comment on proposed changes to settlement boundaries through a parish/town workshop prior to the start of the local plan review: Issues consultation, in addition to formal representations as part of the consultation process. In addition A1 paper copies of the plans were provided to each applicable town or parish council.</p> <p>Some roadside retractions in the settlement boundary are as a result of aligning the boundary with the side of the road rather than then centre of the road.</p>
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		<ul style="list-style-type: none"> Boundaries need to be amended to reflect allocations as the plan progresses Is removal around the boundary due to hedgerow removal around the boundary? 	
Homes	Q9. These principles have led to some of the settlement boundaries being extended or contracted. Please provide comment on any inaccuracies in the application of the above principles to revised settlement boundaries identified in the Settlement Boundary Review Paper		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	368, 406,	Inaccuracies in Bishopsteignton <ul style="list-style-type: none"> BSP4 - Land at Fair Isle, 39 Teign View should be omitted based on previous failed planning applications 	<p>The parcel of land which the paper is proposing to include within the boundary is an integral part of the domestic curtilage of the property Fair Isle, 39 Teign View Road. The curtilage is domestic in appearance and incorporates a driveway/parking area and garage as well as an area of neatly mown lawn and ornamental shrubs. The curtilage is bounded by high mature hedges and relates directly to both the property to which it belongs and to the built form of the village. It must therefore be included under Principles 1 and 2b. The Settlement Boundary Review process is not an exercise in preventing development, it is a review of the existing built form of towns and villages to ensure that the boundary is up to date (Bishopsteignton last reviewed in 1996), and cannot be used to prevent/allow possible future development in itself.</p> <p>Revision BSP4 is proposed to remain included within the revised boundary.</p>

	374	<p>Bovey Tracey</p> <ul style="list-style-type: none"> • Descriptions of BT10 and BT11 have been switched in error 	<p>Officer agrees with the respondent. The two descriptions have been misallocated to reference numbers/sites and will be amended to correct this administrative error.</p>
	376, 393	<p>Inaccuracies in Broadhempston</p> <ul style="list-style-type: none"> • BR10 – should be extended to include curtilage of Old Wottons, Houndshead • BR17 – Land to west of Parke Barn should be included as submitted through HELAA 	<ul style="list-style-type: none"> • BR10- If Old Wootons and Houndshead are included then this leads to the need to also incorporate the curtileges of Saxondale, Blacklers Cottage, Summerhill, Cantledown, Broadhayes, Merrifield and Barters. Inclusion of this tract of land within the settlement boundary would bring potential damage to the Conservation Area as well as changing the historic landscape with regards strip farming and ancient orchards. Whole area (with the exception of BR10 which is kept tightly around the built form of two modern properties - namely Pentreath and Bannuts) should continue to be excluded under Principle 3f. • BR17- As can be seen from aerial image ID041 (BR10, Parke Barn), this holiday letting unit (change of use from barn granted in 2011- Ref- 11/01085/COU) is set apart from the main built form of Broadhempston, being both visually and physically separated from the village by an agricultural field and mature tree/hedgeline. It has therefore been excluded under Principle 3b. HELAA submissions have no relationship with this settlement boundary review.
	193	<p>Inaccuracies in Bickington</p> <ul style="list-style-type: none"> • Revision commentary on BIC3 should state “tightly formed around rural development” rather than urban 	<p>The response is based on further investigation and an officer site visit.</p> <ul style="list-style-type: none"> • BIC3: To connect the existing boundary area to the proposed BIC3 extension would mean incorporating a number of fields which divide the

		<ul style="list-style-type: none"> • The Old Police House and adjoining field parcel should be included in the boundary • Ashleigh, The Old Vicarage Gardens, Park House and Love Lane Farm should be included in line with principles 1 and 2b • Lemonford Lane, Travellers Rest, the Caravan Park and The Toby Jug should be included in the revised boundary 	<p>two areas of residential buildings. This would stand against Principle 1 (defined tightly around built form).</p> <ul style="list-style-type: none"> • The Old Police House sits in its own grounds separated from the other nearby residential properties by an agricultural field, and therefore should be omitted from the boundary under Principle 3b (isolated development which is physically or visually detached from the settlement). If it were to be included then it would represent its own settlement boundary as it is detached from the adjoining areas by fields - as such this in itself would identify it as isolated development and point to the fact it should be excluded under Principle 3b. • BIC6: Curtilages of both Ashleigh and The Old Vicarage are expansive but are bounded by stone walls and mature hedges and defined by neatly mowed lawns and include a shed, a pergola and specimen trees. Following a site visit it is felt that they relate to the built form and are visually and physically detached from the adjoining farmland and as such should be included as requested in line with Principle 2b. • BIC8: Love Lane Farm is excluded from the settlement boundary under Principle 3d (agricultural farmsteads or buildings which stand on the edge of the built form of settlements). Park House is included already. • Love Lane Cottages, The Toby Jug and Travellers Rest are all isolated developments/properties
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		<p>detached visually or physically from the built form of the village and are therefore excluded under Principle 3b.</p> <ul style="list-style-type: none">• The caravan park is a site which provides temporary accommodation for holiday purposes and is therefore excluded from the settlement boundary under Principle 3f.
150, 171, 373, 370, 401, 159 155, 200	<p>Inaccuracies in Denbury</p> <ul style="list-style-type: none">• Land adjacent to Rowan House is domestic curtilage and should be included under Principle 2b• DEN3: should not include the whole strip of land up Greenhill Lane. Extending the perimeter to neaten the boundary is reckless.• DEN3: Denbury manor has no boundary with Greenhill Lane and cannot be justified under principle 3c.• DEN3: inclusion of field recently refused planning permission reckless• DEN3: Denbury Manor and associated curtilage should be included but only as far as the tennis courts, no further north.• DEN3: Line should be drawn from the edge of Sundance Cottage along Greenhill Lane.• DEN3: Pumps Acre garden – why is this now included?• DEN3: Pumps Acre – house should be included but not the land to the east where the holiday accommodation is;	<ul style="list-style-type: none">• Rowan House, 6 North Street, Denbury – Site visit shows curtilage to be residential in nature, contained within a wall and laid to neatly mown lawn with ornamental planting and seating areas. Garden adjacent (Lowes Park Farm, 14 North Street) to also be included for same reasons. Include under Principle 2b.• Through further site visits and discussions with the local authority conservation officer Denbury Manor has been identified as an area in which an extension to the settlement boundary has the potential to adversely affect the Conservation Area. Denbury Manor is an historic property which relates to the historical rural context and development of Denbury. The site when entered provides a perception of isolation from the village, compounded by its enclosing features and lack of clear views to the built form of the settlement. Denbury Manor has been excluded from the revised settlement boundary in line with principle 3c and 3c.• Pumps Acre’s curtilage is considered domestic in character with neatly maintained grass, vegetable plot to the rear and a wooden structure. The area is bounded on all sides by mature hedgerows

		<p>was previously used for goats and prior to that under forestry.</p> <ul style="list-style-type: none"> • DEN3: Pumps acres should not be included because: <ul style="list-style-type: none"> ○ It is the only building the entire length of Greenhill Lane to the south ○ Including it would also bring in rural paddocks, laying Greenhill Lane open to intensive development, impacting on the rural look of the manor grounds standing adjacent a conservation area ○ To protect the rural integrity and wildlife diversity of Greenhill Lane ○ To avoid dangerous use of Greenhill Lane as a developers thoroughfare • DEN3: Horsewell House – became residential curtilage in January 2018 although appeal not brought until March 2018 and Inspector didn't visit until May 2018 – how can this be so? • DEN3: Horsewell House – if the unauthorised building is included within the settlement line it will be eligible for extension to become a dwelling on this single track lane • DEN3: Frawzy and Horsehill House are in the same ownership and is one single open area of land with a rural 	<p>which separates it from the countryside beyond which has a clearly different character than this site. The full curtilage of Pump Acres is to be included within the revised settlement boundary in line with principle 1 and 2b. This area is domestic in character and use and the inclusion of the area into the settlement boundary would have no impact on wildlife diversity than it currently does.</p> <ul style="list-style-type: none"> • Inclusion within the settlement boundary does not confer planning permission and any application will require full and thorough assessment for its impacts, benefits and overall suitability and sustainability. Impacts on highway safety would be a consideration for any application of this site. • The inclusion of Horsewell House within the settlement boundary was originally included in anticipation of a positive result to the pending appeal. This would have been removed if the appeal had been dismissed. The appeal was approved and the area to the rear of Frawzy and Horsewell House now forms the rear residential curtilage of these dwellings- Appeal Ref- APP/P113/W/18/3194062. • An orchard to the west of Horsehill House has not been included within the revised settlement boundary. • The new village hall is not currently built and does not form an allocation in a development plan, therefore does not align with the settlement boundary principles. In addition the inclusion of the site within the boundary could leave the site
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		<p>appearance and should be excluded from the boundary.</p> <ul style="list-style-type: none"> • DEN3: Orchard to west of Horsehill House – should be excluded under Principle 3a • DEN3: Denbury Manors connection to South Street should be included in the boundary • DEN3: land to the north of the dwelling house of Denbury Manor is woodland and paddock and rural in nature and should not be included in the boundary • Proposed village hall: site should be included in the boundary • Proposed affordable homes site: should be included within boundary • DEN5: Large plot of land behind one of the properties included within revision is too large and will create an enclosed space between this land and the rear of Orchard Close. 	<p>susceptible to alternative development pressures. This would also apply to the rural exception site.</p> <ul style="list-style-type: none"> • The area enclosed within the revised boundary includes dwellings and a nursing home which are built development and have a close physical relationship with the built form of Denbury. The curtilages are enclosed and include domestic features. The areas stand a distance from the Conservation Area and the boundary extension is not considered to have a potential adverse effect on the character of the conservation area. This area has been included within the revised boundary in line with principle 1 and principle
	151	<p>Inaccuracies in Chudleigh Knighton</p> <ul style="list-style-type: none"> • CK6 – Ancillary yard space to rear of workshop proposed for inclusion should be omitted 	<p>Further investigation and an officer site visit identified the site is a vehicle repair workshop and is developed with a workshop building and large area of hardstanding for vehicular parking/storage and fenced from surrounding countryside. This area accords with Principle 1 and should remain within the revised boundary.</p>
	173	<p>Inaccuracies in Cockwood</p> <ul style="list-style-type: none"> • CMW7 - Rear garden of Rock Cottage to boundary with School Hill should be included as it is domestic curtilage 	<p>The response is based on further investigation and an officer site visit.</p>

		<ul style="list-style-type: none"> • CMW7 – Field adjoining garden of Rock Cottage should be included on the basis brownfield land 	<p>GARDEN - The revised boundary has been drawn to reflect both an existing fenceline and an observable difference in the character of the land in question. The area proposed to be included is immediately adjacent to Rock Cottage and incorporates a driveway and parking area, tightly mowed grass and an area of ornamental planting. This area is bounded by mature hedges and separated from the larger expanse of garden by a high wood panel fence. It has therefore been included in line with Principles 1 and 2b as it is clearly domestic and relates directly to the built form of the village and its associated property Rock Cottage.</p> <p>The larger expanse, beyond the fenceline is very different in nature. Whilst it may contain a trampoline and slide set, the grass is much rougher in type and appearance, there is no visible ornamental planting, no pathways and no physical boundary dividing it from the agricultural field to the north. This section visibly links much more closely with the rurality of the adjacent field rather than the built environment of Cockwood, and as such the expanse has been excluded under Principle 3C "... with their furthest sections omitted from the settlement boundary where there is an observable land-use difference, an open expansive character or dividing feature" (all three instances apply in this case).</p> <p>THE FIELD - Whilst the Officer agrees that this field was previously identified as 'brownfield' in the 2010 SHLAA assessment, there is no obvious evidence for this classification and the area does not appear on the</p>
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			<p>Teignbridge Brownfield Register. Based on the site visit in 2018 the area is considered greenfield in character.</p> <p>On this basis, and the fact that the site has never been re-classified as domestic curtilage via a planning application, it is still an agricultural field, despite its close proximity to the built form of Cockwood. It must therefore be excluded from the settlement boundary under Principle 1, which states the boundary must "be tightly defined around the built form".</p> <p>In addition, Principle 3e states that "where an extension could lead to development which has a potential to adversely affect the character and/or settling of a conservation area" it should be excluded. The field is immediately adjacent not only to the Cockwood conservation area but also to the Grade II Listed Rock Cottage, which has been classed as "Outstanding" in the Teignbridge Conservation Area Appraisal. Indeed, the Officer's Report when refusing planning permission to build on this area of land in 2014 (14/00469/FUL) was based in part on the fact that "The development would not preserve or enhance the character of the setting of the Grade II Listed Rock Cottage or the setting of the Cockwood Conservation Area.</p> <p>On the basis of this, the field should also be omitted from the settlement boundary under Principle 3e.</p> <p>On the evidence given, the respondent's request for the inclusion within the boundary of both the extended garden and the field should both be refused on grounds</p>
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			that to include either would go against the core Principles of this proposal.
	167, 427, 413,	<p>Inaccuracies in Dawlish</p> <ul style="list-style-type: none"> • DA1 – Object to revision. Buildings are agricultural in origin and should be excluded to guard against development which would ruin urban/rural transition. • DA2 – Object to inclusion of properties – particularly those at Windsor Drive – which do not relate to the built form of Dawlish. • DA3 – Object due to large open spaces between buildings and the adverse impact on the landscape that redevelopment could create. • Northern Dawlish boundary must be limited at Shutterton Lane and the separation between Dawlish and St Mary's Cottages maintained • Field between Country Park and Exeter Road must remain as open countryside to retain character of the park • DA2 – inclusion of hospital makes sense but does this protect the green space around the buildings from infill development? 	<ul style="list-style-type: none"> • DA1 (The Old Cider Mill, Shutterton Lane, Dawlish) – site visit shows properties to be converted barns immediately adjacent to new residential development at Shutterton Lane. Should be included under Principle 1 as part of the continuous form of built development. • DA2 (Windsor Drive, Langdon, Dawlish) – Site visit proves site to be very much visually attached to the main built form of Dawlish, linking the new development at Shutterton Lane to the Langdon hospital site. There is no rurality and boundary should be expanded to incorporate properties under Principles 1 and 2a. • DA3 (Langdon Hospital, Dawlish) – Green space has been omitted so that only that within the built form has been included. All recreational areas and open expanses have been omitted to protect them under Principle 3a. The remaining built form should be included under Principle 1 as it is part of the built form of Dawlish.
	165, 381 205	<p>Inaccuracies in Doddiscombesleigh</p> <ul style="list-style-type: none"> • Garden of Brookford (between DOD6 and DOD7) should be included in revised boundary under Principle 2b. • DOD1- Boundary should be extended up to La Ruche as it complies with policy 	<ul style="list-style-type: none"> • This area of land is visually the north-western corner of an agricultural field which sit adjacent to property Brookford, which has been bought into domestic use as a residential garden at some point over the years, it appears on the block plan for the property Brooklands in planning application

		<p>and is physically and visually part of the settlement</p> <ul style="list-style-type: none"> • Redundant buildings to the north west could be converted to dwellings and should be included in the revised boundary 	<p>06/03895/FUL and the current owner states that he has used it as a domestic garden since 1988.</p> <ul style="list-style-type: none"> • The area is laid to mown lawn and semi-mature trees (Silver Birch) and is accessed from the main property via a narrow gap between hedgerows. The land area is bounded by mature hedging and fencing and relates clearly to the built form of the village rather than the agricultural land surrounding. This area should be included within the revised boundary in line with principle 2b. • DOD1- Whilst the curtilage immediately adjacent to Springfield is visually a domestic garden (tightly mown grass, relates to the built environment, immediately adjacent to the property to which it relates) and should therefore be included within the boundary under Principle 2b, the large extent of land north west of the property is agricultural in appearance and relates more to the character of the surrounding countryside than the built form of the village. As such it has been excluded under Principle 3c. With this area excluded, this means that residential property La Ruche is both visually and physically separated from the settlement and is therefore excluded under Principle 3b due to the isolated nature of its setting. • The buildings referred to are a number of agricultural buildings set in a countryside location adjacent to the village. They have been excluded under Principle 3d and should remain outside of the settlement boundary. This does not preclude
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		future redevelopment of this redundant site, possibly as a site designated through a future Neighbourhood Plan written by the Parish, it simply shows them to be outside of the Settlement Boundary at present in line with the Principles contained within the Settlement Boundary Review Document.
162	<p>Inaccuracies in Exminster</p> <ul style="list-style-type: none">• Sentry's Farm – boundary should be contracted to exclude temporary SANGS and amenity space	<ul style="list-style-type: none">• This SANGS area is only temporary at present. The Boundary will be reviewed in future and will be contracted when the provisions becomes permanent. The area will remain within the boundary under this stage of the review under Principle 2a.
384, 392	<p>Inaccuracies in Kennford</p> <ul style="list-style-type: none">• KEN3 – including an area of land within the boundary because it is mown grass is not sufficient justification. On the basis that it has mown grass, paddock east of Kenbury Court (EX6 7TB) should be included• Lamacroft Farm – Should be included as an allocated site for 120 houses and the farm itself relocated• Boundary should include Lamacroft Farm as this is a brownfield site• KEN7 and KEN9 – both should either be included or excluded as farmsteads are places of employment too. To include one and exclude the other is irrational.	<p>The response is based on further investigation and an officer site visit.</p> <ul style="list-style-type: none">• KEN3 - This site has been included within the revised settlement boundary due to its appearance as a domestic curtilage and its close relationship with the built form of the village. The area forms the rear garden of the Seven Stars Inn; it is bounded by hedge and mature treeline and contains pathways, clipped hedges, a toy goalpost and a neatly mown lawn. It is visually and physically linked to the built environment and should therefore be included with the boundary under Principle 2b. The adjacent field is very much of an amenity appearance and relates to no particular property visually. It is fenced with a wooden post and rail fence and accessed by a metal five bar agricultural gate. Whilst mown there

			<p>is a very large pile of plant waste and debris in the centre of the area and a number of sheds from neighbouring properties back onto it. The area does not appear to be a residential garden and its inclusion would stand against the principles of the Review.</p> <ul style="list-style-type: none"> • KEN7 / KEN 9 - The basic Principles of the paper are that agricultural farmsteads on the outskirts of settlements should be excluded and commercial business premises included. Farmsteads (as in KEN7) link the town/village with the surrounding rural environment and provide a historic rural connection to the outskirts of the settlement, the protection of which safeguards against infilling; as such they should be excluded under Principle 3d. Commercial businesses (as in KEN9), on the other hand, don't maintain this rural/urban buffer and are part of the built townscape as opposed to the rural countryside beyond; as such they should be included under Principle 1. The revised boundary should not be amended in relation to KEN7 and KEN9. • The NPPF defines the term Brownfield (Previously Developed Land) and specifically excludes land currently or last occupied by agricultural structures.
	394	<p>Inaccuracies in Kenton</p> <ul style="list-style-type: none"> • Why have the garages relating to The Willows been excluded? 	<p>Further investigation has identified one garage standing directly adjacent to the revised boundary which closely relates to the domestic dwelling. This garage will be included within the revised boundary under Principle 2b.</p>

	206, 207, 403,	<p>Inaccuracies in Kingskerswell</p> <ul style="list-style-type: none"> • Why is the Crown Estates development in Kingskerswell ((off A380) excluded? • Why is the small parcel of land, Churchway Lane, Greenhill Road, missing? • Garden of Rock House, Maddocombe Road should be included 	<p>KK5 - included as already a petrol station and related forecourt and as such meets Principle 1. KK6 excluded as GI linked to new housing development approved under PP 12/02509/MAJ so excluded under Principle 3a.</p> <ul style="list-style-type: none"> • Boundary currently curtails the garden of Rock House. The whole garden is bounded by a high fence and stone wall and backs onto the South Devon Highway. The curtilage is planted with specimen trees and contains a shed/summer-house, driveway, parking area and pathways. The curtilage relates to the built form of the village and should be included within the boundary under Principle 2b.
	189, 420, 211, 203	<p>Inaccuracies in Newton Abbot</p> <ul style="list-style-type: none"> • Object to boundary change bordering Bradley Farm due to adverse impact on skyline and National Trust Property of any future development • Bradley Farm Cottage, Bradley Wood House, Bradley Cottage and Woodpeckers should all be included due to proximity to allocated housing site (NA6) • Land at Langford Bridge should be included to increase the developable area of the NA3 allocation and prevent development pressures in unsustainable locations 	<ul style="list-style-type: none"> • This is a site allocation, not a change proposed through the boundary review process. The area in question was allocated in the Local Plan for 70 homes (NA6 Bradley Barton). It is therefore included within the settlement boundary under Principle 2a. • These properties, whilst isolated development at present, will be in immediate proximity to the built form when the Bradley Barton residential development (NA6) is completed (depending on where GI ends up being located). Therefore these properties should be brought within the revised settlement boundary in line with Principle 1 and have regard to the adjacent allocation. • No reason given as to why this large tract of agricultural land should be included other to increase the developable area of an existing allocation. The area is not an allocation in the

			Local Plan and is an isolated farmstead at present. It may come forwards later on as an allocated site but does not fall within this settlement boundary review and stands against the Principles for inclusion.
389	Inaccuracies in Shaldon <ul style="list-style-type: none"> SHA7 – Historic orchard and disproportionately large curtilage compared to neighbouring properties; does not fit Principles 1 or 2b. 		The area to the rear of Linacre is a large square parcel adjacent the Conservation Area. The land once formed part of an historic orchard and as such has been excluded from the revised settlement boundary under principle 3a.
182, 391	Inaccuracies in Stokenteignhead <ul style="list-style-type: none"> Full extent of curtilage belonging to Grange Vale should be included under Principle 2b 		Visually from the aerial photographs this area looks like an area of orchard and the trees. These created shading obscuring the aerial view. Photographs supplied by the respondent do indeed show it to be an area of domestic garden which was confirmed through an officer site visit in 2018. This area has been included within the revised boundary in line with principle 2b.
192, 380	Inaccuracies in Teignmouth <ul style="list-style-type: none"> Former contractors yard, Meadow Park, should be included under Principle 2c Allocated Site TE3 should be excluded on the grounds of strong objections to outline planning application 		<ul style="list-style-type: none"> The Settlement Boundary Review process is not an exercise in preventing development, it is a review of the existing built form of towns and villages to ensure that the boundary is up to date and cannot be used to prevent/allow possible future development in itself. The site is an allocated site within the adopted local plan and will remain within the settlement boundary in line with principle 2a.
393	Inaccuracies in Tedburn St Mary <ul style="list-style-type: none"> TSM10 – Land to west of Westwater Hill employment site should be included as brownfield land 		TSM10 - The land to which this comment makes reference has already been included within the revised settlement boundary (see aerial photograph ID041).

	178	<p>General Inaccuracies</p> <ul style="list-style-type: none"> Newton Abbot East revisions have not followed Principles 1, 3a or 3e (specific areas and issues not identified further) 	<p>The boundary is 'tightly defined' but includes some undeveloped areas that, which are site allocations made in the Local Plan. These allocations already stand within the adopted settlement boundary and do not form a settlement boundary revision through this review.</p> <p>With regards the exclusion of "open spaces, orchards and sports and recreational facilities which stand on the edge of the built for of settlements" it is unclear from the response which areas, in particular, is being referring to when stated that the Principles have not been followed in the case of Newton Abbot East. More detailed information would be required in order for an officer response to be made.</p>
	164, 171, 373, 357 182, 391 193	<p>No Inaccuracies</p> <ul style="list-style-type: none"> Support for all amendments in Ipplepen Support for DEN1, DEN2, DE4 and DEN6 Agree with DEN2 and DEN3 Agree with DEN4 and DEN5 Agree with ST02 revision Agree with BIC1, BIC2, BIC4, BIC6 and BIC7 	Noted.
	288, 382, 408, 410, 414	No Comment	
	287, 359, 362, 364, 369, 379, 391, 398,	<p>General Comments</p> <ul style="list-style-type: none"> Boundaries serve no purpose Acceptable 	Nomenclature- agreed that this has led to some confusion and future boundary revision identification tags will differ from those given to local plan allocations.

	402, 411, 413, 159	<ul style="list-style-type: none"> Propose that Combeinteignhead has a settlement boundary Maps have no indication of location so unable to comment Boundaries should be dispensed with KEN7 – Sensible and in line with methodology Increase size of existing industrial estates without creating pollution STO1 – exclusion is in line with Principles Sites put forward by Sibelco for allocations should be included Embury Close and The Sloop public house have had sightings of bats Boundaries are effective in limiting indiscriminate planning applications Unhelpful that DA nomenclature has been used for Dawlish as this is already in use with regards allocated sites Accepted Denbury Manor and to an extent Pumps Acre should be included within the revision 	
Homes	Q10. General comments on draft Settlement Boundary Review		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	162, 164, 357, 288, 370, 401, 407, 408, 410, 374, 382, 395,	No or No Comment	Noted

	<p>398, 400, 185, 359</p> <p>178, 190, 195, 206, 207, 289, 360, 363, 364, 368, 369, 373, 375, 377, 380, 385, 387, 390, 391, 392, 413, 159 201</p>	<p>General Comment</p> <ul style="list-style-type: none"> • Concerned that current boundaries pre-date Local Plan • Premature to determine boundaries ahead of GESP • Boundaries should be given same status as town/village envelopes • Building outside of boundary should only be allowed with local support • Tightly defined boundaries make viability more difficult • Higher land values inside boundaries rather than being based on site's merit • Tightly defined boundaries limit growth which goes against Local Plan • Boundary review should identify sustainable locations for development • Boundaries don't need extending to extent shown • No development should occur outside of boundaries • Question needs more thought and consideration • More consultation should be undertaken • More flexibility for small scale developments required • Maps are difficult to identify changes • Necessary to update boundaries • Remove all boundaries 	<p>Settlement boundaries were subject to a partial review during the preparation of the current local plan to include allocations. The urban area and towns were the focus for allocations and therefore villages were not subject to a settlement boundary review as they had no allocations. The Local Plan review presents the opportunity to comprehensively review these boundaries to make them current and up-to-date.</p> <p>The Settlement Boundary Review establishes the principles in which the final settlement boundary revision will apply in the Proposed Submission version of the Local Plan Review. The Boundary Review sought to apply these principles to reflect the built form of settlements, allocations and extant planning permissions at that time. It is appreciated that the Local Plan Part 2 and GESP will allocate for development and this will be reflected in the final version of the settlement boundary in line with the established principles.</p> <p>Town/village envelopes is another term for settlement boundaries and both references hold equal weight.</p> <p>The Settlement Boundary Review is seeking to reflect the built form of settlements as they currently stand and does not serve to determine locations for development or enable green space to be developed.</p> <p>Maps have been designed to be as readable as possible, utilising different colours for contractions, extensions and</p>
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		<ul style="list-style-type: none"> • People have no knowledge of this review – leaflets should have been sent to all householders • Boundaries should not be set in stone and all cases judged on own merit • Boundaries should be amended to include new allocations in Local Plan Review • Why have sports/recreational facilities on edge of towns been excluded? • General terms of review seem sensible but need local knowledge to implement • Something has to 'give' at some point • Boundaries will result in solid blocks of development which will be visually disastrous • Changes should be discussed with Councils and residents • Principles seem well thought out • Pleased review has taken place • Future extensions should be subject to public debate to prevent urban sprawl • Applications within the boundary should be assessed individually based on their own merits • Green space should be retained and not give over to potential development because it makes the map neater 	<p>to identify the existing boundary, alongside commentary to explain amendments. These maps were provided in paper form within the Review document and amendments could be difficult to identify on A4 maps. This was recognised and large-scale A1 maps were provided to every affected Parish Council for study and comment prior to the consultation beginning. In addition the electronic version of the maps on the Council website could be easily manipulated and zoomed to gain the required detail.</p> <p>All proposed changes in the Review have been presented to District Councillors and Parish Councils through a settlement boundary workshop prior to the formal consultation opening. Councillors, parish councils, the public and stakeholders all have the opportunity to comment on this review and subsequent stages in the preparation of the draft Local Plan.</p> <p>The removal of all settlement boundaries has been a consideration however the consultation has revealed significant support for this designation and is likely to be maintained as a planning tool into the proposed submission of the local plan review.</p> <p>The Settlement Boundary Review (para.3.15) identifies that sports and recreational facilities on the edge of the built form of settlements have been excluded because they have an open character and can provide important views into the open countryside providing that visual connection between the two. These spaces can also provide a visual buffer between the built form and the</p>
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			<p>open countryside, softening the visual impact of the settlement.</p> <p>All applications are assessed individually on their own merit.</p>
177,	<p>General comments relating to historic environment</p> <ul style="list-style-type: none"> • Essential to perform Heritage Impact Assessment to ensure harm is minimised • Historic form and character should determine location and scale of future development 		<p>Neither the Settlement Boundary Review nor the draft Local Plan determines the location and scale of future of development. This will be determined through subsequent stages of plan preparation and proposed allocations will be contained in Part 2 of the Local Plan.</p>
402, 413	<p>General comments relating to natural environment</p> <ul style="list-style-type: none"> • Take the needs of wildlife into account • Boundaries should not mean all green space inside is open to development 		<p>The Settlement Boundary Review is seeking to reflect the built form of settlements as they currently stand and does not serve to determine locations for development or enable green space to be developed.</p>
193,	<p>General comments relating to Bickington</p> <ul style="list-style-type: none"> • BIC5 – Require restriction preventing development due to proximity to Grade 1 Listed Church • No planning permissions for housing in Bickington have been granted but traveller sites have been granted in open countryside 		<p>Noted.</p>
180, 396,	<p>General comments relating to Bovey Tracey</p> <ul style="list-style-type: none"> • Approach to Heathfield boundary supported • Boundaries for Bovey look fine 		<p>Noted</p>

	413, 414	<p>General comments relating to Dawlish</p> <ul style="list-style-type: none"> • DA2 – inclusion of hospital makes sense but does this protect the green space around the buildings from infill development? • Unhelpful that DA nomenclature has been used for Dawlish as this is already in use with regards allocated sites • The boundary for Dawlish holds town to its natural limit • Further development of Dawlish would not be beneficial to residents 	<p>Whilst the Dawlish settlement boundary includes the hospital buildings, it does not include the wider areas of open green space around it.</p>
	204, 155 200	<p>General comments relating to Denbury</p> <ul style="list-style-type: none"> • Boundary around Horsehills has not been mapped correctly in line with Principle 1 • If the southern portion of the grounds of Denbury Manor have been excluded then so should the northern portion as it has a more domesticated appearance • Only the domestic area fronting south street to the south of St Mary's Church should be included in the boundary to protect the integrity of the Conservation Area • Is the justification for inclusion of land opposite 33 East Street based on a honest error or selective choice of facts to support a false argument 	<p>The boundary of Horsewell House has been mapped correctly – as planning permission was granted at appeal which formalised it as residential curtilage.</p> <p>The grounds of Denbury Manor are now excluded from the settlement boundary.</p> <p>The settlement boundary to the south of the church has been amended in this way.</p> <p>The inclusion of the land adjacent to Horsewell House within the settlement boundary was originally included in anticipation of a positive result to the pending appeal. This would have been removed if the appeal had been dismissed. The appeal was approved and the area to the rear of Frawzy and Horsewell House now forms the rear</p>

		<ul style="list-style-type: none"> Greenhill Lane is unsuitable for additional development and traffic Greenhill Lane provides an invaluable asset to the village for recreational purposes 	<p>residential curtilage of these dwellings- Appeal Ref- APP/P113/W/18/3194062.</p> <p>Noted.</p> <p>Noted.</p>
	206,	<p>General comments relating to Kingskerswell</p> <ul style="list-style-type: none"> KK5 – Further development would not enhance the village and would create infrastructure issues 	Noted.
	178, 203,	<p>General comments relating to Newton Abbot</p> <ul style="list-style-type: none"> Difficult to determine proposals on Newton Abbot East map 	Noted.
Homes	<p>Q11. Should the Local Plan Review consider one of the above alternative approaches to settlement boundaries?</p> <p>A: Allow development adjacent to boundaries</p> <p>B: Replace boundaries with criteria based approach</p>		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	162, 164, 206, 417, 207, 419, 289, 365, 368, 370, 380, 387, 390, 391, 396, 399, 401, 405, 406, 411, 415, 407,	<p>No alternative approach should be considered because:</p> <ul style="list-style-type: none"> Boundaries should not be removed Both alternative approaches would leave communities vulnerable to speculative development Alternative approach would make it difficult to control development Existing boundaries have been drafted in to the Bishopsteignton NDP and reflect the wishes of the people 	<p>Settlement Boundaries, or settlement limits, remain in the draft Local Plan as they are a recognised way of controlling urban sprawl. The development that may be permitted within and outside settlement boundaries is set out in Policy SP2: Settlement Limits and the Countryside, which restricts development outside Settlement Limits.</p> <p>The settlement limit of Bishopsteignton has been amended to accord with the Neighbourhood Plan.</p> <p>The draft Local Plan contains Policy EN4: Landscape Protection and Enhancement, which ensures that the</p>

	409, 412, 413, 414 217	<ul style="list-style-type: none"> • Both would lead to sprawling uncontrolled development • Boundaries keep villages contained and do not allow inappropriate development • Established boundaries should be retained • Neither option is good. • Settlement boundaries are effective in limiting ad hoc development • Both options are an excuse for more unsuitable development • Development should only be allowed within settlement boundaries • Leave boundaries as they are • The essential nature of rural landscapes must be protected • Boundaries limit ad hoc planning applications • Boundaries keep things black and white • Clear and tangible way to determine planning applications • Boundaries protect against urban creep • Just revise boundaries for now • Either option would open the door to rampant development • Any development outside a boundary should be considered by a Neighbourhood Plan • Boundaries ensure brownfield sites are redeveloped first 	landscape is protected and enhanced through development.
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	168, 153, 179, 372, 375, 377, 381, 383,	<p>Disagree with boundaries (but have not identified a preferred option) because:</p> <ul style="list-style-type: none"> • Boundaries should not be used as a barrier to meeting housing need • The use of settlement limits to restrict suitable and sustainable development is against the NPPF • Boundaries are overly prescriptive and have a sterilising effect • Boundaries should not be set in stone – each case to be judged on own merit • Boundaries become a focus despite other sites being suitable and sustainable • Sites should be looked at on their merits rather than their location • Boundaries restrict settlements and increase density within villages • Development in open countryside must be considered if sustainable • All forms of sustainable housing must be encouraged with targets taken as a minimum 	<p>Whilst comments suggest that settlement limits are a barrier for development, and that sites should be considered on their merits, there were no suggestions as to how this should be done. As for considering each site on its own merits, this is done at the stage of a planning application and, depending on whether the Council has a 5 year supply of housing land or not, may be permitted if it is sustainable development, in accordance with the NPPF's presumption in favour of development.</p>
	288,	Agree with Option A	Noted.
	179, 185, 192, 197, 360, 388, 392, 397, 398, 373 372	<p>Agree with Option A because:</p> <ul style="list-style-type: none"> • Development beyond settlement limits must be considered • Council should consider permitting development adjacent to as well as within boundaries 	<p>The draft Local Plan contains flexibility for certain types of development outside settlement limits. Policy S2: Settlement Limits and the Countryside sets out how Rural Exception Sites, Entry Level Exception Sites and Local Needs Housing, made Neighbourhood Plan allocations, replacement dwellings, gypsy and traveller and travelling showpeople plots, rural workers' dwellings, certain</p>

		<ul style="list-style-type: none"> • Focus should be on small/medium sized sites adjacent/close to existing settlement and thereby sustainable • Will increase options for affordable housing development • Is the most appropriate approach • It recognises that boundaries should be a guide not a barrier • May help to preserve villages • Small hamlets should be built near villages to support their services • It seems the obvious choice • Without defined boundaries there is the danger of sprawl • It would increase housing provision and provide economic boost for peripheral areas • It would be better than Option B • All development should be sustainable and boundaries will protect areas outside from development 	business development, transport, communication, renewable and low carbon energy and energy storage, development to support biodiversity, minor alterations to buildings and coastal and flood protection can be permitted adjacent to settlement limits or in the countryside. This is subject to impacts in relation to the landscape, biodiversity, travel patterns and impacts on European Wildlife sites.
	363, 364, 367, 398, 393	<p>Agree with Option A on the proviso that:</p> <ul style="list-style-type: none"> • Sustainable load bearing straw bale housing is used • Developments are sustainable • Only for small scale social housing • Development adjacent must meet certain criteria • Boundaries are reviewed in terms of ability to deliver within these areas 	<p>The Local Plan cannot insist on sustainable load bearing straw bale housing.</p> <p>The Local Plan has been written to ensure the delivery of sustainable development and Policy SP1: Sustainable Place, sets out the considerations for sustainable development.</p>

			<p>Small scale social housing is permitted adjacent to settlement limits through Policy H7: Rural Exception Sites.</p> <p>Any development outside settlement limits must take account of the landscape, biodiversity, travel patterns and impacts on European Wildlife sites.</p>
359, 365, 401,	<p>Disagree with Option A</p> <ul style="list-style-type: none"> • Would undermine exception sites and raise land values making viability difficult to achieve • It would complicate things to allow development adjacent and risk challenges from developers and residents 		<p>The types of development that are allowed, under policy S2 of the Local Plan are restricted. Market housing developments are not permitted without providing for any affordable housing need, to ensure that land values do not become inflated and prevent the delivery of affordable and social housing.</p>
179, 195, 362,	Agree with Option B		Noted
195, 355, 369, 377, 383, 403,	<p>Agree with Option B because:</p> <ul style="list-style-type: none"> • Removing boundaries would even out land values • Criteria far more appropriate for assessing impact on settlement facilities • It would remove overreliance on arbitrary boundaries • It is an innovative and positive policy • Clear criteria would guide development to appropriate locations • Each site should be judged by its merits 		<p>Whilst settlement limits have been retained, Policy S2: Settlement Limits and the Countryside, does allow for some types of development adjacent to settlement limits or in the countryside. It is unlikely that removing settlement limits would even out land values, as land adjacent to the existing built development of towns and villages would remain to be the most sustainable for development, due to its proximity to services and facilities, and therefore would remain to have a higher value than land in the open countryside. The Plan does not prevent the consideration of any planning application on its own merits.</p>
153, 369, 393,	<p>Agree with Option B on the proviso that:</p> <ul style="list-style-type: none"> • Policy allows for appropriately scaled development on settlement edges 		<p>Whilst settlement limits have been retained, Policy S2: Settlement Limits and the Countryside, does allow for</p>

		<ul style="list-style-type: none"> • Sustainability is part of the criteria • Boundaries are reviewed based on realistic criteria in terms of ability to deliver 	some types of development adjacent to settlement limits or in the countryside.
	206, 360, 365, 367,	<p>Disagree with Option B because:</p> <ul style="list-style-type: none"> • It would confuse and is very unclear • Could lead to development everywhere and spoiling areas • Would cause lack of clarity for communities • Would support development that has no benefit to local community • Would be open to abuse 	The draft Local Plan has retained settlement boundaries/limits, which are easily understood and provide clarity over where development will generally be acceptable.
	379,	<p>Agree with a combination of boundaries and Option A because:</p> <ul style="list-style-type: none"> • Provides more flexibility 	Whilst settlement limits have been retained, Policy S2: Settlement Limits and the Countryside, does allow for some types of development adjacent to settlement limits or in the countryside.
	192, 210, 287, 357, 381, 384, 385,	<p>Agree with combination of Option A and Option B because:</p> <ul style="list-style-type: none"> • Council may need to consider approaches A and B to stimulate available land • Both would boost the supply of housing • Allows or development on rural fringes where small groups of buildings/farms already exist • Would result in all settlements taking 20 houses with no detrimental effect • Plan to use Option A then, if successful, move on to Option B 	Whilst settlement limits have been retained, Policy S2: Settlement Limits and the Countryside, does allow for some types of development adjacent to settlement limits or in the countryside. This includes small scale affordable housing or local needs housing.

