

LOCAL PLAN REVIEW 2020-2040

Issues Consultation 21 May 2018- 16 July 2018

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Executive Summary

The Issues Paper represents the first stage of engagement in the preparation of the Teignbridge Local Plan Review. The document highlights the main planning related issues affecting the District now and those that will affect it up to 2040.

Government guidance requires Local Plans to be reviewed every 5 years. The Local Plan Review will align the Teignbridge Local Plan with the emerging Greater Exeter Strategic Plan 2020 - 2040 and give opportunity to take account of new legislation and the Consultation Draft National Planning Policy Framework (NPPF).

Homes

The Paper explains how the number of houses that the Local Plan Review will need to provide land for will be significantly higher than the number set out in the Adopted Local Plan, due to changes in the way housing need is calculated, with an uplift relative to the unaffordability of property. It explains how the delivery of housing will be tested and the implications for not meeting targets, exploring how housing delivery can be best supported, for example through the allocation of small – medium sites and consideration of modern methods of construction.

The Paper sets out the current hierarchy of settlements and explores the option of a new category of settlement, Main Villages. This would define villages that contain a higher level of service provision than other villages, but less than the level of provision within towns. In addition, it offers options as to how our development needs could be distributed across this hierarchy, including consideration of a new settlement, and alternative approaches to settlement boundaries.

The Paper discusses the proposed changes to affordable housing and the greater emphasis on providing a mix of housing, as set out in the Consultation Draft NPPF. It includes an explanation of the government's intention to ensure that 10% of all new homes are available for affordable home ownership and, to offer greater support for development on sites adjacent to settlements that provide a high level of entry level homes for first time buyers or renters. It also sets out consideration of a requirement for a proportion of all homes to be adaptable, in order to meet occupiers' changing needs over time, and how the Council will aim to secure the highest quality development through the use of the emerging Design Guide. The success of the custom and self-build policy is recognised and options are explored as to how to support more custom and self-build development to meet the needs of local people.

Jobs and Prosperity

The Paper recognises the low level of unemployment within the District, but also how productivity falls behind the national average and that wages are low. It sets out the high proportion of micro businesses, how 70% of jobs fall outside traditional employment categories, and it explores how best these enterprises could be supported. The idea of diversifying the uses permitted on employment sites is explored, with suggestions on speeding up employment floorspace delivery, such as direct delivery. In addition, the Paper looks at the extent of Town Centres and seeks to ensure vibrant, vital Town Centres with a variety in mix of uses in the day and evening.

Environmental Stewardship

The pressures from the increased development requirements of the District need to be managed in order to conserve and enhance the District's rich and varied natural and historic landscape and coastline. The Paper explores the policy approach to the way the landscape is protected and looks at the role of the Areas of Great Landscape Value, which are now rather out-of-date, lack any reference within national policy and, which do not now tally with more up-to-date Landscape Character Assessments. The use of financial contributions towards biodiversity offsetting is also investigated, along with the different ways that the amount of green infrastructure required for new development could be calculated to take into account local needs and updated standards and evidence.

Climate Change and Energy

The Paper highlights the important role planning has to play in providing resilience to climate change and the reduction of greenhouse gases. Whilst building design can help achieve a reduction of energy use and carbon emissions, the greatest contributor to carbon emissions in Teignbridge is transport. Planning can help to reduce the use of the private car by creating self-sufficient communities, where opportunities for employment and access to services are created alongside new housing and by the creation of sustainable movement links, to encourage walking and cycling. The Paper also explores how the Local Plan Review could support electric vehicles, through car charging points; the energy storage industry, to more effectively balance supply and demand; and discusses the idea of creating opportunity areas for potential renewable energy developments.

Communication, Movement and Infrastructure

The importance of supporting infrastructure such as education, transport, health, digital and green infrastructure to be delivered alongside development is emphasised, but it is acknowledged that such infrastructure requirements should not make a development unviable. The infrastructure required to deliver the current Local Plan is set out in the Council's Infrastructure Delivery Plan. Since the current Local Plan was adopted a number of projects have been completed, including A382 road improvements and the South Devon Highway, providing a 5.5km dual carriageway between Newton Abbot and Torbay, bypassing Kingskerswell and improving local air quality. Improved access to the area has been projected to lead to creation of nearly 8000 jobs in South Devon. In addition, the Council has been successful in securing £4.2 million from the government's Housing Infrastructure Fund, set up to unlock housing development sites.

The Paper explains how the Greater Exeter Strategic Plan will identify the cross-boundary strategic infrastructure required over the plan period and, how the Local Plan Review will undertake an Infrastructure Capacity Assessment to understand the additional pressure on infrastructure created as a result of additional development requirements, which will be balanced against viability.

What is the Local Plan?

- 1.1 The <u>Teignbridge Local Plan 2013-2033</u> was adopted on 6 May 2014 and sets out the policies, proposals and actions to meet the environmental, social and economic challenges facing the area up to 2033. It sets out a strategy for the level and distribution of development and supporting infrastructure, sets policies upon which planning applications are determined and contains proposals for monitoring the success of the plan.
- 1.2 The Local Plan covers part of the District which is outside Dartmoor National Park as illustrated in Figure 1.

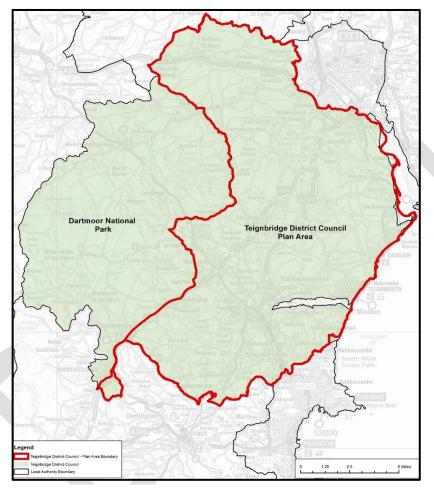


Figure 1: Teignbridge District Council Planning Area

Why do we need a Local Plan Review?

- 1.3 <u>The Neighbourhood Planning Act 2017</u> introduced a requirement to review a local plan in part or full every 5 years to ensure plans are up to date and properly reflect the changing needs of the area.
- 1.4 The Local Plan was adopted 4 years ago and an update is likely to be completed in 2022.
- 1.5 A regular review is also considered good practice and the Council is committed to ensuring the Plan's delivery. The Local Plan Review provides the opportunity to:
 - Respond to district wide trends,

- Extend plan period to 2040
- Respond to Community ambitions for their area
- Identify what has worked and what requires improving
- Update evidence
- Reflect changes to national policy and guidance
- Reflect Neighbourhood Plans
- Align policies and proposals with the Greater Exeter Strategic Plan (GESP)

What happens if we don't review the plan?

1.6 If the Local Plan is not regularly reviewed then it is judged to be out of date and 'the presumption in favour of sustainable development', contained in national policy, would apply. As a result the Council would have less control in determining where development happens and this would provide opportunities for speculative development not identified in the Local Plan. This situation would also apply should the Council be unable to demonstrate a five year supply of land for housing or fail to deliver an adequate level of housing under the Housing Delivery Test.

What Local Plan Review work is being undertaken?

- 1.7 The Local Plan Review will require a number of updated studies to provide evidence for developing the Plan's strategy, determining housing availability and type and tenure requirements, the level of and most suitable locations for housing and employment, information on flooding, transport, viability and infrastructure capacities.
- Some of these studies will be based on a wider than Teignbridge District level, with some more appropriately based on a travel to work area or housing market area which is largely the area covered by the Greater Exeter Strategic Plan.
- 1.9 These studies will directly inform the Local Plan Review and the Greater Exeter Strategic Plan. Others will be tailored to the specific District-based requirements of the Local Plan Review.
 - Teignbridge Housing and Economic Land Availability Assessment (HELAA)
 - Greater Exeter Housing and Economic Development Needs Assessment
 - Mix of Uses in Teignbridge Town Centres Study
 - Strategic Flood Risk Assessment
 - Transport Assessment
 - The Greater Exeter Town Centre and Retail Study Part 1 & 2
 - Landscape Impact Assessment
 - Custom Build Needs Assessment
 - Strategic Environmental Assessment & Habitat Regulation Assessment
 - Whole Plan Viability Analysis
 - Update to Teignbridge Infrastructure Delivery Plan
 - Infrastructure Needs & Capacity Assessment
- 1.10 In addition a Leisure Strategy, Playing Pitch Strategy, Open Space Needs Assessment and Built Leisure Needs Assessment have recently been completed and will inform further plan preparation stages.

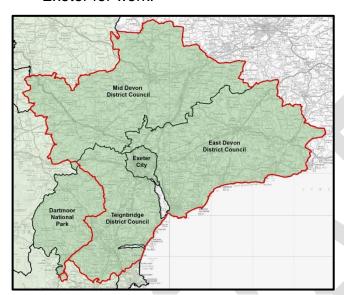
The Greater Exeter Strategic Plan (GESP)

What is the Greater Exeter Strategic Plan?

1.11 This is an overarching strategic plan covering the planning authority areas of Mid Devon, East Devon, Exeter and Teignbridge and is being prepared by all four authorities in partnership with Devon County Council. Once complete this plan will form the upper strategic tier of planning policy for authorities within the GESP area.

What area does the Greater Exeter Strategic Plan cover?

1.12 The GESP plan area largely reflects Exeter's Travel To Work Area in recognition that significant numbers of residents of these surrounding districts travel in and around Exeter for work.



Bideford

Tourton

Crediton

Crediton

Crediton

Crediton

Exeter

Sidmouth

Sidmouth

Liskeard

Sidmouth

Flymouth

Kingsbridge

Axminster

Sidmouth

Flymouth

Kingsbridge

Aminster

Sidmouth

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Figure 2: Greater Exeter Strategic Plan Area

Figure 3: Exeter Travel to Work Area

What will the Greater Exeter Strategic Plan Do?

- 1.13 The GESP will establish the overall strategy for how development is planned and managed in the wider plan area up to 2040. The GESP will make most of the big planning decisions and will include:
 - Establishing the overall development requirements for the GESP area
 - Set the distribution of development across the four local authority areas
 - Allocate strategic housing sites (in Teignbridge sites of 500+ dwellings)
 - Allocate strategic employment sites (in Teignbridge sites of 5 hectares or over)
 - Establish the remaining development requirements to be met by District Council's Local Plans
 - Policies for joint environmental issues
 - Joint infrastructure proposals
- 1.14 It is clear that GESP will be allocating for some of the Teignbridge District's housing and employment land requirement but the level and exact numbers and distribution of housing and employment provision within the Greater Exeter Strategic Plan is still emerging.

Relationship of Plans

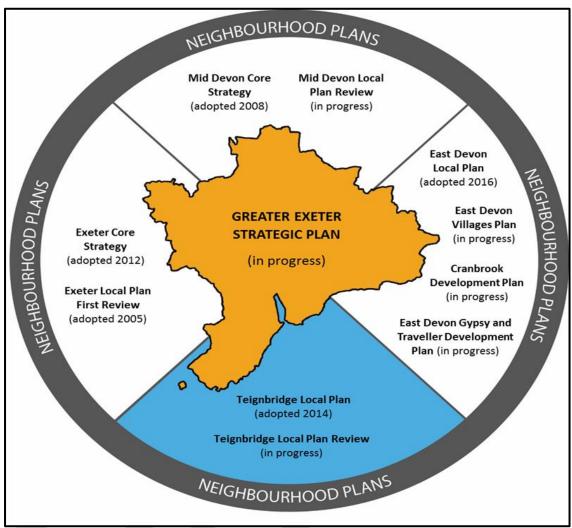


Figure 4: Relationship of plan hierarchy

- 1.15 Figure 4 above illustrates that the Greater Exeter Strategic Plan is the central planning document to provide the strategic level and distribution of development across the four district authority areas.
- 1.16 The Local Plan Reviews of the Districts' Local Plans will stand in conformity with the policies and proposals of the Greater Exeter Strategic Plan. They will provide the more district specific policies and proposals and set how they intend to meet the remaining district development requirements set out in the Greater Exeter Strategic Plan.
- 1.17 Local Plan Reviews should also have regard to adopted Neighbourhood Plans but such plans should stand in conformity with the strategic policies through GESP and those in District Local Plans.
- 1.18 Where policies in a neighbourhood plan conflict with those of the local plan, the most recent document will take precedence.
- 1.19 The Greater Exeter Strategic Plan, District Local Plans and adopted Neighbourhood Plans all form part of the development plan and are all material considerations in the

determination of planning applications. The <u>Devon Minerals Plan</u>, <u>Devon Waste Plan</u> and <u>Devon Local Transport Plan</u>, alongside national policy and guidance also inform the decision-making process.

_1.20 The role and scope of the Greater Exeter Strategic Plan, Teignbridge Local Plan and Neighbourhood Plans in the District are set out in Figure 5 below.

GESP	Teignbridge Local Plan	Neighbourhood Plans
Strategic-scale over the wider GESP plan area	Strategic-scale over the district area and locally specific	Locally specific on a neighbourhood scale
Establish overall housing numbers	Allocate the remainder of development set by the GESP	Allocate land for housing, employment, community and leisure uses
Establish employment land requirements	Review and set Local Plan policy	Establish locally specific design requirements
Set out any need for new retail floor space	Review policy and accommodate additional requirements	Encourage local retail provision
Strategic housing and employment sites	Review and set revised settlement boundaries	Amend settlement boundaries
District targets for remaining housing, employment and retail	Review and set revised Town Centre boundaries and frontages	Identify and safeguard locally important heritage assets
Policies for joint environmental issues which affect the GESP area	Address district-wide environmental issues	Safeguard particularly important areas of Local Green Space
Joint infrastructure proposals	Establish specific policies for new and improved infrastructure	Provide additional local detail to local plan policy
Reflect national policy and guidance	Reflect national policy, the Greater Exeter Strategic Plan and Neighbourhood Plans	Give consent for a development through a Neighbourhood Development Order

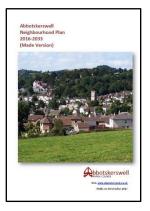
Figure 5: Scope of Plans

How will the Local Plan Review affect Neighbourhood Plans?

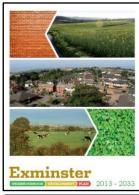
- 1.21 Teignbridge has five adopted Neighbourhood Plans with ten more in development.
- 1.22 Allocations in Neighbourhood Plans for development such as employment and housing sites will be reflected through the Local Plan Review, where they comply with plan development requirements.
- 1.23 Currently adopted Neighbourhood Plans have been found to comply with the strategic policies of the existing Local Plan. The strategic policies of the District may change over the course of the review and will be supplemented by those of the Greater Exeter Strategic Plan.
- 1.24 National policy sets out that neighbourhood plans should not promote less development than that set out in strategic policies of a plan or undermine its strategic policies.
- 1.25 The <u>draft National Planning Policy Framework</u> sets out the relationship between Neighbourhood Plans and states:

"Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan for that neighbourhood, where they are in conflict; unless they are superseded by strategic or local policies that are adopted subsequently."

- 1.26 The Neighbourhood Planning Act 2017 and subsequent regulations have made reviewing existing neighbourhood plans a simpler process. Teighbridge have a dedicated Neighbourhood Planning Officer to assist those preparing or seeking to review their neighbourhood plan.
- 1.27 The Local Plan Review will work closely with those preparing Neighbourhood Plans and with Parish and Town Councils with adopted Neighbourhood Plans to reflect community ambitions for development. Groups preparing or reviewing plans should seek to align their plans with the emerging development requirements in the Local Plan Review.
- 1.28 Once the level of development is set by the Greater Exeter Strategic Plan each neighbourhood area can request a housing figure to be met by their area.
- 1.29 Settlement boundaries have not been revised through the existing five "Made" Neighbourhood Plans and are based upon the 1996 limits. As such the updated settlement boundary in the Local Plan Review will supersede those in "Made" Neighbourhood Plans.









1.30 However if emerging or reviewed Neighbourhoods Plans set their own settlement boundary these would supersede the boundary in the adopted Local Plan Review once made/adopted through a referendum.

Question 1:

How can the Council best ensure that Neighbourhood Plans are reflected through the Local Plan Review?

How to get involved in the Local Plan Review consultation

- 1.31 This consultation includes a series of supporting documents including:
 - 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
- 1.32 Representations are encouraged to be submitted for any and all of the listed documents.
- In addition the Local Plan Review is requesting the submission of land for its consideration for residential and employment potential. This process is a 'Call for Sites' and will form part of the Housing and Economic Land Availability Assessment (HELAA) process for evidencing the Local Plan Review. This process was previously known as the Strategic Housing Land Availability Assessment (SHLAA).
- 1.34 Further detail on how and where to submit potential sites is provided in the Call for Sites chapter or at www.teignbridge.gov.uk/callforsites
- 1.35 The consultation period for all of the above documents, runs from 9am Monday 21st May 2018 until 5pm Monday 16th July 2018. In addition, the deadline for the submission of sites is 5pm Monday 16 July 2018.
- 1.36 All of the above documents can be viewed on the Council's website at:

www.teignbridge.gov.uk/localplanreview

1.37 Paper copies are also available at the following locations:

Location	Address	Opening Hours
Teignbridge District	Forde House	Mon- Fri 9am-4pm
Council	Brunel Road	Sat-Sun- Closed
	Newton Abbot	
	TQ12 4XX	
Newton Abbot Library	Passmore Edwards Centre Mon- Thurs- 9am- 6pm	
	Market Street Fri- 9am- 5pm	
	Newton Abbot Sat- 9am- 4pm	
	Devon	
	TQ12 2RJ	

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	Abbey Road Bovey Tracey Devon TQ13 9HZ	Mon & Weds-Closed Tues- 10am-6pm Thurs- 10am-5pm Fri & Sat- 10am-1pm
Chudleigh	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	

Figure 6: Deposit locations for paper copies of the Local Plan Review: Issues Consultation

- 1.38 This document presents a series of questions to explore what the public and stakeholders think about the challenges facing the District, particularly up to 2040 and identifies the most suitable and sustainable approaches to addressing these. It is not essential to answer all of the questions, just the ones most relevant to you.
- 1.39 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

- 1.40 All comments received during this consultation will be considered in preparing the next stage of the Local Plan Review (Draft Plan) and will be set out in a Consultation Responses document.
- 1.41 Information on this consultation can also be found on:

Our Facebook page: www.facebook.com/planteignbridge

Our Twitter feed: www.twitter.com/planteignbridge

- Please note that comments through Facebook and Twitter **will not** be considered a formal representation for the purposes of this consultation.
- 1.43 The Local Plan Review will also be displaying the consultation at eleven locations in ten towns and villages across the District. We will be available to hear your comments on the paper or its documents, discuss the strategy, explain the challenges we face and explore the opportunities to meet them face to face.
- 1.44 A list of these events, their locations and times of the display are available below:

Area	Date & time	Location
Kingskerswell	Saturday 2 June 2018 10am-3pm	Kingskerswell Village Hall 15 School Lane Kingskerswell TQ12 5HD
Newton	Tuesday 5 June 2018 12pm-8pm	Great Hall Old Forde House, Brunel Road, Newton Abbot, TQ12 4XX
Abbot	Friday 8 June 2018 12pm-8pm	Highweek Village Hall Highweek Village, Newton Abbot, TQ12 1QG
Ipplepen	Wednesday 6 June 2018 12pm-8pm	Main Hall Ipplepen Village Hall, At the Junction of Silver Street and Biltor Road, Ipplepen
Exminster	Tuesday 12 June 2018 12pm-8pm	Main Hall Exminster Victory Hall, Church Stile, Exminster, Exeter, Devon, EX6 8DF
Kingsteignton	Thursday 14 June 2018 12pm-8pm	Kingsteignton Community Hall, Mary Hall Suite, Rydon Road, Kingsteigtnon, TQ12 3LP
Teignmouth	Tuesday 19 June 2018 12pm-8pm	Foyer area of Pavilions Teignmouth, The Den Crescent, Teignmouth, TQ14 8BG
Chudleigh	Thursday 21 June 2018 12pm-8pm	The Rest Centre Chudleigh Town Hall, Market Way, Chudleigh, Devon TQ13 0HL
Dawlish	Friday	The Strand Church (URC)

	22 June 2018	32 The Strand, Dawlish,
	12pm-8pm	EX7 9PT
	Tuesday	Methodist Church Hall
Bovey Tracey	26 June 2018	Le Molay-Littry Way, Bovey Tracey,
	1.30pm-8pm	TQ13 9AD
T II 01	Wednesday	John Bromell Room
Tedburn St Mary	27 June 2018	Tedburn St. Mary Village Hall
wai y	12pm-8pm	Crediton Road, Tedburn St. Mary, Exeter, EX6 6DZ

Figure 7: Roadshow/Exhibition times, dates and locations

How the information you provide will be used

- 1.45 The information you provide will be used by Teignbridge District Council for the purposes of the Local Plan Review.
- 1.46 When submitting information you should be aware that:
 - Personal data will not be published or shared with any other person or organisation outside of Teignbridge District Council except as required by the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended or through subsequent legislation) or without your prior written consent.
 - All personal data provided will be held on a secure database and used for planning policy consultation purposes until the refreshed Teignbridge Local Plan 2020-2040 has completed all the regulatory processes required for its preparation (estimated to be before the end of 2022) after which your personal data will be deleted.