		<ul style="list-style-type: none"> Success will depend on robust criteria for both options 	
	162, 185, 289, 384, 392,	<p>Other Comment</p> <ul style="list-style-type: none"> Agree with enabling small scale development to meet local housing need A clear framework should be provided to ensure Local policy effectively applied Chosen option should provide sufficient opportunity for development to meet need Development should be matched to where best suited Far easier in political terms to focus development in few areas to minimise voters affected Hard to comment on Option B without knowing the criteria 	<p>Small scale development top meet local housing needs is permitted under policy S2.</p> <p>The use of settlement limits provides a clear framework for where development is permitted and where it is restricted and opportunity to meet local housing development needs.</p>
Homes	<p>Q12. Four potential options are presented to achieve the mix and type of housing required in Teignbridge:</p> <p>1A: Through stand-alone allocations</p> <p>1B: Through specific allocations within larger residential and mixed use schemes for specific housing</p> <p>2A: Requiring a general mix as prescribed through local plan policy</p> <p>2B: Via a percentage requirement for developers to meet</p> <p>Which of the above options or combination of options would best address meeting an appropriate mix in the district's additional housing requirements?</p>		
	Ref	Summary of Main Points Raised	Response to Main Points Raised

	162/168 179/370 375/383 393/369 192/197	<p>Support for Option 1A because:</p> <ul style="list-style-type: none"> • Would promote mixed communities • Useful in helping deliver affordable housing when done alongside a clear, criteria-based policy defining scale of local housing need through a numerical housing target • It can meet an identified localised need and demand on a location by location basis • Others are too prescriptive and in the past, rarely adhered to • Some benefits for older people • To meet specific criteria of people's needs with affordable housing continued to be provided via S106 and agreed mix and tenure with developers • Can address certain localised need and demand on a locational basis • to enable market demand and housing needs assessments to be combined with planning policy from a design perspective with a more prescriptive mix likely to lead to housing delivery issues • would work quite well for bungalows for the elderly • can be informed by a range of evidence on local housing needs to stimulate landowner discussion regarding addressing a range and mix of housing 	<p>The use of stand alone allocations for specific types of housing will be considered in Part 2 of the Local Plan, which will allocate development sites.</p>
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		<ul style="list-style-type: none"> • Mortgage lenders are not prepared to lend to purchasers on sites with combined uses given volatility of house prices in close proximity 	
	362/363	Support for Option 1A with Option 1B utilised for affordable and starter homes for locals	Policies H7: Rural Exception Sites, H8: Entry Level Exception Sites and H9: Local Needs Housing will provide opportunities for the development of affordable housing. Policy H1: Affordable Housing Targets will ensure that a percentage of all new residential development, above 4 units, will be provided as social housing.
	398/413 195/208	<p>The following concerns raised over Option 1A:</p> <ul style="list-style-type: none"> • Too prescriptive/inflexible • wouldn't result in the appropriate mix of housing or risk the entire site not coming forward • would create an unhealthy separation of people of the same age or ability rather than mixed communities • not an appropriate approach as the market rarely delivers this • could result in undeveloped sites, if insufficient evidence/market research is undertaken to support the allocation 	This will be considered when Part 2 of the Local Plan, which will allocate development sites, is prepared.
	162/192 197/210 369/385	<p>Combination of options supported:</p> <ul style="list-style-type: none"> • 1A & 1B & 2A • No reason why the review can't allocate a range of sites using all the approaches • 1A & 2A to allow delivery of a full range of affordable housing tenures 	The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand.

		<ul style="list-style-type: none"> • 1B & 2A applied with a flexible approach will support a mix of housing to meet needs whilst not placing restrictions which would impact deliverability • 2A & 2B equally justified as options 1A & 1B where local needs are not evidenced • 1A & 1B with rigorous implementation by the LPA if it is to survive appeals. 	Allocation of sites will be contained within Part 2 of the Local Plan, which is yet to be prepared.
	164/210 392/401 192/361	<p>Support for Option 1B because:</p> <ul style="list-style-type: none"> • Provides certainty for developers and local communities • Provide a stronger basis for negotiations with developers • Requirements for less profitable housing should be placed within bigger schemes if the policy to encourage small schemes is to get mileage • if you leave allocations to developers they will always opt for the most commercially viable option which doesn't reflect the needs of communities • can be informed by a range of evidence on local housing needs to stimulate landowner discussion regarding addressing a range and mix of housing • to allow for specific allocation of affordable and starter homes (only to be sold to locals and not investors) 	This approach has been followed and Policy H4: Homes Suitable for All, ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand.
	369/398 180/195	The following concerns raised over Option 1B:	These concerns are noted. The policy applies to all residential development, so does not preclude small sites and the approach to provide a range of sizes, types and tenures of housing to address identified needs and

		<ul style="list-style-type: none"> • would probably encourage developers to cram too many houses into a development • too prescriptive and wouldn't result in the appropriate mix of housing or risk the entire site not coming forward • should not be relied upon solely as this would exclude smaller sites which deliver a significant proportion of housing • not appropriate because this approach already occurs • Overly prescriptive and unnecessary 	market demands is not considered an overly prescriptive approach. The efficient use of land is encouraged through Policy DW19: Residential Density, but this is expected to be delivered through good urban design, not through cramming of houses, as will be secured through the raft of design and wellbeing policies contained in the draft Local Plan.
	180/195 206/211 365/377 390/369 398/397 391	<p>Support for Option 2A because:</p> <ul style="list-style-type: none"> • It is the most suitable and flexible approach when the mix is agreed on a site by site basis with the LPA • Most sensible choice/suitable method • mixed communities are important for vibrant and positive community life with planners assisting on the mix and developer profit not determining mix • other options are specific and would place a restriction on the way development is brought forward with an ever-changing market • More practical and efficient to enable flexibility for developers and the Council to identify what is needed in a specific area and how best to address it at that time 	The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand. This will also help to deliver mixed communities.

		<ul style="list-style-type: none"> • Health and social care evidence suggests a mix of housing ensures people mix which is best for well-being and maximising health gains • Most practical • Provides a degree of flexibility in line with local and market demand • Allows for diversity • 	
364/366 376/402 403/414 373/384	Support for Option 2A		The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand.
289/399 405/406 411/415 217	None of the options supported: <ul style="list-style-type: none"> • None of the options address social housing demand • None of the options- building good quality small homes would attract elderly living in larger homes and provide a nest egg towards care 		Demand for social housing is addressed through policy H1: Affordable Housing Targets and through Policies H7: Rural Exception Sites and H8: Entry Level Exception Sites, which permit development adjacent to settlement limits where it is providing for affordable housing needs.
357	There should not be a mix of housing		The housing needs of different sections of society varies, and therefore so should the housing that is built to meet those need
369/168 179/197 383	The following concerns raised over option 2A: <ul style="list-style-type: none"> • Doesn't work at present • not sustainable and is a lazy slap-dash approach • not sustainable and is an inappropriate approach to plan making 		The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand. The policy is not considered "slap-dash" or overly prescriptive, as it relates to the

		<ul style="list-style-type: none"> often used too prescriptively and to the detriment of viable developments 	evidenced needs of residents, and is considered wholly appropriate to plan making and the shaping of development.
	208/210 369/396 162/180 211/195	<p>The following concerns raised over Option 2B:</p> <ul style="list-style-type: none"> Too prescriptive/inflexible Would discourage developers, especially SME's Creates targets which tend to lead to abuse and inequality with 'deliverers' and can quickly become out of date and not fit for purpose wouldn't work as developers would use feasibility studies to get out of providing the percentage too prescriptive and wouldn't result in the appropriate mix of housing or risk the entire site not coming forward not favourable as such requirements are easily overridden by viability claims lacks flexibility and ability to react to changing needs and the needs of different areas of the district considered inappropriate 	The approach set out in Option 2B – to set out percentages of different types of houses – has not been followed.
	408/410 195	Support for Option 1B	Noted.
	359/360 380/397 413	<p>Support for Option 2B because:</p> <ul style="list-style-type: none"> Can meet the areas needs such as social housing, smaller affordable homes for the young and suitable housing for the elderly 	The approach set out in Option 2B is considered overly prescriptive. Setting a percentage target for different types of housing could mean that the policy is inflexible to change in Teignbridge residents' needs or is regarded as a barrier to development.

		<ul style="list-style-type: none"> • Ensures developers give thought to the overall package rather than cherry picking to maximise profit • alternatives allows too much wriggle room for developers to avoid building smaller units suitable for the young and older downsizers • easier to enforce • allow for diversity • required mix is provided rather than developer-led 	<p>The plan contains opportunities for small scale social and affordable housing through Policies H7: Rural Exception Sites and H8: Entry Level Exception Sites.</p>
	207/208 287	<p>The following questions raised:</p> <ul style="list-style-type: none"> • How can you go against option 2a which follows local plan policy? • By categorising this different housing types aren't we assuming how people want to live? • How do we define older people and who decides what type of housing they want to live in? • Why is this required because if 10,000 4 bed houses were built people would move up, sideways and down and allocation of housing would be filled? 	<p>The approach set out in option 2A – to provide a general mix – has been followed, with an additional requirement to ensure that the mix addresses identified needs and market demands.</p> <p>The policy does not try to assume the type of housing that people may wish to live in, but to provide a mix of housing that is suitable for the mix of residents of the District.</p> <p>The NPPF defines older people as the following: <i>“People over or approaching retirement age, including the active, newly-retired through the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”</i></p> <p>If only 4 bedroomed houses were built, properties would remain unaffordable for the vast majority of Teignbridge's residents.</p>

	212/213	Gypsy and traveller sites should be secured through stand-alone allocations in appropriate locations and/or delivered by the council through financial contributions from other developments. They should not be secured through the delivery of larger sites.	<p>The delivery of gypsy and traveller sites in stand alone allocations will be considered in Part 2 of the Local Plan.</p> <p>In addition, Policy H9: Homes for the Travelling Community sets out when new gypsy and traveller pitches can be permitted, including in lieu of when they would have otherwise been provided on an allocated site, along with other residential or mixed use development.</p>
	179	Paramount Gypsy and Traveller evidenced need for pitches is met on stand-alone allocation	
	179	Combining open market housing and Gypsy and Traveller sites is not feasible under any circumstance and is objected to on the strongest possible grounds due to impact on market sales, sales rate and delivery making the combined land use unviable.	
	206	Worries over social engineering by local planners	The policies of the Local Plan have been designed to deliver healthy mixed communities.
	206	There should be more than four potential options available	Noted.
	206/207	Review omits executive retirement housing and this would free up family sized accommodation	Policy H4 does not prevent the building of executive retirement housing, where there is local need or market demand for this.
	208/211 407/195	<p>The policy on housing Mix should:</p> <ul style="list-style-type: none"> • remain flexible/not overly restrictive to ensure it does not stifle development and meets acute demand for all types of housing • allow for changes in circumstances considering the length of the proposed plan and natural changes to economic circumstances and cycles 	<p>Policy h4 is considered flexible, in that it requires the mix to address identified needs and market demands, which allows for changes in circumstance, but is based on the District's requirements and evidence, including the Council's Housing Strategy, Local Housing Needs Assessments (where available) and Housing Market Needs Assessments.</p> <p>If the open market alone determined the type of houses delivered, it is likely to be those most profitable to</p>

		<ul style="list-style-type: none"> • be based and shaped to meet the districts requirements which may include publicly owned housing • include evidence of need built up from local surveys and consultation • be based on an up-to-date SHMA • have flexibility to allow developers to respond to the market situation, so as to encourage and facilitate development • let the open market determine market needs 	housing developers, irrespective of whether they meet the local housing needs.
	358	The existing housing mix policy is: letting down first time buyers and those struggling to get on the ladder as new housing estates have more non-affordable than affordable properties	Affordable and social housing will be delivered through Policy H1: Affordable Housing Targets.
	375	Experience of retirement villages in the USA, New Zealand and Canada highlighted fenced, gated oases of calm. Growth in the private sector and housing association renting is very visible as many renters have a very different culture to those with a mortgage and have a much higher churn rate	Noted.
	384	Virtually every settlement could take on average 20 additional houses with no detrimental effect on local services, infrastructure etc. and would provide a welcome boost to the local primary school. This would produce 1600 houses for 80 settlements which combined with existing permissions would be more than enough to satisfy demand. Creates a political problem as far easier to focus to	<p>The distribution of development will be contained in Part 2 of the Local Plan.</p> <p>Teignbridge does not contain 80 settlements.</p>

		development in a few areas to minimise the number of upset voters but politics is not a planning issue and should not influence planning strategy	
	413/380	<p>All new housing should:</p> <ul style="list-style-type: none"> • be easily adaptable to enable people to remain in their homes through advancing age/disability with minimum adjustments • include a mix of properties to buy and rent- renting enables people to move closer to work, reducing travel congestion and cost 	<p>PolicyH4: Homes Suitable for All requires 100% of new housing to be accessible.</p> <p>Policy H1: Affordable Housing Targets seeks to ensure that affordable housing includes social rented properties as well as discount market/shared ownership.</p>
	288/354 355/390	<p>Options not presented:</p> <ul style="list-style-type: none"> • Option A- Development should be relative to local needs- developers won't consider this • Both options • Option B as it would target the actual needs of the community rather than a generalised plan which may not • Maintain boundaries and have a small increase where local services can cope 	Policy H4: Homes Suitable for All will ensure that the mix of housing addresses identified needs and market demand.
	399/405 406/411 415/217	Depends on area, site size and particularly local need	Policy H4: Homes Suitable for All will ensure that the mix of housing addresses identified needs and market demand.
	399/405 406/411 415	All communities should be encouraged to complete regular Housing Needs Surveys to determine their requirement.	Noted.
	399/406 411/415 217	Council should be allowed to borrow in order to build an adequate supply of social homes which should remain in public ownership in perpetuity	Noted. This is not a matter for the Local Plan.

	405	Where appropriate reference should be made to local neighbourhood plans and housing needs surveys to identify appropriate need within a local area.	Reference is made within criteria 2 of Policy H4: Homes Suitable for All to the use of Local Housing Needs surveys.
	413	Housing for people over a certain age produces ghettos	Noted. The Local Plan policies will deliver mixed communities.
	412	Support for mixed housing to meet the requirements of the whole community	This is the approach contained within Policy H4: Homes Suitable for All.
	388	TDC have tried moving families out to villages but it doesn't work and urban vs country people have different requirements and outlook	Noted. The Local Plan provides opportunities for rural housing to meet affordable housing needs.
	387	Affordable housing should be placed on brownfield sites close to Town Centres but must be designed carefully to avoid creating ghettos with development on the outskirts for the better off	The Local Plan aims to deliver mixed communities with social cohesion.
	387	A high percentage of apartment blocks should be placed on the outskirts to avoid spoiling the countryside. We need developers who can build high-rise buildings and incentivise them to build affordable housing on brownfield sites	Noted.
	383	The open market mix must remain open and responsive to market conditions, an over prescriptive policy will sterilise the response of developers to need and demand	Policy H4: Homes Suitable for All allows for market demand to be taken into account as well as identified housing needs.
	383	The delivery of dwelling types such as bungalows is incredibly inefficient with apartments and maisonettes equally able to meet this need	Noted. Policy DW18: Residential Density sets out guides for residential density in order to efficiently utilise land resources.
	383	Care home developers have a fixed criteria of requirements which PLC house builder are unable to provide or meet and forcing such	Noted.

		uses together will negatively impact on delivery and must be kept separate	
	358	We should only be building affordable homes on green belt land as these are necessary whereas second homes are not	Teignbridge District does not have any greenbelt land.
	287	We need cheap and expensive homes and not just a mixture in range of housing due to policy. Consideration needs to be given to location and surroundings	A mix of housing sizes, types and tenures will provide cheap and expensive homes.
	195	Additional requirements for certain types of housing could impact on deliverability of small sites with greater onus on larger sites to deliver	All residential development will be subject to Policy H4, however, the policy is not onerous or overly prescriptive and, the Plan will be viability tested to ensure that the totality of its requirements do not render development unviable.
	195	Support for additional housing for younger adults is positive	Noted. Policy H5: Subdivision of Existing Dwellings allows for the creation on non-self contained accommodation, which can help to provide accommodation for those under 35, who would not receive housing benefit for self-contained accommodation.
	195	Difficult to envisage how an upper age limit (such as 35 proposed in Review) would work in reality	It is unlikely that any planning consent would limit occupancy to a maximum age of 35.
	195	Suitable accommodation for young adults shouldn't be limited to studio or 1 bedroom apartments as it limits adaptability, flexibility and these housing types don't allow for life changes	Suitable accommodation for young adults is not limited in any way through Local Plan policies.
	185	Council should focus on ensuring appropriate sites are allocated to meet the needs of specifically identified groups without seeking a specific housing mix of individual sites	Part 2 of the Local Plan will allocate sites for development.

	185	The local plan should ensure suitable sites are available to meet the need of older people for a wide range of developments across a wide choice of appropriate locations	Part 2 of the Local Plan will allocate sites for development.
	417	Government downgrading affordable housing requirements from 30% to 10% to encourage housebuilding but will cause its own problems. Allowance should be made for LA's to have funding to create their affordable housing and rebuild the public stock of housing	The NPPF 2019 expects major developments to provide 10% of homes to be available for affordable homeownership unless this would significantly prejudice the ability to meet the identified housing needs of specific groups.
Homes	Q13. What impacts should the Local Plan Review consider in the application of the optional standards for adaptable homes in planning policy?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	179/383 398/195 185	<p>Optional standards should not be introduced through planning policy because:</p> <ul style="list-style-type: none"> • Would create immediate and negative conflict • Housing delivery and viability of housing development would be hindered by any over prescriptive approach • Planning should not duplicate or add other regulations • It is overly prescriptive and unnecessary • The focus must be on allocation and delivery of housing allocations and not prescriptive or restrictive on detail and design standards already regulated elsewhere • The government would have incorporated them into building regulations if they wanted them to be mandatory 	<p>The NPPF enables local authorities to make use of the governments optional technical standards for accessible and adaptable homes, where this would address an identified need. These standards are currently optional through the building regulations so their requirement through planning policy would not duplicate existing regulations but rather formally implement them as a policy requirement.</p> <p>The requirement for evidence to support the introduction of this optional standard into policy ensures the application of the standards are necessary for a particular areas needs and characteristics. The introduction of these optional standards as obligatory within building regulations would then apply across the country regardless of these underlying needs and characteristics.</p>

			<p>The Local Housing Needs Assessment undertaken in the preparation of GESP identified that 35% of households require some form of accessible dwelling, rising to 39%, compared to only 18% of the existing housing stock currently being accessible. This creates very unequal access to the housing stock from those with disabilities.</p> <p>The impact of any such proposed policy on viability and deliverability of development will be assessed, alongside all other policy requirements through a Whole Plan viability assessment.</p>
	212/213	These standards should only be applied to affordable housing products as there's no guarantee market homes would be sold to an end user with such needs	The requirement for accessible and adaptable homes helps to meet occupiers' changing needs over time and remain to live independently within their own home for longer.
	192/202 208/288 363/374 375/378 396/397 398/401 408/410 413/213 212/153 162/202 380/384 364/395 185	<p>Consideration should be given to:</p> <ul style="list-style-type: none"> • Ensuring the standards are based on evidenced needs (in line with national policy and Ministerial Statement) • viability and deliverability are considered on a case-by-case basis • including ceiling hoists and adaptable kitchens in extra care facilities to reduce demand for Disabled Facilities Grants • Sustainability • Rainwater harvesting • Green sources of power/solar energy/energy efficiency (in all new homes) • Carbon neutral homes/energy saving materials 	<ul style="list-style-type: none"> • Policy H4: Homes Suitable for All enables an applicant/developer to provide site-specific reasons as to why the prescribed standards are not feasible to ensure each site can be considered on a case by case basis. However, planning policy is unable to insist on specific aids, such as hoists or adaptable kitchens, but accessible homes would need to be provided with an accessible threshold including ramps where necessary. • The energy efficiency of homes is discussed within the Climate Change section. • Adaptable and accessible housing is likely to include step-free accommodation.

		<ul style="list-style-type: none"> • Infrastructure before occupation of dwellings • Broadband • Ensuring the construction method has a minimal impact with consideration to straw bale housing • Prioritising more single storey homes for the less mobile • Ensuring all new builds have exterior ramps and interior and exterior doors wide enough for wheelchairs • Seeking a minimum percentage of adaptable homes • Applying building for life standards • the level of demand and existing availability to meet this demand • Ensuring access for all users with ground floor living with wash facilities included • Adopting the higher optional standards through application of NPPG criteria • Requiring a proportion to be 'Homes for Life' • Building all homes to Level 4 of Part M of the building regulations • A percentage of affordable homes should be built to level 3 of part M of the building regulations • Provision of two parking spaces per household • imposing the current optional requirements for limiting water 	<ul style="list-style-type: none"> • Infrastructure provision, including digital connectivity, is discussed within the Communication, Movement and Infrastructure section. • The requirement for accessible and adaptable homes relates to both affordable and market housing. • Parking standards are contained within Policy DW18: Parking
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		consumption to 110 litres per day per person to minimise water treatment requirements <ul style="list-style-type: none">adopting wheelchair design standards										
206/207 360/361 365/414 396/357 359/385 178	Optional standards should be mandatory because: <ul style="list-style-type: none">otherwise you will have a mismatch of schemes, ideas and outcomesImpact will be too inconsistent without mandatory standardsAny rise in standards is goodto ensure houses will remain fit for purpose into the futureIt makes developers build what is required and not the reverse where they tell us what is to be builtStandards should be as high as possible to mitigate future costs to health services and older persons servicesTo foster the benefits of mixed communities where all can feel safe and valued and live independently for as long as possibleensures a standard and quality of build which should be adhered toAnything optional is unlikely to get donecould increase the value of property relative to non-adaptable homes but this must be balanced with affordability	Policy H4: Homes Suitable for All requires the following Building Regulations Standards to be met. <table><tr><td></td><td>Minor (1-9 homes)</td><td>Major (10+ homes)</td></tr><tr><td>Market housing</td><td>100% M4(2)</td><td>75% M4(2) 25% (M4(3a))</td></tr><tr><td>Affordable housing</td><td>100% M4(2)</td><td>75% M4(2) 15% (M4(3a)) 10% (M4(3b))</td></tr></table>			Minor (1-9 homes)	Major (10+ homes)	Market housing	100% M4(2)	75% M4(2) 25% (M4(3a))	Affordable housing	100% M4(2)	75% M4(2) 15% (M4(3a)) 10% (M4(3b))
	Minor (1-9 homes)	Major (10+ homes)										
Market housing	100% M4(2)	75% M4(2) 25% (M4(3a))										
Affordable housing	100% M4(2)	75% M4(2) 15% (M4(3a)) 10% (M4(3b))										

		<ul style="list-style-type: none"> provides an opportunity to provide more homes that are suitable for an aging population enabling them to downsize 	
399/405 406/411 415/217	Preference for a combination of all three categories to future proof the dwellings and accommodate the needs of all abilities		Noted.
399/405 406/411 415/217	Reference should be made to local neighbourhood plans and housing needs surveys to identify appropriate need within the area.		Reference to Local Housing Needs Surveys is contained within Policy H4: Homes Suitable for All, as a way of identifying local housing need.
375	New retirement properties on the old hospital site took account of wheelchairs etc. but built on one of the steepest slopes in Newton creating difficulties for some resident's accessibility. New Zealand routinely erect outdoor lifts to carry people and their wheelchairs. The NHS spends millions on adapting homes so patients can live there longer.		Noted.
413	All options should be considered to create buildings which are as flexible as possible to residents changing needs		Noted.
414	Optional standards could be used for the re-use of commercial space and empty space above commercial premises to residential conversion		Noted.
395	Current optional building regulations only apply to access, water and space standards but fossil fuel reduction is a serious problem. Buildings should meet high standards of energy efficiency and source energy from renewable sources. Enforcing higher energy standards through additional building regulations should be implemented if possible		Policy C2: Carbon Statements requires development to be carbon neutral.

	164	Evidence to support such a policy could be gathered through Council collaboration with public health analysts, adult social care commissioners and care providers	Based on the findings of the Greater Exeter Strategic Housing Market Assessment, there is a need for 100% of all new residential development to be accessible.
	212/213 185	Application of the optional standards must be done through adopted, examined policy, justified on the basis of appropriate evidence	
	212/213	Must take account of site specific factors such as topography and viability to ensure development is not stifled by additional requirements	Policy H4: Homes Suitable for All acknowledges that there may be occasions where it is not feasible to include accessible housing – eg where there is steep topography
	195	A range of adaptable new housing is important to meet future need	Noted.
	369	Building regulations are aimed at minimum requirements so it is hoped that they would be appropriate for adaptable homes	Based on the findings of the Greater Exeter Strategic Housing Market Assessment, there is a need for 100% of all new residential development to be accessible.
	380	Ensuring all developments include accessible and adaptable dwellings should be required in the plan with the proportion based upon a forecast of the number of people with these needs	
	387	It is not worth providing adaptable homes in areas where hospitals can only be reached by car	If the Local Plan restricted the development of accessible homes to areas within walking distance of hospitals, this would significantly and negatively affect the delivery of accessible homes, which are needed within the District.
	392	The standards won't be adopted if they are too onerous and only optional	The requirement for 100% accessible homes contained within Policy H4: Homes Suitable for All has the potential to affect viability of development from increased build cost. The draft Local Plan will be
	398	Major impact is on the viability of the development with the number of units and the extent of the accessibility key	

	398	No merit in imposing such a condition if it would result in a reduction in housing sites coming forward or reduce the number of consented sites being built out	viability tested to ensure its delivery and to prevent development being over-burdened.
	407	This could be managed through Neighbourhood plan policies in each plan area	Noted.
	408/410	Design standards in keeping with surrounding landscapes and communities	Policy DW3: Good Building Design ensures that development maintains and enhances the character, appearance and historic interests of settlements, streetscenes, groups of buildings, individual buildings and the landscape.
	164	Regret that changes to affordable housing definitions may lead to a reduction in the proportion of affordable rented homes the Council can ask for	Policy A1: Affordable Housing Targets will set out the mix of tenure most suitable to ensure that the Local Plan meets the needs, as best it can, of residents in need of affordable housing.
	164	Suitable, adaptable housing which can also meet the requirements of those with day to day activities limited by disability is essential	Noted.
	179	Specific elderly care home developers have a fixed criteria of requirements which PCL are unable to provide for or meet	Housing for older people can be delivered in many ways and does not necessarily mean the building of care homes. Policy H4: Homes Suitable for All requires a mix of housing to meet identified local needs. This will include housing for older people, given the demographic within Teignbridge, but there is no specification as to what form this housing should take.
	179	Forcing together care home developers and home builders will have a negative impact on delivery and must be kept separate	
	195	Para.3.6.1-3.6.2 fails to recognise the role existing housing stock plays in meeting the need of the population, certain types of housing maybe suitable	Noted. The issues Paper was a document intended to generate discussion. The draft Local Plan is a new document and does not contain paras 3.6.1 and 3.6.2 of the Issues Paper.
	207	Design should be qualified by reputable design consultants and not architects or local councillors	It is not clear who a design consultant would be and why architects are not qualified.

	207	Vital to integrate natural, built and historic environment to create good design but not evident in any local housing developments	Criteria (a) of Policy DW1: Quality Development ensures that development integrates with and, where possible, enhances the character of the adjoining built and natural environment, particularly affected heritage assets.
	289	Planning officers shouldn't make decisions on applications and should instead inform councillors on planning committee as they should be accountable	Planning Officers are professional officers who have trained and are qualified in their field. Officers are the professional experts employed by the Council to make decisions and recommendations. Officers have delegated authority to make decisions on planning applications subject to the Council's Scheme of delegation. If all planning decisions were made by the Planning Committee, this would involve significant and disproportionate Councillor and Officer time at committee meetings and increase the cost to the public purse.
Homes	Q14. Can you Suggest Improvements to the Local Plan design policies?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	288/357 374/384 391	No	Noted.
	396/206 370/372 366/392 395/408 410/156 380/387 388/190 202/428 354/365 373/378	<p>Suggestions for improvements to the local plan design policies include requiring:</p> <ul style="list-style-type: none"> • Electric charging points (close to new homes) • Rainwater harvesting/waterbutts • Extra insulation • Hedgehog gaps in fencing • Swift boxes • All frontages should meet a specific design standard 	<ul style="list-style-type: none"> • Policy CC3: Electric Vehicle Infrastructure requires all allocated parking spaces to be fitted with an electric vehicle charging point or a three phase electricity connection. • Rainwater harvesting/water butts/insulation are considered under the Building Regulations. • Policy EN12: Legally Protected and Priority Species requires proposals to include opportunities for species within the built environment, for example bird, bat and invertebrate boxes and hedgehog holes.

	395/179 192/403 401/416 363/177 398/380 362/365 396/369 207/383	<ul style="list-style-type: none"> • No waste storage on the front elevation • Solar panels to meet certain design standards for rooftops • Essential planting/GI based on square metre coverage • No flat roofs • Prioritise the Building for Life Criteria list • Adequate off road parking • No on street parking • On-street parking with a electricity supply (not currently addressed to make Zero emission policy effective) • Amenity land for each home • Emphasis of local characteristics • Homes to be as close to Zero carbon as possible • Higher energy efficiency standards to reduce additional energy generation • Adopting examples of good design elsewhere in Devon • Exteriors sympathetic with local vernacular • Standards for green space around buildings • Alternate walking and cycling routes across developments • Use of locally appropriate palettes and materials • Buildings of appropriate height to their surroundings (not 3 storeys in areas where they don't occur) 	<ul style="list-style-type: none"> • The Local Plan contains a raft of design policies to ensure quality new development. • Policy DW20: Waste and Recycling Storage Provision ensures that such facilities are located away from prominent public locations. • The Local Plan cannot require the installation of solar panels, but they are supported under Policy CC5: Renewable and Low Carbon Energy. • Natural infrastructure requirements are set out in Policy DW9: Natural Infrastructure. • The Local Plan does not seek to include a blanket presumption against flat roofs. While they are not normally considered good design, there are situations where they may provide the most appropriate design solution. • Building for Life criteria are noted. • Adequate off road parking will be secured through policy DW18: Parking. • On-street parking will be required to be fitted with an electric vehicle charging point or a three phase electricity connection if it is an allocated space. • Amenity land for each home is expected. • Policy DW4: Good building design requires development to respond to local identity, including materials to reinforce local character. • Policy CC2: Carbon Statements requires development within Teignbridge to be carbon neutral. • Policies DW1: Quality Development and DW3: Street Character and Form require development to prioritise movement in the following order - people on foot and
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		<ul style="list-style-type: none"> • Sufficient parking spaces & visitor parking (to avoid street clutter & neighbour aggravation) • green features, especially green balconies and green roofs • include expert opinions of occupational therapists within designs • requiring a minimum average of one bird or bat box per residential unit reflecting that provided through Exeter's Residential Design Guide • Get decent architects involved • All homes would ideally be adaptable • Increase building height and use less land • Engagement with developers on a non-prescriptive basis • Greater weight towards the achievement of the highest standards of design and sustainable construction as supported through national policy (para.63) • Require ample trees and green spaces to create an attractive environment, minimise cost and maximise the range of benefits • Make use of design review panels with local architects to advise on the design of housing and external spaces as planners have no training in the area leading to a decrease in building quality • New homes to be compatible with adjacent existing housing and blend into the neighbourhood 	<p>those with disabilities, cyclists, public transport, and private vehicles.</p> <ul style="list-style-type: none"> • The Local Plan cannot insist that planning application proposals are prepared by architects. • Policy H4: Homes Suitable for all requires all homes to be accessible or adaptable. • Policy DW19: Residential Density ensures the efficient use of land by setting guidelines for the density of development. • The raft of design policies contained in the draft Local Plan replace a single policy and are expected to secure higher standards of design. • Policy DW16: Urban Greening requires the planting of street trees or the use of green roofs/walls/balconies. • The suggestion of the use of a design review panel is noted. • New development is required to maintain and enhance the character, appearance and historic interests of settlements, streetscenes, groups of buildings, individual buildings and the landscape through Policy DW4: Good Building Design. • Policy H4: Homes Suitable for All requires development to meet the nationally described space standards. • Additional design guidance can form part of Neighbourhood Plans. This can relate specifically to the settlement in question and be based on local evidence.
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		<ul style="list-style-type: none"> • Developments with a characterful flare rather than generic style estates • the optimisation of sites in line with the emerging NPPF instead of requiring the effective use of sites • on the delivery of quality places which draw on the opportunities and potential of the local areas historic environment • innovative schemes • a minimum size requirement for 2 bedroom homes of 90m2 with 3 and 4 bedroom homes of 110 m2 • Each community to have a blueprint of standard 'desirable' design styles but not to the exclusion of new trends which could be considered on a case by case basis 	
	399/405 406/415 411/217	Housing developments shouldn't be cramped to facilitate a sense of well-being	Noted.
	364/378 399/405 406/415 411/156 360/428 416/407 202/195 363/217	Design policies should take account of/reflect <ul style="list-style-type: none"> • Energy saving • Parking • Water run-off and • Possible flooding • Newton Abbot NDP policy NANDP2: Quality Design • New technologies • Low-level lighting in environmentally sensitive areas • Hedgehog connectivity 	<ul style="list-style-type: none"> • Requirements relating to climate change and energy are contained within Policies CC1-CC7. • Policy DW18: parking ensures adequate parking is provided/retained. • Surface water run-off and flooding are controlled through Policies DW15: Sustainable Urban Drainage Systems and EN6: Flood Risk. • Policy DW1: Quality Development sets out what is considered to be quality design/development. • Unsure what is meant by comment regarding new technologies.

		<ul style="list-style-type: none"> • Planting native trees and plants, especially insect friendly • Good/adequate sized garages • the demographics of new residents to get the right mix of amenities • integrating biodiversity features into the built fabric such as bird & bat boxes, green roofs and walls • retention and enhancement of green spaces and features within developments • The Woodland Trust Guide to Residential Development and Trees • The resources required for monitoring and enforcement to deliver the standards • An emphasis on housing and health working in tandem on planning and design (possible provision of health hubs) • viability in the context of CIL, affordable housing and deliverability • the potential for straw bale homes with lime or earth render which are more eco-friendly and look attractive if designed well and in keeping 	<ul style="list-style-type: none"> • Policy EN8: Light Pollution protects ecological interests from lighting. • Policy EN12: Legally Protected and Priority Species requires proposals to include opportunities for species within the built environment, for example bird, bat and invertebrate boxes and hedgehog holes. • Policy DW16: Urban Greening requires the planting of street trees. • Policy DW18: parking ensures that garages have a minimum internal size of 3m by 6m, plus additional space if cycle storage is to be provided within the garage. • Policy DW10: Design of Natural Infrastructure requires development to take opportunities to enhance existing or create new natural infrastructure assets. • Staff resources for monitoring and enforcement cannot be influenced through Local Plan Policies DW7: Creating Neighbourhoods and DW8: Healthy Active Places ensure that new development promotes health and wellbeing and opportunities for activity. • The Plan will be viability tested to ensure its deliverability. • The Plan cannot insist on straw bale construction, but requires development to be carbon neutral.
	195/211 164/162 178/365 183	<p>The following points raised over the emerging Urban Design Guide:</p> <ul style="list-style-type: none"> • hasn't been tested and must be tested in an open environment to ensure policies are robust 	The Urban Design Guide is no longer intended to be published as Supplementary Planning Guidance.

		<ul style="list-style-type: none"> • current draft would stifle and stagnate development with the potential to preclude innovative design solutions and may result in allocations not delivering their achievable capacity • should be used to control development and not just influence it • significant worked on the design guide applauded • should consider out of hours parking for commercial vehicles in residential areas • appears more like a tick box exercise, pasting from a national document rather than a tailor made guide taking account of local topography and environment • extremely helpful to developers to provide clarity on the acceptable design standard from the start • incorporate advice provided as part of Active Design Guidance from Sport England 	
	399/405 406/415 411/217	Recent houses by most major housebuilders haven't fulfilled the criteria for quality design with characterless boxes built on previously green rolling hills. Local plan policy S2 appears to have failed.	Noted. The replacement of Policy S2 of the existing Local Plan with a suite of design policies in the draft Local Plan 2020-2040 will secure a better standard of development.
	177/195 375/380	<p>The following questions were raised:</p> <ul style="list-style-type: none"> • How do the plans for each of the settlements contribute towards a positive strategy? 	<p>The Issues Paper consultation was a broad consultation to examine the main issues to be considered through the next and more detailed draft plan stage.</p> <p>The Issues Paper consultation did not propose a housing or development distribution strategy and</p>

		<ul style="list-style-type: none">• What are the specific heritage issues and needs of settlements and how will the plan respond?• Will reference to the design guide be in policy or supporting text?• Questions over the relatively high satisfaction rate in the Review- does it consider turnover rates with sellers on new estates which are not going to publicise disappointments• Question whether satisfaction with design and allocated parking is actually the case	<p>therefore the potential benefits and impact on the historic environment from development opportunities was not featured in this iteration of the local plan review.</p> <p>The draft Local Plan includes a parking policy as the New occupiers Surveys indicated low levels of satisfaction in relation to parking.</p>
179 & 383 177/195 387/369	<p>Objections to:</p> <ul style="list-style-type: none">• over prescriptive nature of design policies proposed• Minimum design and space standards which conflict with the governments approach to deliver more housing more quickly• The chapter title which limits the scope and effect of any future policy and other place-making factors• Imprecise, generic statements of intent that will not provide a sufficiently distinct local strategy• Over prescriptive design policies which can delay development where there is a disagreement over an aesthetic judgement• The preference for individual houses on greenfield sites as this is a waste of space and ecological and visual disaster	<p>The reference to the over prescriptive nature of design policies proposed can only relate to the previously consulted on Urban Design Guide, as the draft Local Plan policies did not exist at the time of the Issues Consultation.</p> <p>The nationally described space standards have been published by government. Evidence shows that the vast majority of recent development in Teignbridge met these space standards and they are not considered at odds with the Plan’s purpose of allowing sustainable development.</p> <p>Part 2 of the Local Plan will allocate sites for development. However, an Urban Capacity Study has been undertaken to ascertain the potential for additional development within Teignbridge’s urban areas.</p>	

		<ul style="list-style-type: none"> • Allowing developers to dictate design as they all appear similar and cramped 	
185	The following concerns should be considered in regards to the introduction of space standards:	<ul style="list-style-type: none"> • Impact on timing and delivery rates as many rates are predicated on market affordability at relevant price points and maximising absorption rates 	Noted.
185	The space standard should not be applied to:	<ul style="list-style-type: none"> • Existing identified sites • any outline or detailed approval prior to a specified date • any reserved matters applications 	If a space standard were included within a revised and adopted Local Plan this would apply to all new residential applications.
399/405 406/415 411	Building for Life criteria should be included in future policy and encompass Neighbourhood plan policies		It is within the remit of neighbourhood plan to include Building for Life criteria within its policy requirements.
411/403 178/206 417	The following issues raised over existing design of development:	<ul style="list-style-type: none"> • Penn's Mount, Kingsteignton is an eyesore • Quality of design in Teignbridge is not good enough • Good quality design is not obviously followed (e.g. Pitt Hill) • Newton Abbot is lacking good design and aesthetic understanding by decision makers • Too many housing developments are overdeveloped with inefficient properties which are far from carbon neutral 	The suite of design policies contained in the draft Local Plan will aid the delivery of quality development.

	185	<p>Impacts on viability should be considered, particularly the cumulative impacts of policy burdens including the impact on:</p> <ul style="list-style-type: none"> • Larger dwellings on land supply • Reduced site yields or number of units on a site, resulting in • more land being required, and • Less efficient use of land due to reduce densities • Infrastructure and regulatory burdens on fewer units per site intensifying the challenge of meeting residual land values • May undermine delivery of affordable housing, whilst • Pushing additional families into affordable housing need because they can't afford a space standard home 	The draft Local Plan will be viability tested to ensure that its requirements do not prevent the delivery of development.
	365/164 398	<p>Good design:</p> <ul style="list-style-type: none"> • Is essential to residents and those who experience the built environment • doesn't need to cost more • is central to good planning and creating places where people can live their life well • is supported providing it's not prescriptive and helps guide the design process 	Noted.
	212/213	No detail comment until precise revisions are proposed to existing policies	Noted.

	185	A local assessment which evidences the district specific justification for the inclusion of the space standard as a policy requirement is required. Evidence presented on current standards in the district (appendix 2) is inconclusive and doesn't demonstrate a problem. The harm caused or that may be caused in the future should be identified.	Policy DW9: Natural Infrastructure uses the Fields in Trust standard as a starting point for the consideration of natural infrastructure requirements.
	185	Applying space standard should only be done in accordance with the criteria in the Written Ministerial Statement (25 March 2015) and national policy guidance	Noted.
	185	Adverse impact on affordability of starter home/first time buyer products may translate into reduced or slower delivery rates and council should put forward proposals for transitional arrangements.	The requirement of good design will not prejudice the delivery of affordable housing required by the Local Plan.
	185	Impact of space standard on timing and delivery rates should be considered as many rates are predicated on market affordability at relevant price points and maximising absorption rates	Noted.
	398	Current design policy S2 is not overly prescriptive, complies with national guidance and doesn't stifle design innovation	Existing Local Plan Policy S2 has been expanded upon to create the suite of design and wellbeing policies in the draft Local Plan.
	419	Settlements should be allowed to grow organically within their natural boundaries	Development within settlement limits is permitted in principle under Policy S2: Settlement Limits and the Countryside.
	383	Localised market demand should naturally dictate what form and type of housing is required in an area	Policy H4: Homes Suitable for All allows market demand to be considered alongside identified local housing needs.
	383	A large number of medium to large allocations will ensure consumer choice and range of product availability	Part 2 of the Plan will allocate development sites.

	383	<p>The requirement to meet certain standards will:</p> <ul style="list-style-type: none"> • Prevent the responsiveness of developers to meet market need and demand • Slow delivery • Fail to make efficient and effective use of greenfield housing allocations • Result in the loss of affordable housing and infrastructure contributions 	The Plan will be viability tested to ensure that its requirements are achievable and will not prejudice the delivery of much needed affordable housing.
	387	Teignbridge must concentrate on using brownfield sites first to build well designed medium or high rise apartment blocks with incentives if necessary	The Brownfield Register shows that there is insufficient brownfield/previously developed land to meet the housing need of the district.
	417	It's possible to develop economically without all homes looking the same and achieve interesting street scenes within planning criteria	Noted.
	195	The design evolution of a scheme should be a well-managed collaborative approach between the developer and local authority and not simply a response to a list of design principle	Noted.
	195	Support for Building for Life 12 for its continued use for assessing design quality	The principles from Building for Life have been incorporated within the suite of design and wellbeing policies.
	177	Tailored policies (e.g. Retail & Transport) are part of a sound design and conservation strategy to achieve positive improvements in the historic environment. Design and conservation is not a standalone exercise satisfied by standalone policies that repeat the NPPF objectives.	Noted.
	375	Average space standard for TDC affordable homes appears generous compared to the national described standards. Private purchasers shouldn't find themselves living adjacent	The requirement for development to meet the nationally described space standards, set out in Policy H4: Homes Suitable for All will apply to both market and affordable homes.

		affordable housing built to higher specifications while they struggle to pay their mortgage as it generates resentment. Economic forces will dictate if smaller homes appeal to private buyers.	
	365	Hope that Teignbridge good space standards are maintained and improved	Noted.
	183	Sport England highlight Active Design Guidance to inform the urban design of places to promote sport and active lifestyles with strong recommendations the included principles and concepts are fully reflected through the Local Plan.	The Local plan contains Policy DW8: Healthy Active Places to ensure that new development promotes health and wellbeing.
	417	Improvements are not sufficient or extensive enough	This comment was made prior to the drafting of the Local Plan, which contains a suite of design policies.
Homes	Q15.How can the Local Plan Review best ensure high standards of design and quality of new development?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	179 & 383 212/213 398/185	The standards (space standard & BfL) should not be required because: <ul style="list-style-type: none"> could unnecessarily risk introducing additional delay in future delivery Minimum design and space standards conflict with government approach to deliver more housing at a higher density and quicker pace Can prevent responsiveness of developers to meet market need and demand Slows delivery fails to make effective use of greenfield housing allocations 	<ul style="list-style-type: none"> Policy H4: Homes Suitable for All requires all new residential development to meet the nationally described space standards. The Local Plan Issues Paper noted that the majority of homes built since the adoption of the existing Local Plan meet or exceed the standards. Therefore, it is unlikely to adversely affect the delivery of housing either in terms of numbers or speed. The requirement, in combination with Policy DW19: Residential Density would not lead to the use of additional greenfield land above what is currently used – the influence of Policy DW19 will help to increase the efficient use of land.

		<ul style="list-style-type: none"> • results in the loss of affordable housing and infrastructure contributions • A growing number of single occupant households don't require or want substantial amounts of space • unnecessary introduction of the Standards could create a "race-to-the-bottom" in terms of unit sizes and disrupt the current market-dictated sizing • Without a small product range lower income households may be forced into applying for social housing relief, compounding the existing housing delivery problem • The market determines the demand for particular sized dwellings and it is suggested this continues to be the case • would have a negative impact on the government agenda to provide more housing at higher densities with better affordability and more choice • Policy requirements should not be more onerous than national policy 	<ul style="list-style-type: none"> • The draft Local Plan will be viability tested to ensure that the combination of its requirements do not render development unviable, or prejudice the delivery of affordable housing. • The nationally described space standards do not result in excessively sized properties, but prevent cramped living conditions and ensure storage is provided. The Plan supports the creation of small units of accommodation through its reference to innovative residential development. Including Tiny Homes. In addition, it supports the creation of non-self contained accommodation through Policy H14: Subdivision of Existing Dwellings. • The introduction of the policy is unlikely to result in a "race to the bottom", as market demands for larger proportioned properties will remain.
	212/213 192/195 383/398 395/179	<p>The following concerns raised over the introduction of the Space Standards:</p> <ul style="list-style-type: none"> • do not consider that evidence exists to merit their adoption • market-dictated sizing appears (based on F.16) to be producing good sized dwellings for both market and affordable housing stock 	<p>The Greater Exeter Strategic Housing Market Assessment identified a need for 100% of all new residential development to be accessible or adaptable.</p> <p>The Local Plan will be viability tested to ensure that the combination of its requirements do not render development unviable, or prejudice the delivery of affordable housing.</p>

		<ul style="list-style-type: none"> do not add standards which sit outside those contained within the National Described Space Standards or “<i>add unnecessarily to the financial burdens on development</i>” (NPPF Para.153) Figure 16 of the Review demonstrates the plan does not need to intervene to achieve nationally described space standards No exceptional circumstances to justify introduction of national space standards into policy based on evidence in the Review Space standards will increase build costs Teignbridge CIL rate is high and adoption of space standards would potentially compromise the delivery other infrastructure such as affordable housing TDC should include both extra build cost and the impact of extra land before following this optional space standard approach Product affordability is extremely important but the ability for a developer to meet a price threshold to accommodate this important part of the market is critical. Without a small product range a large number of lower income households may otherwise be forced into social housing which compounds an existing housing delivery problem. 	<p>Whilst the Issues paper explained that the majority of residential development built since the adoption of the Local Plan has met or exceeded the nationally described space standards, there have been occasions where the small size of affordable homes has caused problems with transfer of ownership. As such, intervention is considered reasonable.</p> <p>Additional build costs from the requirement for accessible and adaptable homes will be considered during viability testing of the Plan as a whole.</p> <p>The nationally described space standard applies to the building only, and not to outdoor space. As such, any additional space required would be insignificant.</p>
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		<ul style="list-style-type: none"> • No merit in including prescriptive design standards such as the nationally described space standards as they are already exceeded from a review of completed dwellings in the borough • National space standards cover more than the internal space to a building • will require more land to build upon for the same level of housing delivery and capacity assumptions of sites will need to be reviewed 	
	183/390 392/208 360	<p>Consideration should be given to:</p> <ul style="list-style-type: none"> • requiring developments to complete the Active Design Checklist to demonstrate how active design principles have been incorporated • the impact on the surrounding area • the ease at which a developer can adopt, if it's not easy it will be ignored • Bovis Urban Design Guide to help shape development proposals • Ensuring all plans are carefully considered and penalise developers for not meeting standards 	<p>Policy DW8: Healthy Active Places ensures that new development promotes health and wellbeing and the supporting text suggests the use of the Healthy Urban Planning Checklist to ensure occupiers are able to lead healthy and active lives.</p> <p>It is unclear what types of “impacts on surrounding area” should be considered.</p> <p>The Bovis Design Guide is noted.</p> <p>Development proposals that do not meet the requirements of the Local Plan, when read as a whole, are unlikely to be supported, unless there are overriding material considerations that bring benefits.</p>
	391/406 164/185 395/156	<p>Support for use of BfL-</p> <ul style="list-style-type: none"> • included in future policy and NDP's • as an explicit policy requirement 	<p>Although the Building for Life tool is not referred to within the Local Plan, the principles that it contains have</p>

	162/192	<ul style="list-style-type: none"> • as a guide rather than mandatory • provide a much better way of assessing development • Properties should provide a full range of lifetime buildings • Stronger policies required to hold developers to Building for Life standard • as an optional standard, alongside design review panels 	been included within the suite of design and wellbeing policies.
	421/428 288/289 357/373 374/375 383/385 387/401 402/405 406/408 410/207 414/183 363/370 395/359 364/397 369/421 380/217	<p>Suggestions for ensuring high standards of design include:</p> <ul style="list-style-type: none"> • A high level design and context policy maybe required • Garages should be wide enough to store a bicycle and/or pushchair in addition to a car and include car charging points • Adopt a Residential Design Guide SPD which includes minimum requirements for biodiversity enhancements within the built fabric and require compliance through robust decision-making • Ensure local/high quality materials/pallets in construction • Research and keep up to date with new materials etc • Ensure the regulations are followed • All houses should have solar panels/renewable energy/energy saving and rainwater collection for toilet flushing • More local level involvement at early stages 	<p>A suite of design and wellbeing policies have been introduced, which amplify the existing Local Plan Policy S2: Quality Development.</p> <p>Policy DW18: Parking requires garages to measure a minimum of 3m by 6m internally, with additional space provided if cycle storage is to be included within the building.</p> <p>Requirements for biodiversity enhancements is contained within Policy EN10: Biodiversity, which requires a 10% uplift in biodiversity.</p> <p>Policy DW4: Good Building Design ensures that materials used in development reinforce local character.</p> <p>It is unclear which regulations “should be followed”.</p> <p>Whilst the Local Plan cannot require all new houses to have solar panels/renewable energy/energy saving and rainwater collection for toilet flushing, Policy CC2: Carbon Statements requires carbon neutral development.</p>

		<ul style="list-style-type: none"> • Better inspections • Engage with developers on a non-prescriptive way • More attention to the local vernacular • Get decent architects to specific acceptable design features from the outset • Ensure at least one highly qualified architect in the planning department to vet designs • Ban developers from using off-the-peg designs, especially if previously used in different environments • Take heed of residents comments, likes and dislikes • Keep track of design features- have caused problems in the past • Encourage developers to use design professionals in their proposals • Adopting best practice to maximise the potential for creating good places to live rather than achieving the maximum number of units on the smallest area • Integrating public open space in a thoughtful way rather than just meeting a percentage target, tucked away in an awkward to develop corner • Ensure developments are not cramped to facilitate a sense of well-being • Stricter enforcement of standards through all stages of planning 	<p>Early engagement with developers is welcomed, however, this service is charged for.</p> <p>The suite of design policies contained within the Local Plan seek to reinforce local vernacular/character.</p> <p>The Local Plan cannot insist on the employment of architects, nor prevent volume housebuilders from using standard designs. However, these designs can be amended to better reflect local character.</p> <p>The purpose of consultation is to listen to the comments of residents. However, comments often represent different opinions and there is rarely a consensus opinion on design.</p> <p>Policy DW9: Natural Infrastructure acknowledges the importance of integrating public open space in new development and requires new development to include a network of attractive, usable, accessible and multi-functional natural spaces and corridors for the movement of people and wildlife and place making. Criteria (a) requires this to be designed-in from the outset to prevent it being left to poor, undevelopable spaces.</p> <p>Development proposals that do not meet the requirements of the Local Plan, when read as a whole, are unlikely to be supported, unless there are overriding material considerations that bring benefits.</p>
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		<ul style="list-style-type: none"> • All representatives providing a judgement on development should have basic, if not extensive understanding of design and building regulations • By stating the minimum standards that are acceptable • Use examples of excellence from elsewhere which have high levels of community buy-in • entrenching the principles of Active Design within developments would result in high quality developments that encourage healthy communities • Draw out Active Design principles more in the local plan • Encourage straw bale homes with a characterful and traditional look and not large generic style homes • Effort and higher standards to avoid repeating recent appalling, cheap and badly designed local buildings • Make use of design review panels with local architects to advise on the design of housing and external spaces as planners have no training in the area leading to a decrease in building quality • New technologies • Low-level lighting in environmentally sensitive areas • Hedgehog connectivity 	<p>The principles of active design are contained within Policy DW8: Healthy Active Places, which ensures that new development promotes health and wellbeing. The supporting text suggests the use of the Healthy Urban Planning Checklist to ensure occupiers are able to lead healthy and active lives.</p> <p>The Local Plan cannot encourage the use of straw bale construction above other forms of construction.</p> <p>The disappointment about recent development is noted.</p> <p>The suggestion to use a Design Review panel is noted. This is a matter of procedure, not planning policy.</p> <p>Policy EN8: Light Pollution ensures that ecological interests are not harmed through light pollution.</p> <p>Policy EN12: legally protected and Priority Species requires proposals to include, where appropriate, opportunities for species within the built environment, eg bird, bat and invertebrate boxes and hedgehog holes.</p> <p>Neighbourhood plans are able to include local Design Guides, which set out design codes for new development at a local level.</p> <p>New tree planting will be required through policy DW16: Urban Greening.</p> <p>Policy DW18: Parking sets out parking requirements and minimum garage size.</p>
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		<ul style="list-style-type: none"> • Provide each community a blueprint of standard 'desirable' design styles but should be to the exclusion of new trends which could be considered on a case by case basis • Planting native trees/large canopy trees and plants, especially insect friendly to enhance living space • Good sized garages/adequate parking • create alternative walkable routes which include open public space • Regard to flooding and water run-off • Ensure adequate gardens for buyers with young families so not to rely on open space as there is immense pressure on living space if there is a lack of outdoor space • Ensuring individual developments are joined-up to infrastructure can be better planned and communities are developed rather than a series of individual estates • ensure only pragmatic developments are allowed, rigorous quality assurance during construction and unlimited liability from developers and builders if problems appear during the life of the dwelling- a mandatory insurance scheme is required 	<p>Policy EN6: Flood Risk and Policy DW15: Sustainable Drainage Systems have regard to flooding and water run-off.</p> <p>Policy H4: Homes Suitable for All requires a mix of housing to meet identified needs and market demand. This will include family housing.</p> <p>Policy SP5: Infrastructure requires the provision of new and improved infrastructure, including joint infrastructure provision, to be provided in the early stages of development.</p> <p>The Local Plan cannot include clauses of liability for developers.</p>
	366/396 395	These standards should be in policy/adopted/mandatory	Design standards are contained within the suite of design and wellbeing policies.
	421/363 207/406	The following comments raised over existing design in the District:	Comments expressing disappointment over recent developments are noted.

	162/199 217	<ul style="list-style-type: none"> • Little boxes on a hillside by the A380 (Wear Farm junction) is an example of very poor design • A current development in Shaldon off the A379 does not respect its place nor take account of its context • Quality of design of larger developments could be improved- some poor examples identified at New road, Teignmouth and Ashburton Road, Newton /Abbot • Lack of education in planning with regard to the influence of design on visual impact • Recent houses by most major housebuilders haven't fulfilled the criteria for quality design with characterless boxes built on previously green rolling hills. Local plan policy S2 appears to have failed. • Poor examples of design in the district do not help the challenge of providing housing numbers • Milbury Reach, Exminster- considered out of character with inadequate parking provision • Concerns regarding design (particularly height) and density of new housing and ugliness of much commercial buildings and nothing presented in the review which will suggest improvement • Shaldon's Shoreline development respects its place and fits in beautifully and was welcomed by local people 	
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	419	Open countryside is a precious and finite resource which should not be wantonly destroyed in favour of characterless housing estates to meet national housing targets	Development in the countryside is restricted under Policy S2: Settlement Limits and the Countryside.
	206	Too many decision makers in local government lack specific knowledge to make value judgements. High standards will come from good design understandings	Planning Officers dealing with major development schemes are professional, experienced and qualified planning officers.
	378	Through good design principles but up to officers and planning committee to ensure high standards, robust enforcement and clearly defined S106 agreements. S106 agreements should clearly define developer commitments both during and after the development	Noted.
	361	The Council are paid by the taxpayer and should be in charge of development and take control on the public's behalf rather than letting developers determine what is built	Noted.
	373	Council shouldn't give way to developers who keep costs down by using low quality materials	Policies DW1: Quality Development and DW3: Good Building Design require buildings to exhibit design quality using materials appropriate to the area that reinforce local character.
	207	Building for Life criteria are not in the correct order, Character should be considered first	Noted.
	208	Recognition of importance of designing and delivering high quality design to create places where people want to live, work and play	The suite of design and wellbeing policies have been written to ensure new development creates places where people want to live, work and play.
	208	LPA's should not set any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings following the Bill given royal assent on 26 th March 2018	The Local Plan is not setting any technical energy efficiency standards, but does require, through Policy CC2: Carbon Statements, development to be carbon neutral.

	190	If the council has adopted the Building for life criteria CPRE hope to see an improvement in the quality of new homes	Whilst the Building for Life criteria have not been adopted, the suite of design and wellbeing policies follow the principles contained within it.
	162	Phrase 'high standards' is imprecise and needs better defining	The Local Plan design policies explain, through numerous criteria, what high quality development should consist of in terms of layout, buildings, streets, open spaces and amenity.
	383	Design and design quality is subjective	Noted.
	202	2 bed 3 person affordable homes should be delivered as 2 bed 4 person homes as standard where possible as should larger 3 and 4 bed homes	Noted.
	375	Promised facilities and infrastructure, public transport and community support are all lacking and take an inordinate time coming forward. Other countries are able to undertake this.	Policy SP5: Infrastructure requires the provision of new and improved infrastructure, including joint infrastructure provision, to be provided in the early stages of development.
	178	Speed and nature of house construction raises questions over their quality and eco-efficiency- no surprise a quarter of residents of new homes are not satisfied	Noted.
Homes	Q16. Which of the following options or combination of options would best meet the growing demand for custom & self build plots? A: Increase the percentage requirement of Local Plan Policy WE7 B: Custom and self-build exception sites C: Permitting custom and self-build infill development in the rural area		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	289/167	Support for Option A	The draft Local Plan has retained the approach to requiring a percentage of development to be delivered as custom and self build plots. The percentage requirement has not been increased. This is because the Local Plan contains other policies which allow the
	375	Support for Option A on the following grounds: <ul style="list-style-type: none"> it would break up the blandness and uniformity of large development sites 	

			development of either affordable custom and self build or local needs custom and self build on land adjacent to settlement limits. This will help with meeting demand.
212/213 210/211 396/373 398	Objection to Option A because: <ul style="list-style-type: none">• presents an unnecessary risk to overall housing supply• No evidence current demand will increase making an increase in the percentage requirement unnecessary at this stage• in some cases this may frustrate the ability for sites to come forward as planned and deliver the districts specified housing need• as this would encourage a mix of houses with different designs to the main development• it would not release more land• it may not be feasible as this would put an unnecessary limit on the supply of market homes	Concern about risk to housing supply is not understood. The evidence for the demand for custom and self build plots is contained within the custom and self build register, which, at the time of writing this document, is 159 people/households. The existing policy in the adopted local plan has not caused problems with the delivery of development and has resulted in opportunities for a mix of housing and improved standards of design.	
377/381 408/410 359	Support for Option B	The approach set out in Option B is contained within Policies H6: Rural Exception Sites, H7: Entry Level Exception Sites and H8: Local Needs Housing in Rural Areas, which permit the development of affordable homes and local needs custom and self build homes or live/work units adjacent to settlement limits. Where affordable custom and self build homes are provided	
385/391 192/365	Support for Option B because: <ul style="list-style-type: none">• It has the most going for it otherwise developers are tempted to offer the worst plots for self-build		

		<ul style="list-style-type: none"> • The Councils could purchase potential exception sites and release them at cost on demand to custom builders • It could deliver more homes at a time and support self-build communities to work together • There are benefits to widening the scope of exception policies to be permissive of custom and self-build • Open market cross subsidies could be permitted 	<p>under Policy H6, an element of market housing is permitted to subsidise the development. The support for such an approach is noted.</p> <p>The development permitted in principle under these policies is subject to restrictions in relation to occupancy, price, need, size of development, need for community engagement and impacts on European Wildlife Sites, as well as the other policies of the Plan.</p> <p>The restriction on the price paid for the plots of affordable homes to £10,000 or price for land to £300,000 per hectare has been retained in Policy H6: Rural Exception Sites.</p>
380/392 365	Support for Option B on the proviso:	<ul style="list-style-type: none"> • Its tightly controlled • With each case looked at on its own merit • They are for local people in affordable housing need • Plot values are pegged at the same value as exception site plots 	
358/362 363/409	Support for Option C		Noted
364/167	Support for Option C on the proviso:	<ul style="list-style-type: none"> • the amount of housing and infrastructure needs are controlled • where strict design codes apply to ensure development is in keeping with the current form 	
206/207 369/372 384/397 414/360	Support for Option C because:	<ul style="list-style-type: none"> • It could work well if there is confidence in the process, design and placing with clear guidance on design and expectations 	<p>The idea of allowing infill development in the countryside has not been pursued in the draft Local Plan because of the potential for environmentally unsustainable development. However, the idea has been adapted and the Plan contains Policy H8: Local Needs Housing in Rural Areas, which provides in principle support for custom and self build development to meet a local need outside, but adjacent to settlement limits. This will help to support local services, such as village shops, pubs or schools, and could provide housing to meet people's/households' needs.</p>

	365	<ul style="list-style-type: none"> • could fulfil self build requirement if sympathetic with local environment • rural areas can stagnate with essential services failing to survive • there are a lack of larger family style homes with larger gardens in some villages forcing growing families to move out to find larger suitable properties • virtually every settlement in the District could take on average 20 houses with no detrimental effect (and even a welcome boost) on local services, infrastructure and would be more than enough to satisfy demand • Self build projects are likely to be well designed single buildings for a specific need rather than speculative development • Their impact on their community is likely to be modest and allows for innovation and diversity. • brings new and modern design into communities • it would maintain a certain amount of individuality to areas concerned. A wide variety of styles provides character • would be positive and attractive to self-builders 	<p>The scale of development is restricted to no more than 10% of the number of existing or allocated homes, to prevent detrimental impacts on existing villages.</p> <p>Comments acknowledging the potential for improved design, innovation and diversity through custom and self build development are noted.</p>
	367	<p>Objection to option C because:</p> <ul style="list-style-type: none"> • It would lead to big houses rather than the needed small social houses 	<p>Policy H8: Local Needs Housing in Rural Areas ensures that sites proposed for local needs custom and self build development are not required for Rural Exception Site development and, provide for any</p>

			identified local affordable housing need in the Parish or adjoining Parish (rural).
211/287 373/395 398/401 403/210	Support for Options B & C on the following grounds: <ul style="list-style-type: none"> • to encourage flexibility • there is so much space in rural areas and no problem with people being allowed to buy land and build a house, if others have previously done it • might combine to allow more self-build • the most suitable, flexible and likely to increase supply • good options • provided the design is sympathetic to the surrounding area • can make a further contribution to meeting housing needs 	<p>The support for both the use of exception sites to accommodate custom and self build development and for infill development is noted.</p> <p>The idea of allowing infill development in the countryside has not been pursued in the draft Local Plan because of the potential for environmentally unsustainable development. However, the idea has been adapted and the Plan contains Policy H8: Local Needs Housing in Rural Areas, which provides in principle support for custom and self build development to meet a local need outside, but adjacent to settlement limits, thus following an exception style policy approach, as set out in Option B. This was considered a approach more environmentally sustainable than infill development in rural areas.</p>	
288/357 366/388 405/406 164/355	Support for all three options <ul style="list-style-type: none"> • To meet differing needs • To enable the young to live near their parent which could help reduce social care requirements • in order to accommodate the needs of all abilities and future proof these dwellings • not mutually exclusive and all have a part to play • if people are willing to finance their own builds in an appropriate way then why not 		
212/213	The following concerns raised over Custom & Self Build:		Between 1 April 2016 and 30 October 2019 planning permission has been granted for 401 plots suitable for

		<ul style="list-style-type: none"> • there is an unproven track record of actual delivery of self and custom built houses within the District from existing Local Plan Policy WE7 • co-locating parcels of self and custom build within wider developments is not necessarily the most attractive option to self and custom builders • Purchasers of 'main' development can be nervous as to what development may come forward in close proximity 	<p>custom and self build development. This evidences delivery.</p> <p>Policy H5: Custom and Self Build requires a variety of plot sizes and, along with the in principle support for local needs custom and self build development contained within Policy H8: Local Needs Housing in Rural Areas, will provide different plot types to suit different people's needs.</p> <p>Concern from purchasers of properties affected by custom and self build plots is understood, as they may be subject to disturbance from building work during construction. Any potential problems should be designed out at planning application stage to ensure compliance with Policy H11: Residential Amenity.</p>
	413/192	<p>Support for Option A & B</p> <ul style="list-style-type: none"> • enables a baseline provision alongside a responsive policy to facilitate exception sites to meet local needs 	Both approaches set out in Options A and B have been pursued in the draft Local Plan under Policies H5: Custom and Self Build and H8: Local Needs Housing in Rural Areas.
	164/195 206/207 365/377 387/398 401/185 405/395 202/208	<p>Consideration should be given to the following:</p> <ul style="list-style-type: none"> • how this housing type can help satisfy local housing needs • a policy limiting occupation to self builders for a number of years • Lowering CIL rates on speculative sites could be explored as a potential way to encourage this • The impact on existing residential area and local environment 	<p>The variety of plots provided through the range of draft Local Plan Housing policies will help to meet the identified needs, as evidenced on the Custom and Self Build Register, for Custom and Self Build plots that the Council has a legal duty to provide. Occupation would be limited to local people where properties have been built under Policy H8: Local Needs Housing in Rural Areas.</p> <p>Custom and Self Build development is CIL exempt. Impacts on residential areas and local environment are protected through Policy H11: Residential Amenity, the</p>

		<ul style="list-style-type: none"> • The careful monitoring of design and ensure construction is regulated • A local connection requirement to improve opportunities for local people • A site promoted on the edge of Ipplepen for custom & self build as part of residential development • Incentivising self-build on brownfield sites • as to why Self build plots have been slower than expected to take off • The abuse of self build with some developers selling off complete projects with these market homes then beyond the reach of local people. Careful control is required to close this loophole • Consultation with the community on any changes • allowing people to build their own home wherever they wish as would lead to bad builders building bad homes • the practicalities of health & safety, working hours, length of build programme and viability • Making reference to local neighbourhood plans and housing needs surveys to identify appropriate need in the area • Breaking down large development sites into serviced plots with services and utilities for small builders and self-builders as the incentive for a self-builder is to develop when the cost is lower 	<p>range of design and wellbeing policies and EN4: landscape Protection and Enhancement. Construction of housing is regulated through the Building Regulations.</p> <p>A local connection is required for houses proposed under Policy H8: Local Needs Housing in Rural Areas.</p> <p>The site in Ipplepen is noted.</p> <p>The Local Plan has no power to incentivise self builders on brownfield sites.</p> <p>Whilst custom and self build plots provided within larger scale development can be sold to people with no local connection, custom and self build housing permitted outside settlements will be subject to local occupancy conditions.</p> <p>Consultation process is set out in the Council's adopted Statement of Community Involvement.</p> <p>The Local Plan does not allow people to build their homes wherever they wish.</p> <p>The comment regarding the practicalities of health & safety, working hours, length of build programme and viability is assumed to refer to the time resource required for self build. This is inevitable, but results in "sweat equity".</p>
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		<ul style="list-style-type: none"> • The use of redundant commercial/public buildings as housing or custom build projects • The alignment between the GESP and Local Plan to ensure requirements are accurately calculated and clearly conveyed • The impact on viability of developments, particularly large schemes, if the % requirement were to be increased 	<p>Local Housing Needs survey are used to identify local housing need as are Neighbourhood Plans if they contain up-to-date information.</p> <p>Policy DW22: Loss of Local Facilities would allow the loss of redundant commercial/public buildings to housing, where there would remain to be sufficient choice of that type of provision in the area, the existing use is causing a significant problem, the benefits of the proposed use outweigh those of the existing use or, the use is no longer necessary or viable and has been marketed.</p>
	185/192 179 & 383 208	<p>The following Issues raised with the existing 5% allocation policy:</p> <ul style="list-style-type: none"> • only changes the form of the housebuilding company without an consequential additional contribution to boosting housing supply • Undeveloped plots are effectively removed from the housing land supply unless a mechanism is provided to enable delivery by a non-self builder in a timely manner • restrict the choice in the location of custom and self- builders • Objection in the strongest possible terms to self-build housing included as part of housing allocation • Custom & Self-build policies add another layer of uncertainty and burden on the delivery of large scale housing developments 	<p>The adopted Local Plan, which was examined and found sound, contains a requirement to provide 5% of new residential development of 20 or more units as custom and self build plots. This is in line with the NPPF and the government's acknowledgement that diversifying the housing market helps to speed up delivery. In addition, the council has a legal duty to meet the identified need for custom and self build plots. Identified need is evidenced on the Council's Custom and Self Build Register. National housebuilders have complied with the existing 5% requirement.</p> <p>SME builders are less likely to have to provide custom and self build plots, as this applies to sites of 20 or more only.</p> <p>If plots are not sold to custom and self builders having been marketed for 3 years, they can be sold to developers.</p>

		<ul style="list-style-type: none"> • The plots are effectively removed from the housing land supply if they are not developed by custom/self builders • Health & Safety regarding cross working between a major housebuilder and one man builder • Lack of detail on design- difficult to assure adjoining purchasers of a conforming design • Lack in certainty of delivery- small builders can't provide security on timing which may impact on sales • Potential sterilisation and incompleteness of permissions if plots not sold 	
	195	Where's the evidence to justify the statement that custom and self-build housing is expected to increase over the plan period?	Further evidence of demand is found in the Greater Exeter Strategic Housing Market Assessment.
	381	In small rural settlements like Doddiscombsleigh it would be possible to identify suitable self-build sites outside the settlement without affecting the character of the village. This could provide locally born/raised young people live in the village they grew up in. A recent housing needs survey showed interest in self build over rented affordable homes.	Local needs custom and self build development adjacent to the settlement limit of Doddiscombsleigh would be acceptable in principle under Policy H8: Local Needs Housing in Rural Areas.
	212/213 179 & 383	<p>Preference for allocation specific Custom & Self Build sites (no exception sites):</p> <ul style="list-style-type: none"> • Current 5% policy requirement should be removed and replaced with stand-alone self-build sites with potential of S106 contributions pooled towards stand-alone allocations 	Part 2 of the Local Plan will contain development allocation.