Local Plan Review Call for Sites

- 1.47 The need for additional housing and employment land is ongoing and part of the Local Plan Review will be to address the increased need for housing and employment floor space up to 2040.
- 1.48 The first step to establishing how that need could be met is to collate a refreshed catalogue of sites with potential for housing and/or employment uses. This catalogue of potential sites will form the foundation of the Housing and Economic Land Availability Assessment (HELAA) which will assess submissions based on a series of criteria informed by specialist advisors. These include specialists in landscape, ecology, highways, and the historic environment with input on achievability from the development industry.
- 1.49 This Housing and Economic Land Availability Assessment (HELAA) was previously known as the Strategic Housing Land Availability Assessment (SHLAA). This was last comprehensively undertaken in Teignbridge in 2009 as part of development of the existing Local Plan, with an update in 2012. The new assessment also includes employment land. Sites previously submitted as part of the SHLAA process will not form part of the Local Plan Review but can be resubmitted.
- 1.50 Further information on the HELAA and its methodology can be found in the <u>HELAA</u> <u>Methodology Paper April 2017</u>. The District will apply the methodology as set out in this paper to ensure consistency across the wider Greater Exeter plan area.

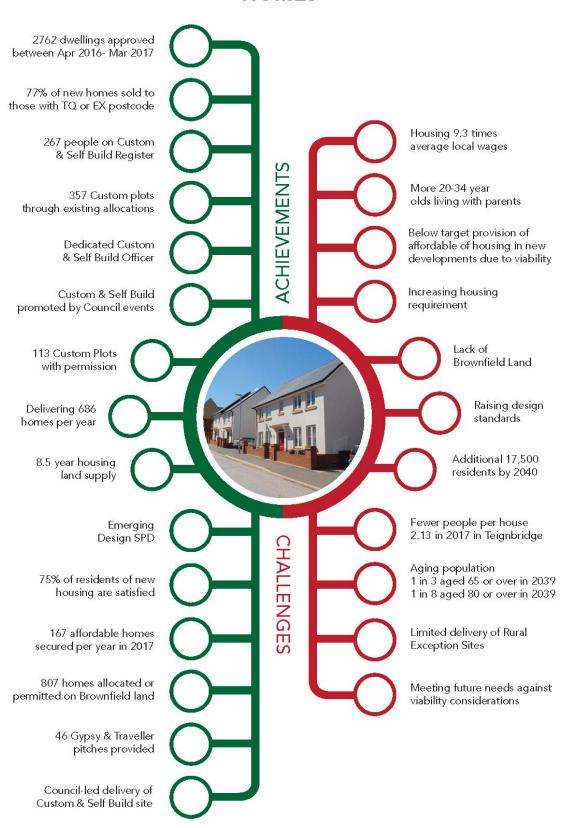
- 1.51 It should be highlighted that a positive assessment of a site's development potential through the HELAA is no guarantee of its allocation within a development plan or of obtaining future planning consent.
- 1.52 The call for sites is open to anyone wishing to promote land for housing, economic or other development within the Teignbridge District Area (outside of Dartmoor National Park). However if you have already submitted a site through the Greater Exeter Strategic Plan Call for Sites between February and April 2017, a resubmission is not necessary through this process.
- 1.53 Sites previously submitted as part of the GESP's call for sites will form part of the catalogue of potential sites for the District's HELAA, informing the Local Plan Review.
- 1.54 The focus of this Call for Sites process is on smaller sites, particularly at or under 0.5 hectare, sites on the edge of settlements and Brownfield Sites. More information is provided on brownfield sites and the Brownfield Register in the Homes chapter.
- 1.55 If you wish to submit your site for assessment as part of the Local Plan Review and HELAA process 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.
- 1.57 Land registry records can be accessed at the following website:
 - www.gov.uk/government/organisations/land-registry
- 1.58 If you are having difficulties when submitting a site proposal, please email localplanreview@teignbridge.gov.uk for assistance or call 01626 215735.

National Policy



- 2.1 National policy currently consists of the <u>National Planning</u> <u>Policy Framework (NPPF)</u> published in 2012 and the <u>National Planning Practice Guidance</u>, which is an online resource that is regularly updated and serves to provide additional detail on the requirements of the NPPF.
- 2.2 The Council wants the Local Plan Review to reflect the choice and aspirations of the local community. However the plan must comply with a number of specific requirements set out in national policy including:
- Reflect national planning policies set out in the National Planning Policy Framework and associated Planning Guidance:
- Contribute to the achievement of sustainable development and be supported by a Strategic Environmental Assessment and Habitats Regulation Assessment;
- Aim to meet objectively assessed development and infrastructure requirements;
- Have regard to other strategies of the Council and its partners;
- Consider whether there is scope to meet the unmet needs of neighbouring areas and demonstrate joint working on cross-boundary issues;
- Take into account evidence of environmental constraints on development and the need to conserve the built and natural heritage, and
- Be deliverable within the plan period taking into account identified constraints, infrastructure requirements and viability considerations.
- 2.3 The current requirements of the NPPF are set against a quickly evolving policy landscape which is seeking to boost employment, productivity and housing delivery through changes to national policy, regulation and legislation.
- 2.4 A draft update to the National Planning Policy Framework was published for consultation on 5 March 2018 and a draft National Planning Policy Guidance on 9 March 2018 with final versions expected to be published in Summer 2018. The Local Plan Review will be required to have regard to these policy changes, updated guidance and up-to-date evidence.

HOMES



A ROOF OVER OUR HEADS



Homes

- 3.1.1 There is a national problem of insufficient housing to meet the needs of the expanding population, including insufficient homes at an affordable price and a lack of a range of housing types to meet the changing needs of the nation.
- 3.1.2 The government has acknowledged a target of 300,000 homes to be built per year through its Budget Statement in November 2017.
- 3.1.3 A range of Consultation Papers have been published to accompany the Housing White Paper which have informed the <u>draft National Planning Policy Framework</u>. These seek to:
 - Increase the number of homes built
 - Increase the rate of delivery of homes
 - Diversify the housing market and open it up to smaller builders
- 3.1.4 The population in Teignbridge is expected to increase from 132,000 in 2019 to approximately 149,500 in 2040, representing an increase of 13.3% or an additional 17,500 residents.
- 3.1.5 In addition, figure 8 identifies that the average number of people per household is on an historic decline both nationally and at a Teignbridge distrct level. The fewer people per house means more housing is required to meets the needs of existing and future residents.

Average Household Size (number of people residing per house)			
	National Average	Te	ignbridge District Average
2001	2.4 (<u>ONS</u>)	2001	2.29 (ONS)*
2011	2.3 (<u>ONS</u>)	2011	2.20 (ONS) [†]
		2017	2.13 (2017 Post Occupancy
			Survey)

Figure 8: Average Household Size 2001 & 2011

Housing Numbers

- 3.2.1 The Consultation Paper, "<u>The Right Homes in the Right Places</u>" included a proposed standard method for determining housing need which has been progressed through the Draft National Planning Policy Framework and Guidance.
- 3.2.2 This standard method when based on 2014 data and applied to Teignbridge District provides an annual housing requirement of 756 dwellings per year compared with the current Local Plan target of 620 dwellings per year.

^{*2001} Office for National Statistics Census sourced from Teignbridge Annual Monitoring Report 2006-2007

[†] 2011 Office for National Statistics Census sourced from Local Government Association

- 3.2.3 This figure would form the District's Objectively Assessed Need (OAN) for housing which will be the <u>minimum</u> the Local Plan will be required to provide for.
- 3.2.4 This is an additional requirement of 136 dwellings per year above the existing target.
- 3.2.5 The new extended plan period of 2020 to 2040 also requires an additional 7 years of housing at the increased delivery rate.
- 3.2.6 This OAN figure will establish the minimum housing requirement for each area, with local authorities encouraged go beyond this requirement if this is sustainable and meets the needs of the district. For example, these needs may include a greater level of specialised elderly accommodation to meet a higher than national average proportion of those over 65 years.

Current local plan per year target	Total overall housing requirement in Local Plan up to 2033	Proposed OAN for District	Total proposed overall housing requirement for District up to 2040	GESP strategic development contribution
620 dwellings	12,420 dwellings	756 dwellings	15120	?

Figure 9: Current & Proposed housing requirements

- 3.2.7 The current Local Plan already includes commitments that can be deducted from the revised housing requirement from 2020. These commitments equate to 8663[‡] dwellings.
- 3.2.8 This leaves an overall District housing requirement up to 2040 of 6457 dwellings.
- 3.2.9 It must be noted that this objectively assessed need figure is based upon data from 2014 and will be updated during plan preparation as updated population forecasts become available..
- 3.2.10 The number of commitments is expected to increase between now and the date when the final plans target will be calculated. This is likely to further reduce the overall number of homes required through the Local Plan Review.
- 3.2.11 The full extent of this requirement will not be borne by the Local Plan Review alone as the GESP will be allocating for strategic development which will accommodate a proportion of this additional development.
- 3.2.12 The Greater Exeter Strategic Plan will set out the strategic distribution of this housing requirement across the four authorities in a way that will best achieve the Plan's vision and priorities. This distribution will be established through the GESP Draft Plan.
- 3.2.13 The GESP will accommodate a percentage of Teignbridge District's housing and employment growth through strategic allocations and establish a remaining figure for the Local Plan Review to accommodate. Some of the District's growth could be met elsewhere outside Teignbridge District.

[‡] As of 19th March 2018

Housing Delivery

- 3.3.1 The Housing White Paper, "Fixing our Broken Housing Market" initially set out that development is too slow coming forward with more than a third of planning permissions granted between 2010/11 and 2015/16 yet to be built and house building not keeping pace with projected household growth. The paper included a number of proposals to increase rates of delivery which have been brought forward through the draft National Planning Policy Framework. These include:
 - Opening the market to smaller builders through an increased supply of smaller, less strategic sites
 - Housing Infrastructure Fund to provide monies to unlock housing sites through the provision of infrastructure
 - Boosting Local Authority capacity through additional funding for planning resources
 - Supporting modern methods of construction
 - Assessing completion rates against a Housing Delivery Test

Housing Delivery Test

3.3.2 The Housing Delivery Test is included in the <u>draft National Planning Policy Framework.</u> It assesses the rate of delivery of new homes against the Local Plan housing target (where it is up to date). Where this test identifies under-delivery a tiered approach has been proposed to address the problem as follows:

Trigger	Response
Housing delivery below 25%	The presumption in favour of sustainable
by November 2018	development would apply
Housing delivery below 45%	
by November 2019	20% additional buffer applied to the 5 year housing
Housing delivery below 75%	land supply
from Nov 2020	

Figure 10: Housing Delivery Test Thresholds

- 3.3.3 Teignbridge currently has a 8.36 year supply of deliverable housing sites and delivered 686 dwellings in 2017. Housing delivery currently exceeds the Local Plan target of 620 dwellings per year.
- 3.3.4 In Teignbridge, housing delivery over the last three years has exceeded the Local Plan housing target of 620 dwellings per year and would therefore pass the Housing Delivery Test based on current requirements.
- 3.3.5 However as noted above objectively assessed need as prescribed through the new standard method would require the delivery of 756 dwellings per annum.
- 3.3.6 This exceeds the current delivery of the Local Plan and the Review will need to consider how to increase the housing delivery rate.

Smaller Site provision

- 3.3.7 Emerging national policy is seeking an accelerated delivery of housing with the promotion and allocation of smaller sites to provide additional opportunities for small to medium sized builders who do not have the capacity for larger strategic sites.
- 3.3.8 The Right Homes in the Right places paper identified 44,000 small builders in 2007 reduced to 18,000 in 2015, illustrating a significant opportunity to build capacity and diversify the range of small and medium sized companies building our homes.
- 3.3.9 These smaller sites play an important role in helping to meet local housing need and can deliver a range of social and economic benefits including:
 - Providing opportunities for small and medium sized companies;
 - Increasing build-out rates by increasing the numbers of companies able to undertake housebuilding;
 - Creating local jobs, and
 - Sustaining local growth, particularly in rural areas.
- 3.3.10 The <u>draft National Planning Policy Framework</u> includes a requirement for 20% of all allocated sites within a local plan to include sites of 0.5 hectares or less.
- 3.3.11 The current Local Plan's housing needs are primarily met through strategic allocations of 30 hectares or above with no residential allocations under the 0.5 hectare requirement.
- 3.3.12 Larger sites have the advantage of providing a master-planned, integrated development that comprehensively considers the needs of residents through supporting infrastructure, open space and connections to the existing built form.
- 3.3.13 The disadvantage is the time which is takes a scheme to be built out from its first allocation. Large strategic allocations also favour the large housebuilders which have the capacity and capital to undertake initial groundworks and environmental and transport studies.
- 3.3.14 The Greater Exeter Strategic Plan will also be allocating strategic level sites of 500 dwellings or more which meet some of the Local Plan Reviews additional housing requirement.
- 3.3.15 A predominance of large housing sites in the current Local Plan and those forthcoming in the GESP provides an opportunity to diversify the supply of housing sites to include a wider range of smaller sites suitable for housing and encourage increased delivery rates.

Question 2:

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?

Site size	Approximate Range of dwellings
Small Sites	1-10 dwellings
Medium Sites	10-200 dwellings
Large Sites	200-500 dwellings
Strategic Sites	500+ dwellings

Figure 11: Approximate site size and capacity

Brownfield Register

- 3.3.16 The Town and Country Planning (Brownfield Land Register) Regulations 2017 places a requirement on all Local Authorities to keep a register of all previously developed land that is suitable for housing. This is called the Brownfield Register. The Register aims to provide transparent information about suitable and available sites and encourage their redevelopment. It also enables sites to benefit from Permission in Principle where they form a Part 2 of the Register.
- 3.3.17 <u>The Register</u> identifies 33 sites within the District, amounting to nearly 53 hectares of land, which would be suitable for housing.

Of the 53 hectares:-

- Approximately 14 ha of land has planning permission for housing development, providing for 413 homes;
- Approximately 12 ha of land is allocated for residential development and would provide for about 394 homes;
- Approximately 25 ha has planning permission for employment development.
- 3.3.18 Given the limited supply of brownfield land for development and the likely increase in the number of homes that national government will require Teignbridge to provide for, it will not be possible to meet the housing needs of the District by developing brownfield land only. Greenfield land will need to be considered for development to meet the housing needs of the District up to 2040.

Modern Methods of Construction

- 3.3.19 Modern methods of construction include ready-made houses delivered from off-site, but also include pre-fabricated internal and external elements and panel/frame systems. These non-traditional forms of development have the potential to deliver housing at a significantly greater pace than traditional forms of construction.
- 3.3.20 In general, the large house builders will build around 50 dwellings per outlet, per year. This shows how, even with the largest of house-building companies, our standard methods of "bricks and mortar" construction are time consuming. The government's paper Planning for the Right Homes in the Right Places suggested that local authorities encourage modern methods of construction as a way to speeding up housing delivery. Such methods could include dwellings that are partly constructed off site, which reduces build time on site, innovative ways of providing pre-fabricated homes, or even forms of mobile home.

Question 3:

Do you think the Council should consider providing additional support for modern methods of construction as a way to speed up housing delivery?

Housing Distribution

- 3.4.1 Housing distribution is currently directed through the Local Plan in two primary ways:
 - 1. Allocation of housing sites in the Local Plan, in line with the strategy and established Settlement Hierarchy; and

2. Through the definition of settlement boundaries and planning policies that direct residential development to areas with the greatest concentration of development, services and transport links.

<u>Distribution in housing through allocations & the Settlement Hierarchy</u>

- 3.4.2 Local plan policy S4: Land for New Homes sets out the per year housing requirements and approximate distribution of allocations within the District. The adopted Local Plan did not direct housing allocations to smaller settlements defined by a settlement boundary and focused development towards the existing concentration of population, services, employment, housing and transport links in the District's urban area and towns.
- 3.4.3 The current settlement hierarchy and distribution of development is illustrated in Figure 12.

EXISTING LOCAL PLAN SETTLEMENT HIERARCHY AND DISTRIBUTION OF DEVELOPMENT

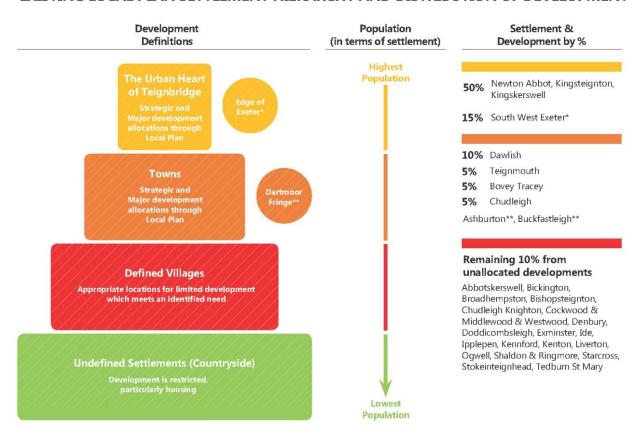


Figure 12: Existing Local Plan Settlement Hierarchy & Distribution of Development

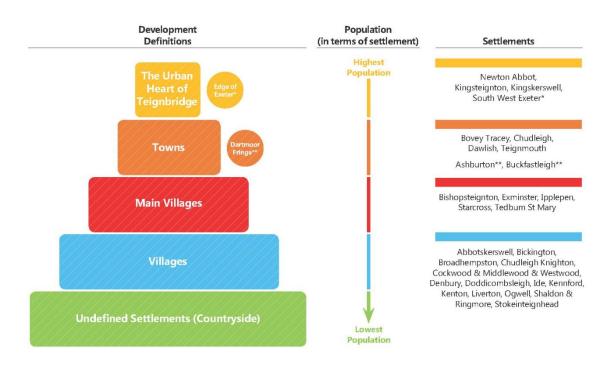
Question 4:

Do you think the current spatial strategy's distribution of housing should be maintained through the Local Plan Review?

3.4.4 The Settlement Hierarchy Paper that accompanies this document reviews the role and function of settlements across the District and proposes an alternative settlement hierarchy for the Local Plan Review to consider.

- 3.4.5 It found that the majority of smaller settlements defined by a settlement boundary still provided or had close access to a shop, public house, village hall and daily public transport services. It also highlighted very limited loss of services since 2011.
- 3.4.6 The assessment of existing defined settlements illustrates a number of villages providing a greater range and access to services and facilities and higher levels of connectivity and self-containment than other settlements in the same category including:
 - half hourly bus services to centres of retail and employment,
 - a rail connection,
 - good mobile and broadband connectivity,
 - a doctor's surgery and pharmacy
 - good access to the District's trunk road and primary route network such as the A379, A381, A38, A30 and A380.
- 3.4.7 The villages with these additional opportunities have the ability to serve most of the day to day needs of residents, are well connected by public transport and the road network enabling residents to have access to a range of retail and employment opportunities. They enable residents to visit their local doctor and receive the required medication within walking distance and provide for the day to day convenience needs of residents, such as milk and bread, without having to get into their car. In addition, with good mobile and broadband connectivity, these settlements provide residents with the option of working from home, thereby reducing private car journeys.
- 3.4.8 The paper recommends a revised settlement hierarchy to reflect the greater role and function of these settlements in the District compared to settlements with more restricted service provision.
- 3.4.9 The proposed revised hierarchy is illustrated through Figures 13 and 14.

PROPOSED LOCAL PLAN REVIEW SETTLEMENT HIERARCHY



Role and Function

The Urban Heart of Teignbridge Principal service centre for the District and home to the majority of the Districts population. A town of district-wide importance for retail, leisure, public administration employment and services, with excellent public and private transport links and superfast broadband access available to the majority of residents.

Towns

A key service centre which provides a good range of services, facilities and retail provision to meet the needs of residents and serves a wider catchment to surrounding villages and rural areas. Towns have good public transport links and are situated close to the District's primary roadways enabling good access to urban areas. They are home to a significant proportion of the District's population and have close access to employment opportunities.

Main Villages

Predominantly residential areas which provide a limited but reasonable range of services to the local community, including at least a school, doctor's surgery, public house, convenience store and village hall. They benefit from good broadband connectivity and are accessible via the District's primary routes, which combined with regular bus services, provide good access to larger towns and areas of employment.

Villages

Predominantly residential areas which provide a basic range of services to the local community including a place for the community to meet via a community hall, public house or place of worship. Villages are largely reliant on larger settlements for the majority of their needs but access can be more limited with a less regular bus service creating a reliance on the private car. Access to these settlements varies between rural roads and the District's primary routes.

Undefined Settlements (Countryside) A cluster of dwellings situated within the rural landscape with few to no services creating a near total reliance on larger nearby settlements to meet the needs of residents. These settlements serve a residential and agricultural purpose and most are accessible via rural roads only.