	375/382 178/185 164/210 369/398 212/213 192	<p>The following comments of general support for Custom & Self Build:</p> <ul style="list-style-type: none"> • Encouraging self build will bring about a greater diversity in new housing stock • As much support as possible should be given to small scale self build housing developments • Success of Custom and self-build policy is a welcome initiative but the low numbers are of limited significance • Supportive of proposals to encourage custom and self-build for its potential contribution to overall housing supply • Custom & Self build has a role to play in increasing housing delivery and policy support with this specific element of the mix supported in principle • Encourage self-built small developments but to agreed design guidelines • Current 5% policy does not preclude a greater number and is thus not an impediment to greater levels of custom build • current Local Plan Policy should be retained to allow an opportunity for its impact to be fully understood as a form of supply over a longer period of time • Maintenance of the Teignbridge Rule is supported as a baseline position to ensure a choice of sites are available to meet the need on the custom and self- build register 	<p>The general support for custom and self build development is noted.</p>
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	398/195 377/185	<p>The following comments made in relation to evidence for existing and/or future policy:</p> <ul style="list-style-type: none"> • Evidence of increased demand for custom build properties has to be the first stage of consideration • If demand is not growing then there is no justification for any proposal to increase plot provision • Option A needs to be based on robust evidence as to whether there is need • The provision of self build plots should primarily respond to the amount of people on the register as part of residential development • The council should provide evidence of the build-out rates of plots consented under current policy requirement • Promotion of Custom and self-build should be on the basis of evidenced need, through its SHMA work as set out in national planning guidance, collated from reliable local information 	<p>The evidence for the need of custom and self build plots can be found in the Council's Custom and Self Build Register, which it has a legal duty to keep and, in the Greater Exeter Strategic Housing Market Assessment.</p>
	202	<p>Increased interest in custom and self-build is acknowledged and evidenced by consultation with Parishes through the Community-led housing programme</p>	<p>Noted.</p>
	195	<p>TDC should examine windfall delivery (generally comprising custom/self build housing) which performs the role of addressing this type of need well and can be used to shape that segment of housing supply, where a windfall allowance is included in the supply calculation, which is a</p>	<p>Windfall plots are included within the calculation of the delivery of plots, which between 1 April 2016 and 30 October 2019 was 401.</p>

		preference to relying on already burdened larger sites.	
	370	Any of the options with higher, suitable design standards	The draft Local Plan has amplified the design policy of the existing Local Plan, through a suite of design and wellbeing policies. This applies to all development, whether custom and self build or not.
	211	Overly prescriptive, inflexible or onerous policy doesn't allow for changes in circumstances or market conditions	Noted.
	375	Allowing a very small number of self build in rural areas will quickly acquire a premium value out of reach of the local born and bred	The higher price of rural properties is accepted. However, custom and self build development permitted outside, but adjacent to settlement limits, under Policy H8: Local Needs Housing, will be subject to a local occupancy condition. This will inevitably reduce the price of the property to make it more affordable.
	377	The provision of self build plots should be considered as much of a benefit as affordable housing and given great weight in application determination	Noted.
	377	Self build plots should not be restricted to delivery as part of large developments or solely in urban areas	The draft Local Plan provides in principle support for local needs custom and self build housing adjacent to rural settlements as well as requiring it to be provided within larger development sites in towns and the urban areas.
	377	Flexibility in plot location with rural and urban areas considered to meet the desires of different self builders and add diversity	
	212/213	Smaller sites (custom & self-build sites) could also help to contribute toward the target of 20% of sites as 0.5 hectares or less.	Development sites will be allocated within Part 2 of the Local Plan 2020-2040.
	206	all depends on the confidence, the design, the expertise and constraints applied by the local plan policy	The draft Local Plan contains a suite of design and wellbeing policies to ensure quality new development.

	365	Simple dwellings are unlikely to have huge impact on traffic	Noted.
	374	Self build is best kept to inside developments	Noted.
	395	A variety of sites is needed to satisfy demand. Developer will forgo profit on the self build site when located on large developer sites with the better plots not available to self builders	The combination of Policy H5 and H8 will provide a variety of sites.

	Q17. What minimum site size is considered appropriate to aid delivery of employment units suitable for small to medium sized enterprises, start-ups and micro-businesses?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
& Prosperity	149	<p>In order to aid delivery of employment sites for small to medium and micro businesses, a suitable size for units/sites would be:-</p> <ul style="list-style-type: none"> • 0.25 acres/ 0.1 ha; • 1 to 2 acres (0.4 – 0.8ha) • 1 acre (0.4ha) – but each site to be judged for its own merits bearing in mind transport requirements, delivery, waste disposal, etc.; • A similar size to those at Estuary Court, Broadmeadow, Teignmouth; • A Minimum of 3 business units that measure 100sqm each • There should be no minimum size; • Based on various factors including type of business, customer base, transport links, energy/utility use, travel distance for staff etc; • Based on area, demand and economic outlook • 25% of the area dedicated to larger businesses; • 6 units of 185 sqm per community with scope to merge 2 units into one larger one of 370 sqm; • This is difficult to answer without a survey of potential businesses <p>The Local Plan Review should provide support for:--</p>	<p>The draft Local Plan encourages the need for new business development including new buildings, extensions to existing buildings, expansions of an existing business or employment site, diversification of a farm and changes of use, redevelopment or conversions of existing buildings (Draft Policy EC1).</p> <p>While the draft Local Plan policies do not specify employment building, unit or site sizes, it acknowledges and encourages a mix of tenancy types and different types of workspace. It also encourages design of units (particularly in neighbourhood centres) that is flexible and adaptable to a range of business uses and potential future changes of business class (Draft Policies DW4 & DW7).</p> <p>As the need for new jobs is not limited to the villages and towns, the plan acknowledges that the need for business to start, expand or relocate to/in rural areas can be vital to local employment provision. By permitting small scale economic expansion, the plan can promote more sustainable rural areas in Teignbridge. To ensure that the countryside remains attractive and retains or enhances biodiversity, and so that development does not increase unsustainable travel patterns.</p> <p>The suggestions on specified sizes are noted.</p> <p>The use of homes for starting and running businesses, or for working away from a larger central business location is an increasing trend. It provides an efficient use of land and buildings and helps to minimise travel as</p>
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		<ul style="list-style-type: none"> • Starter units, provided on a short term lease and for subsidised rents; • Starter units – around 100 sqm; • Small to medium sized workshops; • The growth of micro/'kitchen table' businesses; • Small units, which are well advertised to maximise the opportunity for letting/sales; • Developments of a minimum of 3 business units that measure 100sqm each on the edges of villages with good access to infrastructure and road network; • The reuse of existing commercial sites in town centres; • More mixed development with business space close by residential development, which would be more sustainable - as modern high tech business does not create noise or other nuisance caused by 'traditional' industry; • Consideration of live/work units 	<p>well as encouraging new businesses to start up. The Local Plan supports business start-ups, home-working and small scale employment in rural areas where part of a dwelling is used for an employment generating use provided it does not have a detrimental effect on the amenity, local parking or traffic generation in the area (Draft Policy EC5).</p>
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164 370		<p>The Local Plan Review should require:--</p> <ul style="list-style-type: none"> • Reliable, super-fast broadband as an essential pre-requisite for all employment sites; • New commercial ventures should be clustered together in small areas; 	<p>To ensure that businesses and residents have access to a choice of fixed and mobile internet services with a potential for reliable and resilient gigabit per second speeds, the draft Local Plan Policy EC8 proposes that all major development will:</p> <ul style="list-style-type: none"> a) incorporate digital infrastructure as one of the essential utilities; b) provide a network of open access ducting (open to all fibre providers) suitable for and including full-fibre connections to each building, with the capacity to accommodate and enable multi-operator fibre to encourage competition and choice for consumers; and c) Sites of 5ha of employment will ensure resilience by providing at least two physically separate external connections points.
206 207 370 374 375		<p>Concern expressed in connection with:-</p> <ul style="list-style-type: none"> • The potential impacts on residential development from employment development; • The limited opportunities to access employment without use of a car; • The excessive number of small industrial estates, that are hard to find due to lack of signage; • The lack of vibrancy of Newton Abbot town centre; • Employment sites provided as part of residential development; • Concern about loss of housing stock to commercial premises (eg conversion of 	<p>Employment development can play an important role in the way in which an area is used and perceived. However, sometimes the uses do not sit comfortably alongside the places where people live because of how they function. For some uses, it will not be possible to locate them near to residential development because of the amount of noise, smells, dust or heavy goods vehicle movements they will create.</p> <p>However, some types of employment and retail development are compatible with everyday living and this mix of uses, (particularly within town centres), should be encouraged. Where this happens, these buildings and spaces should integrate with the surrounding built and natural environment, be safe</p>

		Victorian villas in Devon Square, Courtenay Park)	<p>places, and easy for people to walk and cycle around or get to by public transport (Draft Policies DW4 and EC1).</p> <p>The reference to small employment sites and lack of signage is noted and will be considered.</p> <p>The draft Local Plan will include revised Town Centre Policies (EC9 & EC10) that are designed to provide increased flexibility</p>
Jobs & Prosperity	Q18. How can the Local Plan Review support potential projects involving the Council and/or its partners directly delivering employment floorspace?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	162	<p>The Local Plan Review can support potential projects involving the Council and/or its partners directly delivering employment floorspace by providing support for:-</p> <ul style="list-style-type: none"> Managed office space in towns and larger villages (either new build or re-use of existing buildings) to reduce out-commuting Adequate infrastructure, including ensuring employment development provides sufficient parking for vehicles; Encourage more mixed development with business space close by residential development, which would be more sustainable; 	<p>The draft Local Plan policies do not specify employment building, unit or site sizes. However, it acknowledges and encourages a mix of tenancy types and different types of workspace. It also encourages design of units (particularly in neighbourhood centres) that is flexible and adaptable to a range of business uses and potential future changes of business class (Draft Policies DW4 & DW7). Similarly parking requirements for employment will vary according to the commercial needs/demands of the particular business use class in question.</p> <p>Some types of employment and retail development are compatible with everyday living and this mix of uses, (particularly within town centres), which will be encouraged. Where this happens, these buildings and spaces should integrate with the surrounding built and natural environment, be safe places, and easy for</p>
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		<ul style="list-style-type: none">the expansion of existing employment space or on brownfield sites;A wider range of uses of employment land to accommodate non-traditional business uses and allowing a mix of uses;More flexibility in conversion and in developing workspaces in existing buildings;The reuse of existing commercial sites in town centres;By offering incentives or discounted business rates;More flexible uses of unused retail development space for employment, housing and community uses; andThe re-use of empty commercial premises or floors above commercial premises.	<p>people to walk and cycle around or get to by public transport (Policy DW4 and EC1).</p> <p>The Council maintains a Brownfield Register that is updated on an annual basis which identifies previously developed sites that are available for development. Opportunities to develop the small number of sites is actively encouraged and supported. The Brownfield Register can be viewed at https://www.teignbridge.gov.uk/planning/local-plans-and-policy/evidence-facts-and-monitoring/brownfield-land-register/</p> <p>In areas designated as Core and Secondary Activity Areas within town centres, the draft Local Plan protects existing business use of buildings, whilst promoting and encouraging the development of brownfield sites, the use of vacant workspaces, particularly on the upper floors of buildings (Draft Policy EC10)</p> <p>Comments regarding business rates are noted.</p>
206 207 378	The Local Plan Review should:	<ul style="list-style-type: none">Apply a cautious approach to providing employment land without evidence of the new businesses to occupy them;Restrict brownfield sites to industrial development; andClearly highlight the council's ambition to attract businesses that provide skilled and well-paid jobs.	<p>During development of the draft Local Plan, the Council takes advice and guidance from its Economic Development team and those of the County Council in order to determine the best location for employment land from those sites that are available for consideration. Business group and bodies, such as chambers of trade and commerce are also consulted. The demand for employment land and the nature and size of business seeking premises (either new or to expand) is closely</p>

			monitored used to determine the optimum location for this this demand to be best addressed.
	407	Invest in removal of Asbestos at Bakers Yard on edge of Bishopsteignton	The Bakers Yard site in Bishopsteignton forms part of the Bishopsteignton Neighbourhood Plan development policy proposals. As such any developer would be required to safely address the removal of any asbestos found of site prior to development.
Jobs & Prosperity	Q19 What other uses should be supported on our industrial estates and business parks?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	162	Support was expressed for:-	<p>The draft Local Plan supports supports the development of complementary facilities in order to help the social element of employment areas which are not close to existing facilities. The need for these will vary according to the location of individual estates. In smaller employment areas such facilities are likely to be available nearby in town or village centres, therefore these type of employment areas are not covered by the draft policy.</p> <p>Local services include cafes and takeaways, crèches and day nurseries, healthcare facilities under use classes A3 and D1, and fitness centres. However, main town centre uses such as hotels, restaurants, bars and pubs, museums, nightclubs, casinos and other culture and tourism development are unlikely to be permitted due to the potential for such uses to directly compete with town centres (Draft Policies EC2 & DW5).</p>
	164	<ul style="list-style-type: none"> • mixed uses on small industrial estates including retail, energy generation, craft and education; 	
	183	<ul style="list-style-type: none"> • D2 sports uses; fitness clubs, gyms, climbing centres and five-a-side centres acceptable on employment sites, as they create sustainable employment opportunities – when designed as part of an employment park it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to; 	
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	375	<ul style="list-style-type: none"> • small-scale provision of retail; 	
	378	<ul style="list-style-type: none"> • Shops/retail; 	
	380	<ul style="list-style-type: none"> • Retail warehousing; 	
	385	<ul style="list-style-type: none"> • Specialist non food retail; 	
	388	<ul style="list-style-type: none"> • Restaurants/cafes/food outlets/catering; 	
	391	<ul style="list-style-type: none"> • business hubs; 	
	390	<ul style="list-style-type: none"> • financial and professional services; 	
	395	<ul style="list-style-type: none"> • GP surgeries; 	
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	403 405 406 407	<ul style="list-style-type: none"> • Dentists; • Other health services, including podiatry, physiotherapy; • gyms/fitness clubs; • Day nurseries, soft play, play cafes; • Open/green spaces/play areas; • Entertainment & leisure; • Footpaths & cyclepaths • Worker's accommodation; • Charities; • Technology; • As many as possible which create employment opportunities; • Pop up shops/local food producers/artisan crafts; • Rent-free start ups; • Recycling centres; • Affordable housing; • Housing; • Small laboratories. • B1, B2 and B8 uses are appropriate 	
	183 375 380 407	<p>The Local Plan Review should acknowledge:-</p> <ul style="list-style-type: none"> • The contribution sport makes to the economy; • The number of full-time jobs within the sports industry; • The need for adequate parking. 	<p>The draft Local Plan acknowledges the role that active leisure has in the wellbeing of the community rather than identifying sport isolation. It advocates, promotes and supports the inclusion of facilities and design features that encourage active leisure within reach of local communities and in employment areas (Draft Policies EC2, DW1, DW8-13)</p>

Jo	385	Suggestion that the council could offer experienced mentoring and advice for start-ups and, short term but secure leases.	The Council has run business start-up and advice session in partnership with other local organisations. The comments regarding mentoring and leases are noted and will be sent to the Council's Economic Development Team.
	183	It should be noted that that there are usually more employment opportunities generated through a commercial gym (e.g. David Lloyd Gyms), commercial football (e.g. Powerleague) or a gymnastics club D2 use than a 500,000m2 B8 use.	The comment is noted.
	378	The area's "industrial estates" would be more attractive to high tech companies if they were granted permission to be "business parks".	The comment is noted.
	369	Allow self employed persons to have space.	Draft Local Plan Policy EC5 supports business start-ups, home-working and small scale employment in rural areas. Draft Policy EC1 encourages a mix of new commercial tenancy types to meet demand, such as business incubators and enterprise hubs, particularly within the town centres. The Council will also seek to bring forward commercial sites where appropriate and trial new types of workspace.
Jo	Q20a. Should the Local Plan Review support the creation of small scale retail and food outlets within existing business parks an industrial estates?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised

287 288 289 354 355 357 358 359 362 366 367 368 369 360 370 380 385 391 392 395 397 403 406 407	Yes	<p>The draft Local Plan supports supports the development of complementary facilities in order to help the social element of employment areas which are not close to existing facilities. The need for these will vary according to the location of individual estates. In smaller employment areas such facilities are likely to be available nearby in town or village centres, therefore these type of employment areas are not covered by the draft policy.</p> <p>Local services include cafes and takeaways, crèches and day nurseries, healthcare facilities under use classes A3 and D1, and fitness centres. However, main town centre uses such as hotels, restaurants, bars and pubs, museums, nightclubs, casinos and other culture and tourism development are unlikely to be permitted due to the potential for such uses to directly compete with town centres (Draft Policies EC2 & DW5).</p>
217 378 414	<p>Yes, because:-</p> <ul style="list-style-type: none"> • They will be well used by adjacent employment units; • mixed use sites are beneficial and as stated reduce the requirement of car usage • This would help to attract businesses and would reduce travelling at lunchtimes 	See above response.

	162 164 206 207 387 388	<p>Yes, however,:--</p> <ul style="list-style-type: none"> • Food and drink facilities only; • Care is needed to prevent an increase in traffic flow to/from the site by making these an attraction in their own right (eg a fast food restaurant would encourage people to drive there, putting pressure on local roads and causing littering). • Need too ensure this does not reduce the floorspace available for employment, • Support for food, not retail • Most medium and large industrial estates are well-served by mobile caterers during working hours. • Designated parking areas for mobile caterers 	<p>The extent of local services proposed could include cafes and takeaways, crèches and day nurseries, healthcare facilities under use classes A3 and D1, and fitness centres. Site specific assessment will determine whether or not there are opportunities to more sustainably provide these within the local employment area, reducing car use, enlivening areas and making current parks and estates more attractive, vibrant places to work (Draft Policy EC2).</p>
	408 410	<p>Potentially, but need some flexibility of use for these and should be very limited.</p>	<p>The extent of local services proposed could include cafes and takeaways, crèches and day nurseries, healthcare facilities under use classes A3 and D1, and fitness centres (Draft Policy EC2).</p>
	374	<p>No</p>	<p>Noted.</p>
	361 375 396 405	<p>No, because:-</p> <ul style="list-style-type: none"> • There are enough fast food outlets about as it is. More retail outlets here would further erode town centres. • There are sufficient mobile caterers that cause minimal traffic, which would be displaced. 	<p>The comments are noted. The scale of any complimentary facilities would be proportionate to the scale of employment development and impact on the a town centre or nearby local services would be an integral consideration at the earliest stages of development planning (Draft Policy EC2).</p>

	390	No, not in villages	The comments are noted
	373	If areas are already well served by mobile or current businesses, these should be retained.	The comments are noted. It is not intended that complimentary facilities in employment sites would be needed if there are existing local services available within easy walking distance (Draft Policy EC2).
	364	Question about how this would reduce the need to travel, as people drive to work.	It is intended to reduce the isolation of some larger employment sites and provide workers easy access to services that they would have to travel off-site during breaks to access in the past (Draft Policy EC2).
Jobs & Prosperity	Q20b. Should these be restricted to only those which directly support and serve the businesses on the park/estate?		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	289 359 363 364 370	378 396 397 408 410 Yes	The comments are noted
	162	Yes - Opening hours could be restricted to reduce non-business users out of hours.	The comments are noted
	287 288 354 357 358 360 361	380 385 387 388 391 403 406 No	The comments are noted

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	355 366 369 373 414	No:- <ul style="list-style-type: none"> • Passers-by should be able to use them too; • Not able to be enforced; • Market forces should not be interfered with; • But it depends on location and demand for services; • There is support for mixed use developments 		The comments are noted. The draft Local Plan intends that the extent of provision is dependant on that which already exists in the locality, and that the use of local services should not be restrictive (Draft Policy EC2).
	178	Policies should enable flexibility to react to changes.		The nature of the service(s) provided will be dependant on the location and size of the employment site (Draft Policy EC2).
	405	Businesses are unlikely to be viable if customer use is restricted to the industrial estate/business park		The draft Local Plan intends that the extent of provision is dependant on that which already exists in the locality, and that the use of local services should not be restrictive (Draft Policy EC2).
	395	Not restricted in terms of those who can use the facilities, but their purpose should be to support the workers on the industrial estate.		The draft Local Plan intends that the extent of provision is not intended to be restrictive (Draft Policy EC2).
	392	Should be dealt with on a case by case basis		The nature of the service(s) provided will be dependant on the location and size of the employment site and will be dealt with on an individual basis (Draft Policy EC2).
	375	There should be liaison with Exeter City Council, which allowed fast food chains and eateries at Marsh Barton, which attracts a wider range of customer into the early evening.		The comment is noted
	164	It is hard to define "directly support"		The comment is noted. The policy is intended to ensure that the service(s) are designed to directly support workforce needs, but only if sufficient provision is not

Jobs & Prosperity					available through existing services within walking distance (Draft Policy EC2).
	Q21a. Should the Local Plan Review seek to further restrict the loss of employment sites?				
	Ref		Summary of Main Points Raised		Response to Main Points Raised
	206	362	Yes		Support for the Local Plan to further restrict the loss of employment sites is noted (Draft Policies EC1 & EC3).
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	162		Yes, because:- <ul style="list-style-type: none">• The loss of employment sites results in pressure for development of greenfield sites;• Existing employment sites should be expanded, rather than creating new ones;• It is important to retain opportunities for young people and prevent unbalanced development (too much housing development and not enough employment development);• This would help to reduce out-commuting from Teignbridge.		Existing employment sites can be difficult to replace and therefore their loss should be considered very carefully. Any proposal which involves the loss of business, general industrial or storage and distribution land (including land that has an existing use, is currently used, is allocated or has planning permission for use Classes B1-B8) would have to be strongly justified in the context of the high importance of retaining and expanding the local economy and the creation of jobs. This is fundamental to the Local Plan’s strategic objectives (Draft Policies EC3)
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			<p>workforce which will give an added boost to businesses and give people a chance to achieve promotion and increase their wages.</p> <p>The draft Local Plan supports proposals for business development, including new buildings, extensions to existing buildings, expansions to or intensifications of an existing business or employment site, diversification of a farm and changes of use, redevelopment or conversions of existing buildings. (Draft Policies EC1 & EC3)</p>
	217 406	Yes, providing that it is of benefit to the surrounding area and the business is economically viable.	The presence of employment areas in close proximity to a local community and local services often brings both economic benefits such as shop/service patronage and reducing the need to drive to access work or local services (Draft Policies EC1 & EC2).
	287 366 392	<p>This depends on:-</p> <ul style="list-style-type: none"> • the suitability of the use • demand • whether it is better to retain an employment use or develop the brownfield land for housing. 	The individual merits and future potential of each employment site will be considered in order to determine its optimal future use. However, the draft Local Plan seeks to increase the quantity of employment land available in the District in a way that ensures its suitability to the needs of the Teignbridge economy in the future (Draft Policy EC1).
	288	No	The comment is noted
	369	<ul style="list-style-type: none"> • No – don't fight market forces 	The comment is noted

	396 407	<ul style="list-style-type: none"> • No, if this restricts re-development of brownfield site • No - not all former employment sites are appropriate to future needs of the business 	The individual merits and future potential of each employment site will be considered in order to determine its optimal future use.
	361 374 375 385	<p>The Local Plan Review should:-</p> <ul style="list-style-type: none"> • Support the consideration of a community re-use before the consideration of residential; • support the creation of employment opportunities in empty shop premises in towns; • Consider the nature of the jobs lost/created and differentiate between highly skilled, highly paid jobs and unskilled jobs offering zero hours contracts. 	<p>The draft Local Plan recognises the importance of encouraging people to develop work-place skills in order to increase their likelihood of employment and career development, whilst also addressing skills shortages in the health and social care sectors. Working with partner agencies, we will continue to focus their efforts on supporting unemployed people in taking the next steps into employment, education, skills development or training. This includes helping people benefit from the employment opportunities offered by initiatives such as work placements, apprenticeships and pre-employment training programmes. The policy aims to create an environment where the larger businesses (50 or more employees) can be expected to make greater efforts in this regard (Draft Policy EC4).</p> <p>Use of employment premises for community use is actively considered. However, in order for employment land to transfer to community use, it would have to demonstrate that this replacement use would have significant benefits that outweigh the loss of employment (Draft Policies EC2 & EC3)</p>
	405	Suggestion in relation to a more sympathetic rather than punitive business rates regime.	The comments are noted and will be sent to the Council's Economic Development Team for consideration.

	408 410	Encourage high speed broadband in all new housing to encourage flexible working.	Local Plan Draft Policy EC8 requires all new residential and commercial development to have a choice of fixed and mobile internet services with a potential for reliable and resilient gigabit per second speeds, with open access ducting (open to all fibre providers) (Draft Policy EC8).
Jobs & Prosperity	Q21b. Which option or combination of options would best ensure the range of employment sites are retained? (ie to require demonstration of the following:- 1. The significant benefits of a proposed replacement to include a greater level of employment job opportunities than its replacement. This would seek to avoid the reduction of potential job opportunities from our industrial and business units. 2. That the site has been adequately marketed for its existing use for a specified period of time and at a reasonable rate. This would ensure that only the most commercially unattractive sites would be lost to alternative uses)		
	Ref	Summary of Main Points Raised	Response to Main Points Raised
	183 288 378 397	Support for Option 1 – requirement for replacement use to include a greater level of employment job opportunities	Responses to these comments will be provided as part of the Local Plan Part 2 preparation that will address quantity and distribution of employment sites.
	162 206 289 354	373 388 414 Support for a combination of options 1 and 2	
	164	Support for a combination of options 1 and 2 – specific support expressed for the retention of employment sites at Lapthorne, Dainton, Bulleigh Barton Farm, Buttlands, and Ipplepen Business Park.	

Job	408 410		Support for both options – with sufficient advertising	
	207 355 357 359 360 362	363 370 390 391 392	Support for Option 2 – marketing clause	
	396		Support for Option 2 – and ensure sufficient advertising	
	380		Limited support for option 2.	
	287		Support for marketing clause similar to that applied to loss of local facilities	
	375		Support for extension of existing estates and forward funding by TDC to assist delivery	
	401		Suggestion of rates and rents incentives	
	217 406		This should be considered on a site by site basis	
	405 369		No support for either option – as they ignore market forces	
	385		TDC could purchase these premises to aid delivery of employment	
Job	Q22. Are the Town Centre boundaries in the best location or are there areas that should be included/excluded & why?			
	Response ID	Summary of Main Points Raised		Response to Main Points Raised

	207 361 408 410	Yes, the Town Centre boundaries are in the best locations.	Support for the boundary locations is noted (Draft Policies EC9 & EC10).
	360	Yes, but they should be kept under review.	The boundaries are reviewed on an regular basis in response to the annual shop front surveys undertaken by the Council.
	378	Newton's Place community centre should be included within the Town Centre boundary.	Newton's Place is included within the town centre boundary (Draft Policies EC9 & EC10)
	375	<p>Concern expressed about:-</p> <ul style="list-style-type: none"> • The elongated form of Newton Abbot Town Centre; • The excessive number of take-aways in close proximity to each other along Queen Street, Newton Abbot with insufficient lighting, roads and pavements; • The conversion of residential premises to commercial, thus reducing the housing stock. 	<p>The linear nature of Newton Abbot town centre boundary has been reviewed through an independently commissioned town centre study and concluded that while this shape is not ideal, it is appropriate and relevant to envelope the wide range of businesses including takeaways that extend from the railways station through to the A382 bordering Asda (Draft Policy EC10)</p> <p>Draft Local Plan Policy EC10 defines and designates Core and Secondary Activity Areas. Within these areas a change of use will only be permitted in principle , where it has an active ground floor frontage and daytime use, thereby resisting a change to residential of ground floor. Residential uses on upper floors are supported (Draft Policy EC10)</p>
	288 370	<p>Town centre boundaries should be:-</p> <ul style="list-style-type: none"> • Flexible where local need requires it; • Concentrated; 	The revised Town Centre designations in the Local Plan provide both flexibility and focus designed to enable the town centre to be a vibrant and viable place (Draft Policy EC10).

	414	In Dawlish it is essential to maintain the main shopping area of the Strand, Queen Street, Old Town Street and Brunswick Terrace	These areas are identified as Core Activity Areas in the draft Local Plan (Draft Policy EC10).
	390	Investment in town centres is required.	Investment in Town Centres takes place through the County and District Councils, and by private investors. This is often supported through contributions received from local development.
	217	The maps are not large enough to view the boundaries properly	The maps can be viewed in detail on the Local Plan viewer, available at https://www.teignbridge.gov.uk/planning/forms/teignbridge-local-plan-interactive-map/
Jobs & Economy	Q23 Which of the above options or combination of options would be your preference to ensure our town centres remain the heart of our urban area and towns? A. Re-adjustment of the extent of primary and secondary frontages B. The establishment of a primary shopping area C. Tailoring retail policy to individual Town Centres D. Remove restrictions for Main Town Centre Uses		
	Ref	Summary of Main Points Raised	Response to Main Points Raised

	164 178 206 207 288 355 357 359 360 361 362	363 370 372 373 378 380 390 396 397 403 414	<p>Support for Option C:-</p> <ul style="list-style-type: none"> • Which could enable Newton Abbot town centre to thrive through a mix of uses: cultural, arts, food and drink which reflect social trends and the irreversible changes to high street retailing; • Which allows a town centre specific approach as all towns are different; • To encourage diversity and small shop owners and to keep money in the local area; • Noting how town centres need to compete with internet shopping by encouraging people to visit; • As each town centre has a unique set of challenges and opportunities; • However "retail policy" needs to be linked with transport, traffic and parking planning. 	<p>Town centres are vital and sustainable locations for development and the preferred location for main town centre uses, particularly retail provision, but importantly also for employment, housing, leisure and entertainment.</p> <p>An independent study commissioned by the Council examined the current and future characteristics and trends of the District's five town centres (Newton Abbot, Teignmouth, Dawlish, Bovey Tracey and Chudleigh). The study, which was informed by stakeholders and local communities, recommended a vision and policy direction for each of the towns by understanding the unique opportunities and challenges that contribute to their sense of place and the barriers to change that make the towns more or less able to respond to changing demands and expectations.</p> <p>This resultant draft Local Plan Policy EC10, informed by the town centre study sets out the hierarchy of centres in the district as required by the NPPF. This positions Newton Abbot as the strategic town centre within the district, where the majority of commercial, social activity and development is to be expected. Coastal town centres at Dawlish and Teignmouth provide a supporting role and offer a high level of town centre provision to residents, tourists and day visitors. More local needs are met in the smaller rural gateway towns of Bovey Tracey and Chudleigh and both have defined town centres. Other retail provision is restricted to small scale provision only, and covered in draft Policies EC10-EC12.</p>
	183 287 289 391 400		<p>Support for Option D:-</p> <ul style="list-style-type: none"> • Which would allow sport, recreation and leisure facilities to be located in town centres, encouraging physical activity in town centres and encouraging linked trips and vibrancy in the evenings; • To enable enterprises that create jobs to occupy premises which may otherwise remain vacant; 	

		<ul style="list-style-type: none"> To ensure a wide range of uses which support the overall vibrancy and viability of your town centres by minimising vacancies, and ensuring your town centres are active at different parts of the day. 	The draft Policy whilst not broken into town specific sections, introduces greater flexibility for town centres to adapt to and meet the needs of their local economy, while protecting and preserving existing business and services in the most important town centre locations (Policy EC10).
	366	Support for all options:- Including more cultural and leisure facilities in town centres, GP surgeries and more car parking in town centres.	
	217 406	Support for Options C & D:- To enable the very distinct individual character to be maintained e.g. "Market town" versus "Coastal town".	
	369	Support for Options B, C & D	
	378 405 408 410	<p>The Local Plan Review should:-</p> <ul style="list-style-type: none"> Ensure that the retail core of Newton Abbot (Courtenay Street, Market Walk and Queen Street (as far as Devon Square) is not weakened, whilst recognising the role of the cafes and restaurants and cultural quarter in attracting people to the town; 	

		<ul style="list-style-type: none"> • Contain policies to bring redundant retail into use as higher quality community, or employment space, or housing; • Discourage out of town retail 	
	373	Support expressed for live music and markets	
	375	Market forces should be allowed to shape our town centres due to the uncertainty around the future of retailing.	

Q.24 AGLV			
Should AGLVs be retained through the Local Plan Review, if so, how should the area they cover be determined?			
	ref	Summary of comments	Response
	190 206 207 217 288 358 361 363 366 372 380 390 392 399 401 402 403 405 406 407 408 410 411 414 415 417 419	<p>Yes the AGLV should be retained because:-</p> <ul style="list-style-type: none"> • It is a well-established planning concept; • The Teignbridge countryside is unique; • It is important to protect the landscape for the environment, biodiversity and to protect wildlife (including Greater Horseshoe Bats); • The landscape must be protected for tourism and the local economy; • Areas used for farming need protection; • The retention of green spaces is important for mental and physical health; • They represent landscapes which are valued locally and enjoyed by visitors; • The protection of the countryside, environment and landscape is required to prevent further erosion of its rural character from development; • The Teign and Exe estuaries should be protected; • Its removal would enable development; 	<p>The Draft Local Plan acknowledges that we benefit from being in a beautiful part of the country and that the policies of the Plan will protect and manage our built, historic and natural environment.</p> <p>The Draft Local Plan continues to provide protection for the landscape qualities and characteristics of the area, which is enjoyed by locals and visitors alike through Policies EN1: Strategic Open Breaks, EN2: Undeveloped Coast and EN4: Landscape Protection and Enhancement.</p> <p>Whilst it is accepted that the AGLV was a well-established planning concept historically, neither the NPPF 2012 or revised NPPF 2019 contained any reference to AGLVs, which greatly reduced the weight of protection afforded to such areas. In addition, the designation of the AGLV, which dates back to the 1950s, lacks any modern landscape assessment methodology or up-to-date evidence and it steers development to areas outside the AGLV that may be equally sensitive to development. No other Devon authority has retained the AGLV designation and all other authorities use the Landscape Character Assessment approach. This is the approach set out in the Draft Local Plan.</p> <p>The Teignbridge Landscape Character Assessment recognises 24 Landscape Character Areas with detailed</p>

	426	<ul style="list-style-type: none"> Other areas have them so we should too (reference made to Durham Council). 	<p>profiles for each LCA in relation to location, character description, key characteristics, analysis, scenic qualities, sensitivity to change, current and future landscape pressures and strategic guidelines and recommendations. These guidelines and recommendations are derived from analysis of the Key Characteristics of each LCA, sensitivity to change and the current and future pressures affecting these characteristics. The guidelines provide specific recommendations for managing landscape change within each LCA. This is considered to provide better protection for the landscape, including seascapes, than the protection afforded by the out-of-date AGLV designation, which will aid tourism.</p> <p>Protection for the quality of soil is contained within Policy SP1: Sustainable Place, of the Plan.</p> <p>With regard to the reference to the retention of AGLVs within the County Durham Plan, the preferred options Durham Plan 2018 has omitted the Areas of High Scenic Value that were contained in the previous iteration of the plan in favour of a character-led approach to all landscapes. Their Statement of Consultation on Issues and Options states:</p> <p><i>“The policies within the Plan recognise that in the past there has been an emphasis on identifying and protecting high quality landscapes, but that in recent years there has been an increasing recognition that all landscapes matter and that their sensitivity to development depends on their character. The policy is based on a character-led approach to all landscapes, of whatever quality, whether urban or rural, built or natural.”</i></p>
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206 287 357 359 364 370 372 375 376 378 385 388 391 396 397 407 413	<p>Yes, AGLVs should be retained and determined by:-</p> <ul style="list-style-type: none"> • Their importance to tourism; • Their value to locals/benefit to public; • Their importance to biodiversity and habitats; • The boundaries of the Teign and Exe estuaries; • Criteria and liaison with experts and other bodies, such as Devon Wildlife Trust, CPRE and RSPB; • Uniqueness of landscape features or conformity to local landscape characteristics; • Neighbourhood Plans, Town and Parish Councils and local people; • The impact that its removal would have on the population, the diversity, nature, green areas and views of the area; • Evidence (nothing specified); • Distinguished formation of landscape, natural formation, untouched and might include hills, valleys, deep hollows, rocks and woodland and wildlife habitat. 	<p>The reasons given above explain why the AGLV designation is not being retained.</p> <p>The purpose of AGLVs is not to protect biodiversity. The existing Local Plan contains a raft of policies to protect habitats and protected species and to seek net biodiversity gain. (See comments in Biodiversity, Ecosystems and Flooding section).</p> <p>Other comments suggest that uniqueness of landscape features, conformity to local landscape characteristics and distinguished formations of landscape should inform the boundary. This approach aligns with the character led approach supported by the Devon and Teignbridge Landscape Character Assessments which Policy EN4 refers to.</p> <p>Support for the protection of the Teign and Exe estuaries is noted. The Teign and Exe estuaries and land adjacent to them are protected under Policy EN2 Undeveloped Coast of the Draft Local Plan and the NPPF 2019.</p>
154 162 178	<p>Yes, the AGLV should be retained, but it should:</p> <ul style="list-style-type: none"> • Not be reclassified as Undeveloped Coast; 	<p>The reasons given above explain why the AGLV designation is not being retained.</p>

287 360 362 380 387 395 373 387 408	<ul style="list-style-type: none"> • Be reduced in size and more targeted to areas where the landscape is most appreciated and is accessible; • Have better access to it; • Include protection for cross-estuary views; • Be based on prevention of damage to flora, fauna and the landscape; • Be based on evidence; • Offer greater protection against development; • Be reviewed to ensure it is comprehensive and includes areas such as Rolling Field, that may previously not have been included as they were not threatened by development; • Include existing areas of “undeveloped coast”; • Have more flexibility regarding planning issues. 	The desire for better access to such areas is also noted, however, the Local Plan cannot influence a landowner’s decision to make his/her land accessible to the public.
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153 158 162 164 179 195 210 368 369 377 383	<p>No, the AGLVs should not be retained because:-</p> <ul style="list-style-type: none"> • They are out-of-date and poorly evidenced; • Not consistent with the NPPF or national guidance; • It is a blanket designation; • It is inflexible; • The LCA provides a suitable replacement; • The LCAs provide a much more detailed description of an area and its sensitivities; • The LCAs provide a better benchmark against which to judge development; • Sites should be assessed on their own merits. 	<p>There is acknowledgement that the AGLV designation is out-of-date, poorly evidenced and inconsistent with the NPPF and, that the Landscape Character Assessments provide a more detailed description of the character and sensitivities of different landscape areas within Teignbridge and provide a suitable replacement for the AGLV designation.</p> <p>Policy EN4: Landscape Protection and Enhancement will ensure that development conserves and enhances the qualities, character and distinctiveness of the landscape, using the District's Landscape Character Assessment.</p>
162 383	<p>The LCAs should be used, but:-</p> <ul style="list-style-type: none"> • Consideration should also be given to the impact of development on adjacent character areas; • All major development should be accompanied by a LVIA; • If landscape impact is severe, there should be consideration of the mitigation that would be required to make it acceptable. 	<p>Major development is required to submit a Landscape and Visual Impacts Assessment in order to determine the impacts of development on the surrounding area, including adjacent LCAs where appropriate.</p> <p>Development will be judged against the Plan's landscape policies, and if it does not comply with them, would be recommended for refusal.</p>
384 421	<p>The AGLVs should not be retained but:-</p> <ul style="list-style-type: none"> • AONB designated in relevant areas; • AONB designated in Haldon Ridge. 	<p>The designation of AONBs is undertaken by Natural England and not by the local authority or through a Local Plan.</p>

154 387	Recreational areas should be regarded as development within AGLVs as they appear differently from unspoilt countryside	The planning system can only control what is legally regarded as development, which includes changes of use. Where recreational development is proposed, impacts on the landscape would be a material consideration.
207	All of the green landscape within Teignbridge should be regarded as of great landscape value	Policy EN4: Landscape Protection and Enhancement will give weight to the landscape across the whole of the District, as is identified within the Teignbridge Landscape Character Assessment.
214	No objection to retention of AGLV which does not restrict the operation of Exeter Racecourse.	Noted
195	AGLV around west of Exeter should be reviewed in light of recent urban development.	Not relevant – as AGL designation not retained.
377	The fact that development can deliver improvements to the landscape with green infrastructure is not given sufficient weight when determining planning applications.	This is a matter relating to the implementation of the Local Plan policies through Development Management decisions on planning applications.
385	Can the 'Teignbridge District Landscape Character Assessment' safely replace the AGLV?	All other authorities within Devon use the Landscape Character Assessments and none has retained the AGLV designation. The LCAs provide greater detail and guidance and are considered an improved way to protect the landscape when compared to the out-of-date AGLV designation.
154	Questioning of how the boundary would be re-drawn and of the opinion that there is a lack of basis to rescind the AGLV	There is a lack of national policy basis to retain the AGLV and a lack of evidence upon which the boundaries are based. All other authorities within Devon use the Landscape Character Assessments and none has retained the AGLV designation.