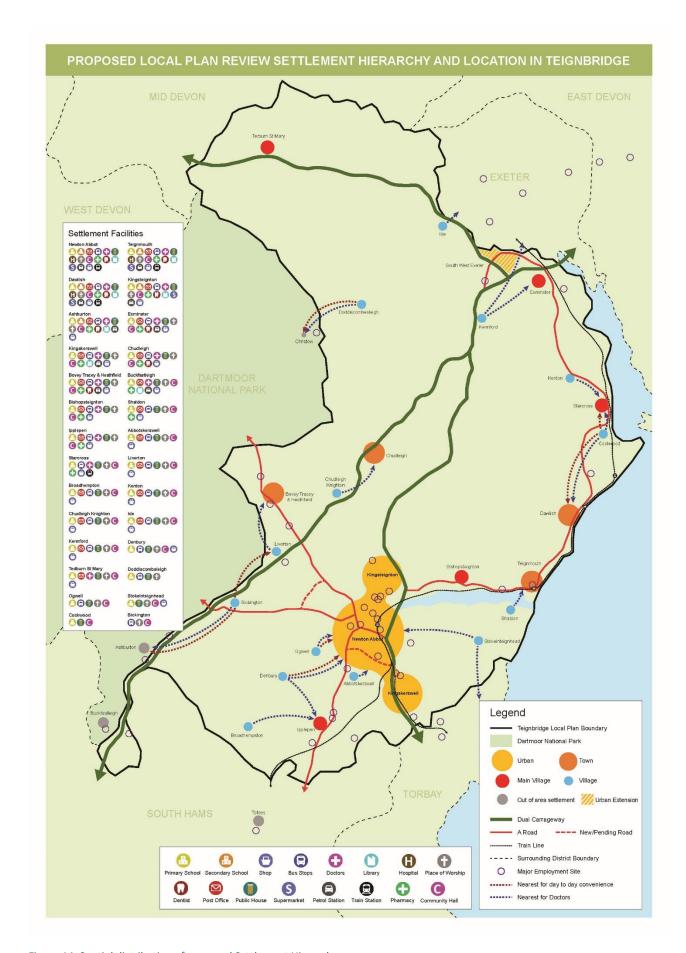


Figure 14: Spatial distribution of proposed Settlement Hierarchy

Question 5:

Should the Local Plan Review include a Main Villages category as an additional tier of the hierarchy?

Question 6:

Are there any settlements that you think should be added, removed, or moved into a different category?

Please indicate which settlements and give reasons.

- 3.4.10 The revised settlement hierarchy does not include proposals on how to distribute development in relation to their role and function. The overall numbers and distribution of housing within the District will be established through the Draft Plan version of the GESP. The next stage of the Local Plan Review will then set out where the remainder of this housing growth to be accommodated in relation to the settlement hierarchy.
- 3.4.11 There are a number of potential options to consider for the distribution of development which are addressed below:

A. Maintain current strategy of primarily allocating housing sites in Urban Areas and Towns

3.4.12 The District's urban areas and towns have been the focus of housing development within the adopted Local Plan, as set out in Policy S4. Development in these areas provides the greatest opportunity to access services, facilities, employment and retail without the need to drive and enables access to other areas, when needed, by public transport. However, due to the expansion of these areas over the last decade, some of the land on their edges is now becoming rather distant from the urban and town centres and require greater effort to be made to ensure sustainable links to facilities are provided.

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 suggested above

3.4.13 Some villages have the ability to serve most of the day to day needs of residents and are well connected by public transport and the road network, enabling residents to have access to a range of retail and employment opportunities. These villages have no allocated residential sites in the Local Plan but limited development is supported through policy S21. Some of these villages may have the capacity and ability to support additional residential development. Such development can have advantages of providing homes for local people, including affordable homes, in addition to providing supporting infrastructure. Development can increase the number of service users for existing businesses and facilities such as shops, schools and doctors. It should be noted however that the scope in the overall housing numbers which could be provided in these areas is likely to be limited and they are unlikely to be able to accommodate the full range of additional housing requirements.

C. Allocate some growth to all villages with a settlement boundary

3.4.14 Villages have settlement boundaries which reflect a concentration of built development, services and facilities. Settlements defined as villages in the revised settlement hierarchy

provide a basic range of services including a place for the community to meet as a minimum. The majority of these villages are primarily accessed via rural roads and have more limited accessibility by public transport. These villages have no allocated residential sites in the Local Plan but limited development is supported through policy S21. Like Main Villages new residential development can have advantages of providing homes for local people, including affordable homes, in addition to providing contributions towards infrastructure. Development can result in additional service users for existing businesses and facilities but additional development is unlikely to result in further service provision.

3.4.15 There are 19 villages with a current settlement boundary, a number of these are distributed around the district with poor public transport provision, rural road access and distant from the concentration of services and centres of employment. These limitations, alongside landscape, environmental and biodiversity considerations are likely to limit the scope of development suitable in these areas.

D. A new settlement

- 3.4.16 The Government's <u>Locally-led Garden Villages</u>, <u>Town and Cities</u> prospectus supports local areas who wish to create garden villages. To be eligible for the garden village support, the new settlement should be between 1500-10,000 homes. This provides an indication of the minimum level of residential development required to form a new settlement, however a development of 1500 homes would not be of sufficient scale for a secondary school for example.
- 3.4.17 The Greater Strategic Exeter Plan will be allocating for strategic level growth of 500+ dwellings but this does not prevent the Local Plan Review from also seeking to address its remaining requirement through a new settlement.
- 3.4.18 With an additional potential housing requirement of 6457 dwellings up to 2040 a new settlement, such as a garden village, could accommodate a large portion of the District's housing requirements in a way that is comprehensively planned from the start. A Development Framework Plan can guide the design and configuration of development, ensure adequate infrastructure provision, incorporate cycleways and paths into existing networks and ensure the provision of open space and recreational facilities that improve the lives of residents.
- 3.4.19 Such propositions can take some time from conception to delivery and even longer until completion and this is likely to have a detrimental impact of the District's housing delivery. A new settlement would also stand in addition to existing large scale and strategic allocations still to come forward in the Local Plan. A new settlement is unlikely to assist in promoting smaller builders through the provision of smaller sites.

Question 7:

Which of the above options or combination of options would best address meeting the District's additional housing requirement of up to or around 6457 dwellings?

Please give reasons

3.4.20 The response to these options will inform the distribution of emerging residential requirements alongside a number of additional factors including:

- Availability and suitability of sites
- Landscape Character considerations
- Safeguarding historic and environmental assets
- Infrastructure capacities
- Availability of and proximity to services, facilities, centres of retail and employment
- Relative size of settlement
- Distribution of existing affordable housing need.
- 3.4.21 The housing distribution and any revisions to the settlement hierarchy will be set out in the next stage of the Local Plan Review.

Housing Distribution through Settlement Boundaries and planning policy

- 3.4.22 The location of housing is both allocated for in the Local Plan but also directed through the definition of settlement boundaries along with policies S21, S21a and S22 which restrict residential development in the countryside.
- 3.4.23 A settlement boundary is also known as a 'village envelope', 'settlement limit', 'development boundary' or 'built up area boundary' but these terms all hold the same meaning in planning terms.
- 3.4.24 A settlement boundary is a line on a plan which provides the divide or boundary between built up areas of towns and particular villages and the countryside beyound. It defines the areas where Local Plan policies S21: Villages, S21a: Settlement Limits, and S22 Countryside apply. These policies define the principle that residential development within a settlement boundary, where it complies with other policy requirements, is usually acceptable. Whereas similar development is strictly controlled outside the boundary.
- 3.4.25 They were last comprehensively reviewed over 20 years ago through the preparation of the 1996 Local Plan. The currently adopted Local Plan revised existing boundaries primarily to incorporate allocated sites.
- 3.4.26 Over the last 20 years our urban areas, towns and villages have experienced various incremental changes to physical features on the ground which form an integral part of a settlement but are not included in the boundary. Advancements in technology, such as aerial mapping and photography and ordnance survey base maps, have also improved the ability to determine the extent and limits of settlements.
- 3.4.27 The Local Plan Review provides the opportunity to both update existing boundaries but also to discuss alternative approaches to directing unallocated development.

Maintaining and reviewing existing settlement boundaries

- 3.4.28 The Settlement Boundary Review paper that accompanies this document has presented a set of principles upon which to base a comprehensive review of all existing settlements' boundaries.
- 3.4.29 The paper details these principles and subsequent amendments to the boundaries of our urban area, towns and villages. These principles are briefly listed below:

Primary Principle- The Settlement Boundary will be:

1. Tightly defined around the built form of settlements

Principle 2- The Settlement boundary will include:

- a) Existing commitments, i.e. unimplemented but active planning permissions, implemented permissions and GESP, Local Plan and Neighbourhood Plan residential and employment allocations where they form a continuous part of the built form of the settlement.
- **b)** The curtilage of buildings which closely relate to the character of the built form and have enclosing features.
- **c)** Brownfield land which stands on the edge of the built form but is not physically or visually detached from the settlement.
- d) Permanent Park Home sites which stand adjacent to existing settlement boundary.

Principle 3- The Settlement boundary will exclude:

- **a)** Open spaces, orchards and sports and recreational facilities which stand on the edge of the built form of settlements.
- **b)** Isolated development which is physically or visually detached from the settlement.
- **c)** Sections of large curtilages of buildings which relate more to the character of the countryside than the built form.
- **d)** Agricultural farmsteads and or buildings which stand on the edge of the built form of settlements
- **e)** Where an extension could lead to development which has a potential to adversely affect the character and/or setting of a Conservation Area
- f) Caravan sites which serve a primarily temporary and/or holiday purpose
- 3.4.30 The Settlement Boundary Review paper is currently in draft form and subject to amendment as a result of this consultation. Readers are invited to review amendments to their settlement boundary and suggest changes to the principles or inaccuracies in the application of the above.

Question 8:

Please provide comment on the principles applied to the Draft Settlement Boundary Review

Question 9:

Please provide comment on any inaccuracies in the application of the above principles to revised settlements boundaries identified in the Settlement Boundary Review Paper.

Comments should include a proposed amendments reference number, street name or nearest/most relevant property to enable further assessment of the boundary.

Question 10:

Do you have any general comment on the Draft Settlement Boundary Review Paper?

Alternative approaches to settlement boundaries

- 3.4.31 The identification of settlement boundaries to direct development is the current approach within the Teignbridge Local Plan. It establishes the principle that residential development is acceptable inside and restricted outside. This approach is only one which could be considered when directing development to the most appropriate locations.
- 3.4.32 Alternative approaches to settlement boundaries could include:

A. Enabling sustainable development adjacent to settlement boundaries

3.4.33 The draft National Planning Policy Framework states Plans should identify opportunities for villages to grow and thrive especially where this would support local services. The principle of residential development on the edge of settlement boundaries is currently not permissible through Local Plan policies S21, S21a and S22. There are exceptions to this including for affordable housing to meet a local need. This also applies to our urban areas and towns where windfall development which stands directly adjacent to a sustainable settlement could provide benefits including market housing with a proportion of affordable homes, provide infrastructure contributions and additional open space provision. This approach would require a policy that establishes where and under what circumstances residential development would be found acceptable. Such an approach could inflate land prices on settlement edges and make the delivery of rural exceptions sites for affordable housing a more difficult proposition

B. Removing settlement boundaries and replacing them with a criteria based policy

- 3.4.34 It would be possible to construct a planning policy through the Local Plan Review which sets out the specific planning criteria to be used for assessing the suitability of a site for a particular kind of development.
 - For example, decisions would be made in the context of the known current needs in Teignbridge for each type of development proposed and referring to other planning considerations, such as flood risk, environmental constraints etc.
- 3.4.35 The advantage of this approach is that it would increase flexibility in deciding where development could come forward. However, the disadvantage would be lack of clarity and certainty for the public and developers about where development can occur. It would also be difficult for the Council to be precise about how it intends to meet its housing target.

Question 11:

Should the Local Plan Review consider one of the above alternative approaches to settlement boundaries?.

if so, please state which option and give reasons.

Affordable Housing

- 3.5.1 Teignbridge faces the challenge of high house prices, but relatively low wages with the average price of property in 2016, 9.34 times the average wage¹.
- 3.5.2 The Local Plan has sought to secure as much affordable housing as possible for local people, whilst acknowledging development has to be viable.
- 3.5.3 The current Local Plan has secured an average 167 affordable units being built each year with a total of 668 affordable homes built since 2014². This is a third more than the annual target of 124 and amounts to approximately 25% of all development.
- 3.5.4 However the overall affordable housing need amounted to 40% of overall housing requirements but development uplift would not allow for the delivery of such a high proportion.
- 3.5.5 Affordable housing is currently delivered through two central mechanisms of the Local Plan; WE2: Affordable Housing Site Targets through a proportion of allocated development and WE5 via Rural Exception Sites.

WE2: Affordable Housing Site Targets

3.5.6 Local Plan policy WE2 provides the affordable housing percentage site requirements which developers are expected to meet.

Percentage of dwellings to be provided as affordable in the Local Plan	Location
20%	Newton Abbot & Kingsteignton (within settlement boundaries)
25%	Dawlish, Teignmouth & South West Exeter Urban Extension (within settlement boundaries)
30%	any other location

Figure 15:Affordable Housing Site Requirements

WE5- Rural Exceptions

- 3.5.7 Local Plan policy WE5 provides support for affordable housing in rural areas. It permits development on sites adjoining rural settlements, where residential development is usually restricted, for the purposes of meeting an identified local affordable housing need. The policy enables an element of market housing to subsidise the delivery of the affordable dwellings but also places a limit of £10,000 per plot or £300,000 per hectare to be paid by a registered housing provider. The current policy also requires schemes to remain as affordable in perpetuity and applies to rural settlements only.
- 3.5.8 Over the Plan period, one rural exception site has been built with another two gaining planning permission. The completed development was progressed by Broadhempston Community Land Trust, which has developed a site of 6 self-build dwellings on the edge of the village to meet local needs.

- 3.5.9 The draft National Planning Policy Framework includes a number of significant changes to affordable housing, including those affecting how much affordable housing can be provided, where it should be located, the mix which can be delivered and the balance of viability.
- 3.5.10 These changes are summarised below including potential implications on existing Local Plan Policy:

Revised definitions of affordable housing

- Annex 2 of the draft National Planning Policy Framework sets out the definition of affordable housing and includes a greater range of products than the definition included within current national policy. These revised definitions include Starter Homes which are homes for sale at a discounted value (likely to be 80% of market value) and Rent to Buy properties which require below local market rents to enable tenants to save for a deposit with a view to purchasing the property. However, these properties can be sold at open market values after a period of time, thus reducing the affordable housing stock and preventing the requirement for them to remain affordable in perpetuity as required through Local Plan policy WE5.
- These additional affordable housing types are considered to provide better returns to a developer than standard affordable housing and their inclusion is likely to improve the viability of exception sites. Plot value limitations and viability generally will need to be re-examined in light of the new affordable housing types such as Starter Homes and Rent to Buy. In addition the percentage of on-site affordable housing requirements may also require revising in light on a changing mix and viability of affordable housing.

A requirement for 10% of homes on major sites to be available for affordable home ownership

3.5.13 These properties will form part of the overall affordable housing contribution from a site and comprise starter homes, rent to buy, discounted market sale, shared ownership and other low cost homes for sale and rent. Currently the Council seek a 70% rented vs 30% ownership split in the mix of affordable housing types. This new requirement will have the effect of limiting this split to 50% ownership vs 50% rented, resulting in a reduction in the amount of affordable rented homes that we will be able to ask for. Those in a position of nearly being able to afford to purchase a property on the open market will benefit from this proposal, however, it is unlikely to help the most disadvantaged within the housing market who can only afford to rent. This prescription in the percentage of home ownership products may change how much affordable housing can be viably delivered through development and the requirements set out in Local Plan policy WE2 may no longer be set at appropriate levels.

Support for an entry-level homes exception site policy

3.5.14 These sites should consist of a high proportion of homes suitable for first time buyers or those wishing to rent their first home. These sites should be next to existing settlements, not allocated in the Plan and be proportionate to their size whilst maintaining protections and complying to design policies. These suitable locations are likely to stand in direct competition with those required for Rural Exception sites. This introduces a new type of exception site which applies to all settlements and not just rural settlements as currently prescribed in Local Plan Policy WE5. Emerging national policy requires a demonstration that a Districts need for entry level homes is not being met. It compares to current policy WE5 that requires demonstration of a local need which is initially based at a parish level.

20% of Local Plan allocations to be under 0.5hectare

- 3.5.15 The <u>draft National Planning Policy Framework</u> includes a requirement for 20% of all allocated sites within a local plan to include sites of 0.5 hectares or less. This size of site would accommodate approximately 10-15 dwellings which is a usual site size for exception sites and introduces an additional element of site competition. The allocation of these sites within existing settlement boundaries would already benefit from an acceptable principle for all residential development including market and affordable. However such sites are likely to be developed for market housing with a proportion of affordable dwellings, as opposed to affordable-led due to higher developer returns.
- 3.5.16 Changes will also need to include a revision to national guidance in relation to vacant buildings. The Council have produced a Technical Advice Note, <u>Vacant Building Credit Advice Note</u>³. This explains how a financial credit equivalent to the gross floorspace of the vacant building will be offered when calculating affordable housing contributions or requirements. ⁴
- 3.5.17 An increased population and additional housing requirements, alongside an expanded definition of affordable housing, rising house prices and increasing concerns over housing affordability and changing viability will require a wholesale revision of Local Plan policies WE2:Affordable Housing Site Targets and WE5:Rural Exception Sites
- 3.5.18 These revisions will be explored in the context of the evidence on the overall affordable housing need of the wider Greater Exeter Plan area, and Teignbridge District, the required mix in type and tenure of housing supplied by the Greater Exeter Strategic Housing Market Assessment and balanced against a Whole Plan Viability Assessment. The specific needs of the District may require further refinement from the Greater Exeter study through a district-specific Strategic Housing Market Assessment.

Mix of Housing

3.6.1 A range of housing is needed during a person's life, including starter homes, family accommodation, smaller homes to enable downsizing and step free accommodation. This range of housing needs to be provided on the open market and as affordable housing. It

is important to make sure there are opportunities for first time buyers to get on the property ladder, but it is also important, as housing needs change over time, that people are able to remain in the area in suitable housing, which meets their changing needs. The draft National Planning Policy Framework seeks policies to identify the size, type and tenure of homes required for different groups in the community. This mix of housing includes:

A range of suitable housing in appropriate locations to meet the specific needs of older and retired people;

By 2039 almost 1 in 3 of Teignbridge's population will be over 65 years old and 1 in 8 will be 80 years old or over. Teignbridge has a higher than average proportion of older people and with it comes increased demand for suitable housing to meet their needs. The needs of this group vary markedly. However, older people will need to be able to access facilities (particularly healthcare), services and social networks, to engage with their community, to be able to access public transport and feel safe and included. Unsuitable housing for older people can result in social isolation and, can significantly impact an older person's physical and mental health and their ability to remain independent and well connected to family, friends and the local community.

A need for homes for families with children;

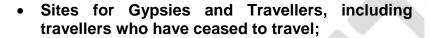
Within Teignbridge, 25.1% of all households are families with dependent children and given the districts older demographic, there will be a greater reliance on the working age population, including couples or single people with children.⁶ Families with children generally require larger houses with outdoor space and close access to services and facilities, particularly schools.

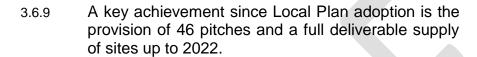
Housing for the under 35s

- Whilst the percentage of Teignbridge's population which are aged between 20 and 34 will decrease by 8% between 2017 and 2040, this group makes up nearly a fifth of our population. Over the 20 years up to 2017, there was a 30% increase in the number of people aged 20 34 who were living with their parents. High house prices and low wages in the District can make owning a home for this age group difficult with an increased reliance on rented accommodation to meet their needs.
- This situation is worsened by national government welfare reforms in 2016, which changed the type of property that under 35s could receive housing benefit for. If you are single and under 35, you can only receive housing benefit for bed-sit accommodation or a single room in shared accommodation. This creates increased demand for types of shared accommodation or micro-flat type properties.
- Investigation into the needs of under 35s will be undertaken as part of a Strategic Housing Market Assessment, and, we will need to consider how best to ensure that the Local Plan Review helps to deliver suitable accommodation to single people under 35.
 - Adaptable homes and homes to meet a specialised need;

- Providing more housing that is accessible and adaptable, including for wheelchair users enables people to stay in their own homes when they suffer an illness, long term life limiting condition or just become less mobile with age.
- In 2011, 20.6% of the population of Teignbridge had their day-to-day activities limited a little or a lot by disability, this compares with national average of 17.6%. This reflects the older population of Teignbridge, which will only increase over the next 20 years.

Further information on adaptable homes is explored below.







- 3.6.10 Local Plan policy sets out a requirement for 70 gypsy and traveller pitches up to 2033 based upon the <u>Devon Partnership Gypsy and Traveller Accommodation Assessment 2015</u> ¹⁰ which extends up to 2035. An extension of the plan period is likely to generate an increased pitch requirement to maintain an adequate supply and meet the needs of this section of the community up to 2040. This additional requirement including a potential need for transit/emergency sites will be identified through the Local Plan Review or alternatively through the Greater Exeter Strategic Plan.
- 3.6.11 There are two principal ways in which the Local Plan can seek to address the range and mix of housing required to meet the changing needs of our residents as identified above:
 - 1. Through specific allocations for different types of housing

A. Through stand alone allocations:

This approach could allocate specific sites for particular types of housing. This would have the advantage of utilising sites for the most appropriate types of housing, such as homes for older people with close access to health services and community facilities. Large scale development of single type housing would not encourage the creation of mixed communities and such a restriction may reduce the likelihood of the site being developed.

B. Through specific allocations within larger residential and mixed use schemes for specific types of housing:

This could allocate smaller areas within a large development for particular types of housing. It could allocate family sized homes close to schools, community facilities or areas of open space and recreation or, could utilise the most level areas within a site for housing for older people or people with a disability. If specific types of housing

were delivered as part of a larger scheme, it would increase the likelihood of their delivery.

2. Through planning policy which seeks a mix of housing to meet identified needs either:

A. through requiring a general mix as prescribed through Local Plan policy:

Adopting a flexible approach would enable developers to react to the market as they see fit, which may encourage development to come forward. However, it would not provide for any guarantee of the delivery of different housing to meet the needs of different groups within our community. There is little indication that this current approach is effectively providing the right mix of housing to meet the District's needs.

B. Via a percentage requirement for developers to meet:

- This approach would set out a specific district-wide split of housing types. For example, it may set a split of 20% first time homes, 25% family homes, 30% homes for older people, 20% adaptable homes, 5% custom and self-build plots for every development site of at least 20 dwellings. This would guarantee a mix of development and the creation of mixed communities, but could reduce the development of housing due to such a fixed requirement.
- 3.6.16 Further work will be required to ascertain the mix of type and tenure of housing required to meet the needs of the District up to 2040 through the GESP area-wide Strategic Housing Market Assessment.

Question 12:

Which of the above options or combination of options would best address meeting an appropriate mix in the Districts additional housing requirement?

Please give reasons

Adaptable Homes and homes to meet a specialised need

- 3.6.17 In addition to the above potential options which seek to address a good mix of uses to meet the current and future needs of residents, there is also the potential to set out minimum standards for adaptable homes and homes to meet a specialised need.
- 3.6.18 Sometimes people need extra help to stay in their own homes when they suffer an illness, long term, life limiting condition or just become less mobile with age. Simple adaptations to properties can enable people to live independently and to remain in their home over time. However, not all properties can be adapted, either due to lack of internal space or external steps.
- 3.6.19 The Building Regulations 2010 set out minimum standards that new buildings must meet. They cover all aspects of construction, including foundations, damp-proofing, the overall stability of the building, insulation, ventilation, heating and, fire protection and means of escape in case of fire. They also ensure that adequate facilities for people with disabilities are provided in certain types of building under Part M of the Regulations.
- 3.6.20 Part M of the Regulations ¹¹ sets out 3 categories of dwellings:

Category 1 – visitable dwellings,

Category 2 - accessible and adaptable dwellings, and

Category 3 - wheelchair user dwellings.

- 3.6.21 All new dwellings must meet the requirements set out in Category 1, visitable dwellings. However, the requirements set out in Categories 2 and 3 are optional.
- 3.6.22 National Planning Guidance allows local planning authorities to set out evidence to demonstrate the need for accessible and adaptable dwellings, and/or wheelchair user dwellings and to clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. If such proportions were to be set, the nature of the topography of sites would need to be considered, as sloping sites may not be suitable, particularly for wheelchair accessible dwellings. Account would also need to be taken of the overall impact on viability of development.
- 3.6.23 Given the older demographic within Teignbridge, it is likely that evidence could be gathered to support a policy for a certain proportion of all development on suitable sites to be designed to be accessible and adaptable. The Strategic Housing Market Assessment will provide information on this, along with the requirement for dwellings for wheelchair users.

Question 13:

What impacts should the Local Plan Review consider in the application of the optional standards for adaptable homes in planning policy?

Quality of Housing



- 3.7.1 Quality housing encompasses both buildings and the spaces around them and, creates neighbourhoods that are safe, attractive, and easily accessible. Quality new development can create cohesive communities and help to improve social wellbeing and health.
- 3.7.2 The draft National Planning Policy Framework seeks plans to set out a clear design vision and expectations to provide as much certainty as possible about what is likely to be acceptable.
- 3.7.3 Chapter 12 of the draft National Planning Policy Framework sets out how the government considers good design to be a key aspect of sustainable development and suggests the use of design codes by local authorities to deliver high quality developments. It acknowledges how good design goes beyond simply the appearance of buildings, but should consider connections between people and places and integration into the natural, built and historic environment.
- 3.7.4 Policy S2: Quality Development of the adopted Local Plan ensures that new development is of high quality design that responds to the characteristics of the site and its surroundings, creating a place with a distinctive character. It sets out a list of

objectives against which quality development will be assessed. The text accompanying the policy suggests the use of "<u>Building for Life</u>" ¹² to assess the quality of development. Since the Local Plan was adopted, scores for Teignbridge's development have increased from 81.9% in 2013/2014 to 88.9% in 2016/2017 (<u>Annual Monitoring Report 2016/2017</u>). ¹³

- In addition, the <u>Post Occupancy Survey</u> ¹⁴ of 2017 demonstrates 82.2% of respondents reporting being satisfied or very satisfied with recent development. This is the fourth year in a row of modest improvement. The highest levels of satisfaction were in relation to residents' homes including the home overall, internal space, private garden and allocated parking. As in previous years the greatest dissatisfaction was with general parking, local shops, community facilities and open space/play space.
- 3.7.6 The Council is committed to furthering the standard of design in developments and seeks to emphasise its corporate aim for development to create well designed, quality neighbourhoods. It has demonstrated this through the recent publication of the draft Supplementary Planning Guidance on design, the Design Guide¹⁵, for public consultation. This sets out what the Council considers to be good principles of design and reference to it will be made in the Local Plan Review to ensure these developments apply these high quality design principles.
- 3.7.7 The development of a Design Guide is just one way in which we can establish our expectations on what we consider to be high quality design and the standards we expect to be achieved. Another two options are the application of national described space standards or utilising the Building for Life assessment tool.

Question 14:

Can you suggest improvements to the Local Plan Design policies?

Nationally Described Space Standards

- In March 2015 the Government published <u>Technical housing standards- national described space standard</u>, which was later updated in May 2016. This standard sets out internal space requirements for new dwellings including standards for room widths, heights and adequate storage provision. These standards are compared with a large sample of the average internal floor area of both market and affordable housing completed since the adoption of the Local Plan in May 2014, referenced in appendix 2. National standards include minimum space requirements for the level of occupation i.e. a 1 bed property with 2 people requires more space than if there were only one occupant. The Teignbridge comparison only includes the average internal floor area.
- 3.7.9 <u>National Planning Guidance</u> sets out these standards are optional and would only apply to developments once set out within a Local Plan. Evidence is required to determine and justify whether there is a need for additional standards. However, if these standards were included within the Local Plan Review they would stand as a requirement for developers to meet for new residential applications.

Minimum national described standard in Sq.m	Size in Sq.m (minimum range)
1 Bed	39-58
2 Bed	61-79
3 Bed	74-108
4 Bed	90- 130
5 Bed	103-134

Affordable Homes in Teignbridge	Average size in Sq.m	Market Homes in Teignbridge	Average size in Sq.m
1 Bed	70	1 Bed	65
2 Bed	73	2 Bed	74
3 Bed	84	3 Bed	100
4 Bed	113	4 Bed	138
>4 Bed	none	>4 Bed	190

Figure 16: Range of National Described Space standards comparison with average space standards for completed dwellings in Teignbridge

Above upper range
Within range

- 3.7.10 Figure 16 compares the average internal floor area of completed dwellings within the Teignbridge sample with the range in the national decribed space standard. This initial assessment identifies recently completed dwellings, on average, all stand within the range within the minimum national space standard and no property type fails to meet the lower requirement in the range.
- 3.7.11 Smaller units can provide the opportunity for small market housing which is more affordable on the open market for those currently priced out of homeownership, such as single people. The current approach provides greater flexibility in the overall layout, design and siting of development than may be the case with fixed standards.
- 3.7.12 However there are potential concerns with the application of a rigid minimum space standard to all residential developments in terms of viability and the level of housing provision.
- 3.7.13 The requirements go beyond the current internal floor area measurements undertaken as part of the calculation of the Community Infrastructure Levy. Therefore additional staff time and resourcing may be required to ensure that each room of each dwelling submitted is measured and assessed against the standards.
- 3.7.14 By defining a minimum space requirement this has the potential to result in a race to the bottom, with developers submitting schemes at a minimum standard and not beyond; whereas previously they may have submitted larger dwellings. The reverse could also be a potential consequence, where space standards are increased above existing levels which impacts on the number of homes that can be delivered on a site and adversely impact on viability. If space standards are to be pursued through the Local Plan Review then a viability assessment on its impacts will be required.

Building for Life

3.7.15 "Building for Life 12" (BfL12) is a government endorsed industry standard for well-designed homes and neighbourhoods. It updated the previous "Building for Life" in accordance with the publication of the current National Planning Policy Framework in

- 2012, to reflect the government's commitment to build more homes and to build better homes. It has regard to the building itself, but also to the spaces around buildings. The draft National Planning Policy Framework also identifies Building for Life as an appropriate tool to assessing and improving the design of development.
- 3.7.16 BfL12 sets out 12 urban design criteria based on integration into the neighbourhood, creating a place and, street and home.

Integrating into the Neighbourhood	Creating a Place	Street & Home
1. Connections	5. Character	9. Streets for all
2. Facilities & Services	6. Working with the site and its context	10. Car Parking
3. Public Transport	7. Creating well defined streets and spaces	11. Public and private spaces
4. Meeting local housing requirements	8. Easy to find your way around	12. External storage and amenity space

Figure 17: Building for Life Criteria

- 3.7.17 The text accompanying Local Plan Policy S2 suggests the use of "<u>Building for Life</u>" to assess the quality of development, with schemes expected to score well against it. It is not an explicit policy requirement.
- 3.7.18 As previously noted scores for Teignbridge's development have increased from 81.9% in 2013/2014 to 88.9% in 2016/2017 (Annual Monitoring Report 2016/2017).
- 3.7.19 There is potential to further integrate the Building for Life requirements into planning policy however developments coming forward are already scoring highly.

Question 15:

How can the Local Plan Review best ensure high standards of design and quality of new development?

Custom & Self-Build Housing

- There is a growing number 3.8.1 of people who are interested in solving their housing needs head on through custom and selfbuild housing. These may be individual people who wish to build their own arrange home or someone else to build a designed bespoke property, or they may be part of a group of people within a community who have come together to deliver affordable housing to meet their local needs.
- 3.8.2 Custom and Self Build has a number of benefits which are illustrated in Figure 18
- Supports smaller buildings firms

 Can foster innovation and raise the standard of design

 More floorspace for your money

 Average self-builder occupying their home for 26 years compared to 6 years for a standard market home

 Can foster innovation and raise the standard of design

 Provides a diversity and choice of house types
 - Figure 18: Benefits of Custom & Self Build
- Districts housing supply whilst ensuring a higher quality of design and flexibility of layout to meet individual needs.

but can also make an important contribution to the

- 3.8.3 There are currently 113 custom build plots with planning permission, situated throughout the District. With the exception of a single plot, these have been delivered through large sites allocated for development in the Adopted Plan. A further 357 plots are anticipated to come forward through large sites between 2017 and 2033.
- 3.8.4 There are 267 names on the Council's <u>Custom and Self Build Register</u>. ¹⁷ This is a high level of interest compared to other councils. This can be attributed to the fact that Teignbridge is a "vanguard" authority with the introduction of a 5% custom build requirement on all new developments over 20 dwellings.
- 3.8.5 Whilst the number of plots coming forward would meet the existing demand on the Register, there is increasing awareness of this opportunity and the demand is anticipated to increase.
- 3.8.6 <u>An Ipsos MORI survey ¹⁸</u> identified that 1 in 8 Britons now expect to research or plan to build a home for themselves in the next 12 months.
- 3.8.7 The Greater Exeter Strategic Plan includes evidence to explore Custom and Self Build demand within the wider-plan area and this will inform the District's custom and self-build plot requirements.
- 3.8.8 The Local Plan Review provides the opportunity to investigate whether there is potential to further increase the supply of custom and self-build plots to meet a growing demand and enable a greater variety of housing choice.

3.8.9 This can primarily be delivered by the Local Plan through three potential options:

1. Increase the % requirement of Local Plan Policy WE7

Local Plan policy WE7 or the 'Teignbridge Rule' currently requires 5% of dwelling plots on sites of over 20 dwellings to be for sale to custom builders. This policy is considered to have been largely successful with little to no resistance from the development industry and 113 plots granted planning permission so far. It has enabled a supply of custom build plots into the local housing market which wouldn't have existed otherwise and has added to the diversity and range of housing options. This approach concentrates custom and self-build to areas of existing residential development where they can benefit from additional open space, improved infrastructure and service access as a result of the wider development. An increase in this 5% requirement would deliver additional plots but this restricts the choice in location of custom and self-builders to large housing sites.

2. Custom and Self-Build Exception Sites

Affordable housing is currently permitted next to the settlement boundary through a rural exception site, where it meets an identified need. These sites can include affordable custom and self-build dwellings. Such a policy could be extended to provide for market custom and self-build housing which meet a local need and could extend to those with a local connection. It would direct developments to the more sustainable locations of the district identified by a settlement boundary and provide opportunities for local people to build their own home in their local area. This type of approach would however directly compete for available edge of settlement land, potentially increasing land values and reducing landowner's willingness to develop their sites for affordable housing which is likely to provide lower returns.

3. Permitting Custom & Self Build infill development in the rural area

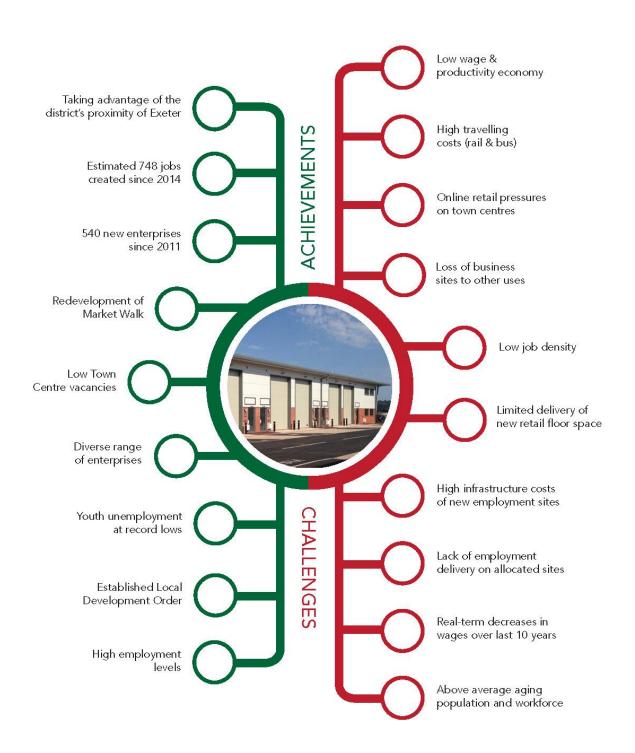
- 3.8.12 To enable greater flexibility in the location of Custom and Self Build housing plots which come forward in areas outside of settlement boundaries, could be approved where it would serve as infill between two existing dwellings. Such an approach would be accompanied by a number of restrictions to ensure potential impacts such as intrusion into the countryside are avoided and benefits such as providing choice for local people to build their own home could be maximised. It should be noted that such development would introduce new dwellings in areas largely only accessible via rural roads, have poor access to public transport and are usually more distant from services and centres of employment and retail.
- There is potential for this option to only be applicable to those demonstrating a local connection. This provides the benefit of avoiding speculative developers, improves choice for local people whilst freeing up the properties those building their own home will vacate. It can also have the advantage of increasing the volume of business for smaller builders and bolster the local supply chain.

Question 16:

Which of the above options or combination of options would best meet the growing demand for Custom and Self Build plots?



JOBS & PROSPERITY



Jobs & Prosperity

Employment

INVESTING IN PROSPERITY



- 4.1 Over recent years much emphasis has been placed on a growth agenda at government level, the most recent of which has been the <u>UK Industrial Strategy White Paper</u>. 19 Key policies have been put forward to address the long tail of lower productivity firms and agree local industrial strategies that build on local strengths and deliver on economic opportunities.
- 4.2 Locally, Teignbridge has a higher rate of gross value added (GVA) per head (£18,583 at 2016)²⁰ compared to neighbouring areas (apart from Exeter) but remains well below the national average of £27,108. In sectoral terms, the highest GVA for Teignbridge is recorded for manufacturing and construction.
- 4.3 The Teignbridge economy in terms of enterprises is relatively diverse with the 'agriculture, forestry & fishing' and 'professional, scientific & technical' sectors taking particular prominence.
- Importantly, the number of enterprises in Teignbridge has been consistently growing since the low in 2011 of less than 5000 enterprises to 5540 in 2016.²¹
- 4.5 88% of these are micro enterprises (0-9 employees) counting for 4895 enterprises. Only 10 can be taken as large enterprises (of 250+ employees) at the other end of the spectrum. There are a number of common requirements to help local micro-businesses better able to grow, these include an adequate supply of small workspace, usually up to about 150 square metres at a reasonable rental cost, strong broadband connectivity and market proximity.
- 4.6 Whilst unemployment levels are low at 3.9%²², this can create a shortage of workers and skills needed for businesses to expand. The existing industry we do have in Teignbridge is generally dominated by low value, low productivity jobs. The average wage for Teignbridge residents is higher than the average wage for those working in the district, one implication is that many Teignbridge residents are commuting outside the district for better paid jobs.
- 4.7 70% of jobs will be in sectors of the economy that fall outside the traditional employment land categories, such as retail, leisure and tourism or through existing firms taking on staff, working from home and through the re-use or intensification of existing buildings.²³ There is every prospect that the trend will continue during the Local Plan Review period up to 2040.
- 4.8 The current Local Plan has sought to address this through policies covering the local economy and range from the strategic position of setting out land supply for business, general industry and storage/distribution, through to specific sector requirements of

tourist accommodation and attractions that reflect the position of the district in an established holiday area of the south-west region.

Employment Space Delivery & Distribution

- 4.9 The Greater Exeter Strategic Plan will focus on the allocation and delivery of strategic employment sites which best suit the needs and priorities of the plan's vision and aims. These sites will stand in addition to existing employment allocations in the Local Plan and any further employment requirements up to 2040.
- 4.10 The Greater Exeter Economic Needs Assessment²⁴ will establish the wider employment space requirements in the GESP area and appropriate distribution at District level. This will provide the evidence for updated employment requirements.
- 4.11 Local Plan policy S3: Land for business, general industry and storage and distribution, establishes the current district requirement for B1, B2 and B8 employment provision up to 2033. It sets out a requirement to allocate sufficient land for about 3 hectares of business, industrial and warehousing sites per year with a total requirement to allocate for 75.7 hectares.
- 4.12 It seeks to create about 300 jobs per year in these sectors and ensure a continual deliverable supply of employment land of 15 hectares per year as part of a five year rolling supply.
- 4.13 This policy also sets out the approximate distribution of such development around the district as follows:

Focus for Employment development	Distribution targets in local plan
Heart of Teignbridge (Newton Abbot, Kingskerswell & Kingsteignton)	60% +
South West Exeter	5%
Dawlish	3%
Bovey Tracey	3%
Chudleigh	3%

Figure 19: Employment Development Local Plan Distribution

- 4.14 The plan does not make specific proposals for employment development in defined villages or countryside but does include supportive and permissive policies for appropriate employment provision in rural areas which is brought forward by the market.
- 4.15 An assessment of the success of this policy is however judged to be slow from April 2013. The Local Plan allocated fourteen employment sites with their progress noted below:

Sites	Progress
5 Allocated sites- 4.1ha	Outline permission
2 Allocated sites- 13 ha	Full planning permission
2 Allocated sites- 2 ha	Pending Outline determination
5 Allocated sites- 20.9ha	No interest so far

A further employment site which adjoins the Peamore allocation (SWE2) at West Exe Park for about 15ha now has outline permission for B1, B2 & B8 uses to provide 47,000 sq m gross floor space.

Between 2013-2018 there has been no development for employment purposes on allocated sites in the Local Plan.