		Summary of Other Landscape Comments		
	ref	Comments	Response	
	147	Need to protect:-	Dawlish Countryside Park will be protected from development, as it is required to alleviate recreational pressure on the protected European Wildlife Sites of the Exe Estuary and Dawlish Warren. The land between it and Exeter Road is not currently allocated for development. Allocations for development will be contained in Part 2 of the Draft Plan, which is likely to be published in early 2021 and which will be subject to public consultation.	
	156	<ul style="list-style-type: none">Dawlish Countryside Park and the land between it and Exeter Road;		
	158			
	167			
	198			
	217			
	405	<ul style="list-style-type: none">the area around Langdon hospital if re-developed;		
	390			
	399			
	406	<ul style="list-style-type: none">Teign and Exe estuaries;		
	412			
	415			
	416	<p>The Teign and Exe estuaries are and will continue to be protected for landscape and ecological reasons through Policies EN2: Undeveloped Coast, EN4: Landscape Protection and Enhancement, EN11: Important Habitats and features, EN12: Legally protected and Priority species and EN14 European Wildlife Sites, of the Draft Plan.</p>		
	417			<p>The character and setting of existing villages and setting of the National Park is protected under policy EN4: Landscape Protection and Enhancement. In addition, Policy EN1 ensures that strategic open breaks remain between Newton Abbot – Kingskerswell – Abbotskerswell – Torbay, Newton Abbot –</p>
	419			
	427			

		<ul style="list-style-type: none"> • grade 1 agricultural land; • existing woods and trees, particularly irreplaceable ancient woodland, aged and veteran trees, especially given the high pressure for housing growth; • the ancient woodlands that provide a setting for Dartmoor National Park; • Ancient woodland from increased recreational pressures arising from new development. • Open countryside including farmland from the creation of housing estates, as it is a finite resource. 	<p>Kingsteignton, Exeter - Exminster, and Teignmouth – Bishopsteignton.</p> <p>Policy SP1: Sustainable Place prevent pollution of soil.</p> <p>The additional protection for ancient woodland and veteran trees in the 2019 NPPF is contained within Draft Local Plan Policy EN16: Trees, Hedges and Woodland.</p> <p>Whilst the countryside needs to be protected, there needs to be a balanced approach between environmental, social and economic considerations, as set out in the NPPF.</p>
	289	Planning permission should be refused if a proposed development is out of keeping with the character of the area.	Development that is contrary to the objectives of Policy EN4: Landscape Protection and Enhancement will be refused, unless material consideration outweighs the harm caused.
	164	The Local Plan Review should consider strengthening Policy EN5 Equine Development to	Policy EN5: Equine Development of the Draft Local Plan contains stricter criteria than the previous policy, requiring

	prevent harm to the countryside from subdivision of fields, fencing, enclosures, tracks, structures and lighting and the potential for the establishment of a house in the future.	justification for the structure/development, which should be located adjacent to existing buildings and should not create cumulative harm with other development. Additional criteria regarding external lighting and removal of redundant buildings have also been added to the policy.
164	Requirement to strengthen equine policy to prevent erosion of countryside character.	
374	Development on greenfield sites should not be considered in Bovey Tracey	There will be opportunity to comment on allocated development sites when Part 2 of the Draft Plan, which will include allocated development sites, is published for public consultation.
372	The effects of street lighting on the landscape should be considered.	The Draft Local Plan contains policy EN8: Light Pollution, which permits lighting to create safe places to live and work, but requires development to avoid excessive levels of lighting. However, Devon County Council as Highway Authority has certain “permitted development” rights that enable development to take place without requiring consent from the local planning authority, such as street lights.
416	The Woodland Trust would welcome the retention of policies EN8 and EN12 which would benefit from being updated in line with the emerging NPPF which gives increased protection to ancient woodland.	The additional protection for ancient woodland and veteran trees contained in the NPPF 2019 is contained within Draft Local Plan Policy EN16: Trees, Hedges and Woodland.
162	Policy S22 should be strengthened to safeguard the countryside	Whilst the countryside needs to be protected, there needs to be a balanced approach between environmental, social and economic considerations, as set out in the NPPF.

	192 406	The Undeveloped Coast should be reviewed and include reference to cross estuary views as well as cross river views	The Undeveloped Coast has been retained within the Draft Local Plan as the NPPF 2019 supports protection of undeveloped coast areas.
	210	The Undeveloped Coast designation should be removed as it is a blanket designation poorly supported by evidence and contrary to national guidance	
	427	Policies should restrict development along Port Road, Dawlish to agricultural uses only.	Port Road, Dawlish is outside the settlement boundary of Dawlish and is not proposed to be included within the proposed revised boundary. As such, development is restricted in this area under Policy SP2: Settlement Limits and the Countryside of the Draft Local Plan.
Q.25 Green Infrastructure			
Is tailoring the provision of green infrastructure to the specific requirements of an area a suitable approach?			
	ref	Summary of Comments	Response
	162 164 288 289 357 358 359 360 361 362 363 364	Yes, tailoring the provision of green infrastructure to the specific requirements of an area is a suitable approach.	Policy DW9: Natural Infrastructure of the Draft Local Plan seeks to tailor the needs of different areas through criteria (b) of the policy, which ensures that natural infrastructure will reflect the diverse needs of all residents of a community in planning for new natural infrastructure, taking into account the size of the development, the site's characteristics, location, historic patterns and features, existing footpaths and cycleways and current or likely future deficits. It also gives flexibility to provide the required natural infrastructure off-site where surpluses exist. Although criteria (d) requires the use of the Fields in Trust Standards publication 'Guidance for Outdoor Sport and Play - Beyond the Six Acre Standard'

366 367 369 370 374 376 378 380 384 391 395 397 402 403 408 410 416		<p>(2015 and subsequent revisions) to be the starting point for provisions, it allows account to be taken of the capacity and accessibility of, and opportunities for improvements to, existing nearby provision.</p> <p>In addition, Policy DW10: Design of Natural Infrastructure ensures that the design of natural infrastructure responds to opportunities to enhance existing or create new natural infrastructure assets and connections and also requires wildlife buffer zones where necessary.</p> <p>.</p>
210	<p>Yes, tailoring the provision of green infrastructure to the specific requirements of an area is a suitable approach because:-</p> <ul style="list-style-type: none"> • responding to local needs will result in better outcomes for existing and future residents; • the biodiversity and public benefits of natural greenspace will be greatly enhanced by tailoring GI provision to the requirements of an area. 	

387 402	<p>Yes, tailoring the provision of green infrastructure to the specific requirements of an area is a suitable approach, however:-</p> <ul style="list-style-type: none"> • Some green areas need to be left alone due to ecology and wildlife; • The preservation of natural green space should be a priority, rather than replacing them with playing fields and parks, which manipulates the natural landscape. 	<p>The need for Suitable Alternative Natural Green Spaces required by the Habitat Regulations Assessments to relieve recreational pressure on European Wildlife Sites is contained within Policy DW9: Natural Infrastructure, as well as the specific ecology policies at EN10-15 of the Draft Local Plan.</p>
195 211 375 377 401 413 416	<p>Green Infrastructure requirements should:-</p> <ul style="list-style-type: none"> • Be delivered through new development which should include a comprehensive GI strategy ; • Reflect the Playing Pitch Strategy • Follow a needs based/evidence based approach; • Be reasonable in scale and kind to prevent over-burdening developments; • Adopt the best practice available to maximise the potential for creating good places to live by integrating public open space in a thoughtful way; • Create places where both people and wildlife can flourish; • Be decided in liaison with Town and Parish Councils and Neighbourhood Planning Groups; 	<p>Policy DW9: Natural Infrastructure of the Draft Local Plan requires new development to provide attractive, useable, accessible and multi-functional natural infrastructure that meets the needs of different areas through criteria (b) of the policy, which ensures that natural infrastructure will reflect the diverse needs of all residents of a community in planning for new natural infrastructure, taking into account the size of the development, the site's characteristics, location, historic patterns and features, existing footpaths and cycleways and current or likely future deficits. It also gives flexibility to provide the required natural infrastructure off-site where surpluses exist. Although criteria (d) requires the use of the Fields in Trust Standards publication 'Guidance for Outdoor Sport and Play - Beyond the Six Acre Standard' (2015 and subsequent revisions) to be the starting point for provisions, it allows account to be taken of the capacity and accessibility of, and opportunities for improvements to, existing nearby provision, taking account of evidence. Criteria (h) and (i) ensure that ecological networks are protected and enhanced and that</p>

		<ul style="list-style-type: none"> • Create a network of quality green spaces based on the Lawton principles; • Should include trees and woods and street trees in urban areas, to improve health and wellbeing, climate change mitigation and wildlife; • Seek a smaller number of larger, targeted areas of GI, rather than requiring a <i>pro rata</i> provision at every development, which would bring multiple benefits including cost efficiencies and increased ecological resilience 	<p>natural greenspace is publicly accessible unless this is not compatible with biodiversity compensation and/or net gain.</p> <p>Policy DW10: Design of Natural Infrastructure requires any necessary wildlife buffers and connections to be maintained and</p> <p>The Plan will be viability tested to ensure that all requirements do not render the Plan's requirements undeliverable.</p> <p>The Lawton Review is acknowledged through Policy EN11: Biodiversity, which ensures that the loss or fragmentation of habitats is minimised in order to provide more, bigger, better and connected habitats.</p> <p>Policy DW16: Urban Greening will ensure that a greening of the urban environment is achieved through new development, by requiring new street trees and an improved level of urban greening through other tree planting in public spaces, green roofs, green walls or green balconies.</p>
174 201 217 372 373 385 399 401 405 406 407 411	Green Infrastructure should:-	<ul style="list-style-type: none"> • Be adequately resourced and future proofed; 	<p>The funding for GI comes from new development – either from direct provision, in the form of payments towards off site provision (and secured through s106 Agreements) or through Community Infrastructure Levy. Policy DW8: Natural Infrastructure requires the use of sustainable drainage solutions and Policy DW15: Sustainable Drainage Systems requires SuDS to be multifunctional and Policy CC1: Resilience requires climate change to be taken into account to create resilient development.</p>

414 415 417	<ul style="list-style-type: none"> Recognise the need to provide GI to serve visitors to the area; Consider a range of users; Take opportunities to link GI provision for new development with planned and aspirational flood risk management and environmental projects; be tailored to meet an area's needs – but should also be designed to suit wildlife; Take account of biodiversity requirements and maintain extensive dark, wild areas to allow species, such as bats, to traverse undisturbed; Be provided locally to reduce the need to travel by car and thus reduce pollution; Be integrated with existing village infrastructure (eg connection to existing footpaths to encourage walking routes). 	<p>The pressure on existing GI from visitors to the area is acknowledged, but measures to alleviate this, such as a Tourist Tax, are not land use matters and within control of the planning system.</p> <p>Policy DW10: Design of Natural Infrastructure ensures that natural infrastructure is accessible by people of all ages and abilities, particularly those with mental and physical disabilities and carers.</p> <p>Policy DW10: Design of Natural Infrastructure requires natural infrastructure to incorporate/deliver the principles and projects set out in the Natural Infrastructure Strategy for Teignbridge</p> <p>Policy DW10: Design of Natural Infrastructure ensures that natural infrastructure incorporates necessary wildlife buffer zones, is compatible with achieving biodiversity compensation and/or net gain, and that lighting design and levels are compatible with wildlife.</p> <p>Policy DW10: Design of Natural Infrastructure ensures that natural infrastructure incorporates publicly accessible natural infrastructure with interconnected pedestrian, cycle and vehicular networks integral to proposals.</p>
206 207 373 395 397 403 416	<p>Development should:-</p> <ul style="list-style-type: none"> Create alternative walkable routes that include open public spaces such as parks and squares; 	<p>Policy DW10: Design of Natural Infrastructure ensures that natural infrastructure incorporates publicly accessible natural infrastructure with interconnected pedestrian, cycle and vehicular networks integral to proposals and Policy DW3: Street Character requires development to prioritise movement</p>

		<ul style="list-style-type: none"> • Maintain and enhance green spaces for the health and well-being of people and wildlife; • Retain green spaces in the interests of residents' physical and mental health. • incorporate sufficient green space to allow the inclusion of some large "canopy" trees, which will greatly enhance the living space; • Integrate trees and green spaces into developments early on in the design process. 	<p>by the following hierarchy , ensuring places are well connected throughout the site and with the surrounding area:</p> <ul style="list-style-type: none"> i. people on foot and those with disabilities, ii. cyclists, iii. public transport vehicles and stops, and <p>the car or other private motorised vehicles.</p> <p>Policy DW1- sets out that the Council will continue to establish and safeguard a network of attractive, usable, accessible and multi-functional green and blue spaces and corridors for the movement of people and species, place-making and the provision of ecosystem services, through the determination of planning applications, infrastructure investments and by partnership working.</p> <p>Policy DW10: Design of Natural Infrastructure ensures that there is sufficient space for the mix of natural infrastructure features and functions within the proposed spaces. In addition, Policy DE16: Urban Greening requires new tree planting and improved levels of urban greening.</p>
	195 208 211	Quality of open space should be taken into account as well as quantity - suggested use of FIT standards as benchmark	Criteria (d) of Policy DW9: Natural Infrastructure requires the use of the Fields in Trust Standards publication 'Guidance for Outdoor Sport and Play - Beyond the Six Acre Standard' (2015 and subsequent revisions) to be the starting point for provisions, it allows account to be taken of the capacity and accessibility of, and opportunities for improvements to, existing nearby provision.

	<p>158 DNP welcome the sharing of datasets in relation to Open Space, Sport and Recreation, and where possible a consistent approach to local plan standards and would seek a more detailed conversation around the recreational impacts of development on the fringes of the National Park in the context of the review of your CIL charging schedule.</p> <p>DNP considers there are opportunities for us to more think strategically around Green Infrastructure networks and the importance of non-designated areas, which we may seek to recognise more completely through our own local plan review</p>	<p>Data sharing is welcomed, as is collaborative working.</p>
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174 211 396	<ul style="list-style-type: none"> • This approach would not be supported if it resulted in the requirement for smaller areas of green space. • At present, a number of the standards, particularly for children's and young people's space, are significantly higher than other authorities and produce requirements upon developments that are not in the best interests of future residents who, in most cases, are required to pay for its maintenance through management fees. • Will the Local Plan Review specify the GI requirements for each development site or state factors to be taken into consideration – will these be general or site specific?? How does the local authority propose to evidence its approach to GI and to assess and monitor FIT standards. 	Criteria (d) of Policy DW9: Natural Infrastructure requires the use of the Fields in Trust Standards publication 'Guidance for Outdoor Sport and Play - Beyond the Six Acre Standard' (2015 and subsequent revisions) to be the starting point for provisions, it allows account to be taken of the capacity and accessibility of, and opportunities for improvements to, existing nearby provision.
183	A strategy based approach would also clearly set out the key projects that are required to meet identified needs which in turn can be incorporated within CIL Regulation 123 Lists and Infrastructure Delivery Plans.	This will be dealt with in Part 2 of the Plan, which will set out development allocations and the infrastructure required to deliver them.
428	Multiple benefits, including cost efficiencies and increased ecological resilience, would be realised by delivering a smaller number of larger, targeted areas of GI.	Criteria (k) of Policy DW9: Natural Infrastructure gives flexibility to, where relevant, protect and extend existing natural infrastructure assets, enhancing their function and overall accessibility to the network.

	179 383	Raises question about the purpose CIL has in the delivery of strategic green infrastructure? Does Teignbridge DC not collect pooled contributions of CIL and then direct the monies to the areas of specific need and shortfall already?	The funding for GI comes from new development – either from direct provision, in the form of payments towards off site provision or through CIL. CIL monies are spent according to the priorities set out in the Schedule 123 List.
	175	Sandy Lane playing fields should not be built on as they are well used locally	Policy DW23: Protection of Recreational Land and Buildings, prevents the loss to another use, unless it would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision the needs for which clearly outweigh the loss.
Biodiversity, Ecosystems and Flooding			
	ref	Summary of Comments	response
	190 217 396 399 402 405 406 407 411 415	<p>The Local Plan Review should provide greater protection for Greater Horseshoe Bats:-</p> <ul style="list-style-type: none"> • Large areas of the countryside should remain as dark, undeveloped areas to allow bats to commute; • Greater weight should be given to the cumulative impacts of developments on their habitats, roosts, flyways and feeding zones and a precautionary principle applied; • Retaining cattle grazing land, which supports Greater Horseshoe Bats, by attracting dung beetles; 	<p>As part of its planning function, Teignbridge District Council before giving any consent, permission or other authorisation for a plan or project, must consider the underlying purpose of the EU Habitats Directive (2017 as amended). This is to ensure that a plan or project is authorised only to the extent that it will not, either '<i>alone</i>' or '<i>in combination</i>' with other plans or projects, adversely affect the integrity of a European site. As such, it includes consideration of cumulative effects.</p> <p>The <i>Conservation of Habitats and Species Regulations</i> 2010 transpose the Habitats Directive into national law in England and Wales. Regulations 102 to 105 require planning authorities to assess the potential effects of their development plans on European Sites.</p>

	<ul style="list-style-type: none">• Safeguarding conditions must be monitored over extended time frames by independent observers, be subject to scientific evaluation and any subsequent recommendations implemented in full;• Mitigation is not always the answer - best not to create disturbance or loss of habitat in the first place;• Until the biodiversity of species in the area is fully understood in terms of flight paths and feeding areas nothing should be allowed that impacts on their continuing presence in South Devon.	<p>The Draft Local Plan contains a raft of ecology related policies, including a new policy, Policy EN14: South Hams Special Area of Conservation that provides specific protection for the South Hams SAC, which is designated to maintain a favourable status of the Greater Horseshoe bat population in Teignbridge and South Devon.</p> <p>Given the legal duty of the Council to ensure that European Sites are not adversely affected, this protection carries great weight in the consideration of development proposals. Bat surveys inform of any required mitigation and measures, including dark corridor flyways, foraging areas and low lux lighting are often required.</p> <p>When preparing the draft Local Plan Review the Council has a legal duty to take into account the potential impacts on Greater Horseshoe Bats from planned development. The Plan has been subject to a Sustainability Appraisal/Strategic Environmental Assessment to assess how it will contribute to the achievement of sustainable development and Habitats Regulations Assessment.</p>
148 169 175 190 194 195 201 214 373 402	<p>The Local Plan Review should:-</p> <ul style="list-style-type: none">• Protect locations of ecological importance from development;• Prevent the loss of wetlands, which cannot be offset nor hydrology recreated;• Protect wildlife, which attracts tourists to the area;	<p>Policies EN11: Important Habitats and Features, EN12: Legally Protected and Priority Species, EN13: European Wildlife Sites and EN14: South Hams SAC contain protection for habitats and wildlife. They protect and seek to enhance the full hierarchy of sites, from those legally protected at a European and National level, to locally important sites and networks and features important to wildlife to ensure that a favourable conservation status is maintained.</p>

<p>419 421 428</p>	<p>Contain more policies on protecting wildlife, especially bats</p> <ul style="list-style-type: none"> • Require a financial contribution to compensate for any loss of biodiversity and explicitly require net biodiversity gain for all developments. • Provide clear evidence of the methodology used to calculate financial contribution required towards biodiversity offsetting; • Provide opportunities for off-site biodiversity offsetting, but acknowledge that biodiversity offsetting may best be done on site; • Achieve a net gain in biodiversity and no net loss of priority habitats in Teignbridge; • explicitly require net biodiversity gain from all developments, to secure the movement to net gain for nature expressed in the National Planning Policy Framework; • Acknowledge the challenge of the general decline in biodiversity as mentioned in Defra's recent 25 Year Environment Report; • Address the possible future requirement for SANGs; • Ensure that indirect impacts from the increased population will not harm Teignbridge's internationally important wildlife sites - an assessment of whether 	<p>Policy EN10: Biodiversity seeks 10% net increases in biodiversity in association with new development through habitat enhancement and creation, and through the introduction of appropriate biodiversity offsetting measures.</p> <p>Defra's Biodiversity 2.0 metric calculator will be used, which is the most up-to-date nationally endorsed methodology.</p> <p>Criteria 4 of this policy allows for off-site offsetting and/or gain, including financial contributions towards this, where it would generate the most benefits for nature conservation.</p> <p>Defra's recent 25 Year Environment Report is acknowledged in the text supporting Policy EN10: Biodiversity.</p> <p>Criteria (I) of Policy DW9: Natural Infrastructure requires "Suitable Alternative Natural Green Space" (SANGS) where development is allocated that could have likely significant effect on the Exe Estuary Special Protection Area (SPA) and Dawlish Warren Special Area of Conservation (SAC) through impacts arising from an increased use of these areas from recreational use. Given the legal duty of the Council to ensure that European Sites are not adversely affected, this protection carries great weight in the consideration of development proposals.</p> <p>Policy EN13: European Wildlife Sites refers to the Joint Interim Approach with East Devon District Council and Exeter City Council.</p> <p>Protection for Cirl Buntings is provided under Draft Local Plan Policy EN12: Legally protected and Priority Species, which, at</p>
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	<p>the proposed new growth can be accommodated without risking any adverse effect on the integrity of Dawlish Warren SAC and Exe Estuary SPA will need to be undertaken;</p> <ul style="list-style-type: none"> • Refer to the shared Mitigation Strategy with East Devon District Council; • Include policy protection for Cirl Buntings; • explicitly commit to the Cirl Bunting Wildlife and Development Guidance Note; • Encourage the designation of further County Wildlife Sites; • Not restrict necessary and appropriate development at Exeter Racecourse through policies relating to County Wildlife Sites • Include a spatial distribution of housing dictated by sensitive ecological receptors, including avoiding development of land required to functionally support relevant areas of the South Hams SAC and avoiding indirect impacts arising from local residents and visitors enabled by the plan on the Exe Estuary SPA and Dawlish Warren SAC; • be accompanied by an assessment of whether the proposed new growth planned can be accommodated without risking an adverse effect on the integrity of Dawlish 	<p>criteria 1a, requires development to take account of additional species specific guidance.</p> <p>The Local Plan Review cannot designate new County Wildlife Sites. County Wildlife Sites are designated by a panel of experts using strict criteria and are monitored by Devon Biodiversity Records Centre.</p> <p>Policy EN11: Important Habitats and Features provides protection for County Wildlife Sites, but allows development where it would not harm the site, taking account of the weight of protection afforded to the site, and there are public benefits that outweigh the harm, that cannot be provided in an alternative location or form of development, and losses are mitigated and compensated and, where affecting a statutory site, a favourable conservation status is maintained. Some CWSs are not statutorily protected, whilst others, such as SSSIs are.</p> <p>The distribution of housing has not yet been decided. This will be within Part 2 of the Local Plan. It will of course be necessary to take account of the constraints of each site proposed, including ecological sensitivity, and to consider both direct and indirect impacts upon European Wildlife Sites, including the Exe Estuary SPA, Dawlish Warren SAC and the South Hams SAC, which the Council has a statutory duty to ensure remain at a favourable conservation status.</p> <p>The impact on the environment from the development set out in Part 2 of the Local Plan will be assessed by way of a Strategic Environmental Assessment and Sustainability</p>
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	<p>Warren SAC, the Exe Estuary SPA, and potentially other Natura 2000 sites; what measures are required to ensure there is no adverse effect; and whether the availability of effective long term measures to reduce these risks will limit the extent and inform the distribution of growth.</p> <ul style="list-style-type: none">Require wildflower verges and roundabouts to encourage butterflies and insects.	<p>Appraisal as well as assessment under the Habitats Regulations.</p> <p>The Local Plan requires 10% net biodiversity gain, but cannot be as specific as to require wild flowers to be planted on verges and roundabouts.</p>
178 190 217 378 396 405 415 428	<p>New development should:-</p> <ul style="list-style-type: none">Be refused unless it is proved that it will not have a significant impact on protected wildlife;Include low-level lighting in environmentally sensitive areas;Include biodiversity enhancements in the built fabric of new buildings, such as bat and bird boxes, green roofs and walls and hedgehog connectivity;Comply with Newton Abbot NDP Policy 3 (Natural Environment and Biodiversity).	<p>The Draft Local Plan contains Policies EN11: Important Habitats and Features, EN12: Legally Protected and Priority Species, EN13: European Wildlife Sites and EN14: South Hams SAC, protect and seek to enhance the full hierarchy of sites, from those legally protected at a European and National level, to locally important sites and networks and features important to wildlife to ensure that a favourable conservation status is maintained.</p> <p>Given the legal duty of the Council to ensure that European Sites are not adversely affected, this protection carries great weight in the consideration of development proposals. Bat surveys inform of any required mitigation and measures, including dark corridor flyways, foraging areas and low lux lighting are often required under the existing policy powers of the Local Plan.</p> <p>Policy EN10: Biodiversity seeks 10% net increases in biodiversity in association with new development through habitat enhancement and creation, criteria 3 of Policy EN12:</p>

			<p>Legally Protected and Priority Species requires, where appropriate, development to include opportunities for species within the urban environment, for example bird, bat and invertebrate boxes and hedgehog holes, and Policy DW16: Urban Greening requires development to include tree planting and result in an improvement in the level of urban greening through green roofs, walls and balconies or tree planting in public places.</p> <p>Policy NADP3 of the Newton Abbot Neighbourhood Plan seeks to retain existing trees and hedgerows on development sites where possible and requires the submission of a landscaping, biodiversity action and management plan with development proposals. Policy EN15: Trees, Hedges and Woodlands of the Draft Local Plan contains protection for trees, woodlands and hedgerows and Policy EN10: Biodiversity requires a 10% net gain in biodiversity.</p>
163 178	Questioning how further development will impact on the wildlife and protected species in Teignbridge and raising the lack of information to show how the strategic priority of protecting and enhancing biodiversity including international wildlife sites has been met.		<p>The distribution of housing has not yet been decided. This will be contained within part 2 of the Plan. It will of course be necessary to take account of the constraints of each site proposed, including ecological sensitivity, and to consider both direct and indirect impacts upon European Wildlife Sites, including the Exe Estuary SPA, Dawlish Warren SAC and the South Hams SAC, which the Council has a statutory duty to ensure remain at a favourable conservation status.</p> <p>The impact on the environment from the development set out in Part 2 of the Local Plan will be assessed by way of a Strategic Environmental Assessment and Sustainability</p>

			Appraisal as well as assessment under the Habitats Regulations.
148 178 211	Concern how the use of biodiversity offset metrics leads to a system which overestimates the importance of low value habitat and underestimates the importance of as built development, which can place an unnecessary burden on development in terms of providing mitigation. It also has the disadvantage of encouraging driving to new sites to see and enjoy “rehoused” wildlife and should thus be a last resort where no other alternative is available.		<p>The text supporting Policy EN10: Biodiversity explains that the nationally endorsed biodiversity metric will be used – which is Biodiversity Metric 2.0, published by Defra.</p> <p>Policy EN1- also requires 10% net gain in biodiversity to be provided on site, unless this would not provide the most benefits for nature conservation.</p>
178	Questioning to what extent it is reasonable to relocate a species to a new mitigation site (example given of the mitigation area within Wolborough used during the construction of the South Devon Link Road)		Whilst the Draft Local Plan contains a raft of policies that will protect biodiversity, wildlife and habitats, it is not possible to answer such a specific comment/question. Each case would need to be considered on its merits, taking account of the degree of protection for the species/habitat, the extent of the effects and mitigation and, any public benefits that may outweigh any harm.
148 209	Concern is expressed about the impact from NA3 on ecological/biodiversity threats, including threats to Wolborough Fen SSSI, Cirl Buntings, Bats, Newts, rare plant/insect species.		The development at NA3 is subject to an appeal, the decision of which is awaited.
190	Has Teignbridge District Council adopted the Prospectus for Natural Devon 2014 – 19 which was produced by the Devon Local Nature Partnership (DLNP)?		This document is now out of date.

	190	Concern about impact from surface water pollution from the development of TE3 on Coombe Valley.	<p>The impacts of surface water run-off from new development on land west of Higher Exeter Road (allocation TE3 in the existing Local Plan) is being considered by the planning authority in consultation with Devon County Council Flood Risk and Coastal Management team, under the current planning application 17/02480/MAJ. Policy EN4 Flood Risk, of the existing Local Plan ensures that the adequacy of drainage, the need for surface water drainage systems, separate from all foul drainage systems and the use of sustainable drainage systems where ground conditions are appropriate are considered and states how planning permission will not be granted for any proposal which as a consequence of inadequate provision of water services or surface water drainage and disposal, would pollute the water environment.</p>	
178 190 201 215		<p>With regard to flood risk:-</p> <ul style="list-style-type: none"> • Overall flood risk should be reduced; • Development in the floodplain or low lying catchment areas should be avoided and these areas used to create GI networks, valley parks and habitats; • The impact of increased flood risk should also consider the risk from surface water and groundwater and the risk of flooding from surface water mapping should be used alongside the Flood Zone 2 and 3 maps; 	<p>The NPPF requires Local Plans to take a sequential, risk-based approach to the location of development in order to steer development to areas with the lowest risk of flooding. In order to be considered sound, the Local Plan Review must comply with the NPPF. The distribution strategy for development and allocated development sites will be contained within part 2 of the Local Plan.</p> <p>Policy EN6: Flood Risk sets out that there will be a sequential approach to all new development, guiding it to areas at lower risk of flooding.</p> <p>Policy DW15: Sustainable Urban Drainage Systems prioritises multi-functional above ground SuDS for the benefit of wildlife, amenity and water quality.</p>	

	<ul style="list-style-type: none"> • The Local Plan Review should include policies to secure financial contributions towards flood and coastal risk management schemes; • Policies relating to the provision of SuDS to manage surface water in new development should be reviewed in order to ensure they are fit for purpose to deliver the required onsite drainage standards; • Surface water should be managed in a more natural way; • The Local Plan Review should recognise the aim to achieve mitigation in flood risk wherever possible through growth for both existing and proposed homes, businesses and the environment; • The Local Plan Review should also consider how flooding is not just about the floodplain; it is also about run-off from the landscape and the role that land management elsewhere in a catchment plays in this; • There should be collaboration with the Environment Agency over the Strategic Flood Risk Assessment of the Local Plan Review; • Housing distribution will need to consider water supply, foul drainage and pressure on environmental infrastructure and development located where foul drainage can connect to the existing sewer network; 	<p>Such contributions could only be sought should there be a direct impact upon flood or coastal risk from the development, in which case, it is likely that the development would not be supported.</p> <p>Devon County Council is the Lead Local Flood Authority, and provides advice on the management of surface water for all major development proposals. They have published Sustainable Drainage Systems Guidance for Devon in 2012 and this document was most recently updated in 2017. The use of SuDS manages surface water in a more natural way than the previous underground storage tanks used and provides greater environmental benefits. This is required by Local Plan P Policy DW15: Sustainable Urban Drainage Systems, which prioritises multi-functional above ground SuDS for the benefit of wildlife, amenity and water quality.</p> <p>Work on Part 2 of the Local Plan will involve allocating land for development, including housing. This will be done in collaboration with other parties and will involve assessment of infrastructure.</p> <p>Place-specific policies of the adopted Local Plan will be saved through the draft Local Plan.</p> <p>Protection for soils is provided within criteria (l) of Policy SP1: Sustainable Place, which requires minimisation of impacts on soils and ensures use of appropriate construction techniques to prevent over compaction, pollution or a reduction in soil quality.</p>
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	<ul style="list-style-type: none"> • The Local Plan Review should recognise: <ul style="list-style-type: none"> ○ The challenges around fluvial flood risk in Newton Abbot, Bovey Tracey, Dawlish Warren and Dawlish town and the coastal risks at Teignmouth and ○ The challenges posed by soil compaction such as environmental degradation, pollution of the water environment and flood risk. 	
201	The Local Plan Review should consider water quality and water resources and take account of the Water Framework Directive.	Criteria 6 of Policy EN6: Flood Risk, states that planning permission will not be granted for any proposal which will pollute the water environment, including coastal waters, or result in an increase in flood risk at the site or elsewhere.
429	Concern expressed about deteriorating condition of coastal waters	
201	<p>The Local Plan Review should acknowledge the planned Environment Agency Flood and Coastal Risk Management schemes which will be necessary over the plan period. On our current flood and coastal risk management programme within Teignbridge we have the following:</p> <ul style="list-style-type: none"> • Combeinteignhead (TDC project) • Coombe Valley Dam (TDC project) • Exe Estuary Habitat Delivery (although outside Teignbridge, in the Lower Otter) it is an essential project to enable compensation for loss of habitat within the Exe Estuary (e.g. as a consequence of the works at Dawlish Warren). • NFM Dartmoor Headwaters Phase 2. • Newton Abbot and Kingsteignton Flood Defence Improvements. 	The planned flood management schemes by the Environment Agency are noted. There will be further liaison with Flood/Drainage Officers in Teignbridge District Council and Devon County Council during the preparation of Part 2 of the Local Plan.

	<ul style="list-style-type: none"> • Starcross and Cockwood Tidal Defence Scheme. • Stokeinteignhead Flood Alleviation Scheme. • Ashburton Flood Defence Improvements. • Bovey Tracey. • Chudleigh – Bridgelands Bridge Flood Management. • Dawlish Water Flood Defence Improvements. • Teignmouth Beach Management Plan (TDC project). • Teignmouth Beach Management Scheme (TDC project). • Kingsteignton Sandygate (TDC project). • Shutterton Brook Flood Defence Improvements. • Powderham Banks. • Dawlish Revetment. 	
161	Indio House BT2A should be de-allocated as the mitigation required to prevent harm to the bats on site (ie the Dark skies” approach, would be unfeasible should the highway authority wish the new access to be street lit.	The development (17/02118/MAJ) was allowed appeal on 6 November 2018.
178	Question about the Habitat Mitigation Officer - what is their background and experience and their terms of reference?	Teignbridge is part of the South East Devon Habitat Regulations Partnership with Exeter City Council and East Devon District Council. The Partnership has 4 members of staff – a Habitat Regulations Delivery Manager, 2 Habitat

			<p>Regulations Officers and a Devon Loves Dogs Project Co-ordinator.</p> <p>In addition, Teignbridge Council has 2 part time Biodiversity Officers and share Devon County Council's Senior Ecologist.</p>
	407	Biodiversity evidence suggests expansion into the neighbouring countryside is not a good thing	The concern about expansion of existing settlements into the countryside is noted. However, Part 2 of the Local Plan will need to identify land for additional development up to 2040. Whilst the re-development of brownfield land is preferred, this is unlikely to provide sufficient land to meet the needs of the District. In addition, an Urban Capacity Study will be undertaken to investigate whether there are areas within existing urban areas and towns that could accommodate development.
	402	Species of protected bat have been identified to the rear of Embury Close.	Land to the north and north east of Embury Close is allocated for development in the adopted Local Plan. The site does not extend as far south as Embury Close.
Air Quality			
	ref	Summary of comments	response
	217 190	Concern is raised about new development in Newton Abbot, Kingskerswell and Teignmouth and it is suggested that no development takes place in these areas until there are improvements to the air quality	Development throughout the District is subject to Policy EN6 of the adopted Local Plan 2013-2033, which ensures that major developments likely to have a negative impact on an Air Quality Management Area provide sufficient information to assess the impact and, where a significant impact is indicated within an existing Air Quality Management Area or which could itself result in the declaration of an additional Air Quality Management Area, the development mitigates negative

			<p>impacts through the production and implementation of a tailored Low Emission Strategy which proposes management and other measures including implementation of relevant proposals within the Air Quality Action Plan.</p> <p>Draft Local Plan Policy EN7: Air Quality, is broadly similar to the existing policy, but includes reference to the Air Quality Action Plan produced by the Council and makes clear circumstances when planning permission will be refused.</p> <p>It is likely that the Kingskerswell Air Quality Management Area will be able to be revoked due to improvements in air quality since the opening of the South Devon Link Road.</p>
	162	Requests the designation of a new AQMA along the A379 corridor (Exminster)	AQMAs are designated where air quality falls below the objectives set out in the Air Quality (England) Regulations 2000 as amended by the Air Quality (England) (Amendment) Regulations 2002. They are not policy areas and are not designated through the Local Plan.
	178 209	Concern raised about the impacts of new developments within the existing Local Plan on air quality, with particular reference to NA3.	Policy EN6 Air Quality of the adopted Local Plan ensures that major developments likely to have a negative impact on an Air Quality Management Area provide sufficient information to assess the impact and, where a significant impact is indicated within an existing Air Quality Management Area or which could itself result in the declaration of an additional Air Quality Management Area, the development mitigates negative impacts through the production and implementation of a tailored Low Emission Strategy which proposes management and other measures including implementation of relevant proposals within the Air Quality Action Plan.