Figure 20: Progress of Local Plan Employment Allocations

- 4.16 Therefore, no land has been developed for employment purposes on the site allocations. It should be noted that the Local Plan is currently only 4 years old and employment space can take longer from allocation to delivery than other forms of development.
- 4.17 A number of reasons for the under delivery are noted in the draft Employment Land Delivery Review²⁵ including:
 - High cost of highways and access improvements compared to returns
 - Remediation costs associated with previously developed sites
 - Lack of investment in utility connections
 - Lower land values than residential
- 4.18 Potential solutions to poor employment land delivery are multi-faceted and go beyond what a local plan can do alone. The emerging Teignbridge Economic Delivery Plan²⁶ seeks to identify and address some of these barriers and the Local Plan Review would like to explore how it can contribute to the increased delivery of employment floorspace and generate additional and higher paid jobs.
- 4.19 A significant proportion of existing employment allocations are strategic in nature i.e. over 10 hectares. Larger sites can require significant investment before any development can take place and jobs are created. This existing supply of strategic employment sites in the Local Plan will be supplemented by additional strategic sites through the GESP, either in our district or neighbouring districts.
- 4.20 With an increasing population and an increasing need for job creation, alongside a 7 year extension to the plan period, additional employment land will be required, whilst addressing barriers to the delivery of existing sites. However further allocations of large employment sites would not provide for the required balance in site sizes to meet the varied needs of existing and future businesses.
- 4.21 There is an opportunity to explore whether smaller employment sites could potentially deliver a greater variety of opportunities for micro-business, start-ups and small to medium sized enterprises to grow and develop and increase the rate of site delivery and job creation.

Question 17:

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?

4.22 Local Authorities directly delivering employment units can be a successful solution to meeting the demand for new employment floorspace without burdening enterprise with upfront delivery costs or relying on a small pool of developers of employment land. This could particularly benefit micro-businesses which currently dominate the make-up of District enterprises. Direct delivery can provide additional revenue to the Council but such provision comes at a significant upfront cost through land purchase but also in the provision of buildings and infrastructure costs. The development of Estuary Court,

Broadmeadow in Teignmouth is a recent example of the Council involved in directly delivering employment floorspace.

4.23 Such an option is not for the Local Plan alone and requires the co-operation of many departments of the Council, members, landowners, developers and stakeholders. However the Local Plan Review would like to support such innovative approaches which could also fulfil a corporate aim and seeks views on how this might be achieved.

Question 18:

How can the Local Plan Review support potential projects involving the Council and/or its partners directly delivering employment floorspace?

Best Use of Existing Employment Sites

- 4.24 **Business Development policy (EC1)** sets out a focus on traditional B1, B2 and B8 use development within settlements. This position has maintained a realistic approach to future delivery of sites that matches the plan's strategy, however new business development schemes have still been slow coming forward.
- 4.25 As the nature of employment generating uses continues to evolve there is a case for considering a widening out of the definition to allow for other uses. It was for example shown previously (in Employment Land Review for Teignbridge Local Plan) that about 70% of jobs will be in sectors of the economy that fall outside the traditional employment land categories. There is every prospect that the trend will continue during the Local Plan Review period up to 2040.
- 4.26 The Local Plan Review seeks to maximise the opportunities for employment generation whilst maintaining an adequate supply of traditional B1, B2 and B8 employment land. Whilst ensuring the integrity of the employment role of our industrial estates and business parks continues into the future.

Question 19:

What other uses (other than B1, B2 and B8) should be supported on our industrial estates and business parks?

4.27 It is not uncommon for workers on our business parks and industrial estates to drive to local retail and food outlets during the working day. This could be more sustainably provided within the local area, reducing car use, enlivening areas and making current parks and estates more attractive, vibrant places to work.

Question 20a:

Should the local plan support the creation of small-scale (under 280 square metres) retail and food outlets within existing business parks and industrial estates?

Question 20b:

Should these be restricted to only those which directly support and serve those businesses on the park or estate?

Loss of Employment Sites

- 4.28 The loss of our existing employment sites continues to be a pressing issue in the early years of the plan period, (up to March 2017) with a total of at least 16,021 ²⁷square metres developed for other purposes, the most frequent being for residential uses. This loss has predominately been as a result of permitted development rights which enable the conversion of some types of employment space without requiring compliance with Local Plan policies.
- 4.29 Impacts of this existing loss are compounded by:
 - an increasing population which need local jobs to avoid commuting outside the District,
 - a high demand for small workspaces from growing enterprises, particularly micro businesses,
 - high initial infrastructure costs,
 - lower returns to developers from employment floorspace delivery than residential, and
 - a resulting lack of new employment floorspace delivery.
- 4.30 Therefore the retention of our existing employment sites to provide employment opportunities to our growing population is vital as new sites are difficult to develop and lost sites hard to replace.
- 4.31 Local Plan policy EC2 seeks to maintain the use of existing employment sites unless the existing use is causing a significant problem which cannot be resolved without relocation or the proposed replacement use has significant benefits which outweigh the loss.
- 4.32 There is potential to update and strengthen this policy further by providing some clarifying text to express a requirement to demonstrate one or all 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.

Question 21a:

Should the Local Plan Review seek to further restrict the loss of employment sites?

Question 21b:

Which option or combination of options presented above or alternative solution would best ensure the range of employment sites are retained?

Town Centres



- 4.33 National Policy defines a town centre as an area defined on the policies map predominantly occupied by Main Town Centre Uses including a Primary Shopping Area. They should be vibrant, vital and sustainable locations for development, particularly retail provision but importantly also for employment, housing, leisure and accessible services throughout the day and into the evening.
- 4.34 Main Town Centre uses include: retail development, cinemas, bars and pubs, restaurants, nightclubs, fitness centres, bowling and bingo halls, offices, arts, culture and tourism development.
- 4.35 A full definition is provided in <u>Annex2 of the draft National Planning Policy Framework</u>.
- 4.36 Local Plan policy S13: Town Centres defines the role and hierarchy of town centres in the district as follows:
 - Newton Abbot is the strategic town centre within the district, where the majority of activity and development is to be expected;
 - Dawlish & Teignmouth are significant town centres providing a supporting role and giving access to residents in the coastal area to higher level town centre provision;
 - Bovey Tracey & Chudleigh are locally important town centres where more local needs are met in these smaller towns.
- 4.37 This hierarchy of town centres is not proposed to be amended as part of the Local Plan Review, unless evidence indicates a change in their role.

New Retail Needs

- 4.38 Local Plan policy S13 currently establishes a net comparison additional floor space requirement of:
 - Newton Abbot around 11,000 square metres net
 - Teignmouth around 1,000 square metres net
- 4.39 These current requirements have been accommodated in the Local Plan through:
 - Policy TE4 allocates the Brunswick Street/Northumberland Place area in Teignmouth for a mixed use development, including 1,000 square metres of either comparison goods retail or commercial floorspace. This area also benefits from a Local Development Order.
 - Policy NA9: allocates the Markets area in Newton Abbot for 11,000 square metres net comparison goods floorspace, along with residential, leisure, commercial floorspace and car parking provision. The Market Walk

redevelopment has been approved and will commence shortly. This redevelopment will contribute to the aims of policy NA9.

- 4.40 Work is currently underway on a town centre masterplan that will propose ideas for enhancement and development of Newton Abbot Town Centre. This plan, which is focussed on reviving the core area of the town centre by strengthening the retail/night time economy and improving the connection between town centre spaces, will contribute to delivery of policies NA8, NA9, NA10 and NA12.
- 4.41 The Greater Exeter Retail Study will define the role of town centres and identify additional comparison and convenience retail needs across the plan area up to 2040, taking into account existing and proposed retail provision. The requirements which apply to Teignbridge will be presented in the Draft Local Plan Review.

Ensuring Vibrant Town Centres

- 4.42 National policy seeks the Local Plan to promote the long term vitality and viability of our town centres to support a diverse retail offer and customer choice with a suitable mix of uses which reflects their distinctive character.
- 4.43 This is currently achieved by two central planning mechanisms;
 - Defining a Town Centre boundary
 - Managing the mix of uses and level of active shop fronts

Town Centre Boundaries

- 4.44 National policy requires town centre boundaries to be kept under review to ensure there are a range of suitable sites to meet the needs for retail, leisure, office and other main town centre uses.
- 4.45 The boundaries of our five town centres have been examined to explore whether they still appropriately reflect the concentration of main town centre uses and are wide enough to meet future needs.
- 4.46 A review of the existing diversity of uses is monitored through the annual Town Centre Health Checks and reported through the Annual Monitoring Report. The variety of uses for each town centre is identified in appendix 1.
- 4.47 Dawlish and Teignmouth both have proposed revisions to their Town Centre boundaries which can be viewed in appendix 1d and appendix 1e respectively.
- 4.48 The boundary revision in Teignmouth Town Centre has excluded Powderham & Bath Terraces, a section of Carlton Place and The Den because these areas lack a retail focus and are predominately residential or recreational in their use and character.
- 4.49 The boundary revision in Dawlish Town Centre has excluded the southern side of High Street, Albert Street, Town Tree Hill and Brook Street. These areas lack a retail focus and are predominately residential in their use and character.
- 4.50 Newton Abbot, Bovey Tracey and Chudleigh Town Centre boundaries are considered appropriate to reflect a good mix of uses to serve the wider town, reflect their role in the

hierarchy and provide a range of suitable sites to meet future needs. These town centre boundaries have not been amended.

Question 22:

Are the town centre boundaries in the best location or are there other areas which should be included or excluded, and why?

Please see boundaries in appendix 1.

Managing the mix of uses and level of active shop fronts

- 4.51 A vital and vibrant town centre is one with a variety in mix of uses which meet a range of needs but serves as the retail core and focus for the town. They should be active places both in the day and evening.
- The mix of uses within our town centres is managed through the application of primary and secondary shopping frontages and accompanying policies EC7 and EC8.
- 4.53 Primary shopping frontages illustrate areas important to maintaining the central function of core retail areas. Policy EC7 reflects these by restricting the mix of uses to at least 70% of A1 retail use and restricting the level of non-active shop fronts.
- 4.54 Secondary shopping frontages illustrates areas with a greater range of uses which are complementary to the vitality of the Town Centre. Policy EC8 reflects this by seeking to maintain 30% of the mix of uses to be of A1 retail with the complementary town centre uses making up the remaining 70%.
- 4.55 The Council review the health of our town centres on an annual basis through an assessment of retail occupiers, vacancy rates and footfall which directly informs the Annual Monitoring Report.
- The latest health check in 2017 identified that non-retail uses in some streets of our town centres are exceeding Local Plan policy limits as presented in Figure 21.

Primary Frontages that DO NOT meet Local Plan Policy EC7 (At least 70% of ground floor units are in active A1 usage)		% of A1 retail less than 70%	
Newton Abbot	Newton Abbot Bank Street		
	Courtenay Street	67.30% (33 units)	
	Queen Street	61.50% (32 units)	
	Wolborough Street	53.30% (8 units)	
Teignmouth Wellington Street		68.18% (15 units)	
Secondary Frontages that DO NOT meet Local Plan Policy EC8 (At least 30% in A1 use; at least 70% in active use; and no more that 6 adjoining properties are		% of A1 retail less than 30%	
in non-active use)			
Bovey Tracey	Town Hall Place	0% (0 units)	
Dawlish	King Street	20.00% (1 unit)	
	Piermont Place	25.00% (3 units)	
Teignmouth	Den Crescent	0% (0 units)	

Figure 21: Town Centre Frontages which breach the limits in local plan policies EC7 & EC8

- 4.57 The limits set out in Local Plan policies EC7 and EC8 are historic limits considered to maintain a significant proportion of retail provision and are common to many Local Plans.
- 4.58 However the way we shop is changing quickly, lowering high street footfall and increasing pressure on high street retailer profits. The way we use town centres is also changing with an increased focus on leisure oriented trips in addition to shopping, such as going for a meal or coffee with a friend before shopping or visiting the cinema followed by drinks at a nearby bar.
- 4.59 The generic historic limits for non-retail uses in current local plan policy have been exceeded in some areas and do not reflect the distinctive characteristics and role of our town centres.
- 4.60 The Local Plan Review will commission a bespoke Teignbridge Town Centre study to establish the best mix of town centre uses and identify which locations in town centres would be most appropriate for a particular diversity of uses. Depending on the findings of the study there are considered to be a number of potential options to explore which are identified below:

A. Re-adjustment of the extent of primary and secondary frontages

The percentage of A1 retail to be retained has been breached in some of the existing frontages. The current approach could be maintained with both a change in the percentage of uses allowed in the frontages or an adjustment to the area of frontage covered by policies EC7 and EC8.

B. The establishment of a primary shopping area

- The District's Town Centres do not currently have a defined primary shopping area and currently rely on Primary and Secondary Frontage Areas to determine the range of and mix of uses within particular parts of the Town Centre.
- The application of Primary Shopping Areas provides the opportunity to tailor a policy through the Local Plan Review which seeks to focus retail provision (A1) within a tightly defined core retail area. This would enable a greater variety and mix of town centres uses which fall outside of A1 retail elsewhere in the Town Centre.

C. Tailoring retail policy to individual Town Centres

- A bespoke retail study will seek to identify what the best range and mix of main town centres would be for each of our Town Centres. This may reveal that a different mix of uses are appropriate for different types of Town Centres. For example, Dawlish and Teignmouth Town Centres may be more suitable for a greater concentration of cafes and restaurants, reflecting their costal location and tourism role in the District.
- This may lead to the tailoring of policies to meet the specific needs, role and function of our individual town centres, as opposed to a blanket district-wide approach in the current Local Plan.

D. Remove restrictions for Main Town Centre Uses

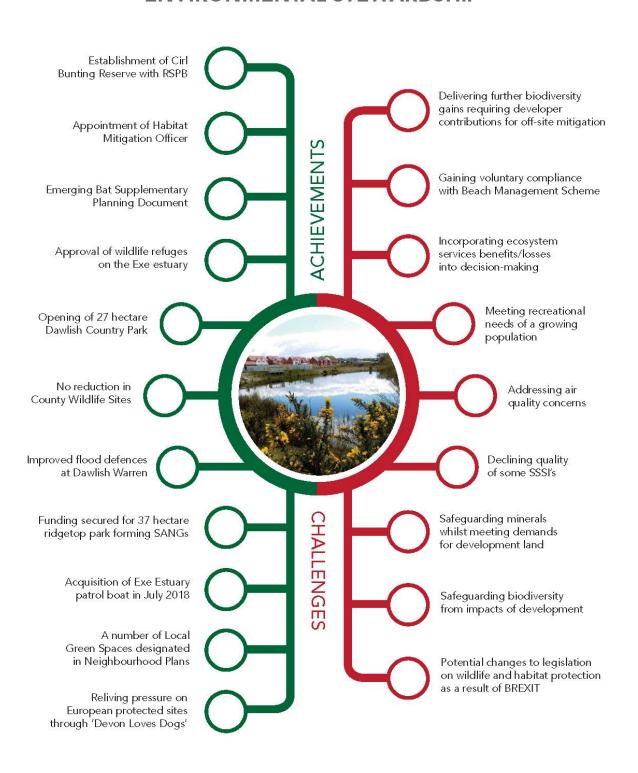
Main Town Centre uses which do not form A1 retail use are currently permitted within existing town centre boundaries. These are restricted to a high degree within primary shopping frontages and to a lesser degree within secondary shopping frontages. An option available could be to remove these restrictions enabling the full range of main town centre uses to be located anywhere in the town centre boundary, including primary and secondary frontages (without the existing % limits). This could have the advantage of diversifying the mix, and range of uses within the Town Centre through a market-led approach, where the market determines the best locations for various Town Centre uses. It may present the risk that areas of the Town Centre which currently have a retail core and focus could have this role eroded by uses which have little or no relationship to retail provision.

Question 23:

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?

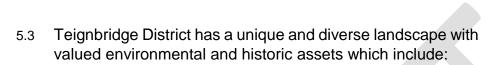
Please give reasons

ENVIRONMENTAL STEWARDSHIP



Environmental Stewardship

- 5.1 National policy requires Local Plans to recognise the intrinsic character and beauty of the countryside and should contribute to conserving and enhancing the natural environment. It establishes that plans should set out how valued landscapes will be safeguarded.
- 5.2 It also seeks a positive strategy for the conservation and enjoyment of the historic environment with safeguards proportionate to the significance of the historic asset.



- 22 miles of coastline
- 20 Countryside Parks & Nature Reserves including a National Nature Reserve
- 28 SSSI's covering 2,758 hectares or 6% of the district
- 665 ha of green space
- 96 square miles of Areas of Great Landscape Value (half the Districts area)
- 1800 Listed Buildings
- 32 Conservation Area Character Appraisals
- 2 Special Areas of Conservation (SAC) (Dawlish Warren and South Hams)
- 1 Special Protection Area (SPA) (Exe Estuary)

Landscape

- The countryside, coast and beaches attract people to live and work in the area and many visitors. It has a significant economic, social and community value, contributing to a sense of identity, well-being and being a major contributor to a strong tourism economy. However, the landscape is under continuous pressure for change from development, land management practices and, from the effects of climate change. Growth in visitor numbers and the resident population will exert further pressure on Teignbridge's landscape and this needs to be managed carefully to maintain the high quality and distinctive character of the landscape; in order to secure future economic prosperity and health and wellbeing.
- 5.5 Local plan policy EN2A seeks to protect and enhance this valued landscape, in particular it references Areas of Great Landscape Value.

Areas of Great Landscape Value

- 5.6 Areas of Great Landscape Value are areas of land that were considered to have a particular scenic value and were first introduced through the 1947 Town & Country Planning Act. This designation is a remnant of the Devon County Structure Plan which is no longer in place and is not directly referenced through national policy or guidance.
- 5.7 The designation covers more than half of the area of the District but is currently considered a blanket designation which is poorly supported by current evidence.

GREAT PLACES TO

LIVE AND WORK



Figure 22: Area of Great Landscape Value coverage in Teignbridge

- 5.8 The <u>Teignbridge District Landscape Character Assessment 2009</u> ²⁸ (updated in 2014) describes the diversity and distinctive qualities and features of the Teignbridge landscape and how it has been shaped by natural and human influences over time. It defines 18 geographically unique 'Teignbridge Character Areas' with their own distinctive sense of place. These character areas have little relationship with those areas defined as Areas of Great Landscape Value.
- 5.9 Currently the impact of development on the landscape is judged on a site by site basis regardless of whether the sites stand within the AGLV. Through this process the sites contribution to the wider landscape and its own specific landscape characteristics are assessed against current evidence and understanding.

5.10 The lack of supporting evidence for this historic designation and the effectiveness of the site by site landscape impact assessments reduces the weight of the designation in decision making and can make its defence through Appeal unnecessarily time-consuming.

Question 24:

Should Areas of Great Landscape Value be retained through the Local Plan Review, if so, how should the area which they cover be determined?

Air Quality



- 5.11 Within Teignbridge local air quality is generally very good. However, there are locations where air pollution levels are high. Whilst a small percentage of our pollution comes from shipping that takes place within the English Channel, the vast majority of air pollution within Teignbridge (particularly nitrogen oxide) comes from the vehicles on our roads.
- 5.12 There are four Air Quality Management Areas (AQMAs) within Teignbridge. These AQMAs are in:
 - Dawlish Iddesleigh Terrace ²⁹
 - Kingskerswell along the former A380 ³⁰
 - Newton Abbot and Kingsteignton ³¹
 - Teignmouth Bitton Park Road ³²
- 5.13 The Council have produced an <u>Air Quality Action Plan 33</u> explaining what we are doing to reduce levels of nitrogen dioxide within the four AQMAs. An Updated Air Quality Management Plan is expected later this year.
- 5.14 The 2016 Air Quality Annual Status Report ³⁴ stated how there is a year on year trend of pollution levels reducing across the District. It notes that the Kingskerswell and Dawlish AQMA status could be revoked in 2019 due to reduced pollution levels.
- A shift to zero and low emission vehicles is expected to further improve air quality but this will be a slow process and the Local Plan Review must continue to reduce the impact of air pollution whilst managing the demands of an increasing population.
- The current Local Plan includes Policies S11: Pollution and EN6: Air Quality. These policies seek to reduce the impact of air pollution and, where a major development would have a negative impact on an AQMA or result in the designation of a further AQMA, requires mitigation, such as the implementation of a Low Emission Strategy or relevant proposals within the Air Management Action Plan.
- 5.17 With increasing development demands, the air quality impacts of proposals will be kept under review, with impacts avoided or mitigated where possible.

Biodiversity, Ecosystems and Protected Species & Habitats

5.18 Biodiversity is fundamental to our health and wellbeing and economic prosperity.

'Biodiversity' refers to the wealth and diversity of all our wild plants and animals and

their habitats. It is also used to include our geological and geomorphological heritage. Section 40 of the Natural Environment and Rural Communities Act 2006 ³⁵ places a duty on all public authorities in England and Wales to have regard to the purpose of conserving biodiversity. This duty ensures that biodiversity is an integral consideration within policy and decision making in order to contribute to the achievement of the commitments made by government in its Biodiversity 2020 strategy. ³⁶

European Sites

- 5.19 As well as general obligations to conserve biodiversity, the UK government is also subject to obligations set out in European legislation regarding wildlife protection.
- The UK's departure from the European Union may bring with it changes to legislation but the Government has expressed its continued commitment to protecting the environment and enhancing biodiversity. This European legislation on the protection of the environment is expected to be transferred into English law through the EU Withdrawal Bill.
- Local Plan policies EN10 European Wildlife Sites and EN11: Legally Protected and Priority Species, specifically address these European requirements and any update to national legislation, policy or guidance will be reflected through the Local Plan Review.
- The emerging South Hams Special Area of Conservation: Greater Horseshoe Bats SPD consultation document provides guidance and additional detail on the implementation of Local Plan policies EN10 and EN11, specifically in relation to Greater Horseshoe Bats. It aims to provide clarity on planning requirements and reduce costs and delays. This document is currently subject to public consultation.
- 5.23 Once adopted this document will replace the <u>South Hams SAC Greater Horseshoe Bat Consultation Zone Planning Guidance</u> published in 2010 and provide important additional detail to these Local Plan policies.
- 5.24 The Local Plan Review will reference this updated guidance to ensure the most upto-date and rigorous application of safeguards in line with EU legislation (as applied to English law) and national and local policy.

Financial Contributions towards Biodiversity net-gain

- The National Planning Policy Framework makes it clear that sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature. It also encourages the establishment of Local Nature Partnerships ³⁷ to deliver a strategic approach to protecting and improving the natural environment. Teignbridge lies within the Devon Local Nature Partnership.
- A large part of our District contains protected habitats and species and this means that the land available for development is constrained. Often mitigation or compensation measures for the harm to wildlife or habitats is required alongside development, to ensure that biodiversity is increased.

- 5.27 Local Plan Policy EN9 establishes the hierarchy developers should undertake when development would likely harm the biodiversity of a site or feature;
 - demonstrate the benefits of the scheme cannot be provided on an alternative site,
 - mitigate losses, or
 - where loss is unavoidable to fully compensate for the loss
- The compensation of loss is called biodiversity offsetting and ensures that when a development damages nature (and this damage cannot be avoided or mitigated) new nature sites will be created. The introduction of appropriate biodiversity off-setting measures are enabled through Local Plan Policy EN9.
- An example of biodiversity off-setting is the establishment of a Cirl Bunting reserve. The Council has funded the purchase of land, to be managed by the RSPB, as a <u>Cirl Bunting reserve</u> ³⁸ as part of the charity's long term work to secure the future of the nationally rare bird. The purchase is funded by building developers as compensation for the impact of forthcoming development on Cirl Buntings. This provides an example where biodiversity off-setting on an alternative site, through financial contributions, can deliver significant net gains in biodiversity and protect and expand protected species in accordance with local plan policy.
- 5.30 Local Plan policy currently enables biodiversity off-setting but this largely relates to the provision of land and habitats on an alternative site to be provided by developers. It does not explicitly reference potential financial contributions for delivering biodiversity off-setting. Through the Local Plan Review there is the opportunity to clarify that such biodiversity off-setting measures could alternatively be provided through a financial contribution from developments in lieu of the provision of land.
- 5.31 Additional clarity on enabling a financial contribution from developers to compensate for any loss to biodiversity would enable contributions to be made to schemes.

Flood Risk

- 5.32 Current and emerging national policy requires strategic plans to manage flood risk and direct development away from areas at highest risk of flooding.
- Local Plan policy S6: Resilience ensures that flood risk is considered when designing buildings/communities/infrastructure and Policy EN4: Flood Risk sets out a sequential approach to new development, guiding it to areas at lower risk from river or coastal/tidal flooding.
- These policies are considered to align with current and emerging policy and guidance and the majority of their wording is proposed to remain unchanged. However additional guidance has been produced which provides additional detail to these policies.
- 5.35 The Devon Local Flood Risk Strategy and the Teignbridge Design Guide contain information helping to design sustainable, attractive, wildlife friendly drainage solutions, but are not referred to in Policy EN4.

5.36 A policy requirement to adhere to these guidelines would help to support environmentally friendly solutions to drainage and a reference will be included within the Local Plan Review.

Green Infrastructure through Development

5.37

Green Infrastructure is a term used to describe the network of natural spaces and corridors within and between our urban areas, towns and villages. It includes parks, gardens, allotments, churchyards, cemeteries, woodlands, fields, hedges, lakes, ponds, playing fields, footpaths, cycleways, coastal areas and rivers. Benefits can include areas for recreation, habitats for wildlife, flood risk mitigation, carbon storage, improvements in health and wellbeing, better social cohesion and interaction, and economic growth and investment. Green infrastructure works as a network of areas that together deliver multiple environmental, social and economic benefits.



- 5.38 Current Local Plan policy WE11 seeks to ensure that sufficient Green Infrastructure is delivered in accordance with the Teign Green Network Green Infrastructure Strategy 2011, Teignbridge Green Space Strategy 2009 and Exeter Area Green Infrastructure Study 2009. The policy provides a minimum requirement for 10 square metres of children's play space per dwelling and 100 square metres of other Green Infrastructure, including playing pitches, allotments, parks, biodiversity enhancement and natural green space.
- 5.39 The Teignbridge Green Space Strategy converts this overall requirement of 100 square metres into the amount and type of Green Infrastructure for each developer to provide and applies District-wide as illustrated in Figure 23.

Type of Space	Quantity Ha/1000 population	Quantity Square metres per person	% of total provision
Formal and informal green space	0.75	7.5	16%
Active recreation space 1.20 12.0 26%	1.2	12	26%
Children and young people's space	0.25	2.5	5%
Natural green space 2.20 22.0 48%	2.2	22	48%
Allotments	0.25	2.5	5%
Total	4.65	466.5	100%

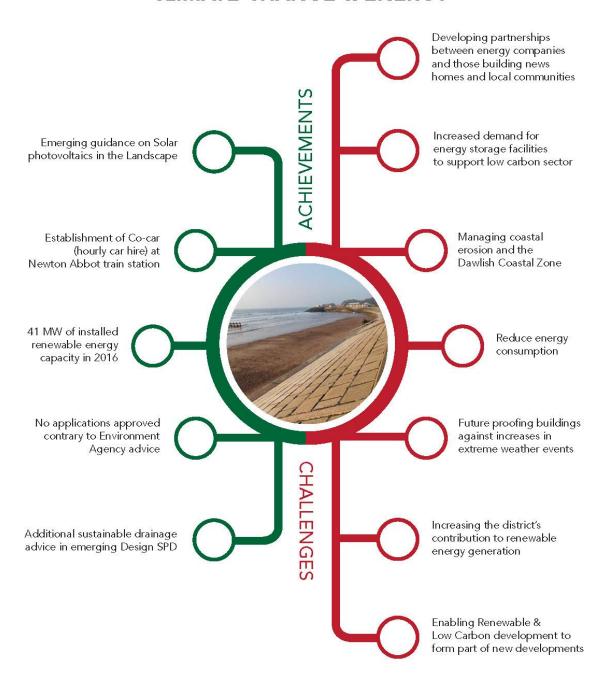
Figure 23: Current Green Infrastructure quantity standards in the Teign Green Space Strategy

- 5.40 The current approach does not tailor the provision of new green infrastructure to address existing shortfalls or surpluses in quantity, quality or accessibility within local areas. In addition these requirements are not based upon up-to-date national standards.
- The recently completed Open Space Needs Assessment 2017 has been based on <u>Fields in Trust</u> (FIT) ⁴⁰ standards. It identifies that, with regard to quantity of open space within the District, there is an under-supply of parks and garden, amenity greenspace, play provision and allotments and, there is an over-supply of natural and semi-natural open space. However, there are variations across the District in terms of both quantity and quality of provision.
- The Local Plan Review provides the opportunity to review and update the Teignbridge Green Space Strategy and Local Plan Policy WE11 to reflect the updated evidence provided by the Open Space Needs Assessment 2017, Built Leisure Needs Assessment 2017 and emerging Playing Pitch Strategy.
- The update to Local Plan policy WE11 and supporting strategy will seek the application of the Fields in Trust standard to provide an up-to-date national benchmark and make reference to the emerging Design Guide on Green Structures to ensure high quality design. It will seek to tailor the green infrastructure requirements of developments to local circumstance which looks to address identified gaps in quality or quantity and ensure that existing and future residents benefit from a full range of high quality, accessible open spaces.

Question 25:

Is tailoring the provision of green infrastructure to the specific requirements of an area a suitable approach?

CLIMATE CHANGE & ENERGY



Climate Change & Energy



Figure 24: Meteorological Office publication "State of the Environment"

6.1 Climate change is the large-scale, long-term shift in the planet's weather patterns and/or average temperatures. The impacts of climate change include rising temperatures, higher sea levels with increased coastal erosion and occurrences of extreme weather events such as heat waves and more frequent and severe storm events.

Average UK Temperature °C					
Season	1961-1990	1981-2010	2007-2016		
Winter	3.3	3.7	4.4		
Spring	7.1	7.7	8.1		
Summer	13.8	14.4	14.4		
Autumn	9.1	9.4	9.9		

- 6.2 National policy recognises the important role planning plays in providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon development.
- 6.3 It seeks developments to be located in ways which reduce greenhouse gas emissions, support energy efficiency improvements and expect local requirements for a building's sustainability to be consistent with nationally adopted standards.

Sustainable Design & Location of Development

- 6.4 Design of the built environment has an impact on climate change. This is not just a matter of energy efficiency of a building, it is a consideration of how a place functions. Carefully thought out layouts can encourage walking and cycling, rather than car use, for short journeys, helping to reduce greenhouse gas emissions. Orientation of buildings can help to improve solar gain and offer opportunities for domestic solar power and, massing of buildings, e.g. terraced dwellings, can utilise materials more effectively.
- 6.5 Local Plan policy S6 seeks to develop resilient communities, which are able to adapt to climate change and fossil fuel scarcity. It ensures that climate change and flood risk, including changes in temperatures, rainfall and wind, are considered when designing buildings/communities/infrastructure and, it seeks to minimise the use of energy, water, fuel and materials. It encourages the local production of food, generation of renewable energy and the use of locally supplied building materials.
- 6.6 With regard to climate change, the main thrust of the policy ensures that development takes account of changes in temperature, rainfall and wind, and that it minimises impacts of climate change.

Energy Efficiency Improvements

6.7 Part L of the Building Regulations ⁴¹ sets out the legislation requirements for the conservation of fuel and power in new buildings and planning policies cannot duplicate these energy efficiency requirements for new dwellings.

Carbon Reduction

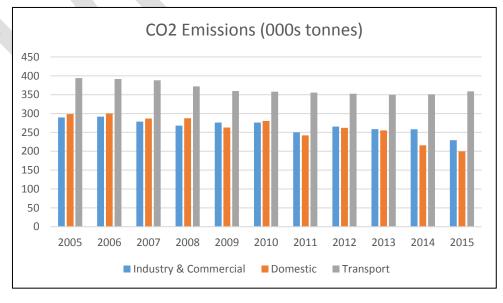
- 6.8 The Climate Change Act of 2008 set out targets to reduce carbon emissions by at least 80% between 1990 and 2050.
- 6.9 To meet these targets, five-yearly "carbon budgets", which currently run until 2030, have been set by the Committee on Climate Change. These restrict the amount of greenhouse gas the UK can legally emit in a five year period. The "carbon budgets" beyond 2030 have yet to be set, but will lead up to the 2050 aim of an 80% decrease in carbon emissions.

Year	Target reduction below 1990 levels
2012	25%
2017	31%
2020	37%
2025	51%
2030	57%

Figure 25: National Carbon Reduction Targets

- 6.10 UK emissions in 2016 were 42% below 1990 levels, which is well ahead of the 31% target set for 2017, but this reduction needs to continue in order to meet the 2030 target and those yet to be set, taking the country up to 2050.
- 6.11 Local Plan policy S7: Carbon Emission Targets seeks to achieve a reduction in carbon emissions of approximately 42% from 2009 to 2030. Teignbridge has seen a reduction in carbon emissions over the past decade or so, with a 21% decrease in carbon emissions from industry and commercial uses and a 33% decrease in domestic carbon emissions as illustrated in Figure 26.

Figure 26: Teignbridge CO2 Emissions



www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxideemissions-national-statistics-2005-2015

- The greatest contributor to carbon emissions in Teignbridge is transport. Therefore, the best way planning policies can contribute to a reduction in carbon emissions is through focusing the majority of development to locations within walking/cycling distance of services and facilities, the creation of self-sufficient communities, where opportunities for employment and access to services are created alongside new housing and, the creation of sustainable movement links, to encourage walking and cycling.
- 6.13 Local Plan policy EN3: Carbon Reduction Plans requires major developments to produce a carbon reduction plan which identifies how they will minimise their carbon footprint and achieve emission targets in strategic policy S7.
- 6.14 Further advice and guidance on how to calculate carbon reduction and prepare carbon reduction plans is provided with the <u>Carbon Reduction Calculator Instructions</u>
- 6.15 The carbon emission targets will be kept under review in light of updated emission limits set through carbon budgets. A revised limit, with the aim of extending this to the end of the plan period, will be addressed through the Local Plan Review or through the Greater Exeter Strategic Plan.

Renewable & Low Carbon Energy Development

- 6.16 Increasing the amount of renewable and low carbon energy that the country produces will help to reduce greenhouse gas emissions, slow down climate change, increase the security of the country's energy supply and, stimulate investment in new jobs and businesses.
- 6.17 Renewable and low carbon energy resources include:
 - hydro (conventional hydroelectric power),
 - geothermal (such as ground source heat pumps),
 - solar thermal and Solar Photovoltaic
 - tidal and wave action.
 - onshore and offshore wind and
 - biomass.
- 6.18 Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable and the resource can be maximised.
- 6.19 National planning policy broadly supports the provision of renewable energy, encouraging communities and industry to provide for renewable energy and, requiring Local Plans to promote energy from renewable and low carbon sources.
- 6.20 In 2013-2014, about 5.6% of Teignbridge's energy supply was generated by renewable sources⁴². In spite of the sensitive landscape, the capacity of renewable energy produced within Teignbridge has increased over recent years, mainly due to a marked increase in photovoltaics between 2014/2015.

	2014	2015	2016
Photovoltaics	13	31.8	32.1
Onshore	0.1	0.1	0.1
wind			
Hydro	0.4	0.4	0.4
Landfill gas	8.5	8.5	8.5
Total	21.9	40.7	41.0

Figure 27: Renewable Energy Generation in Teignbridge

- Support for the development of renewable energy is contained within Policy S22, which permits energy development in the open countryside, subject to impacts on:
 - the distinctive characteristics and qualities of the landscape;
 - integrity of green infrastructure and biodiversity networks;
 - integrity of the South Hams SAC, and
 - aims to provide attractive and biodiverse landscapes and a resilient rural economy.
- 6.22 Policy S22, alongside other policies in the Local Plan, such as those relating to landscape, biodiversity, impact on historic assets, support renewable and low carbon development whilst seeking to avoid or mitigate against its impacts. However, the Local Plan does not include a bespoke policy relating to renewable energy developments.

Energy Storage

- 6.23 Energy storage is the capture of energy at one time for use at a later stage. These can take the form of large battery-like facilities or through alternative technologies such as compressed air energy storage or pumped hydro-power.
- 6.24 With the significant rise in power generated by renewable sources such as wind and solar, comes a variable or intermittent power supply to the National Grid. This can result in difficulties balancing energy supply with demand.
- 6.25 Energy storage facilities provide the opportunity to store excess energy at times of low demand and utilise it back into the National Grid when demand is higher. These facilities serve to more effectively balance supply and demand which in turn supports increased renewable energy generation, as it avoids wasted energy and increases efficiency.
- 6.26 The need and demand for energy storage facilities is only expected to increase with the continuing decarbonisation of our economy and the rise of plug-in vehicles.
- 6.27 This is a new and emerging industry which is expected to expand significantly over the plan period. The Local Plan Review would like to support energy storage schemes which best meet the energy needs of the District, maximise renewable energy use whilst maintaining amenity and environmental safeguards.

Question 26:

What should the Local Plan Review consider when exploring the benefits and impacts of energy storage facilities?

Teignbridge District Council is committed to encouraging and supporting appropriate renewable energy and low carbon energy schemes in suitable locations and two potential options have been identified which could contribute towards this aim.

1. A bespoke renewable energy policy

The Local Plan is supportive of renewable and low carbon energy developments in the District through policies S6 and S22 and the District has seen a number of large-scale solar photovoltaic arrays. A Local Plan policy explicitly referencing support for renewable and low carbon technologies and addressing their potential impacts could provide clarity to potential developers. This would largely repeat the existing provisions of the Local Plan which seek to maintain and enhance landscape character, historic assets and their settings, habitats and biodiversity and residential amenity.

2. Identify opportunity areas for potential renewable developments

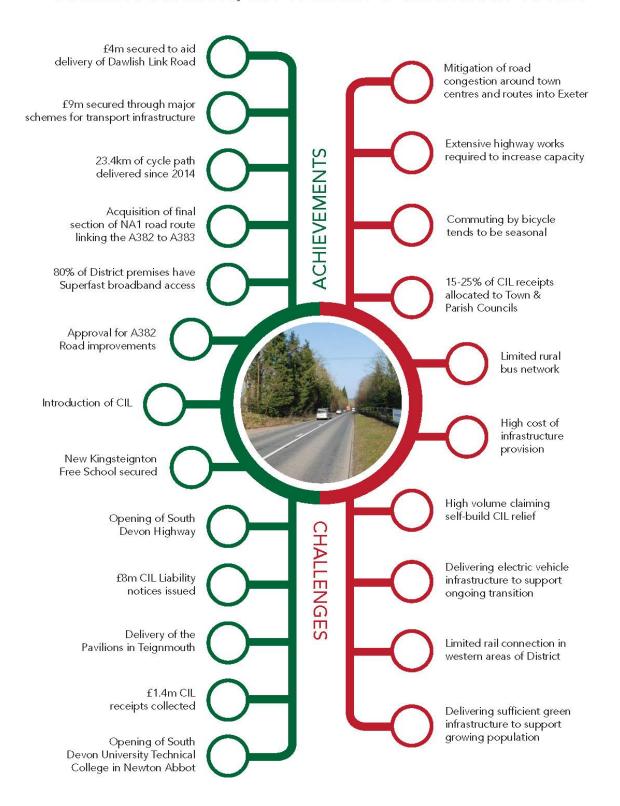
- 6.30 National policy enables local plans to identify suitable areas for renewable and low carbon energy sources and supporting infrastructure, where this would help secure their development.
- 6.31 Such an approach would require an assessment of various criteria for each technology to identify defined areas which are, in principle, appropriate for that technology, both in terms of it being a viable location to generate energy and would not be unduly harmful to the surrounding environment or uses. This would be a time consuming and challenging task, given the sensitivity of the natural and cultural landscape, including the setting of Dartmoor National Park. It may limit the areas where such development could be permitted but would offer a degree of certainty over the locations where renewable energy developments would be supported.

Question 27:

Should the Local Plan Review provide additional guidance and support for renewable energy and low carbon development through one of the above options, a combination or through an alternative approach?

Please provide comment.

COMMUNICATION, MOVEMENT & INFRASTRUCTURE



Communication Movement & Infrastructure



- 7.1 National policy states identifying and coordinating the provision of infrastructure is a key economic objective to build a responsive and competitive economy and support sustainable development.
 - 7.2 It requires plans to set out the contribution requirements for different types of development. In particular they should set out policy requirements for the level and types of affordable housing, and for supporting infrastructure including (but not limited to) education, transport, health, green infrastructure, and digital infrastructure. These requirements should not make a development unviable and plans should set out the circumstances in which further viability assessment may be required in deciding individual applications.
- 7.3 Local Plan policy S5: Infrastructure provides the broad context for new and improved infrastructure which is required to support sustainable communities. Relevant elements of required infrastructure include;
 - Improvements to public transport provision and cycle and pedestrian provision
 - New roads and road improvements,
 - New schools & 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.
- 7.4 The infrastructure requirements arising from development identified in the current Local Plan are detailed in the Infrastructure Delivery Plan.⁴³
- 7.5 It identifies approximate time periods for delivery, the nature of the priority, the key delivery partners, and the likely costs of projects. The infrastructure projects listed include those funded by public finances, by private sector companies and by other organisations that contribute to delivering the infrastructure we need. The **Community Infrastructure**Levy (CIL) is a charge for new development based upon additional floorspace. The money raised can be used to fund a wide range of infrastructure needed to support new development within the District, not necessarily in the location where the money is raised.
- 7.6 Since the introduction of the Community Infrastructure Levy, £1.4m of receipts have been collected and a further £8m CIL liability notices issued. This is helping to fund a number of important projects.
- 7.7 Whilst CIL funds strategic infrastructure improvements, legal agreements between the Council and developers called Section 106 agreements are used to ensure infrastructure that is required to make new development acceptable is provided. S106 agreements are

- also used to secure affordable housing delivery where required as part of mixed development.
- A number of infrastructure projects have been or are nearing completion since the Local Plans' adoption which include:
 - The Pavilions, which provides a community and enterprise resource to improve the leisure and cultural facilities of Teignmouth
 - **South Devon University Technical College** which provides specialised training in Engineering, Science and the Environment in Newton Abbot.
 - The South Devon Highway, providing a 5.5km dual carriageway between Newton Abbot and Torbay, bypassing Kingskerswell and improving local air quality. Improved access to the area has been projected to lead to creation of nearly 8000 jobs in South Devon.