			<p>Draft Local Plan Policy EN7: Air Quality, is broadly similar to the existing policy, but includes reference to the Air Quality Action Plan produced by the Council and makes clear circumstances when planning permission will be refused.</p> <p>Policy NA3 of the existing Local Plan includes the requirement for a new road, to link the A380 with the A381, which will enable traffic movements to avoid the Newton Abbot/ Kingsteignton AQMA when travelling towards the A38 or A380.</p>
	178	Lack of reference to how the strategic priorities of improvement to air quality have been met	Air Quality Annual Status Reports are published by the Environmental Health service of the Council.
	421	Wishes to see improvements in air quality in Teignmouth AQMA and to see TDC and DCC working together.	<p>In 2017 10 locations within the Teignmouth AQMA were monitored. Of these 2 locations showed a small reduction in Nitrogen Dioxide, however, 5 locations exceeded the National Objective.</p> <p>Teignbridge Air Quality Action Plan is currently being updated and is due to be published in 2019. There has been consideration of a Joint AQMP across the Greater Exeter areas, however, because the challenges to each of the authorities is very different, it was concluded that each authority produce the plan individually.</p>
Other Environmental Stewardship			
	ref	Summary of comments	response
	155	The Local Plan Review should:	Local Authorities have a legal duty under sections 69 and 70 of the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 to determine which parts of
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	199 201 215 217 378	<ul style="list-style-type: none"> Support the objective to enhance the character of the Bishopsteignton Conservation Area – as set out in the Bishopsteignton Neighbourhood Plan; Protect views into and out from Denbury Conservation Area; comply with Policy NANDP11 of the Newton Abbot Neighbourhood Development Plan; Include a vision stating that we will have a District where local residents and visitors enjoy unspoilt coastline, countryside and heritage assets; and our great natural biodiversity is promoted and protected; Make it clear that the Devon Minerals Plan and Devon Waste Plan form part of the development plan; Include reference to bathing waters and soils which are environmental and historic assets; acknowledge the importance of agriculture; make reference to the Marine Policy Statement and the South Inshore and Offshore Marine Plans. 	<p>their areas possess special architectural or historic interest and to designate them as conservation areas and, under section 71 of the act to formulate and publish proposals for the preservation and enhancement of conservation areas.</p> <p>The Vision for the draft Plan includes...”Teignbridge will be a leading example in tackling climate change and nurture an environment in which both people and nature can thrive. We will encourage a buoyant local economy that is supported by physical and digital infrastructure. It will be a District where more homes will be truly affordable and able to meet the needs of each generation and where high standards of design create places of quality where residents can lead healthy, happy lives.”</p> <p>The Introduction to the draft Local Plan clarifies that the Devon Minerals and waste Plans form part of the development plan for Teignbridge.</p> <p>Policy SP1: Sustainable Plan ensures that impacts of development on soil and agricultural production are considered.</p> <p>Policy EN6: Flood Risk ensures that regard is had to the most up-to-date River Basin Management Plan, Shoreline Management Plan, Exe Estuary Management Plan, Local Plan Strategic Flood Risk Assessment and the Local Flood Risk Management Strategy.</p>
	216	The Local Nature Reserve at Coombe Valley, Teignmouth should be re-designated a National Nature Reserve and the “Other Site of Wildlife	The Local Plan Review cannot designate areas as National Nature Reserves – this is done by Natural England. Local Authorities can designate areas as Local Nature Reserves,

	Interest” to the north of this should be re-designated as a Local Nature Reserve	<p>however, the Local Authority must own or have control over the land and manage it to care for its natural features.</p> <p>The land at Coombe Valley, Teignmouth that is designated as an “Other Site of Wildlife Interest”, is not in the ownership of the Council.</p>
177	<p>The Local Plan Review should set out a positive strategy for the conservation and enjoyment of the historic environment, taking into account:-</p> <ul style="list-style-type: none"> ○ heritage at risk, ○ how development can contribute to local identity and distinctiveness, ○ the interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport ○ works, infrastructure planning, tourism, town and village centres and climate change mitigation or adaptation; ○ management of conservation areas; ○ usefulness of local lists in identifying non-designated heritage assets; ○ opportunities to improve historic streets, townscapes, landscapes and settings. ○ expectation in relation to desk-based assessment and field evaluation in relation to sites of possible archaeological interest; ○ areas where archaeological potential has already been identified; 	<p>The Draft Local Plan’s raft of Design and Wellbeing policies, along with Policies EN16: Heritage Assets and EN17: Conservation Areas will provide significant detail about the design of new development and help to ensure that new development contributes to local identity and distinctiveness and the relationship between heritage assets and new development.</p> <p>Policy EN16 protects both designated and undesignated heritage assets and requires development to sustain the significance, character, setting and local distinctiveness of heritage assets, to preserve or enhance elements that make a positive contribution to heritage assets and their settings or which help understand the significance of heritage assets and to retain and refurbish, and only when this is not practicable, replace or otherwise change historic fabric, plot boundary, layout, plan form, architectural features and detailing . The policy ensures that materials appropriate to the heritage asset are used and are applied in a traditional manner, using specialists where required and that extensions are subordinate in scale to the principal building and respect and complement it in terms of form, features and architectural style. The policy supports opportunities for access, education and appreciation of Teignbridge’s historic environment and, where it would better reveal the significance of the heritage</p>

	<ul style="list-style-type: none"> ○ whether there are any key views or skylines that are important to the sense of place and the significance of the heritage assets within them; ○ how CIL and/or S106 agreements could contribute towards the enhancement of individual assets or specific historic places; <ul style="list-style-type: none"> • identify areas where development might need to be limited in order to conserve heritage assets or would be inappropriate due to its impact upon the historic environment. • include strategic policies to deliver the conservation and enhancement of the historic environment; • contain a clear strategy for enhancing the natural, built and historic environment; • identify land where development would be inappropriate, e.g. for its environmental or historic significance; • be based on adequate, up-to-date and relevant evidence about the historic environment; • take account of Historic England's Good Practice Advice and <i>Historic Environment and Site Allocations in Local Plans</i>, <i>Historic England Advice note 3</i>; 	<p>asset, the removal of modern additions that detract from the special historic character or appearance of the building.</p> <p>The policy ensures that where the loss of a non-designated heritage asset is considered acceptable, any replacement building or structure reflects and respects the special historic, architectural or landscape interest of the heritage asset lost.</p> <p>In addition, the policy allows for enabling development where there is no viable alternative option available, the benefits of the scheme outweigh any non-compliance with other planning policies, and mechanisms are in place to secure the conservation of the heritage asset.</p> <p>Policy EN16 makes it clear that it applies to Scheduled Monuments, Listed Buildings, Conservation Areas, Historic parks and Gardens, other archaeological sites and other non-designated heritage assets on the Register of local Assets (particularly those of national importance) or identified in Neighbourhood Plans.</p> <p>In addition to Policy EN16, the Plan contains Policy EN17: Conservation Areas, which ensures that development sustains or enhances the significance and special character or appearance of Conservation Areas, by requiring it to respect, reflect or respond to existing traditional architectural and historic character, having regard to the Conservation Area Character Assessments and Conservation Area Management Plans and Neighbourhood Plans and to retain, or refurbish, and only where it is unpracticable to do so, replace or otherwise change traditional built and natural features such</p>
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		<ul style="list-style-type: none"> • undertake a thorough assessment of the significance of heritage assets when allocating development sites, consider direct, indirect and cumulative effects of proposals on the historic environment and, demonstrate how great weight has been applied to the conservation status of heritage assets ; • require developers to undertake an assessment of the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future; • consider the historic form and character of existing settlements, which should help to determine the location and scale of future development; • consider dispersal of development across all settlements in the District as this may help to reduce a more dramatic landscape impact and urbanisation associated with large scale strategic allocations; • address the 2 Conservation Areas that are at risk and the 8 that are considered vulnerable. 	<p>as shop fronts, walls, railings, gates, Devon hedgebanks, hard surfaces and architectural features. The policy supports the removal of modern features that detract from the special historic character or appearance of buildings where it would better reveal the significance of the heritage asset and proposals that seek to improve neutral and negative buildings within Conservation Areas, as included in Conservation Areas Character Appraisals, or that lead to an enhancement in the Conservation Area.</p> <p>The policy limits the demolition of a building or structure (including means of enclosure, such as walls or railings) in a Conservation Area to circumstances where the building or structure to be demolished does not make a contribution to the significance or special architectural or historic character or appearance of the Conservation Area; it is demonstrated that it would be impracticable to repair the building or structure and it is incapable of beneficial use or that the removal of the building or structure, including its subsequent replacement where relevant, will lead to an enhancement of the Conservation Area; or the removal of the building or structure is required to deliver a public benefit that outweighs its loss.</p>
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	177	A Heritage Impact Assessment of the new settlement boundaries should be undertaken	Whilst a Heritage Impact Assessment has not been undertaken for the draft proposed changes to settlement boundaries, the Settlement Boundary Review Principles set out that where an extension could lead to development which has a potential to adversely affect the character and/or setting of a Conservation Area, it would not be included within a settlement boundary.
	215	<p>It is recommended that the wording of policy EN5 could be reviewed to include reference to:</p> <ul style="list-style-type: none"> - the impact of development upon the area's heritage - historic landscapes that form the setting of the area's settlements - the County Historic Environment Record as a record of the area's heritage assets - designated and undesignated heritage assets. <p>The policy should clarify the concepts of an area's heritage and historic landscapes, include reference to designated and undesignated assets, require preservation in-situ and, the wording should be strengthened to require "work with" rather than "discuss with interested parties".</p>	<p>Existing Policy EN5 has been replaced with policies EN16 and EN17, as described above.</p> <p>Policy EN4: Landscape protection and Enhancement includes a requirement to have special regard to the historic designed landscapes around the Haldon Hills of Mamhead, Oxtun, Powderham and the Haldon Estates.</p> <p>The supporting text to Policy EN16 refers to the Devon Historic Environment Record as a source of information about the historic environment.</p> <p>Reference to and protection for undesignated assets is contained within Policy EN16.</p>
	177	Historic England suggests that Policy EN5 be amended in the Local Plan Review, stating concern that many policy requirements are currently referred to in the general text of the plan rather than the policy itself. It suggests a redrafted historic environment policy as follows:-	

	<p><input type="checkbox"/> Teignbridge's historic environment shall be sustained and enhanced. This includes all heritage assets such as historic buildings, conservation areas, historic parks and gardens, archaeology, historic landscapes, townscapes and their distinctive features.</p> <p><input type="checkbox"/> Development affecting a designated or non-designated heritage asset and its setting will be expected to make a positive contribution to its character, appearance and significance.</p> <p><input type="checkbox"/> Sympathetic, creative and innovative urban design and architecture which helps to secure the conservation of heritage assets and integrates new development into the historic environment will be encouraged</p> <p><input type="checkbox"/> Applications affecting the significance of a heritage asset will be required to provide sufficient information to demonstrate how the proposals would contribute to the asset's conservation.</p>	<p>This is contained within the first paragraph of Policy EN16: Heritage Assets.</p> <p>This is contained within criteria (c) of Policy EN16: Heritage Assets.</p> <p>Criteria (a) of policy DW1: Quality development requires new development to integrate with and, where possible, enhance the character of the adjoining built and natural environment, particularly affected heritage assets.</p> <p>The text supporting Policy EN16 explains that In order to properly assess the nature, extent and importance of the significance of heritage assets and the contribution made by their setting, development that could adversely impact on designated and non-designated heritage assets will be required to submit sufficient information, proportionate to the significance of the heritage asset, to demonstrate:</p> <p style="padding-left: 40px;">a. An understanding of the significance of the heritage asset and its setting; and</p>
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		<p><input type="checkbox"/> The Devon Historic Environment Record, Conservation Area Appraisals, Landscape Character Assessment, Somerset Historic Towns Survey, should be used to inform the consideration of future development including potential conservation and enhancement measures.</p> <p><input type="checkbox"/> Great weight will be given to the conservation of Teignbridge's heritage assets. Any harm to the significance of a designated or non-designated heritage asset must be justified. Proposals will be weighed against the public benefits of the proposal; whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses, or mitigate the extent of the harm to the significance of the asset; and whether the works proposed are the minimum required to secure the long term use of the asset</p> <p><input type="checkbox"/> Where such harm can be fully justified, where relevant, the Council will require archaeological excavation and/or historic building recording as</p>	<p>b. The impact of the development on the significance of the heritage asset and its setting, including measures to avoid or minimise impact; and</p> <p>c. How any public benefits of the development will outweigh the harm caused.</p> <p>The text supporting policy EN16 explains that applicants should use all available information including, as a minimum, the Devon Historic Environment Record, and this should be assessed by a professional with appropriate expertise. The text supporting Policy EN17 advises that development should have regard to the Conservation Area Character Assessments and Management Plans.</p> <p>This is contained within Policy EN16.</p> <p>This is set out in the text supporting policy EN16.</p>
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		appropriate, followed by analysis and publication of the results.	
	177	Conservation and enhancement of the historic environment should be incorporated into a revised Vision and run from that as a golden thread through the Local Plan Review. This is important in the context of the need for a “positive strategy for the conservation and enjoyment of the historic environment” required by paragraph 126 of the NPPF.	This has been reflected in the combination of Design and Wellbeing and Environment policies.
	177	Historic England raises concern about the HELAA process and emphasises the importance of paras 129, 132 and 152 of the NPPF and S66 & S72, Planning (Listed Buildings and Conservation Areas) Act 1990. It is suggested that where initial desk top assessment of the impact on the historic environment/heritage assets and their settings is inconclusive then further work should be required at an early stage to ensure reasonable and informed conclusions can be established as to the likely relative sustainability of emerging proposals.	Assessment of all HELAA sites will include consideration of comments received from the Council’s Heritage Officers. Historic England is welcomed to sit on the HELAA panel, should this be available at nil cost to the Council.
	178 401	Concern expressed about the lack of content within the Issues Paper about the historic environment and heritage assets	The Issues Paper acknowledged the requirement contained in the NPPF (2012) for a positive strategy for the conservation and enjoyment of the historic environment with safeguards proportionate to the significance of the historic asset. The lack of content within the Paper reflected the fact that the protection of

			the historic environment is a statutory duty and not an option for discussion.
160	The Combeinteignhead Conservation Area boundary should be amended as per the appraisal that was undertaken some years ago		<p>The Conservation Area Character Statement for Combeinteignhead was endorsed by the Planning Committee on 18 December 2000. Since that time it has been the subject of public consultation and the feedback from the public and other interested bodies was fully considered and a number of amendments were made as a result - notably further amendments to the proposed Conservation Area boundary.</p> <p>A review of this Character Appraisal was undertaken in September 2009, and amendments made. The revised Appraisal was approved on 22nd March 2010.</p>
161	Indio House BT2A should be deallocated for reasons including heritage – as the works needed to widen the drive to an acceptable standard would have a detrimental impact on the setting of and approach to the Listed Building and the development would also undermine the heritage values of designated and non-designated assets		Outline planning permission was granted, at appeal, for up to 30 dwellings and associated works at Indio House under reference APP/P1133/W/18/3207470. In doing so, the Inspector considered there would be no harm to the setting of Indio House from the development proposed.
209	Concern about the development of NA3 and impacts including air quality, noise pollution, artificial light pollution, groundwater pollution, threats to ecology/biodiversity, threat to the setting of the Grade 1 Listed church and destruction of the amenity value of Decoy Country Park from increased footfall		The development at NA3 is subject to an appeal, the decision of which is awaited.

	178	Questioning whether the reference to the 28 SSSIs covering 2758ha or 6% of the District includes the area within DNP?	There are 28 SSSIs covering a total of 2,579 hectares or 6% of the Teignbridge District excluding Dartmoor National Park. .There are a further 12 SSSIs in the Teignbridge area of Dartmoor, covering about 4,000 ha.
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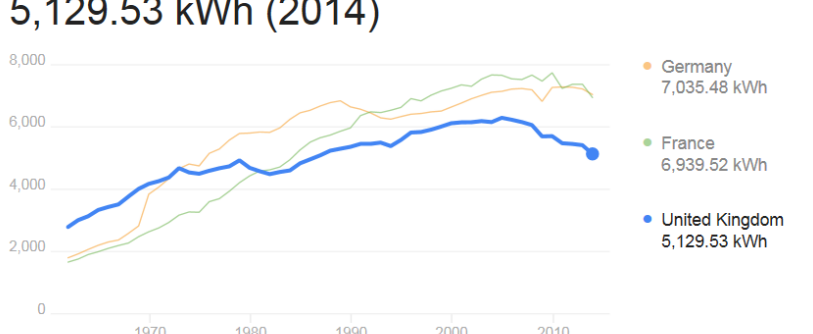
Q.26 What should the Local Plan Review consider when exploring the benefits and impacts of energy storage facilities?			
	ref	Summary of Comments	Response
	288 289 357 380 407 417	Yes – the Local Plan Review should consider energy storage, which will become more important over time	The draft Local Plan contains support for energy storage within Policy CC6: Energy Storage.
	164 179 217 287 359 364 366 369 375 376 383 391 395 405	<p>When exploring the benefits and impacts of energy storage, the Local Plan Review should consider:-</p> <ul style="list-style-type: none"> the visual impact on the environment and character and appearance of the area; the impacts on land use; impacts from noise or emissions; locating in industrial areas; the impact of transport required to feed the plant; safety; the speed with which technology changes and be responsive to technological changes; the need for additional unsightly power lines; the potential situation of there not being enough electricity within the country; costs, location, design and size; changing energy demand and management. 	<p>The draft Local Plan contains support for energy storage within Policy CC6: Energy Storage subject to impacts on residential amenity, highways and road safety, historic and ecological interests, impact on the most versatile agricultural land and impacts on European Wildlife Sites.</p> <p>In addition, the Local Plan Review will itself be reviewed every 5 years, which will allow for the updating of policies and prevent the Local Plan lagging behind technological advances.</p>

162 206 217 366 373 387 395 396 399 405 406 411 413 415 417	<p>Energy storage facilities should be:-</p> <ul style="list-style-type: none"> • Sited where they will not have a detrimental impact on the landscape, such as on industrial estates; • Sited away from existing developments and screened by green infrastructure; • Located close to towns and away from villages; • Located underground; • Located adjacent to the main grid; • Located close to energy generation sites • Located where they will maintain the integrity of the green infrastructure and biodiversity of the area; • Governed by the same consideration of impact upon the population and environment as any other development; • Installed in all new development, preventing the need for large scale, visually intrusive storage facilities. 	<p>The draft Local Plan contains support for energy storage within Policy CC6: Energy Storage subject to impacts on residential amenity, highways and road safety, historic and ecological interests, impact on the most versatile agricultural land and impacts on European Wildlife Sites.</p>
179 383	<p>The LP must not enforce any new policy in respect of energy storage or design. Building Regulations impose strict requirements on developers to meet nationally recognised standards. Many larger developers already exceed these standards substantially through a fabric first approach. An unresponsive and inflexible approach prescribed through planning policy is not supported. It would have a negative effect on viability of schemes.</p>	<p>The draft Local Plan Review aligns with the GESP in terms of low carbon development context. The impact on the viability of development from any requirements exceeding the Building Regulations will be considered when a whole plan viability check is undertaken.</p>

	360	Do the benefits help support the local communities?	Energy storage would help communities become more energy resilient should there be a shortage of energy supply.
	404	The specific question on battery storage is interesting as the visual impact of these would be almost imperceptible, except possibly pumped-hydro if large scale. This technology will evolve by itself as part of greater deployment of renewables and the need for local balancing. It is therefore unclear what the council wants to encourage or is concerned about.	<p>Policy CC6: Energy Storage subject to impacts on residential amenity, highways and road safety, historic and ecological interests, impact on the most versatile agricultural land and impacts on European Wildlife Sites.</p> <p>The need for local balancing of energy is acknowledged and this will be further investigated during the preparation of the Local Plan Review.</p>
Q.27 Should the Local Plan Review provide additional guidance and support for renewable and low carbon energy development through one of the following options, a combination of both or through and alternative approach? A. a bespoke renewable energy policy B. Identifying opportunity areas for potential renewable energy developments			
	ref	Summary of Comments	Response
	162 288 354 357 358 366 367	370 380 385 391 392 395 403 Yes – through a combination of A and B	<p>The support for both a bespoke renewable energy policy and the identification of opportunity areas is acknowledged.</p> <p>The draft Local Plan contains Policy CC5: Renewable and Low Carbon Energy, which supports the principle of low carbon and renewable energy schemes and smart energy networks.</p>
	359 360 362 364	372 413 414 A. - through a bespoke renewable energy policy.	The Local Plan Part 2 will contain allocations for development, which would include identifying opportunity areas for renewable and low carbon energy.

	164	Option A (a bespoke renewable energy policy) may be better as offers more flexibility given that renewable energy technology is developing rapidly.	<p>The draft Local Plan contains Policy CC5: Renewable and Low Carbon Energy, which supports the principle of low carbon and renewable energy schemes and smart energy networks.</p> <p>The Local Plan is reviewed every 5 years years to ensure that it remains up-to-date.</p>
	3 5 5 2 8 9 3 6 2	3 6 3 3 6 9 3 7 6	<p>B. - through identifying opportunity areas</p> <p>This will be considered when preparing Part 2 of the Local Plan.</p>
	373 395 397	A combination of both is the best approach	Noted.
	175 177 178 190 207 374 375 396 397 403 404 408 410 424	<p>Renewable energy development should be:-</p> <ul style="list-style-type: none"> provided on all new buildings, which would help the local economy by putting the income into the pockets of locals; Installed on all new development, including homes, office blocks and supermarkets, to prevent the installation of photovoltaics in the countryside or on agricultural land leaving green space for wildlife, recreation and farming. as non-visible as possible;fitted to business and industrial units on the edge 	<p>Comments given about functional requirements of renewable technology is acknowledged.</p>

	<p>of towns, where there would be more space for storage; Assessed against clear policy criteria to ensure that the adverse impacts are addressed satisfactorily, including cumulative and visual impacts.</p> <ul style="list-style-type: none">• Installed where its generation would be most efficient, particularly given the unpredictable nature of the sun and wind;• Installed locally as this reduces transmission losses and reduces the need for costly grid reinforcements.	
375 396 397 408 410 424	<p>New development should:-</p> <ul style="list-style-type: none">• Be as energy efficient as possible;• Incorporate renewable energy developments;• Have better insulation.	<p>Whilst the Building Regulations apply certain standards for the conservation of fuel and power, the work that is being undertaken on the Local Plan Review will consider whether there is evidence to require higher standards of energy efficiency in new buildings, whilst acknowledging that this can have impacts on development viability.</p> <p>The Future Homes Standard intended by 2025 and earlier uplift standards for Part L of the Building Regulations, offer related improvements for energy efficiency through better fabric and services for instance.</p>
191 207 289 374 378 395 407	<p>The Local Plan Review should:-</p> <ul style="list-style-type: none">• Encourage solar panels on public buildings;• Support inconspicuous solar panels;• reflect the Newton Abbot Neighbourhood Plan Policy NANDP1 by offering support for Community Energy Initiatives;	<p>The draft Local Plan contains Policy CC5: Renewable and Low Carbon Energy, which supports the principle of low carbon and renewable energy schemes and smart energy networks.</p> <p>Local Plans are required to be reviewed every 5 years, which gives the opportunity to update policies as technologies change.</p>

413 414	<ul style="list-style-type: none">• be flexibility in any policy to adapt and move with technology changes;• consider the use of air source and ground source heat pumps;• Consider roof mounted solar PV to be generally acceptable;• Identify high electricity consumption areas (eg industrial estates) and enable renewable energy developments in these areas;• Recognise that electricity will become the main source for transport and heating, so energy demand per household will double, particularly given the increase in housing planned for the area;• Acknowledge that it is hard to deliver carbon reduction targets through renewable energy generation only;• Consider any renewable energy requirements in combination with delivering other policy aspects (eg affordable housing, CIL etc);• Ensure that renewable energy development does not harm historic interests.	<p>Solar PV, solar thermal equipment, ground source heat pumps, water source heat pumps, air source heat pumps and flues for biomass heating systems or combined heat and power systems are already permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).</p> <p>Assessment will be undertaken to ascertain whether it will be possible to identify opportunity areas for the generation of renewable energy as part of the preparation of Part 2 of the Local Plan.</p> <p>Acknowledged, although there is a shift to greater use of electricity in comparison to other energy sources, the UK's consumption of electricity is actually decreasing.</p> <div><p>United Kingdom / Electricity consumption per capita</p><p>5,129.53 kWh (2014)</p><table><tr><th>Country</th><th>Electricity consumption per capita (kWh)</th></tr><tr><td>Germany</td><td>7,035.48</td></tr><tr><td>France</td><td>6,939.52</td></tr><tr><td>United Kingdom</td><td>5,129.53</td></tr></table></div>	Country	Electricity consumption per capita (kWh)	Germany	7,035.48	France	6,939.52	United Kingdom	5,129.53
Country	Electricity consumption per capita (kWh)									
Germany	7,035.48									
France	6,939.52									
United Kingdom	5,129.53									

			<p>It is acknowledged within the adopted Local Plan (para 2.32) that tackling carbon reduction will require a combination of decarbonising energy production through a mix of technologies, increased carbon prices in the longer term, new technologies such as electric vehicles, energy efficiency of buildings and sustainable transport provision.</p> <p>Whilst the Building Regulations apply certain standards for the conservation of fuel and power, the work that is being undertaken on the Local Plan Review will consider evidence to require higher standards of energy efficiency in new buildings, whilst acknowledging that this can have impacts on development viability.</p> <p>National and local tiers of policy combine to conserve historic interests that is relevant to renewable energy development along with other forms. Legislation through S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local authorities in exercise of planning functions to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.</p> <p>The NPPF explains how heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. This is echoed and added to within Policy EN16: Heritage Assets of the draft Local Plan.</p>
	397	If local communities benefited directly from hosting renewable energy systems, there would be less opposition.	The NPPF outlines that local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in

			local plans or other strategic policies that are being taken forward through neighbourhood planning.
	395	Renewable development is essential if future demand for clean energy is to be met	Noted.
	206	Wind farms should be avoided due to harm to the landscape	Any wind energy opportunity areas that could be identified would be contained within Part 2 of the Local Plan and would be subject to public consultation.
	375	Support for wind turbines along the Haldon Ridge	Noted.
	287	If a house is carbon neutral then the council tax should be reduced	It is not possible to affect council tax through the Local Plan.
	207 217 375	399 411 415 Installation of a barrier incorporating turbines across the Teign Estuary should be investigated/tidal power should be investigated.	Noted.
	191 401	The council must invest in an energy policy and invest in renewable energy infrastructure in order to meet carbon reduction targets.	The Council Strategy includes “Zero Heroes” as one of the top priorities. As a large organisation the Council acknowledges it is important that it reduces its environmental impact, taking a lead with its own waste management by re-using and re-cycling more, reducing its energy consumption, and encouraging working practices that reduces its environmental footprint.
	395	On shore wind should be part of the mix. Wind generation is much more efficient using large turbines in windy areas. (Output is proportional to the cube of wind speed). Turbines are also more efficient if the airflow is not turbulent, so should be away from trees and buildings. A wind map such as https://www.rensmart.com/Maps could	The potential to identify opportunity areas for the generation of renewable energy from onshore wind will be considered as part of the preparation work being done on the Local Plan Review. However, the sensitive landscape context of the district does constrain the potential for this form of renewable energy generation.

		be used to identify areas of high wind speed. For Teignbridge the best wind areas currently lie within an areas designated as Areas of Great Landscape Value. The realistic alternative is to import electricity to the area, this would require more 133Kv lines than there are now, which in turn means pylons	
	191	Misleading figures about carbon reduction, as no reference to the reduction in emissions achieved from national government targets for industry and decarbonisation of the national electricity network	<p>It is difficult to obtain data that sets out the reduction in emissions achieved from national government targets for industry and decarbonisation of the national electricity network.</p> <p>The figure was derived from the Department for Business, Energy and Industrial Strategy data on UK renewable energy statistics by local authority.</p> <p>Noted.</p>
	191	It was not clear how the figure of 5.6% for Renewables was derived in relation to the total energy for the district.	
	191	The Council is encouraged <i>to include annual energy generated, and therefore quantifiable Carbon reduction, as a planning criteria/measure for Renewables</i>	
	158	The key aspects of this would be shared evidence and co-operation (particular in relation to landscape), and opportunities for joined up infrastructure planning (ideally picked up through our respective Infrastructure Delivery Plans).	Noted – the team intend to share evidence and liaise with adjacent local authorities.
Climate Change and Energy - Other			
	ref	Summary of comments	
	202	The Local Plan should:-	

370 384 395 396 413 427	<ul style="list-style-type: none"> • Allow for a reduction in CIL charges if energy efficiency standards are raised; • Ensure all new developments incorporate solar panels, grey water systems and are as close to carbon zero as possible; • Require buildings to meet higher standards of energy efficiency; • Impose the optional requirement in the Building Regulations that limits wholesome water consumption to 110 Litres/day/person; • Require maximum insulation of buildings. 	<p>The Community Infrastructure Levy charges are imposed to help deliver infrastructure to support development and should not be reduced or waived as this would create a shortfall in funding for vital infrastructure.</p> <p>Local authorities have the powers, under the Planning & Energy Act 2008 to require higher energy efficiency standards than the Buildings regulations require. This will be investigated during the work being done to prepare the Local Plan Review.</p>
211	Any requirements for low carbon development should not differ significantly from the Building Regulations	Noted – however, local authorities have the powers, under the Planning & Energy Act 2008 to require higher energy efficiency standards than the Buildings Regulations require. Such a course will be investigated during the work being done to prepare the Local Plan Review.
364	Homes should be built with energy saving materials	Policy CC2: Carbon Statements requires new development to demonstrate how it will be carbon neutral.
191	There will need to be an overall reduction in energy consumption to meet carbon reduction targets	Noted
217 361 395 403 399 405 406 415 175	Need to improve public transport and walking and cycling routes to make them useable alternative to the private car, which is the highest contributor to carbon emissions	The draft Local Plan contains Policy CC4: Sustainable Transport requires development to promote public transport, cycling and walking as sustainable modes of transport. Policy DW7:Creating Neighbourhoods seeks to provide new homes within 10 minute's walking access of jobs and facilities.

178 191 194 201 215 368	<p>Lack of reference to:-</p> <ul style="list-style-type: none"> the need to protect the long term retention of the coastal railway line; the challenge of managing coastal erosion (the coastal zone should include reference to Teignmouth); Coastal Change Management Areas and their identification; Energy efficient homes; how the strategic priorities of reducing carbon emission through sustainable transport have been met; the fact that carbon reduction achieved is a consequence of persistent low economic activity and favourable government policy on renewables as well as carbon targets for industry; provision of a quantitative measure of the reduced emissions from the new homes built (as per EN3) or the new renewable generation and energy saving measures given planning consent; progress on the development of the Teign Estuary Trail between Passage House Inn and Teignmouth 	<p>Work will be undertaken following a national review of Shoreline Management Plans which will determine Coastal Change Management Areas to be designated along the coastline or part of the coastline, including the coastal railway line. The draft Local Plan contains Policy EN3: Coastal Management Change Areas, for when/if any CCMA's are designated within Teignbridge.</p> <p>Policy CC2: Carbon Statements requires new development to be carbon neutral.</p> <p>One of the Council's Strategic priorities is "Moving up a Gear", which seeks to improve sustainable access for Teignbridge residents to jobs and facilities in nearby cities and to improve cycling and walking provision. This is monitored on a quarterly basis.</p> <p>Noted</p> <p>The reduction in emissions from new homes built, renewable energy developments permitted and other energy saving measures have not been monitored. Consideration will be given as to whether this should be done.</p> <p>The Issues Paper did not include reference to all ongoing projects, such as the Teign Estuary Trail, as its purpose was to highlight the main issues affecting the area of Teignbridge.</p>
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			Since then further progress has been made following joint commitment from Devon County Council and Teignbridge to address the missing link between Passage House Inn and Teignmouth with funding for a planning application agreed in March 2019.
417	Carbon natural housing needs to be complemented by improved cycle paths, public transport and local retail facilities in order to reduce the carbon imprint of private cars.		The draft Local Plan contains Policy CC4: Sustainable Transport requires development to promote public transport, cycling and walking as sustainable modes of transport. Policy DW7:Creating Neighbourhoods seeks to provide new homes within 10 minute's walking access of jobs and facilities.
399 405 406 415	New developments within TDC are not located in ways that reduce greenhouse gas emissions and still require the use of a car, which causes congestion around Newton Abbot and on the A380/A381.		The draft Local Plan Review has been subject to a Sustainability Appraisal & Strategic Environmental Assessment in order to ensure that the policies it contains will support sustainable development.
385	The probable long term implications of climate change, although unprovable, appear to be major and unavoidable. All steps must be taken to reduce the causes, and to mitigate the probable consequences. Over the next 22 years the technology of energy storage will develop considerably, and Teignbridge could have a large part to play in this. Imagine if we developed new battery technology and production here in Heathfield, and all the local public transport was carbon neutral. What a winner that would be! What if Teignbridge had the courage to promote the use of PV roofing tiles and panels on all public buildings, and to install large PV arrays at suitable locations with visual impact mitigated by intelligent planting.		The Council Strategy includes "Zero Heroes" as one of the top priorities. As a large organisation the Council acknowledges it is important that it reduces its environmental impact, taking a lead with its own waste management by re-using and re-cycling more, reducing its energy consumption, and encouraging working practices that reduces its environmental footprint. However, although planning policies can be supportive of the installation of PV arrays at suitable locations, it cannot directly deliver this on land or buildings outside of its control.