Infrastructure to Support Development

- 7.9 The additional growth identified in previous chapters will require supporting infrastructure to ensure new development creates sustainable communities where people want to live, work and visit.
- 7.10 National policy seeks authorities to engage in joint working to help determine where additional infrastructure is necessary, and whether development needs that cannot be met wholly within a particular plan area could be met elsewhere.
- 7.11 The Greater Exeter Strategic Plan will identify the strategic cross-boundary infrastructure requirements over the wider-plan area and these will be included within an updated Infrastructure Delivery Plan.
- 7.12 The Local Plan Review will undertake an Infrastructure Capacity Assessment to understand the additional pressures on infrastructure created as a result of the additional development requirements. The requirements must be balanced against viability to ensure the total cumulative cost of all relevant policies is not of a scale that will make development unviable. A Whole Plan Viability Assessment will aid in the understanding between infrastructure requirements and what can viably be achieved through the Community Infrastructure Levy and S106.

Housing Infrastructure Fund

- 7.13 The Housing Infrastructure Fund 44 is a pot of up to £5 billion of government funding to key local infrastructure projects including new roads, cycle paths, flood defenses and land remediation work needed to unlock housing development sites.
- 7.14 Working with our Greater Exeter Delivery partners, who put in complementary bids across the area, Teignbridge were very successful in their bid for a portion of this infrastructure funding for the Dawlish Relief Road in which £4.2 million was secured towards its delivery that will unlock 350 new houses.
- 7.15 The Council will continue to pursue funding opportunities to deliver the infrastructure that will benefit the District, its residents, workers and visitors.

Electric and Low Emission Vehicle Infrastructure

- 7.16 The Government has announced plans to end conventional car and van sales by 2040 and for almost every car on the road to be zero emissions by 2050. This has clearly set the future direction that the use of electric and low emission vehicles is set to increase significantly over the plan period.
- 7.17 The draft National Planning Policy Framework requires that in considering development proposals it should be ensured that they are designed to enable charging of plug-in and other ultra-low emission vehicles.
- 7.18 Local Plan policy S9: Sustainable Transport recognises the integral role transport plays in a successful economy and healthier communities and seeks to minimise the impacts of the private car and encourage alternative modes of transport. This includes support for infrastructure for electric vehicles.
- 7.19 Policy S9 supports electric vehicle infrastructure but the Local Plan does not currently include a requirement for developments to incorporate such facilities as electric car charging points.

Question 28:

What implications should the Local Plan Review consider when drafting a policy to require electric charging point infrastructure on new developments?

Loss of Local Facilities'

- 7.20 The Council value the role and importance of retaining existing local facilities and service provision such as local shops and community centres. Local Plan policy WE12 seeks to retain these services through a set of criteria which need to be met before another use is acceptable. These include demonstrating that the use is no longer necessary or viable in the long term.
- 7.21 The Draft Settlement Hierarchy Review identified very limited loss of service provision between 2011 and 2017, particularly in our defined settlements.
- Ogwell Neighbourhood Plan has sought to refine the requirements an applicant must meet to demonstrate a local shop use is no longer necessary or viable. It aims to provide clarity to decision-makers and applicants on the evidence needed to justify the loss including:
 - "an independent assessment that the vacant units have been actively marketed and offered at a reasonable rent for a minimum period of 1 year, a market view of the sites and details of the marketing."
- 7.23 This applies to Ogwell parish only and specifically to local shops however the additional clarity this neighbourhood plan policy provides could be included in a revised loss of local facilities policy, through the Local Plan Review.

Question 29:

Is it appropriate to include additional marketing requirements before the loss of local facilities to alternative uses?

Question 30:

Do you have any other suggestions to improve Local Plan Policy WE12?

Safeguarding Heathfield Railway Line

- 7.24 Figure 14 illustrates the coastal route of the only active railway through Teignbridge which limits rail connectivity to the western parts of the District, resulting in a greater reliance on the private car.
- 7.25 National policy states planning policies should identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice.
- 7.26 This opportunity is presented in Local Plan policy S10 which safeguards the Newton Abbot to Heathfield Railway Line route as a movement corridor to enable its future transport use.



- 7.27 The re-opening of the Heathfield to Newton Abbot section of the Teign Valley Railway as a commuter route would provide additional rail connectivity further into the west of the District. It would link a centre of employment to the rail network and provides residents of Heathfield, Bovey Tracey and surrounding areas with an additional transport option from the private car.
- 7.28 Since the adoption of the Local Plan, Heathfield Railway Revival Group have continued to pursue their ambition of a re-opened, active Heathfield railway line and have made considerable progress towards this aim.
- 7.29 The Local Plan Review provides the opportunity to reflect this additional progress and provide additional support to its delivery. This could potentially be through a safeguarding area on the policies map and an accompanying policy.

Question 31:

What can the Local Plan Review include to provide additional support for the reopening of the Heathfield Railway Line?

Access to Broadband

- 7.30 National policy establishes that high quality and reliable communications infrastructure is essential to economic growth and social well-being. It sets out that planning policies should prioritise full fibre connections to existing and new developments.
- 7.31 The District Council has been working with the Connecting Devon & Somerset partnership to improve access to Broadband and speed of available service. There has been a steady increase in broadband coverage in the Devon & Somerset area, however the percentage remains lower than the national average as illustrated in Figure 28.

7.32 The Draft Settlement Hierarchy also analysed broadband availability and speeds on a local level through a review by rural postcode via the <u>Ofcom Broadband checker</u>. ⁴⁵ This assessment also noted high to total coverage of superfast broadband availability in the urban area and towns but more patchy availability in more rural locations.

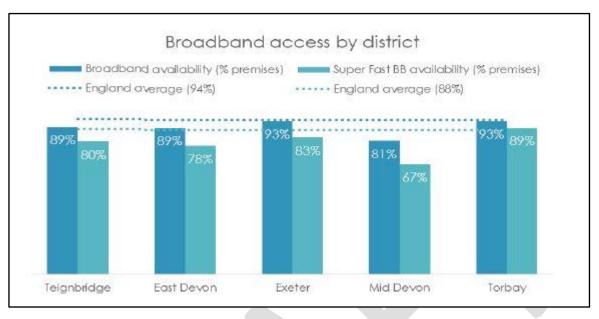
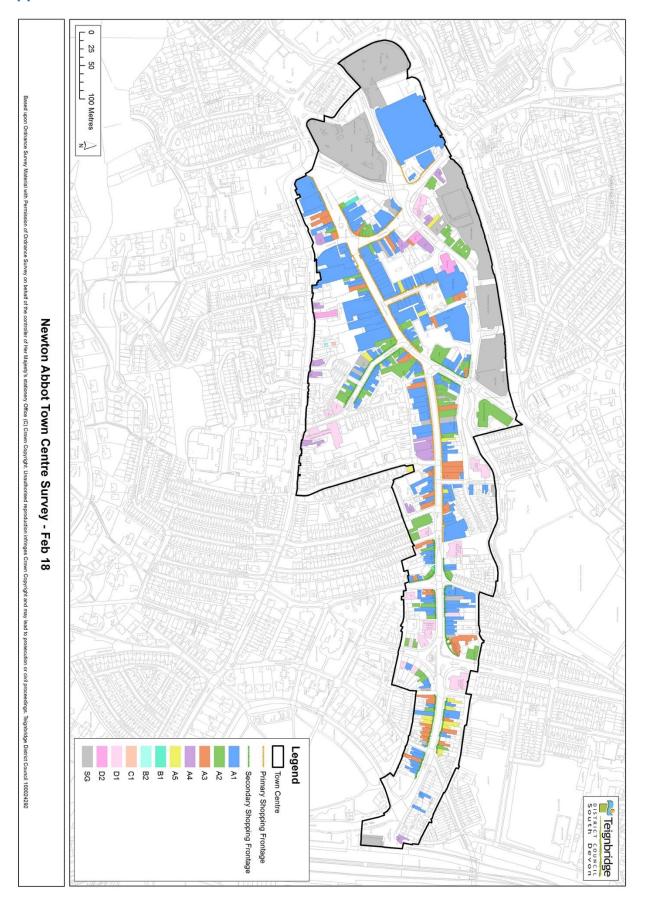


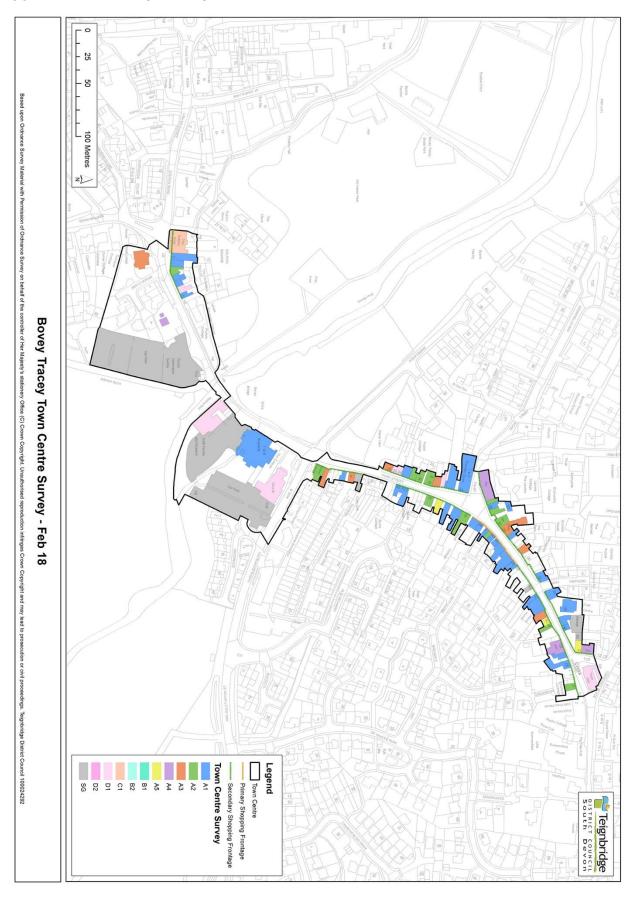
Figure 28: Broadband Access by District

- 7.33 The Greater Exeter Strategic Plan is anticipated to include an over-arching policy requirement for new developments to provide a full fibre connection to the front door.
- 7.34 The Local Plan Review will include a similar requirement if the Greater Exeter Strategic Plan does not provide a strategic broadband policy. Alternatively, the Local Plan Review may provide some additional detail if required.
 - Q32. Do you have any other comments or suggestions on matters not covered by the consultation questions?
 - Q.33 Are there any other issues which the local plan review should be focusing on?

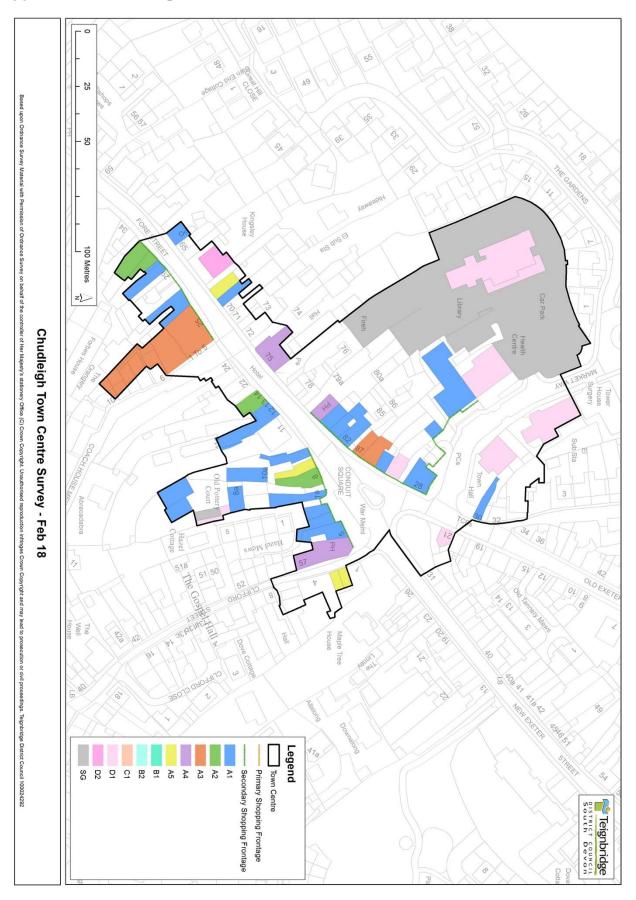
Appendix 1a: Newton Abbot Town Centre



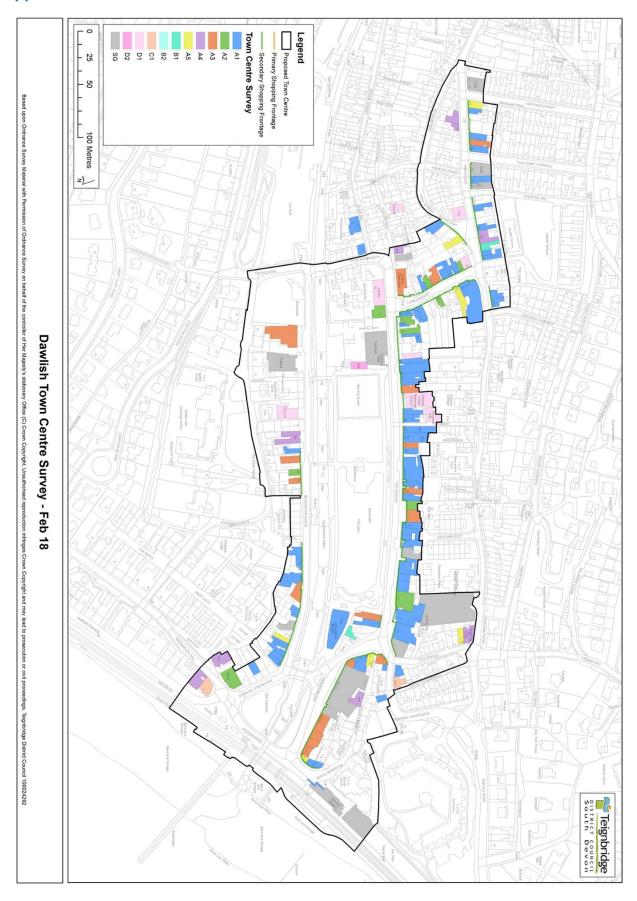
Appendix 1b: Bovey Tracey Town Centre



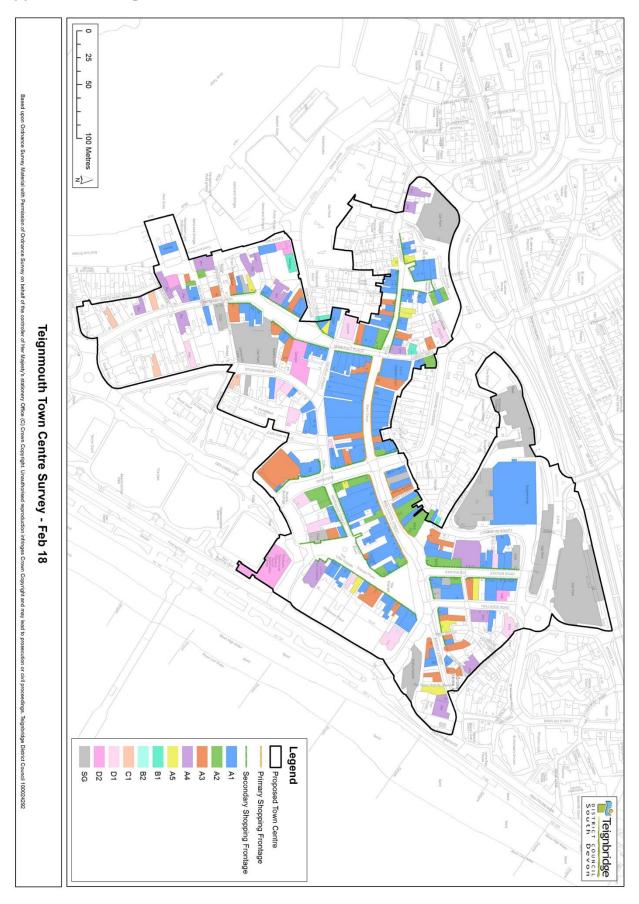
Appendix 1c: Chudleigh Town Centre



Appendix 1d: Dawlish Town Centre



Appendix 1e: Teignmouth Town Centre



Appendix 2 Gross Internal Floor Areas (wide sample of dwellings completed between May 2014 to March 2018)

Affordable Housing Gross Internal Floor area								
GIA of propert y sqm	Tenure	Dwellin g type and no. of units (if more than 1)	No. bedroom s		GIA of propert y sqm	Tenure	Dwellin g type and no. of units (if more than 1)	No. bedroom s
36.72	Affordable Rent	Flat	1		76.67	Intermediat e	House	2
42	Affordable Rent	Flat	1		76.7	Affordable Rent	House x 6	2
43	Affordable Rent	House	1		77	Affordable Rent	House x 2	2
45	Affordable Rent	Flat x 3	1		77	Intermediat e	House x 8	2
46	Affordable Rent	Flat	1		77	Social Rent	House x 6	2
49.9	Social Rent	Flat x 6	1		79.5	Affordable Rent	House x 10	2
49.91	Affordable Rent	Flat	1		81	Affordable Rent	Self Build	2
50	Affordable Rent	Flat	1		86	Intermediat e	House	2
52	Affordable Rent	Flat x 4	1		92	Intermediat e	House	2
54	Affordable Rent	Flat x 6	1		100	Affordable Rent	House	2
55	Affordable Rent	House x 7	1		100.64	Affordable Rent	Extra care x 13	2
55	Not known	House	1		100.64	Intermediat e	Extra care x 5	2
56	Affordable Rent	Flat	1		101	Affordable Rent	House	2
59	Affordable Rent	House x 6	1		104	Intermediat e	House	2
60	Affordable Rent	Flat x 4	1		132	Affordable Rent	House	2
61	Intermediat e	Flat	1		152	Discounted	Self Build	2
61.5	Affordable Rent	Flat x 3	1		60	Affordable Rent	House	3
62	Affordable Rent	Flat	1		60	Intermediat e	House	3
63	Intermediat e	Flat x 2	1		63	Affordable Rent	House	3
69	Affordable Rent	Flat x 3	1		73	Intermediat e	House	3
73.6	Intermediat e	Flat	1		75	Affordable Rent	House	3
76	Intermediat e	Flat	1		75.8	Affordable Rent	House x 2	3
77.6	Affordable Rent	Flat x 3	1		75.8	Intermediat e	House	3

78	Intermediat e	House	1	76	Affordable Rent	House x	3
79.35	Affordable Rent	Flat	1	76	Intermediat e	House x	3
80.13	Affordable Rent	Flat	1	77.12	Affordable Rent	House	3
100.64	Affordable Rent	Extra care x 26	1	77.12	Intermediat e	House x 4	3
54	Affordable Rent	Flat x 2	2	77.8	Affordable Rent	House x 5	3
57	Intermediat e	House x 3	2	77.8	Intermediat e	House x 2	3
58	Affordable Rent	Flat x 3	2	79	Intermediat e	House x 2	3
58	Discounted	Flat x 3	2	79	Social Rent	House x 4	3
59	Affordable Rent	Flat x 4	2	80.5	Intermediat e	House	3
60	Affordable Rent	House x 2	2	81	Affordable Rent	House x 10	3
60	Intermediat e	House	2	81	Discounted	House x 2	3
60.19	Affordable Rent	House x 2	2	81	Intermediat e	House	3
61	Intermediat e	Flat x 2	2	81.7	Affordable Rent	House x 5	3
62	Affordable Rent	House x 10	2	82	Affordable Rent	House x 2	3
62	Intermediat e	House x 4	2	83	Affordable Rent	House x 9	3
63	Affordable Rent	House x 6	2	83	Discounted	House	3
63	Affordable Rent	Flat x 3	2	83	Intermediat e	House x 10	3
63	Discounted	House x 2	2	83.32	Affordable Rent	House	3
63	Intermediat e	House x 3	2	84	Affordable Rent	House x 9	3
63	Intermediat e	Flat	2	84	Intermediat e	House x 9	3
63.02	Intermediat e	House	2	84.92	Affordable Rent	House x 3	3
64	Affordable Rent	Flat x 2	2	85	Intermediat e	House x 3	3
65	Intermediat e	House	2	85	Social Rent	House x 3	3
65	Social Rent	House x 3	2	86	Affordable Rent	House x 10	3
66	Affordable Rent	Flat x 6	2	86	Intermediat e	House x 4	3
66.7	Affordable Rent	Flat x 3	2	87	Affordable Rent	House	3
67	Affordable Rent	Flat x 5	2	87	Intermediat e	House	3
68	Affordable Rent	House	2	88.4	Affordable Rent	House	3
68	Affordable Rent	House	2	89	Affordable Rent	House x 4	3