Q.28 - What implications should the Local Plan Review consider when drafting a policy to require electric charging point infrastructure on new development?			
	ref	Summary of comments	response
	162 288 357 372 373 374 375 385 395 421	Electric car charging points should be built into all new development.	The draft Local Plan contains Policy CC3: Electric Vehicle Infrastructure, which requires new allocated parking spaces to be provided with an electric vehicle charging point or three phase electricity connection.
	206 207 354 403 413 414 417	Electric car charging points should be built into new housing developments.	
	387 417	Electric car charging points should be provided for at places of work and public places.	
	162 178 185 192 202 208 289 360 363 366	<p>The following need to be considered when drafting a policy to require electric car charging infrastructure on new development:-</p> <ul style="list-style-type: none"> Capacity of the local power network and whether new substation infrastructure is required; Safety; Whether it be efficiently supplied to rural areas; The scale of the development; 	<p>The draft Policy CC3: Electric Vehicle Infrastructure contains the following criteria that development needs to accord with:</p> <p><i>Residential and commercial development proposals will include the infrastructure to be ready for electric vehicles (EV-ready), in accordance with the following specific points:</i></p> <p><i>a) All off highway vehicle parking spaces in new residential developments will be fitted with an electric vehicle charging point or provided with a three phase</i></p>

369	• The location of the development;	<i>electricity connection and ducted circuit in a suitable</i>
370	• Creating a good distribution of charging	<i>position to enable an electric vehicle charging point to</i>
376	points, particularly in town centres for	<i>be easily installed in the future;</i>
378	shoppers and visitors;	<i>b) Where residential development includes on highway</i>
380	• Ensuring a growing demand for facilities can	<i>parking, a plan will be required, setting out how</i>
385	be met in a way which does not compromise	<i>sufficient charging infrastructure is to be provided and</i>
388	the needs of other vehicle users requiring	<i>maintained;</i>
391	car parking;	<i>c) Non-residential developments with 10 or more off-</i>
395	• Provision of charging points for vehicles	<i>highway vehicle parking spaces will include at least</i>
396	parked on-street;	<i>30% with electric vehicle charging points or a</i>
399	• Design/futureproofing of parking spaces to	<i>proportion equal to electric vehicle market share</i>
401	allow integration of charging points if	<i>(whichever is higher at the time of a full or reserved</i>
405	required;	<i>matters application);</i>
406	• Retro-fitting charging points on residential,	<i>d) Developers promoting strategic scale development will</i>
411	commercial and public buildings;	<i>work with appropriate energy companies and the</i>
415	• The proximity of car parking to people's	<i>district council to ensure the development of relevant</i>
	homes;	<i>and appropriate smart energy infrastructure is planned</i>
	• Demand – which will rise over time;	<i>to provide current and future electric vehicle capacity</i>
	• The provision of fast charging points within	<i>(for example energy storage and management and</i>
	garage forecourts;	<i>renewable generation);</i>
	• The requirement for charging facilities at	<i>e) All dwellings with a likely maximum load in excess of</i>
	hotels, guest houses, caravan and camp	<i>7.5 KW will be connected to the grid with a three phase</i>
	sites;	<i>electricity connection which will extend to electric</i>
	• The effect of on-street charging points on	<i>vehicle charging points, to enable improved</i>
	footpaths – it could be integrated within	<i>management of electricity supply during periods of</i>
	hard/soft landscaping;	<i>high demand;</i>
	• The availability of power without the need	<i>f) The provision of fast electric vehicle charging points</i>
	for additional unsightly overhead power	<i>and hydrogen fuelling facilities, particularly in highly</i>
	lines;	<i>accessible locations will be supported. New or</i>
	• The speed of advancement of technology;	<i>significantly altered petrol filling stations/other facilities</i>
	• Impact on the viability of the development;	<i>serving the travelling public will include provision of at</i>
		<i>least 2 fast electric vehicle chargers;</i>

	<ul style="list-style-type: none"> the ways in which electric charging point infrastructure could contribute to the measures for offsetting the impact on air quality arising from new development in AQMAs. 	<p><i>g) Sited so that they integrate positively with the built environment and do not affect the significance, character, setting or local distinctiveness of a heritage asset.</i></p>
395	Charging points should be smart so that all vehicles are charged before next use, but not at the same time.	This level of technical requirement goes beyond what could be requested through planning policy.
164 179 185 397	Charging infrastructure needs to be addressed by national policy and rolled out in a coordinated way – with on-street parking controlled to enable the use of street lights as charging points.	Noted.
195 211 383	<p>Electric car charging points should not be required because:-</p> <ul style="list-style-type: none"> There is an absence of any practical ideas on how this would be achieved; There is insufficient electricity to meet the demand of cars charged between work hours; Introducing a strict requirement for the provision of infrastructure risks rendering any technology installed obsolete very quickly; the inevitable impact on development cost and viability is passed on to the end housebuilder, registered provider and/or occupier. 	<p>The NPPF requires Plans that set out parking standards to include adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.</p> <p>There are many industry based ideas on how electric cars can be charged, from plug-in systems to wireless charging.</p> <p>This is a matter for national government to resolve and does not override the need to provide infrastructure to support plug-in and ultra-low emission vehicles.</p> <p>There is a requirement to review Local Plans every 5 years and this would prevent any policy becoming out of date.</p> <p>The Local Plan Review will be viability tested to ensure that it is deliverable.</p>
375	Electric car charging points should not be required until Teignbridge District Council has installed them at the council offices and car parks.	TDC's Electric Vehicles Charging Infrastructure & Ultra Low Emission Vehicles Policy (2019) sets out that EV charging points will be installed in specific council car parks in Newton Abbot and Teignmouth. (in or close to Air Quality

			Management Areas) EV charging points for off street parking at Forde House Council offices will be provided subject to a successful workplace grant aid application.
287	Companies who provide charging points should receive a reduction in business rates.		These suggestions are not something that can be influenced through a planning document.
385	Shared rental of electric cars should be promoted and a local electric shuttle bus should be investigated.		
185	The Council should be wary of developing its own policy and await the outcome of the Government's proposed future consultation to be undertaken by the Department of Transport later this year.		The Government's Road to Zero Strategy, published in July 2018, sets an ambition for between 50% and 70% of new car sales to be ultra low emission by 2030 and advises how the Government will take steps to enable a massive roll-out of infrastructure to support the electric vehicle revolution.
390	It is not possible to plan this far into the future.		The Local Plan must plan for a period of at least 15 years.
217 396 399 405 406 411 415	<p>Concern expressed about:-</p> <ul style="list-style-type: none"> • Lack of reference to hydrogen fuelled vehicles or recognition of low powered vehicles, such as scooters and small motorcycles which use less fuel, or for more parking provisions for them; • Lack of reference to electrically assisted bicycles some of which can be charged at home or workplaces; • Lack of alternative to diesel powered trucks for goods deliveries over any distance; • Lack of reference to the scope of local deliveries by electric powered vehicles; 		<p>The lack of reference to hydrogen fuelled vehicles or recognition of low powered vehicles, such as scooters and small motorcycles which use less fuel, and electric bicycles is accepted. Allowance for hydrogen fuelled facilities will be included in new policy conditions.</p> <p>Noted</p> <p>Noted</p> <p>The Government's Road to Zero Strategy, published in July 2018, sets an ambition for 40% of new vans to be ultra low emission by 2030.</p>

		<ul style="list-style-type: none"> Insufficient power to charge the cars; High price of electric vehicles. 	<p>This is a matter for national government to resolve and does not override the need to provide infrastructure to support plug-in and ultra-low emission vehicles.</p> <p>The Local Plan is not able to influence the cost of purchasing electric or ultra-low emission vehicles.</p>
	211	The existing approach in Policy S9 is supported (support infrastructure for electric vehicles).	Noted.
Q.30 – Do you have any suggestions as to how to improve policy WE12?			
	ref	Summary of comments	Response
	287 288 359 360 362 369 370 373 391 407 408 410 414	No suggestions as to how to improve Policy WE12.	Noted
	308	No:- <ul style="list-style-type: none"> Teignbridge District Council must not pay for the marketing. 	A marketing condition will not place responsibility for funding on TDC, it is normal for applicants/developers to meet these costs.
	164 241 361 364 375 396	Improvements could be made to Policy WE12 by:- <ul style="list-style-type: none"> Changing the wording to specifically refer to shops, pubs, health services and include examples of community facilities, such as 	The draft Local Plan contains Policy DW22: Protection of Facilities and Services. Within the context of this policy, local services and facilities include (but are not limited to) healthcare and education facilities, pubs, shops, community buildings and specialist accommodation providing care to older or disabled people.

400 401 405	<p>libraries, youth centres and community hubs.</p> <ul style="list-style-type: none"> the inclusion of a criteria which requires marketing evidence to demonstrate that a realistic sale price/rental value is sought appropriate to existing use without development potential and condition of the facility in question; sending out information to all Teignbridge residents to comment on; making the policy flexible; ensuring that facilities are available to all types of users; ensuring that it applies to banks; requiring sufficient length of time to allow communities opportunities to bid for such services; removing the protection for retail, other than essential community shops so the policy relates to facilities with demonstrable community benefit; removing criteria parts a) and b) as they are problematic by virtue of them being easy to manipulate - criterion a) fails to address whether the characteristics and users of one type of facility can realistically be absorbed by a similar facility and criterion b) is a management issue which could be manipulated by owners having a vested interest in seeking alternative use due because it is more financially lucrative; including sports facilities; 	<p>The policy has incorporated a marketing clause.</p> <p>Marketing information for individual cases will be available for public inspection and comment through the planning application process once the Local Plan Review has been adopted.</p> <p>Some flexibility is already allowed through Policy DW22.</p> <p>The case for banks inclusion is not realistic within the scope of the policy, such commercial resources can be provided on a shared basis with other local services particularly in rural based settlements.</p> <p>A timescale for at least 24 months is contained in the revised policy for the marketing period.</p> <p>Retaining reference to retail rather than changing to community shops is preferable, it is necessary to be able to maintain a wider definition of shops than the latter term allows.</p> <p>These criteria have so far been clearly implemented since adoption of the Local Plan in 2014 without the shortcomings identified coming to the fore through experience of past planning applications. Both criterion do require applicants to substantiate through supporting information if either a) or b) is relevant to scheme proposals.</p> <p>Protection for sport facilities are contained within Policy DW23.</p>
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		<ul style="list-style-type: none"> including Exeter Racecourse. 	Exeter Racecourse does not fit the terms of the policy as a local facility or service.
	206	There should be further training for staff involved as evidence points to some very poor decisions made by Teignbridge in the past.	Not relevant to Local Plan Review process.
	397	Dedicated support for community projects, seeking to preserve local assets should be provided by TDC.	TDC does provide advice on community projects through the Community Funding service, it is unnecessary to specify this position in the policy.
Q.31 Heathfield Railway Line			
	ref	Summary of comments	response
	374	Support for the re-opening of the Heathfield Railway line	Noted.
	162 288 289 357 360 373 391 395 396 401 405 406 414	<p>The Local Plan should:-</p> <ul style="list-style-type: none"> Support the reopening as a means of encouraging employment in the heart of Teignbridge and reducing reliance on motor vehicles and helping ease congestion; Consider creating a park & ride facility at Heathfield, linked to bus routes to the town centres; Simply acknowledge this might happen; Encourage businesses to help make this happen; Provide funding opportunities for this; 	<p>The Local Plan would support the re-opening of Heathfield Railway line as a sustainable form of travel. However, any site specific policy would be contained in Part 2 of the Plan.</p> <p>Of relevance to Local Plan Review-Part Two</p> <p>Noted</p> <p>The Local Plan is a land use document and would not be able to influence local business to financially support the re-opening of the railway line.</p> <p>It is highly unlikely that the Council would be able to offer funding for the re-opening of the railway line, unless a large amount of Government assistance was received.</p>

	<ul style="list-style-type: none"> Encourage new development by stations on the line. 	If the railway line was re-opened, development would be encouraged in appropriate places where new residents would have access to it as a sustainable mode of transport and alternative to the private car.
287 364 375 380 390	<p>The re-opening of Heathfield Railway line should not be supported because:-</p> <ul style="list-style-type: none"> The high cost is disproportionate to the benefit – better use of it would be to create a cycle track; No case has been made for investment in this; Excessive cost It is not viable and the location of both Heathfield and Newton Abbot stations mean people would still have to drive; 	Of relevance to the Local Plan Review – Part Two. The Council is not presently intending to use public funding to facilitate the re-opening of the railway line or to purchase it. Therefore, whilst planning policy can be supportive of the principle of its re-use, it could not create the finance with which to do this, unless this was as part of a strategic large scale development, where developer contributions could be used.
385	CIL should be used to fund this project	CIL monies could not be used as the re-opening of the railway line is not set out in the Council's 123 List, which contains the infrastructure projects to be funded through CIL.
206	Funding will be needed for this project	Accepted.
361	A subsidised fair should be introduced to encourage use	This suggestion goes beyond the influence of planning.
390	More investigation should be undertaken to find out whether its re—opening would be justified in terms of level of use	Of relevance to the Local Plan Review – Part Two. It would generally be expected that an existing or commercial operator would undertake should they be interested in re-opening the line.
392	Housing communities need to be given stations	The cost of creating new stations could only be met if strategic large scale developments were able to fund them through developer contributions.

Q32 & 33, Other Issues, Comments and Suggestions Infrastructure to Support Development		
Ref	Summary of Comments	Response
152 162 164 169 178 181 202 207 211 214 217 354 355 366 368 373 374 375 378 380 390 395 399 402 407 417 421 422 423	<p>The Local Plan Review should:-</p> <ul style="list-style-type: none"> • apply caution when setting multiple onerous Policy requirements on new developments as this may frustrate the ability for sites to come forward as planned and result in failure to deliver the Districts specified housing needs; • contain a policy to require developers of all medium and large-scale sites to seek to deliver access to superfast broadband, which is considered an essential service for modern living; • acknowledge the importance of providing for spiritual needs, by both retaining existing places of worship and providing new ones; • Acknowledge the need for high speed Broadband in rural areas; • not allow urban sprawl which creates areas with minimal facilities, places additional pressures on existing facilities and damages rather than enhances communities; • Align with GESP infrastructure provision; 	<p>The plan making process will address this concern by requiring a viability check to be carried out of emerging policies. It will ensure that the whole plan can be delivered; viability can be updated if necessary after completion of the plan to reflect local market conditions amongst other factors.</p> <p>Access to high speed digital infrastructure will be required for new residential and business developments through the implementation of the Energy Hierarchy connected to Policy CC2: Carbon Statements.</p> <p>The importance of existing places of worship is recognised through Policy DW22, which protected local services and facilities. New resource provision could come forward through development allocations in part 2 of the Local Plan Review for urban extensions.</p> <p>Noted</p> <p>Policy S2: Settlement Limits and the Countryside set out the restricted types of development that can take place outside settlement limits.</p> <p>Noted</p> <p>Noted</p>

425	<ul style="list-style-type: none"> • Ensure the speed of development does not exceed the ability of a community to match the increased demands for education, healthcare and social provision; • Ensure that the infrastructure promised by developers is delivered in a timely manner – ideally community facilities provided early on – to prevent harm to existing communities; • Ensure that infrastructure for individual developments are joined up to provide better planned communities; • Require road infrastructure to be in place prior to houses • Ensure provision of reliable, super-fast broadband for all employment sites and new houses; • include an expression of support for the Teign Estuary Trail; • acknowledge the importance of Exeter Racecourse, which provides an important tourism, social and cultural infrastructure; • ensure that new infrastructure links with existing village infrastructure, such as footpaths; • Ensure sufficient infrastructure is in place or planned to support residential and visitor populations; 	<p>Policy SP5: Infrastructure of the draft Local Plan ensures that new development is provided with appropriate infrastructure as early in the development as possible. It requires connections to existing footpaths and cycleways should be delivered prior to occupation;</p> <p>Noted.</p> <p>Noted.</p> <p>There is no particular need to provide separate policy or supporting text for Exeter Racecourse, the Local Plan Review (Part one) is setting out a generally broader approach to rural based economy matters, than individual site proposals which may be covered in Part two.</p> <p>Policy DW9: Natural Infrastructure requires the provision of a network of attractive spaces and corridors.</p> <p>Noted</p>
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		<ul style="list-style-type: none"> Focus more on the provision of local services and education; <p>Provide support for:-</p> <ul style="list-style-type: none"> safeguarding corridors of land along all railway lines; additional stations on existing railway lines or halts/request stops to serve existing settlements; additional footpaths and cycle ways; the Teign Estuary Trail (a cycle and pedestrian link between Teignmouth and Newton Abbot), from Teignmouth town centre to Shaldon Bridge and, between Teignmouth and Dawlish. 	<p>The plan will give high regard to local services and education infrastructure through respective policies, although actual delivery will mostly flow from development allocation policies in Part Two of Local Plan Review.</p> <p>The plan will include relevant supporting references to the majority of these points in place based sections of Part Two of the Local Plan Review for Teignmouth and Dawlish.</p>
	156 215 354 359	<p>When allocating sites for development, the Local Plan Review should consider:-</p> <ul style="list-style-type: none"> the capacity of village primary schools and the requirement for secondary school transport – Devon County Council’s information on forecast school capacities and whether schools are capable of expansion should be used to inform the location of development and which is particularly relevant when considering smaller scale allocations which are not of a sufficient size to require a new school; capacity of health centres/doctors’ surgeries; access to employment opportunities by public transport; 	<p>Acknowledgement of the factors raised and will be met in broad terms by policies for Sustainable Place and Infrastructure, the latter emphasizes importance of consultation and co-operation with infrastructure providers to take account of infrastructure capacity and need in decisions on the location of development. Specifics for individual locations may also come through with Local Plan Review Part Two place based proposals.</p>

		<ul style="list-style-type: none"> • frequency of public transport, especially along the coastal route and Totnes/Ipplepen to Newton Abbot; • frequency and capacity of the railway line, which should be increased during summer months; • the level of infrastructure required to support development in rural areas. 	
183 190 202 217 386 405	Development should:	<ul style="list-style-type: none"> • create environments that make the active choice the easy choice; • provide more pedestrian and cycle ways; • have infrastructure in place before houses are built; • provide services and facilities comparable to those available in those developed historically; • provide sufficient facilities to create a community heart; • Be designed to maximise New Technology; • provide “health hubs”. 	These requirements will be informed by a specific policy for Infrastructure which sets out that provision of new and Improved infrastructure, such as education, health, transport, recreational facilities and green infrastructure will form a key issue in planning for the growth of sustainable communities. Together with relevant design policies that will emphasize the importance of Place-Based Strategies and other mechanisms to help deliver the components listed.
156 166 217 425	Before more development happens:-	<ul style="list-style-type: none"> • Mobile and broadband need improving in Dawlish to encourage more microbusinesses into the area and creation of business hubs; • Public transport, cyclepaths and footpath links need to be improved; 	These points will be informed by a specific policy for requiring access to high speed digital networks and a policy for Infrastructure which sets out that provision of new and improved infrastructure, such as education, health, transport, recreational facilities and green infrastructure will form a key issue in planning for the growth of sustainable communities. Together with relevant Place-Based policies for the Dawlish area to be formulated in Part Two of the Local Plan Review.

	<ul style="list-style-type: none">• New infrastructure will be required (<i>none specified</i>);• land for the Teign Estuary cycle trail should be secured as it would alleviate traffic safety concerns, help to improve health and wellbeing and create business opportunities.	
426	Devon should remain an open area, not towns and all built on – we do not have the infrastructure	The plan approach towards Sustainable Place will help to safeguard essential character of the countryside from inappropriate types and level of development.
178 183 195 215 378	<p>With regard to CIL:-</p> <ul style="list-style-type: none">• it is recommended that education infrastructure is removed from the regulation 123 list to ensure appropriate contributions from development to be used towards projects that will directly mitigate the impact of development, as the funding provided through CIL is not directly related to the cost on education incurred;• A strategy based approach (to sports provision) would clearly set out the key projects that are required to meet identified needs which in turn can be incorporated within CIL Regulation 123 Lists and Infrastructure Delivery Plans;• Concern that CIL levies are insufficient to meet the aims of Policy S5 of the existing Local Plan –<ul style="list-style-type: none">○ Improvements to public transport provision, cycle and pedestrian provision,○ New roads and road improvements,	The proposal falls outside the direct ambit of the Local Plan Review and instead is more relevant to separate Planning legislation and CIL Regulations under which consultation will be undertaken in due course.

	<ul style="list-style-type: none"> ○ New schools and enhancements to existing schools' ○ Additional GP provision, ○ Green infrastructure, ○ New and improved open space, recreation and leisure provision, ○ Affordable housing, ○ Habitat creation, restoration and mitigation. • charges should be transparent and robustly justified and take account of viability to ensure that CIL costs do not prevent delivery of development; • CIL receipts should be used to support the communities from which the receipts originate. 	
158	Each Authority's Infrastructure Delivery Plan should contain specific issues and opportunities and infrastructure planning and delivery.	The Infrastructure Delivery Plan although related falls outside the direct ambit of the Local Plan Review.
178	Lack of information addressing how infrastructure meeting needs of providers and communities has been met.	Further details will be incorporated into the plan about Noted.
406 415	Concern that there has been insufficient infrastructure provided within Teignbridge to support the large housing developments	Only partial relevance, the majority of significant residential development allocations, including urban extensions have not been implemented and will be subject to comprehensive delivery of related infrastructure, as defined in existing Local Plan policies and forthcoming Local Plan Review-Part Two.
417	The lack of infrastructure is impacting on Newton Abbot/Kingskerswell and developments should only be carried out in tandem with infrastructure and job creation.	Of relevance to Local Plan Review-Part Two.
162	Infrastructure of Exminster would be unable to cope with additional development	Of relevance to Local Plan Review-Part Two.

	374 385 396	Bovey Tracey is already struggling with limited infrastructure (school, doctor and roads), and accelerated delivery of allocated sites- infrastructure needs to be assured before further development under the Local Plan Review.	Of relevance to Local Plan Review-Part Two.
	198 217 405	Infrastructure, including mains water, drainage, electricity, gas, telephone, roads and footpaths require updating to remain fit for purpose within Bishopsteignton.	Of relevance to Local Plan Review-Part Two.
	373	Lack of capacity in for additional traffic in Denbury, Abbotskerswell and Ipplepen.	Of relevance to Local Plan Review-Part Two.
Communication, Movement & Infrastructure – Highways and Parking			
	ref	Summary of comments	response
	149 156 162 178 215 217 360 364 366 373 375 380 396 405 406 415 417 421 424	<p>The Local Plan Review should ensure:-</p> <ul style="list-style-type: none"> • Sufficient parking, including visitor spaces; • Two parking spaces are provided per household; • The number of parking spaces varies depending on the number of bedrooms in a house; • Domestic garages are large enough to accommodate a vehicle; • Domestic garages are wide enough to allow for storage of a bicycle or pushchair as well as a vehicle; • Adequate parking on industrial estates; • A policy is included setting out parking requirements for new development; • More parking is provided in towns and residential areas; 	<p>The Local Plan Review will contain a new policy for Parking provision within an overall framework for achieving well designed places. It comprises a set of standards which take account of how people use their cars locally for employment, local facilities and leisure trips, the availability of public transport and local levels of car ownership. The standards will be used as a starting point for planning for parking in new developments but where evidence clearly shows that a different ratio is appropriate then variations will be permitted. The points raised have contributed to formulation of the policy.</p> <p>It will be necessary for new residential development schemes to provide transport infrastructure in accord with Infrastructure policy of the Local Plan. A condition of the policy will require that new development is provided with appropriate infrastructure as early in the development as possible.</p>

	<ul style="list-style-type: none"> • Road infrastructure is provided prior to houses; • Adequate investment in road and traffic infrastructure to serve additional development; • Improvements are made to Broadway Road, Kingsteignton, including a footpath and cyclepath, before additional development takes place; • The role of Community Transport Groups in helping with keeping communities connected is acknowledged, 	<p>Of relevance to Local Plan Review – Part Two.</p> <p>Noted</p>
413	<p>GESp should include:-</p> <ul style="list-style-type: none"> • A travel policy improving park & ride. 	Noted
361 372 380 385 392 399 411	<p>In order to reduce the number of vehicles on the roads:-</p> <ul style="list-style-type: none"> • Bus routes should not be cut; • There should be more mini bus routes; • Rural communities need to be better served by public transport; 	<p>Outside scope of Local Plan Review.</p> <p>Largely a transport authority matter, although Infrastructure policy may be supportive to such a facility for appropriate schemes coming forward.</p> <p>Sustainable Place policies within the Local Plan Review will help to guide development towards those locations with accessibility by public transport for main travel purposes. Potential for improvements to public transport facilities in relation to new larger scale development allocations to be contained within Local Plan Review – Part Two.</p>

	<ul style="list-style-type: none">• Improvements are needed to public transport, including linking communities with railway stations;• Improvements are needed to cycleways;• A more efficient and low cost public transport system;• The 39 bus route should be extended to connect with Exeter Train station at the NE end, and Newton Abbot at the SW end.	<p>A new policy for Infrastructure will provide a context for these type of improvements to public transport, together with future development allocations within Local Plan Review – Part Two.</p> <p>Outside scope of Local Plan Review.</p>
355 372 399 411	<p>New development has resulted in :-</p> <ul style="list-style-type: none">• Congestion in and around Newton Abbot and on the A380/A381;• Congestion along the A379/A381 Dawlish and Teignmouth• Congestion along Ashburton Road;• Excess pressure for parking around schools.	<p>These concerns about congestion on the local road network are noted. It should be recognised that future development schemes coming forward from the Local Plan Review will need to be accompanied by appropriate transport infrastructure. Expectations will be clearly set out in the Local Plan Review-Part Two and Infrastructure Delivery Plan for individual sites.</p>
207 375	<p>Planned development will result in:-</p> <ul style="list-style-type: none">• An increase in traffic flow in and out of the area at critical times;• Additional pressure on the A380, which is already saturated at peak times;• residents to use major roads for travel rather than Devon lanes.	<p>These concerns about traffic increases on the local road network are noted. It should be recognised that future development schemes coming forward from the draft Local Plan will need to be accompanied by appropriate transport infrastructure. Expectations will be clearly set out in the Local Plan Review-Part Two and Infrastructure Delivery Plan for individual sites.</p>
156 162	<p>Concern expressed about:-</p>	<p>These concerns about traffic increases and congestion on the local road network are noted. It should be recognised</p>

163 175 178 190 355 358 359 360 375 405 408 410 417 422 423 424	<ul style="list-style-type: none"> • Lack of infrastructure in Newton Abbot to cope with additional traffic; • Congestion, which will worsen as new development will result in more vehicles; • The lack of capacity of the A38 to cater for traffic from new development; • The creation of new roads, which often lead to increased traffic and pollution, rather than reducing it; • • Lack of car parking at Milbury Reach development in Exminster; • The one way system in Highweek; • The lack of capacity of the A381/A379 to accommodate extra traffic; • The impacts on local roads and pollution unless the Wolborough spine road is built before houses are built; • The creation of a rat run if the Wolborough spine road is built; • The physical state of Broadway Road, Kingsteignton; • Lack of coordination between bus and rail services; • Lack of local bus services to Bishopsteignton and the steep climb up to the village from the bus service that stops on the A381; • cars parked in the evenings on the new road that will link the A382 and A383, which will impede traffic flow. 	<p>that future development schemes coming forward from the Local Plan will need to be accompanied by appropriate transport infrastructure. Expectations will be clearly set out in the Local Plan Review-Part Two and Infrastructure Delivery Plan for individual sites.</p> <p>Noted.</p>
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	163	Questioning what mitigation will be put in place to address increased noise, air and light pollution from new development.	These items fall primarily outside the scope of the Local Plan Review and relate more specifically to wider Environmental Regulations. However, the plan approach towards Quality Development will assist with meeting those mitigation needs in terms of Application Design Requirements, including in particular Place-Based Strategies which may include Environmental Health considerations.
	215	It should be made clear that the improvements to the A382 have not yet been undertaken.	It is not necessary to make such a statement in the Local Plan Review-Part One. The planned A382 road improvements north of Newton Abbot will be undertaken during the period 2020/21.
	161 172	BT2A Indio House should be de-allocated as a safe access and egress cannot be provided – or alternatively access should be via St John's Close.	Of relevance to Local Plan Review – Part Two.
	155	Greenhill Lane, Denbury is unsuitable for through traffic.	Of relevance to Local Plan Review – Part Two.
Q32 & 33, Other Issues, Comments and Suggestions			
General Comments			
	ref	Summary of Comments	Response
	201	Would also like to see Flood and Coastal Erosion Risk Management asset issues referenced in the infrastructure delivery plan and needs assessment.	The Infrastructure Delivery Plan although related falls outside the direct ambit of the Local Plan Review. There will be referencing to the IDP in an Infrastructure policy and supporting text. Policies within the Environment Chapter, including Coastal Change Management Areas will be particularly relevant.
	196	The extent of the Port of Teignmouth should be specifically identified on the Local Plan map and include a specific port policy which encourages and supports development in this area for port and port related purposes and prevents development nearby that would restrict its 24 hr a day operation.	Of relevance to Local Plan Review-Part Two.

		The National Policy Statement for Ports (DfT 2012) should also be considered (and referred to in the SA/SEA)	
	201 215	Lack of reference to the need to protect the coastal railway, particularly at Teignmouth and Dawlish, which should be acknowledged as a challenge	Existing Local Plan through Transport Networks policy sets out protective stance for Paddington to Penzance railway line which will be maintained in the Local Plan Review along with more specific details about coastal areas.
	429	Support expressed for the retention of Teignmouth Lido and suggestion that a survey of local residents be undertaken to explore demand for extension of this facility.	Of relevance to Local Plan Review-Part Two.
		Q34 Statement of Community Involvement	
	ref	summary of comments	response
	288 289 359 360 362 364 369 373	375 382 391 395 396 401 408 414 No comment	
	154 178 190 206 217 387 407	<p>The SCI should:-</p> <ul style="list-style-type: none"> Contain greater encouragement for Neighbourhood Planning; Take account of emerging Neighbourhood Plans; 	<p>The SCI has been amended to include an extended section on Neighbourhood Planning. This sets out the steps of the Neighbourhood Planning process and the key requirements within them. (SCI para 2.5-2.7, table 3 and chapter 5).</p> <p>Although the SCI was published and consulted on at the same time as the Local Plan Issues consultation, it will be in place and applied for the next stages of the Local Plan consultation.</p>

	<ul style="list-style-type: none"> • Have been published prior to the publication of the Local Plan Review Issues Paper Consultation to establish general principles for involvement of communities; • contain reference to consultation/ engagement with organisations representing local groups, such as Wolborough Residents' Association • Include information detailing how the strategic priorities of involving the local community in decision making have been met; • Ensure that locals' views are better considered when decisions are made • Require all nearby properties to be written to when a planning application is submitted, rather than relying on a site notice and local press for publicity, which may not be seen by all. 	<p>Paragraph 2.13 of the SCI states that “we will engage with a range of groups and individuals who may have a role or interest in shaping the planning of Teignbridge, including any who have asked to be consulted.</p> <p>The SCI provides a framework for how consultation and engagement will be conducted. More detailed consultation and engagement plans are created prior to each stage of the Local Plan. Following each consultation stage of the Local Plan development, the performance and process is reviewed to identify what worked well and what could be improved upon. One of the key documents required for examination of the Local Plan prior to adoption is a Consultation Statement setting out the details of all consultation undertaken throughout the process.</p> <p>As part of the Local Plan process, the Council is required to show that all comments received have been read, considered and how they have or have not resulted in changes to the Plan. This information is publicly available prior to each redrafting of the Plan. Responses to planning applications</p> <p>Standard publicity for planning applications includes local display of the planning notice, notification of the town/parish council, and publicity in the local media / council website. Neighbours are only contacted directly in exceptional circumstances as determined by the application case officer in accordance with Development Management Procedures.</p>
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190 217 366 406	The Local Plan Review documents are too technical and lengthy, which discourages engagement.	A summary document is being created to accompany the Local Plan consultation. This 'plain English' document will be succinct and summarise the background, key issues, timetable, what happen next and how to get involved.
361 380 406	Concern is expressed about the lack of publicity of the Local Plan Review Consultation, including a lack of awareness of the SCI.	We seek to use the widest possible range of mediums to make people aware of the plan. These are reviewed on an ongoing basis with the Council's Communication Team. One element of our consultations is to ask people how they prefer to receive information so we can adapt accordingly.
190	The Council should make greater use of social media to engage the public in planning issues.	The use of social media will be a key element of the Local Plan consultation and engagement process.
154	Concern that the deadline for comment on the SCI should not have preceded the completion of the Teignmouth Neighbourhood Plan.	The timing of the consultation or adoption of the SCI has no bearing on the Teignmouth Neighbourhood Plan.
154	An explanation of why reference is made to the need to build more "houses" in the SCI rather than "homes" as is the terminology used in the NPPF is requested.	The terms 'homes' and 'houses' have been removed from the SCI.
154	Questions the difference (in section 9) between the references to "others who have expressed an interest in the preparation of Local Development Documents' and "the general public".	"Others who have expressed an interest" refers to people who have requested in writing to be kept informed of the development of the Local Plan and have their details retained on a secure database. "The general public" refers to people residing in the district who have not made this request.
154	Questioning whether a Neighbourhood Planning Officer has been appointed for Teignmouth.	The Neighbourhood Planning Officer employed by Teignbridge District Council supports the development of

			Neighbourhood Plans throughout the district, and is not assigned to a specific town/parish.
	390	Planning decisions should be taken between councillors and residents.	Councillors, as the elected representatives and spokespeople for their locality, make decisions on planning applications based on planning officer recommendations. These recommendations consider the comments received from residents.
	385	A request is made for the enlargement of the Neighbourhood Planning team to assist further with preparation of Neighbourhood Plans.	At present, limited financial resources prevent the enlargement of the Neighbourhood Planning Team. The comment is noted.
Q35. Do you have any comments on the SA/SEA/HRA?			
	ref	Summary of comments	Response
	161	There is a requirement for a plan-level Habitats Regulations Assessment as part of the Local Plan Review as the development of BT2A Indio House is likely to have significant effects on European protected species.	Outline planning permission was granted in December 2018, at appeal, for up to 30 dwellings and associated works at Indio House under reference APP/P1133/W/18/3207470. In doing so, the Inspector considered there would be no harm to the setting of Indio House from the development proposed.
	172	The allocation BT2A contradicts the intentions expressed in the Sustainability Appraisal of the Teignbridge Local Plan 2013-203	
	177	An SA/SEA is not an appropriate historic environment assessment – changes to settlement boundaries will require an appropriate Heritage Impact Assessment to ensure harm is minimised.	Whilst a Heritage Impact Assessment has not been undertaken for the draft proposed changes to settlement boundaries, the Settlement Boundary Review Principles set out that where an extension could lead to development which has a potential to adversely affect the character and/or setting of a Conservation Area, it would not be included within a settlement boundary.

201	<p>The SA/SEA should:-</p> <ul style="list-style-type: none"> • Emphasise the importance of reference to 'Rebuilding Devon's Nature Map' in achieving net biodiversity gain and appropriate compensation for habitats lost to development. • Use hydrological modelling outputs from the SFRA and the climate change runs to set a baseline to measure against to try derive targets of areas to protect better and to compare through monitoring in light of flood events and properties affected to assess if this has been successful • Include sustainability objectives in relation to soil quality and coastal erosion. • Include monitoring of the ecological status of waterbodies. 	<p>Reference has been made to 'Rebuilding Devon's Nature Map' in the revised SA/SEA document</p> <p>Work will be undertaken in liaison with the Teignbridge District and Devon County Council's Drainage Engineers/Flood Prevention team to consider the best ways to assess and monitor this.</p> <p>Coastal change has been highlighted in the revised SA/SEA and draft Local Policy EN3. The use of additional sustainability objectives and monitoring will be considered.</p>
194 201 215	<p>The following amendments are suggested:-</p> <p><u>Environmental baseline data</u></p> <ul style="list-style-type: none"> • Whilst the SA/SEA references soil type, it has not investigated soil condition/quality, which has implications for drainage/run-off. It is recommended that soil surveys across the District are undertaken. • The baseline data for the coast should highlight the ongoing pressures on the coast refer to the current Shoreline Management 	<p>It would not be feasible to undertake soil surveys across the District. However, the inclusion of soil condition as an indicator will be considered. This would be assessed on information available and would not involve explorative work.</p> <p>Coastal change and the Shoreline Management Plan have been highlighted in the revised SA/SEA and draft Local Policy EN3.</p>

		<p>Plan (SMP) and the refresh which will take place over the next 3 years.</p> <ul style="list-style-type: none"> • Baseline data in respect of Flood Risk needs to recognise the need for significant infrastructure and land management changes to try to reduce climate change impacts, the funding pressure that this will generate and, the need to work collaboratively to solve this issue. • The section on Waste should discuss the waste that is disposed of within the District as well as waste produced. • In the Minerals section of baseline data:- “There are a range of minerals <i>that are or have been worked</i> across the Teignbridge area which include Limestone, Ball Clay, Igneous Rock and Sand and Gravel”. • More recent information is available from the County Council waste management team for inclusion in the ‘waste’ section and Table 5. • The title of Table 8 should be amended to ‘historical household recycling rates’ to avoid the implication that the figures include commercial and construction wastes. <p><u>Table 18</u></p>	<p>Draft Local Plan Chapter 3 and Policies EN3, EN6 set out the Council’s approach to flooding and climate change.</p> <p>These points have been incorporated into the revised SA/SEA.</p> <p>These points have been incorporated into the revised SA/SEA.</p> <p>Further liaison will be undertaken with Devon County Council.</p> <p>This point has been incorporated into the revised SA/SEA table 6..</p> <p>These points have been incorporated into the revised table 25.</p>
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	<p>Loss of mineral resources' should be amended to 'sterilisation of mineral resources'. Building over mineral resources does not mean that the mineral is lost, rather it is sterilised.</p> <ul style="list-style-type: none"> • Amend to "... nationally and locally important..." to avoid the implication that only nationally important minerals constraint development (locally important minerals such as Limestone are also a constraint). • Should include reference to the decline of biodiversity and the deterioration and fragmentation of habitat which poses a sustainability issue across the entire plan area. <p><u>Para 3.12</u></p> <ul style="list-style-type: none"> • Should be amended to read 'Likely significant effect of the Local Plan, <i>in combination with other plans and projects</i>, on all affected European sites will be undertaken assessed through a Habitats Regulation Assessment Screening and further Appropriate Assessment if required'). <p><u>Table at para 4.1</u></p> <ul style="list-style-type: none"> • Should include the consideration of water and soil quality under 'natural environment' and 'coast' or 'coastal change' as a factor to be considered under climate change. <p><u>Table 20</u></p>	<p>These paragraph has been amended (para 3.12)</p> <p>Coastal change and the Shoreline Management Plan have been highlighted in the revised SA/SEA and draft Local Policy EN3.</p> <p>This will be considered.</p> <p>These layers will be available on the more detailed plans published as part of the Local Plan Review conbsultation.</p>
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	<ul style="list-style-type: none"> Biodiversity net gain and delivery of GI through development should be included as monitoring indicators. <p><u>Appendix 2</u></p> <ul style="list-style-type: none"> Biodiversity sites outside but adjacent to Teignbridge should be shown more clearly, in order to show interrelationships and actual or possible connections. The Shoreline Management Plan area should also be shown <p><u>Appendix 7</u></p> <ul style="list-style-type: none"> The map does not show Mineral Safeguarding Areas (but shows mineral sites and some (but not all) planning permissions). . It would be more helpful to show the Mineral Safeguarding Areas (GIS data for these has previously been provided to Teignbridge but will need to check that the District Council's Letter of Undertaking entitles them to publish the Mineral Safeguarding Areas that are derived from BGS data). <p><u>Appendix 9</u></p> <ul style="list-style-type: none"> The European Sites map should be revised as the new SPD for the South Hams SAC emerges. The map is misleading as it does not show Special Areas of Conservation or Ramsar Sites, whilst the bat flyways are not themselves a European site. It would be 	<p>Appendix 7 has been amended to show Minerals Safeguarding Areas.</p> <p>Appendix 9 has been amended to incorporate the new zones identified in the South Hams SAC HRA Guidance (2019).</p> <p>These documents have been incorporated into the revised SA/SEA.</p> <p>The emerging Teignbridge Natural Infrastructure Strategy will be included in the list of documents once completed and approved.</p> <p>These changes have been incorporated into the revised SA/SEA. The 7th Local Aggregate Assessment has been included as it is the more recent publication.</p>
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	<p>helpful to amend the title to 'European nature conservation sites'.</p> <p><u>Appendix 10</u></p> <ul style="list-style-type: none"> • The Habitats Directive 92/43/EEC should be included in the list of international plans and the Conservation of Habitats and Species • Conservation of Habitats and Species Regulations should refer to the latest 2017 version within Appendix 10. • The Teignbridge GI Strategy should be referred to. • Amend the reference to the Devon Minerals Plan to 'Devon Minerals Plan (DCC, Feb 2017) • Replace '...recognised mineral areas...' with the clearer 'Mineral Safeguarding Areas' • Amend to "...helps to manage waste sustainability" as minimisation is only part of addressing waste management. • Update to reference '6th Local Aggregate Assessment 2007-2016 (DCC, July 2017)'. <p><u>Appendix 11</u></p> <ul style="list-style-type: none"> • In the Brownfield Land section of Appendix 11, it should be made clearer that mineral sites (which include the operational ball clay sites) that are subject to restoration 	<p>All these changes have been incorporated into the revised SA/SEA.</p>
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		<p>conditions fall outside of the definition of brownfield/previously developed land.</p> <ul style="list-style-type: none"> • In Aggregates section, amend second and third sentences to: “At the end of 2016, Devon had crushed rock reserves of 114 million tonnes, giving a landbank of 48 years. Sand and gravel reserves amounted to 7 million tonnes with a landbank of 13.4 years.” • Delete Other Minerals section – none of the minerals mentioned are found within Teignbridge. • Omit Linhay Quarry from Table 21 as it is within Dartmoor National Park and therefore outside the Teignbridge Local Plan area and amend the title to ‘6th Devon Local Aggregate Assessment 2007-2016’ • In Waste section, <ul style="list-style-type: none"> ○ amend the second sentence to ‘It treats up to...’ and add ‘the northern part of’ before ‘Teignbridge’.... ○ add ‘household waste from the remainder of Teignbridge, along with other parts of South Devon, is managed at the Devonport EfW facility in Plymouth which opened in 2015.’ ○ Amend the third paragraph to “The Devon Waste Plan (Policy W3) identifies Newton Abbot as one of three settlements in Devon for the development of strategic recycling, recovery and disposal facilities. Policy W6 of the Waste Plan includes Heathfield 	
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		near Kingsteignton as one of six locations for new energy recovery capacity.”	
201 217 364 369 380	Concern is expressed in relation to:-	<ul style="list-style-type: none"> • The limited review of waterbody ecological status and groundwater quality referred to in the Environmental baseline data; • The lack of emphasis given to monitoring the impact of change using Health & Wellbeing statistics such as increase in respiratory illness, especially in the young and the old and mental health conditions. • That consideration of sustainability is included as “lip service” only. • That the impact on the environment from development will not be taken into account given the government’s requirement to build more houses. • The lack of pragmatic implementation of the SA/SEA 	<p>The use of additional sustainability objectives and monitoring will be considered.</p> <p>The consideration of sustainability and the carrying out of Sustainability Appraisals a legal requirement, under S39(2) of the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008). In addition, a Strategic Environmental Assessment is required to be conducted, in accordance with the requirements of European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004.</p>
194	The SA/SEA will also need to consider the settlement boundary review.		The Draft Local Plan 2020-40, including the changes to settlement boundaries has been subject to assessment under the HRA and will be subject to an SA/SEA. This has been done as a whole in order to consider the combined impacts of the Plan.
194	The proposed development boundary changes should be HRA screened.		
194	The HRA should set out the current European Sites Mitigation Strategies in place in the area, as these		

		provide a strategic solution to mitigating the likely adverse impacts from new development on the relevant European sites and avoids the need for each individual proposal within the zone of influence to be supported by a bespoke Appropriate Assessment. For instance the development boundary review should identify each village covered by such a strategy and explain whether a bespoke Appropriate Assessment is required.	
	194	Concern expressed that the HRA screening is too simplistic. It is recommended that at this stage the HRA clearly sets out its purpose and process, where the European sites are, what possible pathways would affect the European sites and, based on the issues identified in the Issues Paper, what the likely further HRA work is that will be undertaken as the Local Plan review progresses.	The Issues Paper did not contain any policies or proposals that could be assessed - it simply highlighted the main issues affecting the District now and this that will affect it up to 2040. As policies and proposals emerge, they will be subject to assessment under HRA.
	207 206	Support is expressed for protection of the environment and habitats.	Noted – however, a Sustainability Appraisal considers social and economic factors as well as environmental considerations.
	387	The criteria set out in the SA/SEA should be respected.	Noted.
	385	Questions whether the positive intentions set out in the SA/SEA are working.	In order for the Local Plan Review to be found “sound” at examination, it must be prepared with the objective of contributing to sustainable development – this is a legal requirement of local planning authorities exercising their plan-making functions.

	361	The SA/SEA and HRA should be tested in a more transparent way so that residents can be shown that these are correctly done. Residents should be allowed to comment and local knowledge should be included within these assessments	Whilst the SA/SEA process is something that would be undertaken by the Local Planning Authority, it will be subject to further public consultation which gives local residents opportunity to share their knowledge.
	359	It would have been helpful to have all relevance documents and links attached to this survey.	Noted.
	178	Wolborough Residents Association express their keenness to participate in the SA/SEA process.	Whilst the SA/SEA process is something that would be undertaken by the Local Planning Authority, it will be subject to further public consultation, when Wolborough Residents Association will be able to make representations.
	405	The SA/SEA is necessary	The SA/SEA is a legal requirement. The carrying out of Sustainability Appraisals a legal requirement, under S39(2) of the Planning and Compulsory Purchase Act 2004 (as amended by the Planning Act 2008). In addition, a Strategic Environmental Assessment is required to be conducted, in accordance with the requirements of European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations 2004.
	164 288 289 360 362 370 373 375 382 391	No comment to make	

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Consultation Statement Appendix 1

Letter requesting Town and Parish Councils to display consultation poster sent 4 June 2018

Please Ask For:

Tel: Direct Line 01626 21....
Email: localplanreview@teignbridge.gov.uk
My Ref RK/Local Plan Review

Dear Parish Council

Teignbridge Local Plan Review 2020-2040 – Display of Posters

The Local Plan Review Issues Consultation is underway and will run until **5pm on 16th July 2018**. Any comments received after this time will not be considered.

Please find enclosed two A4 copies and one A3 copy of a poster setting out the dates for our consultation roadshow. These drop-in sessions provide the opportunity for people to chat with our planning officers about the draft plan. We would therefore be grateful if these could be displayed in a public location within your Parish area.

The documents and questionnaire can be viewed on our website www.teignbridge.gov.uk/localplanreview, at the Council offices in Newton Abbot and Libraries around Teignbridge.

Using the online questionnaire will ensure that you provide all the information necessary for your response to be valid. The online form also ensures that the costs to the public purse to the absolute minimum.

If you have any questions, please contact us by email on localplanreview@teignbridge.gov.uk or by phone on 01626-215735.

Yours faithfully

Spatial Planning & Delivery

Encs

Consultation Statement Appendix 2

Consultee letter

Email: localplanreview@teignbridge.gov.uk

Website: www.teignbridge.gov.uk/localplanreview

Dear consultee,

Review of the Teignbridge Local Plan 2013 - 2033

The Teignbridge Local Plan 2013 – 2033 was adopted on 6 May 2014. The Local Plan contains the policies, proposals and actions to meet the environmental, social and economic challenges facing the area and it is used to determine planning applications.

The Neighbourhood Planning Act of 2017 introduced the requirement to review local plans every 5 years to ensure that they reflect the changing needs of their area. The Local Plan was adopted 4 years ago and the process to review it has been started.

We have prepared six documents that we are seeking people's views on:-

- The Local Plan Review: Issues Paper 2018
- The SA/SEA Scoping Report on the Local Plan Review Issues Paper
- The HRA Screening determination on the Local Plan Review Issues Paper
- The Draft Settlement Boundary Review
- The Draft Settlement Hierarchy Review
- The updated Statement of Community Involvement 2018

Representations are encouraged to be submitted for **any or all** of the listed documents.

We are also undertaking a **“Call for Sites”**. This is an invitation for landowners and land promoters to submit sites to be considered for development.

Make Your Views on the Local Plan Review Known:

The consultation runs from 9am Monday 21st May to 5pm Monday 16 July 2018.

- The Local Plan Review: Issues Paper 2018
- The SA/SEA Scoping Report on the Local Plan Review Issues Paper
- The HRA Screening determination on the Local Plan Review Issues Paper
- The Draft Settlement Boundary Review
- The Draft Settlement Hierarchy Review
- The updated Statement of Community Involvement 2018

This is your opportunity to look at the above documents and make **representation** or **comments**.

Any comments received through consultation must be in writing which can be done through the completion of our **online questionnaire** at:

www.teignbridge.gov.uk/localplanreview

via email at: localplanreview@teignbridge.gov.uk **or**

in the post to:

Local Plan Review
Spatial Planning and Delivery
Forde House
Brunel Road
Newton Abbot
TQ12 4XX

You can view the above documents online at:

www.teignbridge.gov.uk/localplanreview

You can also view paper copies of the documents at the following locations:

Location	Address	Opening Hours
Teignbridge District Council	Forde House Brunel Road Newton Abbot TQ12 4XX	Mon- Fri 9am-4pm Sat-Sun- Closed
Newton Abbot Library	Passmore Edwards Centre Market Street Newton Abbot Devon TQ12 2RJ	Mon- Thurs- 9am- 6pm Fri- 9am- 5pm Sat- 9am- 4pm
Kingsteignton	Newton Road Kingsteignton Devon TQ12 3AL	Mon- 2pm- 5pm Tues & Thurs- Closed Weds- 10am- 6pm Fri- 10am-5pm Sat- 10am- 1pm
Kingskerswell	1 Newton Road Kingskerswell TQ12 5EH	Mon- 10am- 1pm Tues & Weds- 2pm-5pm Thurs- Closed Fri- 2pm- 5pm

		Sat- 10am- 1pm
Dawlish Library	Lawn Terrace Dawlish Devon EX7 9PY	Mon- 9am-1pm Tues- 9am- 5pm Weds- closed Thurs- 9am- 6pm Fri- 9am- 5pm Sat- 9am- 1pm
Teignmouth Library	Fore Street Teignmouth Devon TQ14 8DY	Mon & Weds- 9am- 6pm Tues- 9am- 5pm Friday 9am- 5pm Sat 9am- 1pm
Bovey Tracey Library	Abbey Road Bovey Tracey Devon TQ13 9HZ	Mon & Weds-Closed Tues- 10am-6pm Thurs- 10am-5pm Fri & Sat- 10am-1pm
Chudleigh Library	Market Way Chudleigh Devon TQ13 0HL	Mon- 10am-1pm Tues- 3pm- 6pm Weds- 10am- 1pm Thurs- Closed

		Fri- 2pm- 5pm Sat- 10am- 1pm
Devon Mobile Library	http://www.devon.gov.uk/teignbridge_mobile_timetable_2018_.pdf	

Response Guidance

Comments cannot be treated as confidential, and anonymous or verbal comments cannot be taken into consideration. Comments will be published on our website excluding phone numbers, email addresses and signatures. You can see copies of all representations online at www.teignbridge.gov.uk/localplanreview or at our offices, by appointment.

Inappropriate comments including those which are racist, sexist, xenophobic, defamatory, prejudiced or otherwise likely to cause offence will be removed and not considered.

All representations must be received during the consultation period. Any responses received after this deadline may not be considered.

If you need this information in another format, or have any queries please email localplanreview@teignbridge.gov.uk or call 01626 215735.

Call for Sites

The need for additional housing and employment land is ongoing. Part of the Local Plan Review process will be to find **additional land for housing and employment development**.

The first step is to collate a catalogue of sites with potential for housing and/or employment uses.

The Call for Sites is open to anyone wishing to promote land for housing, economic or other development within the Teignbridge District area (outside Dartmoor National Park).

If you have already submitted a site through the Greater Exeter Strategic Plan Call for Sites process, which was undertaken between February 2017 and April 2017, you do not need to re-submit through this process.

The focus of the call for sites is on smaller sites, particularly on sites of 0.5 hectare or less (1.25 acres or less), sites on the edges of settlements and on brownfield land.

If you wish to submit your site for assessment as part of the Local Plan Review, please fully complete the **Call for Sites Submission Form** at:

www.teignbridge.gov.uk/callforsites

Please follow the instructions and guidance notes on the website and ensure you provide a map of the site at suitable scale, preferably a land registry document.

Land registry records can be accessed at the following website:

www.gov.uk/government/organisations/land-registry

If you are having difficulties when submitting a site proposal, please email localplanreview@teignbridge.gov.uk for assistance or call 01626 215735.

Appendix 3

List of Persons/Organisations Consulted

- Town and Parish Councils (including Parish Meetings)

Abbotskerswell Ashburton Ashcombe Ashton Denbury Bickington Bishopsteignton Bovey Tracey Broadhempston Buckfastleigh Chudleigh Coffinswell Dawlish Denbury	Doddiscombsleigh Dunchideock Ide Dunsford Exminster Hacombe-with-Combe Hennock Holcombe Burnell Ideford Ilsington Ipplepen Kenn Kenton Kingskerswell	Kingsteignton Mamhead Newton Abbot Ogwell Powderham Shaldon Shillingford Starcross SAtokeinteignhead Tedburn St Mary Teigngrace Teignmouth Torbryan Trusham Widcombe-in-the-Moor
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- All Ward Members

C'llr Connett C'llr Eden	C'll Gribble C'llr G Hook	C'llr Piulkington C'llr Bromell
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C'lr Dewhirst C'lr Ford C'lr Jones C'lr Kerswell C'lr Austen C'lr Thorne C'lr Dennis C'lr Clarence C'lr Parker C'lr Matthews C'lr Rollason C'lr Cox Cp'lr Smith C'lr Hockin	C'lr Clemens C'lr J Hook C'r Orme C'lr Christophers C'lr Goodey C'lr Nutley C'lr Lake C'lr Mayne C'lr Evans C'lr Wrigley C'lr Coldclough C'lr Hocking C'lr Haines C'lr Jeffery	C'lr Bullivant C'lr Winsor C'lr Keeling C'lr Hayes C'lr Peart C'lr Prowse C'lr Morgan C'lr Cook C'lr Barker C'lr Russell C'lr Golder C'lr Fusco
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- Other Consultees

Ms	Sarah	Smith		PCL Planning Ltd
Mrs	Sue	Walker		Waddeton Park LTD
Mr	Peter	Harding		Harding & Sons Ltd t/a Fairway Furniture

...Ms	Louise	Beard		Hillside Product Design Ltd
Mr	Jeremy	Newcombe		LSN Architects
Mr	Paul	Garvey		QA South West Limited
Mr	Toby	Cox		
				Sibelco UK Ltd
Mr	Graham	Beck		Luken Beck Ltd
Mr & Mrs	Nat & Helen	Bond		
Mr	Michael	Hindle		
Ms	Denise	Pichler		Pichler Planning Consultancy Ltd
Mr	Carrick	Johnson		Carick Johnson

Mr	Michael	Todd		Specsavers Optical Superstores Ltd
Mr	Steve	Anderson		Steve Anderson Planning & Development
Mr	Peter	Cousens		Wyse Homes
Mr	Tim	Baker		Strategic Land Partnerships
Mr	Simon	Lloyd		
Mrs	Margaret	Cloke		
Mr		Geoffrey		Geoffrey J Gilpin
Mr	Geoffrey	Gilpin		
	J	Young		
Mr & Mrs	Michael	Riley		
Mr	JE	Newbery		

Ms	Daphne	Williams		
Mrs	Kathryn	Todd		
Mr & Mrs	Richard King	Edwards		
Ms	S A	Cusenier		
Mrs	Mary	Edmonds		
Ms	S A	Cusenier		
Mr	Malcolm	Pinney		
Mrs	Sandra	Pinney		
Ms	Janet	Simmons		
Mr	Andrew	Greenfield		
Mr	Geoffrey	Hobson		
Mr	William	Tampion		

Mr	Leslie	Lacey		
	T & M	Revitt		
Mrs	Patricia	Kaljusko		
Mr	Michael	Rhodes		
Mr & Mrs	B R & M I	Wordsworth		
Mrs	Sue	Wilkinson		
Mr	J	Wilkinson		
Mr	Michael	Waite		Michael Waite Chartered Surveyors
Mrs	Julie	Williams		Unison
Mr	Michael	Hunt		
Mr	Nigel	Roberts		The Benbow Group Ltd
Mrs	Jennifer	Bassett		

Dr	Marion	Edwards		
Mr	Duncan	Cherrett		Young Devon
Mr	Paul	Green		Paul Green Planning
Mr	Andrew	Rowe		Eagle One Limited
Mr	Peter	Sheldon		J & P Sheldon
Dame	Janet	Ritterman		
Mr	Brian	Butt		BB Sports Distributors
Mr & Mrs	David & Peggy	Munden		
Mr	Barrie	Simmons		Barrie Simmons & Associates Ltd
Ms	Bridget	Arnold		Moorskating
	Stephanie	Tomes		St Paul's Dental Practice
Mr	Brian	Aird		
Mr	Charles	Williams		

Mr	Anthony	York		Aldens Farm
Mr	Michael	Joyce		
Dr	Chris	Marsh		Dawlish Transition Ambition
Ms	Mary	James		
Rev	David	Goddard		
Mrs	Carol	Retallick		Dunchideock Parish Council
Mrs	Jane	Graham		
Mr	M	Gladwin		
Mrs	Carol	Retallick		Christow Parish Council
Mr	Peter	Sandover		Sandover Associates Limited
Major	Ranulf	Rayner		Ashcombe Community Association

Mr	Simon	Steele-Perkins		Strategic Land Partnerships
Mr	John	Pike		Ball Clay Heritage Society
Mrs	Linda	Drew		
Mr	Derek	Densham		
Miss	Kate	Templeton		
Mr	Andrew	McNaughton		Rymack Ltd
Mr	Ian	Calderbank		
Mr	Michael	Hill		
Mrs	Michelle	Fairley		Casa Software Ltd
Mr & Mrs	Alan & Katie	Bunn		
Mr	David	Snape		

Ms	A	Howell		
Mr	R	Little		
Mrs	Karen	O'Neill		Karen O'Neil & Co Family Solicitors
Mr	Darran	Armitage		
Mr & Mrs	Jeremy & Hilary	Howell		
Mr	John	Hewitt		
Mr	Keith	Groves		Cockwood Residents' Association
Mr	P	Bloxham		
Mrs	Helen	Donnellan		
Mr	John	Pike		
Mr	Gary	Taylor		
Mrs	Juliet	White		

Mr	Christopher	Harper		
Mr	Bruce	Watt		
Mr	Leslie	Calder		Personal and lead co-ordinator of Neighbourhood Watch Bovey Tracey
Mr	Peter	Burgess		
Mr	Andrew	Richards		
Mrs	Anthea	Hoey		
Mr	J	Wormald		
Mrs	Helen	Wills		
	W	Davies		
Mr	David	Bailey		Teignbridge Friends Of The Earth
Mr	Ray	Harris		Bradley Evangelical Church

Dr	Richard W G	Ward		
Mr	David	Allen		
Mr	Roger	Smith		Teignmouth Arts Action Group
Mrs	Karen	Dawson		
Ms	Jean R	Stevenson		
Mr	Stuart	Mallinson		Venture Court
Mrs	Marilyn	Field		
Mr	Brian	Eastwood		
Mrs	Rachelle	Dobson		
Dr & Mrs	Lee & Rachelle	Dobson		
Mr	Chris	Watts		
Mr	Roger	Oatley		

Ms	Joy	Watts		
Dr	Ed	Moffatt		Diocese of Exeter and Churches Together in Devon
Mr	Andrew	Shadrake		Climate Positive
Mr	Paul	French		
Mr	Andrew	Braund		
Mr	Andrew	Ross		Turley Associates
Mr	P M	Ash		
Mr	George	Sobol		Permaculture Education Project
Mr	Philip	Rowe		
Mr	Jonathan	Aylett		Michelmores Hughes, Chartered Surveyors
Mrs	Naomi	Harnett		Exeter and East Devon Growth Point

Mr	George	Marshall		Devon County Council
Mr	Ian	Grout		
Mr & Mrs	William	Watson		Wolborough Residents Association
Mr	Roy	Stephenson		
				Devon County Council
Mr	Colin	Moore		
Mr	Geoffrey	Wood		
	Will	Smith		Complete
	H	Thorne		
Mr	P H	Pitts		
Mr	James	Dawson		JD Architectural Design
	Sally	Preston		Dawlish Community Transport

Mr	Timothy J	Ramsay		
Mr	John	Whiting		
Mr	Graham J	Read		
Mrs	Ann	Savage		
Mr & Mrs	D & P	Curtis		
Mr	Charles	Dixon		Savills- Smiths Gore
Mrs	Susan	Harris		Venture Court Trust
	Zohan	Nash		Marsland Nash Associates
Mr & Mrs	Steve & Ann	Porter		
Mr & Mrs	David	Warren		
Cdr	Christopher M	Cole		

Mr	Kelvin	Warn		Coombesend Road Residents Association
Mr	Graham	Harvey		
Cdr	David	Vaughan		Teignmouth Harbour Commision
Mrs	Amanda	Burden		Luscombe Maye
Mr	Maurice	Willey		
Cdr	David	Vaughan		Teignmouth Harbour Commision
Miss	Karen	Willey		
Mrs	Rebecca	McAllister		Savills UK Ltd
Mr	Peter	Cockram		H-S Hire & Sales Limited
Mrs	Linda	Whitehouse		
Mr		Blake		Charles Blake & Associates

Ms	Jan	Ward		
Dr	Vaughan	Lancaster-Thomas		
Mr	Nick	Hole		Blue Cedar Homes Limited
Ms	Naomi	Selley		
Mr	Andrew	Butcher		
Mr	Clive	Harrington		Coffinswell Parish Council
Mr	Lyn	Yarwood		
Mr	Marcel	Venn		RICS
Mr	Nicholas	Lloyd		Kingsteignton Veterinary Group
Mr	Anthony	Rew		
Mrs	Sheila	Page-Dove		
Mr	Ken	Dainton		

Mr	R	Lea		
Cllr	Avril	Kerswell		League of Friends Bovey Tracey Hospital
Mr	Ian	Butter		Park Holidays UK
Mr	Hugh	Anderson		
Mr	John	Carlton		Chudleigh Town Council
Ms	Lynn	McElheron		Newton Abbot Community Interest Company
Mrs	Helen	Curtice		
Mr	John	Leonard		
Mr	Stuart	Ludford		Hazeldown School
Mr	Ravi	Karir		Marrons Planning
Mr	David	Risdon		

Ms	Sue	McMillan		
Mr	Andrew	McMillan		
Mr	John	De Vere Whiteway- Wilkinson		
Mr	Jon	Clyne		Charles Darrow
Mr	Ken	Holland		
Mr	Richard	Coombes		
Dr & Mrs	Paul & Maryllon	Evemy		
Mr	Alex	Chu		New Golden Crown Limited
Mr	E	Potter		Roadform Civil Engineering Co Ltd
Mr	Roddy	Dawe		Southwest Properties
Mr & Mrs	J & V	Bodley- Tickell		

Ms	Elizabeth	Goodman		
Mr	Alan	Sanders		
Dr	Betina	Winkler		Transition Newton Abbot
				Dawlish SOUL
Mrs	Mary	Adams		
Ms	Maria	Tremlett		
Mr	Keith	Tremlett		
Mr	John	Williams		
Mr	Richard	Weeks		
Mr	David	Copeland		

Mr	Roger	Anderson		
Ms	Rebekah	Hayden		
Mrs	Lisa	Warren		Barton Willmore
Ms	J	Turner		
Ms	Elizabeth	Maddicott		
Mr & Mrs	W G	King		
Ms	Karen	Morton		
Mr	Cameron	Morton		
Mr	Keith	Stone		
Dr & Mr	Susan & Chris	Dawe & Neal		school

Mr	Mike	Stewart		Devon Square Surgery
Miss	Mary	Dolley		
Mr	Stefano	Cannizzaro		
Mr & Mrs		Manley- Tucker		
Mrs	Carole	Waters		
Mr	Andrew	Thorne		
Ms	Michele	Berry		
Mr & Mrs		Eales		
Mr	David	Potter		
Mr	Michael	Rickard		Teign Estuary Transition

Mr	R	Partridge		
Mr	Andrew	Goodridge		
Mr	Frank	Welsman		
Mr	Andrew	Carpenter		Teignbridge District Council
Mr	David	Lobban		PCL Planning Ltd
Mrs	Lucy	Ash		
Mr	Philip	Williams		
Mr	David	Stark		
Mrs	Emma	Reeve		
Miss	Joan	Atkins		
Mr	Dennis	Graham-Troll		
Mr	Peter	Montague		

Ms	Helen	Adams		
Mr	John	Williams		
Mr	Edward	Foale		
Mr	Nicholas J	Reed		
Mr	Nick	Hill		Newton Abbot College
Mr & Mrs	D M	Thorne		
Mrs	Pamela	Pegden		
Mr & Mrs	Roger & Anne	Kirk		
Mr	Malcolm	Welch		
Mr & Mrs	P	Burgess		
Mr	S J	Riddell		
Mrs	Mildred	Bazley		

Mrs	Sonia	Cartwright		The Health Centre
Mr	Charles	Dicks		Civic Planning and Design Group
				Mid Devon District Council
Mr	M	Parkes		Michael Parkes Design
Mr	B	Lewarne		The Devon Karst Research Society
				Marine Management Organisation
				Kingsteignton Medical Practice
Mr	Stuart	Oxton		NPS South West Ltd
Mr	Philip	Rose		
Mr	Ray	Brooks		TRACE
Mrs	Sheila	Pike		
Ms	Michelle	Jones		Teignmouth Medical Practice

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Ms	Audrey	Compton		Bovey Climate Action
	M M	Hopkins		
Mrs	Jane	Isaacs		
Mrs	Sona	Styles		
Mr & Mrs	Roger	Kirk		
Mr & Mrs	Philip & Susan	Leather		
Mrs	Pamela	Pegden		
Mr	Dennis	Humphreys		
Mr	Tim	Gilbert		Connells Land & Planning
Mr	Richard	Newington		

Mrs	Margaret	Clark		Organisation Alphington Community Association
Mr	David	Pugsley		
Mr	John	Tolliday		
Mrs	S M	Tucker		
Mr	Raymond	Masters		
Mr & Mrs	RL & LJ	Pickford		
				Marine Management Organisation
Mr	Stephen	Joep		
Mr	Simon	Prescott		Barton Willmore
	Peter	Roberts		Barton Willmore
	Faith	Wright		Barton Willmore

	Georgina	Nelson		Barton Willmore
	Lawrence	Turner		Barton Willmore
	Jean	Moloney		Barton Willmore
Mrs	Sara	Davies		
Miss	Dawn	Spencer		
Mr	Neal	Jillings		Place Land LLP
Mr	Tim	Smith		Greendale Group
Miss	Jasmine	Philpott		Barratt Homes
Mr	John	Ponting		
Mr	Christopher	Dean		
Mr	Philip	Rowe		Newton Abbot Town Council
Mr	Nick	Hill		

Mr	Tom	Wilson		Bovey Parish Neighbourhood Plan Steering Group
Mr	Edward	Chorlton OBE		Teignmouth Town Centre Management Partnership
	Alex	Gandy		Dartmoor National Park Authority
Mr	Jamie	Grant		Wainhomes SW
Mr	David	Copeland		
Mr	David	Nappin		Exeter and District Bus Users Group
Mrs	Mary	Crew		Peter Brett Associates
Mr	Peter	Edwards		
Mrs	Mary	Elkington		
Mr	Andrew	Cole		Greenslade Taylor Hunt
Mr	Ian	Roach		Roach Planning and Environment Limited

Mr	Marcus	Salmon		Environment Agency
Mr	Chris	Angell		Environment Agency
Mr	Nigel	Dennis		
Ms	Helen	Adams		
Mrs	Jenny	Bryant		NPS South West Ltd
Mr	Peter	Adams		Teigngrace Parish Council
Mr	Richard	House		Gladman Developments Limited
Mr	James	Clack		NPS South West Ltd
	David	Clarke		
Mr	Tim	Gilbert		Connells Land & Planning
	Aaron	Smith		Fowler Architecture and Planning

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				Civil Aviation Authority
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Mr	Chris	Marrow		Forestry Commission
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Mr	Mark	Beighton		South West Water plc
	T	Berndes		Western Power Distribution
Mr	George	Marshall		Devon County Council
	Property Department			South West Water Ltd
	Jo	Rumble		Dartmoor National Park Authority

Mr	M	Broom		South West Water
Dr	Amanda	Newsome		Natural England
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Ms	Moir	Andrews		Bovey Tracey Library
Mr	Gus	Ferguson		The National Trust
Ms	Judith	Sharples		Local Government, Fire & Assessment Directorate
				Teignmouth Harbour Commision
Mr	Phil	Thomas		South West Water
Ms	Hannah	Elcocks		DCC Childrens Services
Mr	Lee	Tozer		Job Centre Plus

Mr	Steve	Jackson		Homes and Communities Agency
Mr	John	Richardson-Dawes		DCC Public Transport
				Network Rail
				Devon County Council
Mr	Matthew	Dodd		Homes and Communities Agency
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Mr	Dan	Janota		Dartmoor National Park Authority
Mr	Christopher	Shaw		Devon and Cornwall Police

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Mr	Ian	Goodwin	Chairman	Seale-Hayne Future Group
Mr	John	Pike	Chairman	Ball Clay Heritage Society
Mr	John	Bryant	Chairman	Chudleigh Sports Centre
Mr	Jim	Putz	Chairman	Trusham Parish Meeting
Mr	Nick	Walter	Chairman	Chudleigh Town Council
Mrs	Jennifer	Rowland	Chairman Chairman	Powderham Parish Meeting
Ms	Sue	Wroe	Chief Officer	Teignbridge Community and Voluntary Services
Ms	Ruth	Flynn	Church Office Manager	Parish Church of St Peter, St Paul and St Thomas of Canterbury
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Mrs	Kim	Ford	Clerk	Bishopsteignton Parish Council
Mrs	Carol	Retallick	Clerk	Ilington Parish Council
Mrs	Ashley	Lamb	Clerk	Ideford Parish Council
Mr	Philip	Rowe	Clerk	Newton Abbot Town Council
Mrs	Penny	Clapham	Clerk	Kenn Parish Council
Mrs	Patricia	Vaughan	Clerk	Whitestone Parish Council
Mrs	Julie	Lammin	Clerk	Moretonhampstead Parish Council
Mrs	Karen	Gilbert	Clerk	Bickington Parish Council
Mrs	Carol	Lakin	Clerk	Kingsteignton Town Council
Mrs	Helen	Reynolds	Clerk	Henock Parish Council
Mrs	Joan	Banks	Clerk	Bridford Parish Council
Ms	B	Snook	Clerk	Drewsteignton Parish Council

Mrs	Rachel	Avery	Clerk	Coffinswell Parish Council
Mrs	Rachel	Avery	Clerk	Broadhempston Parish Council
Mrs	Suzanna	Hughes	Clerk	Widcombe-in-the-Moor Parish Council
Mrs	Suzanna	Hughes	Clerk	Hacombe-with-Combe Parish Council
Mrs	Suzanna	Hughes	Clerk	Starcross Parish Council
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Mr	John	Clark	Conservation Officer	Devon Gardens Trust
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Miss	Rachael	Bust	Deputy Head of Planning and Local Authority Liaison	The Coal Authority
Mr	Martyn	Dunn	Development Coordinator	South West Water Plc
Mr	Martyn	Dunn	Development Coordinator	South West Water Plc
Mr	Malcolm	Walker	Development Plan Manager	Peacock & Smith
Mr	Nick	Jones	Director	Savills
Mr	Richard	Mead	Director	Summerfield Developments (SW) Ltd
Mr	Neal	Jillings	Director	Place Land LLP
Mr	Jason	Sandland	Director	J Sandland Limited
Mr	James	Gibbs	Director - Development Land and New Homes	Jackson-Stops and Staff
Mr	Simon	Coles	Director - Planning & Environment	WYG Planning & Design

Mr	Tom	Higginson	Director of Planning and Land Services	Network Rail
Mr	Harvey	Gardner	Estates Surveyor	Devon and Cornwall Police
Mr	Graeme	Smith	Estuaries and Coastal Officer	Teign Estuary and Coastal Partnership
Mr	Graeme	Smith	Estuaries and Coastal Officer	Teign Estuary Partnership
Mr	Graeme	Smith	Estuaries Officer	Exe Estuary Partnership
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Mrs	Hilary	Winter	Forum Officer	Devon Countryside Access Forum
Mr	Matt	Dickins	Forward Planning	East Devon District Council
Mr	Matt	Dickins	Forward Planning	East Devon District Council
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Mr	Andrew	Rimell	General Manager	Yeo Valley Farms (Production) Ltd
Mr	Richard	Wood	General Manager	South Devon Railway
Mr	Neil	Collins	General Manager Planning	National Express Group PLC
Mr	Philip	Saunders	Graduate Planner	Savills
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Mr	Joe	Keech	Head of Strategic Planning	Devon County Council
Mr	David	Stuart	Historic Areas Adviser	Historic England, SW Region
Mr	David	Stuart	Historic Areas Adviser	Historic England, SW Region
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Mr	Michael	Calder	Land Use Planning Adviser	The National Trust
Mr	Graham	Bond	Legal Advisor and Clerk	Teignmouth Harbour Commission
Ms	Philippa	Edmunds	Manager	Freight on Rail
	Kay	Yendall	Manager	Newton Abbot Community Transport Association
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Mrs	Suzanna	Hughes	Parish Clerk	Kenton Parish Council

Ms	Annette	Everett	Parish Councillor	Kingskerswell Parish
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	Heidi	Hallam	Partnership Manager	Heart of the South West Local Enterprise Partnership
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Mr	Ross	Anthony	Planning Advisor	The Theatres Trust
Mr	Gary	Staddon	Planning and Estates Manager	Imerys Minerals Ltd
Mr	Simon	Tofts	Planning Manager	Blue Cedar Homes Limited
Mr	Gary	Parsons	Planning Manager	Sport England
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Mr	Christopher	Stacey	Principal	Christopher Stacey Architecture
Mr	Paul	Newman	Principal	Paul Newman Property Consultants Limited
Mr	James	Purkiss	Principal Consultant	WSP
Mrs	Anthea	Hoey	Principal Planner	Atkins Limited
Ms	Meghan	Rossiter	Principal Planner	Tetlow King Planning
Mr	Brian	Godfrey	Principle Architect	The Godfrey Partnership
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	Catherine	Brabner-Evans	Regional External Affairs Officer - South West	Woodland Trust
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			Response and Resilience Manager	Devon & Somerset Fire & Rescue Service
Mr	Chris	Watts	Secretary	Wolborough Residents Association
	Andrew	Bulpin	Secretary	Dawlish Warren Tourism
			Secretary of State for Transport	Department for Transport
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Mr	Gavin	Bloomfield	Senior Conservation Officer	RSPB
	Alys	Thomas	Senior Consultant, Planning	Cushman & Wakefield

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	Mel	Nicholls	Senior Marine Planner	Marine Management Organisation
Mr	Colin	Field	Senior Town Planner	Network Rail Ltd
Mr	Colin	Field	Senior Town Planner	Network Rail
Mr	Colin	Field	Senior Town Planner	Network Rail
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Cllr	Chris	Clarance	Teignbridge District Councillor	District Councillor for Shaldon and Stokeinteignhead
Cllr	Mike	Pilkington	Teignbridge District Councillor	District Councillor Newton Abbot College
Cllr	Bill	Thorne	Teignbridge District Councillor	District Councillor Kingsteignton West
Cllr	Jackie	Hook	Teignbridge District Councillor	District Councillor Newton Abbot Bushell
Cllr	Ted	Hockin	Teignbridge District Councillor	District Councillor - Dawlish Central and North East
Cllr	Mary	Colclough	Teignbridge District Councillor	District Councillor Ambrook
Cllr	Avril	Kerswell	Teignbridge District Councillor	District Councillor - Bovey Ward
Cllr	Dennis	Smith	Teignbridge District Councillor	District Councillor Ambrook

Cllr	Bill	Thorne	Teignbridge District Councillor	District Councillor Kingsteignton West
Cllr	Colin	Parker	Teignbridge District Councillor	District Councillor Newton Abbot Buckland and Milber Ward
Cllr	Michael	Hocking	Teignbridge District Councillor	District Councillor Newton Abbot Bradley
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Mrs	Judith	Hart	Town Clerk	Buckfastleigh Town Council
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Miss	Beatrice	Scott	Town Planner	WYG Planning and Design

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Mr	Colin	Field	Town Planning Manager	Network Rail Ltd
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