68	Intermediat e	House x 8	2	89	Intermediat e	House x 2	3
68	Not known	House x 5	2	92.9	Affordable Rent	House x 2	3
68.5	Affordable Rent	House	2	97	Intermediat e	House x 3	3
69	Affordable Rent	House x 2	2	99	Affordable Rent	House	3
69	Affordable Rent	Flat x 8	2	99	Not known	House	3
71	Affordable Rent	House x 8	2	108.69	Intermediat e	House	3
71	Intermediat e	House	2	110	Affordable Rent	House	3
71.8	Affordable Rent	House x 4	2	121.83	Intermediat e	House	3
72	Affordable Rent	House x 3	2	121.83	Intermediat e	House	3
72	Intermediat e	House x 2	2	140	Discounted	Self Build x 2	3
72.38	Intermediat e	Flat	2	91.47	Affordable Rent	House x	4
73	Affordable Rent	Flat	2	92	Affordable Rent	House	4
73	Affordable Rent	House x 12	2	92	Intermediat e	House x 2	4
73	Intermediat e	House x 2	2	94.6	Affordable Rent	House	4
73.6	Intermediat e	Flat x 2	2	96.5	Affordable Rent	House x 2	4
73.9	Social Rent	Flat x 6	2	97	Not known	House	4
74	Affordable Rent	House x 10	2	106	Affordable Rent	House x 2	4
74	Intermediat e	House x 15	2	110	Affordable Rent	House x 2	4
75	Affordable Rent	House	2	114.7	Affordable Rent	House x 4	4
75	Intermediat e	House x 2	2	115	Affordable Rent	House x 2	4
75.96	Affordable Rent	House x 2	2	116	Affordable Rent	House x 2	4
76	Affordable Rent	House x 4	2	117.2	Intermediat e	House x 2	4
76	Intermediat e	Flat x 2	2	117.2	Social Rent	House x 2	4
76	Intermediat e	House x 4	2	120	Intermediat e	House x 4	4
76.67	Affordable Rent	House x 6	2	130	Affordable Rent	House	4
				140	Discounted	Self Build x 4	4

	Dwelling Type and			Dwelling Type and	
OIA of	no. of		OLA of	no. of	
GIA of	units (if	Niversia are af	GIA of	units (if	Niversham of
Property	more than	Number of	Property	more than	Number of
sqm	1)	Bedrooms	sqm	1)	Bedrooms
51	Bungalow	1	119	House x 3	3
79	Flat	1	119	House	3
66	Bungalow	2	120	House x 5	3
68	Bungalow	2	120	House x 9	3
72	Bungalow	2	121	House x 4	3
75	Bungalow	2	121.83		3
95 96	Bungalow x 2	2 2	122.4	House x 2	3
106.5	Bungalow	2	125 127	House x 5	3
121.2	Bungalow	2	127	House x 4	3
54.9	Bungalow Flat x 2	2	128.7	House x 4	3
57.9	Flat x 6	2	130	House x 7	3
58	Flat	2	131	House x 5	3
58.2	Flat x 6	2	131.6	House	3
58.7	Flat x 2	2	132.5	House	3
61	Flat	2	132.3	House	3
62.4	Flat	2	134.4	House x 9	3
64	Flat x 3	2	137	House	3
66	Flat x 2	2	142	House x 3	3
68	Flat x 2	2	144	House	3
70	Flat	2	145	House x 3	3
71	Flat	2	146	House x 3	3
72	Flat	2	148	House	3
73.2	Flat x 2	2	153	House	3
77	Flat	2	158	House x 3	3
80	Flat	2	167.5	House	3
81	Flat x 2	2	171	House	3
82	Flat	2	184.4	House	3
85	Flat x 6	2	199		3
87	Flat	2	219		3
89.3		2	238	House	3
90	Flat x 7	2	278	House	3
92	Flat	2	308	House	3
93	Flat	2	164	Live_work	3
102	Flat x 2	2	206.75	Live_work	3
108	Flat	2	121.68	Self Build	3
110	Flat x 4	2	124	Self Build	3
112	Flat	2	125	Self Build	3
135	Flat	2	157	Self Build	3
54	House	2	169	Bungalow	4
55	House	2	190	Bungalow x 2	4
56.7	House	2	78	House	4
59.13		2	81.68	House x 2	4
60	House x 4	2	84	House	4
61	House	2	95	House	4
61.44	House x 6	2	96	House x 5	4
	House x 2	2	97	House x 3	4
62	House	2	98.7	House	4
62.14	House x 2	2	100.6	House x 5	4

l 63	House	2 [102	House	4
64	House x 38	2	103		4
	House	2	104		4
65		2	100.6		4
65.4	House	2	104		4
66.05	House	2	105		4
66.29	House	2	106	ļ	4
68.1	House	2	107.4		4
68.4	House x 20	2	109.4	House	4
71	House x 22	2	110	House x 6	4
72	House x 5	2	111.8		4
73	House x 2	2	111.9		4
74	House x 3	2	113		
75		2	113.7		4
	House				4
	House x 4	2	113.9		4
	House x 6	2	114		4
79	House x 4	2	115		4
86	House x 2	2	116		4
88	House	2	117		4
89	House	2	117.5		4
90	House	2	120	House x 11	4
90.5	House	2	120.1	House x 5	4
93.5	House	2	120.8	House x 13	4
104	House x 2	2	121	House x 8	4
105	House x 2	2	122.5		4
114	House	2	123		4
154	House	2	123.9	House x 2	4
159.55	House x 2	2	124.4		4
57.29	Self Build	2	125	House	4
140	Self Build	2	126	House x 15	4
69	Bungalow	3	127	House x 7	4
87.92	Bungalow	3	128	House x 35	4
87.95	Bungalow	3	129	House x 2	4
88.16	Bungalow	3	129.6	House x 13	4
88.25	Bungalow	3	130	House x 25	4
93.28	Bungalow	3	130.5	House x 2	4
99	Bungalow x 2	3	130.8		4
100	Bungalow	3	131		4
112	Bungalow x 2	3	132	ļ	4
131	Bungalow	3	132.5	House x 2	4
164.02	Bungalow	3	133	House x 16	4
192.4	Bungalow	3	134	House x 8	4
118	Flat	3	135	House x 5	4
127	Flat x 2	3	136	House x 9	4
129	Flat	3	137	House	4
137	Flat	3	137.7	House x 11	4
159	Flat	3	138	House x 2	4
58	House	3	138.8	House x 2	4
65	House x 2	3	139	House x 8	4
66	House x 5	3	140	House x 20	4
69	House x 3	3	140.2	House x 4	4
71	House	3	141	House x 8	4
71.97	House	3	142	House x 11	4
71.97	House x 3	3	143.79	House	4
73	House x 5	3	144.4	House	4
73.1		3	144.4		4
/ 3.1	House x 15	3	145	House	4

74	House x 2	3 [146	House	4
	House x 4	3	147		4
	House x 7	3	148	House x 4	4
77	House x 12	3	148.18		4
77.1	House x 8	3	150.6	House x 3	4
77.3	House x 3	3	151	House x 6	4
77.7	House x 22	3	151.8	House	4
78	House x 14	3	153	House x 14	4
78.4	House	3	154	House x 8	4
79	House x 51	3	156	House x 3	4
80	House x 6	3	157	House x 2	4
81	House x 13	3	158	House x 11	4
	House	3	160		4
81.68		3	160.3		4
82		3			
	House	3	160.91		4
82.1	House x 2		161		4
	House x 2	3	162.74		4
82.8	House x 2	3		House x 5	4
83	House x 4	3	164		4
83.18	House	3	166.5	House	4
83.4	House	3	167	House x 4	4
84	House x 8	3	169	House x 5	4
84.4	House x 6	3	173.9		4
84.63	House	3	177		4
85	House x 2	3	181.5		4
85.3	House	3	182		4
85.84	House	3	182.9		4
85.9	House	3	185	House	4
86	House x 7	3	190	House x 3	4
86.6	House x 2	3	193	House	4
86.7	House	3	195.8	House	4
87	House x 6	3	196	House	4
87.5	House x 6	3	196.9	House	4
	House x 5	3	204		4
88.4	House x 6	3	206	House x 4	4
88.8	House x 4	3	207	House	4
89	House x 14	3	208	House	4
90	House x 2	3	209	House x 2	4
90.9	House	3	211	House	4
91	House	3	217	House x 2	4
91.2	House x 6	3	235	House	4
91.59	House x 2	3	237	House	4
92	House x 13	3	239	House x 3	4
92.9	House	3	259	House	4
93	House x 15	3	261	House	4
95	House x 2	3	269	House	4
95.2	House x 2	3	272	House	4
95.9	House x 2	3	299	House	4
96	House x 11	3	304	House	4
97	House x 16	3	162	Self Build	4
97.3	House x 6	3	170	Self Build	4
98	House x 2	3	177.6	Self Build	4
98.8	House x 5	3	203	Self Build	4
99	House x 5	3	204	Self Build	4
100	House x 18	3	244	Self Build	4
101.4	House x 3	3	299	Self Build	4
101.4	0400 A 0	<u> </u>	200	Don Dana	т .

101.8	House x 2	3	148	House	>4
101.84	House	3	154	House	>4
102	House x 3	3	154.4	House	>4
103	House x 13	3	158	House	>4
103.3	House	3	160.1	House x 2	>4
104	House x 14	3	166.5	House x 2	>4
104.66	House	3	167	House x 6	>4
104.9	House	3	176	House x 10	>4
105	House x 20	3	177	House x 3	>4
106	House x 2	3	179	House x 8	>4
106.2	House x 5	3	180	House	>4
107	House x 22	3	184	House x 2	>4
108	House x 3	3	185	House x 2	>4
108.5	House x 21	3	187	House	>4
108.7	House x 4	3	189	House	>4
109	House	3	193	House	>4
110	House x 11	3	200	House	>4
112	House	3	201	House x 5	>4
112	House x 16	3	206	House x 2	>4
112.6	House x 6	3	211.2	House	>4
113	House x 3	3	212.5	House x 3	>4
113.6	House x 9	3	214.1	House x 5	>4
114	House x 13	3	215	House	>4
115	House x 2	3	279	House	>4
116	House x 7	3	417	House	>4
117	House x 19	3	214	Self Build	>4

Glossary

Affordable	Housing for sale or rent, for those whose needs are not met by
housing	the market (including housing that provides a subsidised route to
	home ownership and/or is for essential local workers).
Affordable	The calculation of the amount of affordable housing required
Housing Need	within a particular area – usually done as part of a Strategic
Assessment	Housing Market Assessment.
Air Quality	Areas designated by local authorities because they are not likely
Management	to achieve national air quality objectives by the relevant
Areas	deadlines.
Brownfield land	
	See previously developed land.
Brownfield land	Registers of previously developed land that local planning
registers	authorities consider to be appropriate for residential development,
	having regard to criteria in the Town and Country Planning
	(Brownfield Land Registers) Regulations 2017.
Call for Sites	This is an invitation from the council during the preparation of
	development plans for landowners/agents to put forward land to
	be considered for development.
Climate change	Action to reduce the impact of human activity on the climate
mitigation	system, primarily through reducing greenhouse gas emissions.
Commitments	Sites with planning permission or allocated for development in a
	development plan.
Community	A levy allowing local authorities to raise funds from owners or
Infrastructure	developers of land undertaking new building projects in their area.
Levy	developers of land undertaking new building projects in their area.
Conservation	Areas designated for their special architectural and historic
Area	character.
Curtilage	The curtilage of a property is the land immediately surrounding
Curtilage	and closely associated with it. It usually refers to a residential
	curtilage, which is the immediate domestic garden ground
	associated with a dwelling, but it can be used to refer to land
0 1 10 16	associated with other buildings.
Custom and Self	Custom and self-build housing projects are those where someone
Build	directly organises the design and construction of their own home.
	This can take a "hands on" approach involving a traditional DIY
	self-build home, to projects where the "self-builder" employs
	someone to build their home for them, or where the "self-builder"
	works with a developer as an individual or a group to help deliver
	their own home.
Dartmoor	Dartmoor National Park is an area of land designated as a
National Park	National Park, which includes parts of Teignbridge, South Hams,
	West Devon and Mid Devon. It has its own Local Planning
	Authority and produces its own Local Plan.
Development	Is defined in section 38 of the Planning and Compulsory
Plan	Purchase Act 2004, and includes adopted local plans,
	neighbourhood plans that have been made and published spatial
	development strategies, together with any regional strategy
	policies that remain in force.

Dueft Netional	This is an analytical accession of the COAO National Diameira Delica
Draft National	This is an updated version of the 2012 National Planning Policy
Planning Policy	Framework and was published for public consultation on 5 March
Framework	2018.
Edge of	Sites that lie adjacent to a settlement boundary of an urban area,
settlement	town or village.
European site	Sites protected under European legislation, including Special
	Areas of Conservation, Sites of Community Importance, Special
	Areas of Conservation and Special Protection Areas.
Green	A network of multi-functional green space, urban and rural, which
infrastructure	is capable of delivering a wide range of environmental and quality
	of life benefits for local communities.
Gross Value	The measure of the value of goods and services produced in an
Added (GVA)	area, industry or sector of an economy.
Gypsies and	Persons of nomadic habit of life whatever their race or origin,
Travellers	including such persons who on grounds only of their own or their
	family's or dependants' educational or health needs or old age
	have ceased to travel temporarily, but excluding members of an
	organised group of travelling showpeople or circus people
	travelling together as such.
Habitats	The Habitats Directive requires an appropriate assessment where
Regulation	a plan or project is likely to have a significant effect upon a
Assessment	European site, either individually or in combination with other
	projects.
Housing and	All local planning authorities are required by national planning
Economic Land	policy and guidance to maintain an up-to-date picture of the
Availability	amount of land that is available for new development, including
Assessment	land for housing and economic development. This process is
	known as the Housing and Economic Land Availability
	Assessment (HELAA). The HELAA is a technical assessment, not
	a policy-making document. This was previously done through a
	Strategic Housing Land Availability Assessment.
Heritage asset	A building, monument, site, place, area or landscape identified as
3	having a degree of significance meriting consideration in planning
	decisions, because of its heritage interest. It includes designated
	heritage assets and assets identified by the local planning
	authority (including local listing).
Historic	All aspects of the environment resulting from the interaction
environment	between people and places through time, including all surviving
	physical remains of past human activity, whether visible, buried or
	submerged, and landscaped and planted or managed flora.
Infrastructure	The physical structures and facilities (e.g. buildings, roads, power
	supplies) needed for development.
Infrastructure	This identifies the infrastructure that will support Local Plan delivery.
Delivery Plan	,
Local connection	A person or household who have a connection to a local area, by
	way or residence, employment or family connections.
Locally	These are buildings, monuments, sites, places, areas or
designated	landscapes identified as having a degree of significance meriting
heritage asset/	consideration in planning decisions but which are not formally
Locally listed	
	ı

	designated havitage appets. In some areas level sutherities
	designated heritage assets. In some areas, local authorities
	identify some non-designated heritage assets as 'locally listed'.
Local planning	The public authority whose duty it is to carry out specific planning
authority	functions for a particular area.
Local nature	A body, designated by the Secretary of State for Environment,
partnership	Food and Rural Affairs, established for the purpose of protecting
	and improving the natural environment in an area and the benefits
	derived from it.
Local policies	Policies contained in a neighbourhood plan, or those policies in a
	local plan that are not strategic policies.
Market housing	Private housing for rent or for sale, where the price is set in the open
	market.
Modern Methods	Modern methods of construction (MMC) is a term used to
of Construction	describe a number of construction methods which differ from
(MMCs)	'traditional' construction. Other terms that are commonly used
	include off-site construction, factory-built, industrialised or system
	building and pre-fabrication.
Nationally	These are minimum space standards set out by national
Described Space	government, including room size, ceiling heights and storage
Standards	areas. They can be included within Local Plan policy and would
	apply to all residential development within that area.
National Planning	The National Planning Policy Framework sets out the
Policy	Government's planning policies for England and how these are
Framework	expected to be applied.
National Planning	The National Planning Policy Guidance provides additional
Practice	guidance to local planning authorities to ensure the effective
Guidance	implementation of the planning policy set out in the National
	Planning Policy Framework.
National policy	This refers to the National Planning Policy Framework and
	accompanying Planning Practice Guidance.
Neighbourhood	A plan prepared by a parish council or neighbourhood forum for a
plans	designated neighbourhood area.
Objectively	A standardised way of calculating the minimum housing
Assessed Need	requirement for each local authority.
(OAN)	requirement for each result authority.
Older people	People over or approaching retirement age, including the active,
oraci poopio	newly-retired through to 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.
Open space	All open space of public value, including not just land, but also
	areas of water (such as rivers, canals, lakes and reservoirs)
	which offer important opportunities for sport and recreation and
	can act as a visual amenity.
People with	People have a disability if they have a physical or mental
disabilities	impairment, and that impairment has a substantial and long-term
	adverse effect on their ability to carry out normal day-to-day
	activities. These persons include, but are not limited to, people
	with ambulatory difficulties, blindness, learning difficulties, autism
	and mental health needs.
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ermission in A form of planning consent granted by a local planning authority	
rinciple which establishes that a site is suitable for a specified amount of	
housing-led development in principle. Following a grant of	ı
permission in principle, the site must receive a grant of technical	ı
details consent before development can proceed.	•
lanning A legal agreement entered into under section 106 of the Town	
bligation and Country Planning Act 1990 to mitigate the impacts of a	
development proposal.	
reviously Land which is or was occupied by a permanent structure,	
eveloped land including the curtilage of the developed land (although it should	
not be assumed that the whole of the curtilage should be	
developed) and any associated fixed surface infrastructure. This	
excludes: land that is or has been occupied by agricultural or	•
forestry buildings; land that has been developed for minerals	
extraction or waste disposal by landfill, where provision for	
restoration has been made through development control	
procedures; land in built-up areas such as residential gardens,	
parks, recreation grounds and allotments; and land that was	
previously-developed but where the remains of the permanent	
structure or fixed surface structure have blended into the	
landscape.	
rimary shopping Defined area where retail development is concentrated (general	lv,
rea comprising the primary and those secondary frontages which are	
adjoining and closely related to the primary shopping frontage).	C
rimary and Primary frontages are likely to include a high proportion of retail	
econdary uses which may include food, drinks, clothing and household	
ontages goods. Secondary frontages provide greater opportunities for a	
diversity of uses such as restaurants, cinemas and businesses.	
ent to Buy Rent to buy is a government scheme that provides new build	
homes for rent at 80% of market price for up to 5 years, to allow	
occupiers to save and to either purchase the property after this	
period or enter into shared ownership.	
ural exception Small sites used for affordable housing in perpetuity where sites	<u> </u>
ites would not normally be used for housing. Rural exception sites	
seek to address the needs of the local community by	
accommodating households who are either current residents or	
have an existing family or employment connection. A proportion	
of market homes may be allowed on the site at the local plannin	
authority's discretion, for example where essential to enable the	_
delivery of affordable units without grant funding.	
106 agreement See Planning obligation	
etting of a The surroundings in which a heritage asset is experienced. Its	
eritage asset extent is not fixed and may change as the asset and its	
surroundings evolve. Elements of a setting may make a positive	
or negative contribution to the significance of an asset, may affe	
the ability to appreciate that significance or may be neutral.	
ettlement A notional boundary that is drawn around an existing urban area	ì,
oundary town or village, outside which is regarded for planning purposes	
as countryside.	

Settlement	A settlement hierarchy is a system of ranking settlements by their population, physical size and level of services and facilities
hierarchy	
Shoreline	A plan providing a large-scale assessment of the risk to people
Management	and to the developed, historic and natural environment associated
Plans	with coastal processes.
Special Areas of	Areas given special protection under the European Union's
Conservation	Habitats Directive, which is transposed into UK law by the
	Habitats and Conservation of Species Regulations 2010.
Special	Areas which have been identified as being of international
Protection Areas	importance for the breeding, feeding, wintering or the migration of
	rare and vulnerable species of birds found within European Union
	countries. They are European designated sites, classified under
	the Birds Directive.
Site of Special	Sites designated by Natural England under the
Scientific Interest	Wildlife and Countryside Act 1981.
Strategic	A procedure (set out in the Environmental Assessment of Plans
environmental	and Programmes Regulations 2004) which requires the formal
assessment	environmental assessment of certain plans and programmes
	which are likely to have significant effects on the environment.
Strategic	Site of % hectares or above for employment development
employment site	
Strategic	The Strategic Environmental Assessment Directive is a European
Environmental	Union requirement that seeks to provide a high level of protection
Assessment	of the environment by integrating environmental considerations
	into the process of preparing certain plans and programmes.
Strategic	A Strategic Housing Land Availability Assessment identifies land
Housing Land	and assesses the availability, suitability and deliverability of that
Availability	land as a potential housing site.
Assessment	
(SHLAA)	
Strategic	A Strategic Housing Market Assessment forms part of the
Housing Market	evidence base for the local plans and aims to identify the
Assessment	scale and mix of housing and the range of tenures that the
(SHMA)	local population is likely to need over the plan period.
Strategic housing	Sites of 500+ dwellings
site	
Strategic plan	A plan which sets out the strategic policies for an area in the form
	of an individual or joint local plan (which may also include local
	policies); or a spatial development strategy prepared by an
	elected Mayor or combined authority (where this power has been
	conferred).
Strategic policies	Policies and strategic site allocations which address strategic
	priorities.
Supplementary	Documents which add further detail to the policies in the
planning	development plan. They can be used to provide further guidance
documents	for development on specific sites, or on particular issues, such as
	design. Supplementary planning documents are capable of being
	a material consideration in planning decisions but are not part of
	the development plan.
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Sustainability	A sustainability appraisal is an appraisal of the economic,
appraisal	environmental, and social effects of a plan from the outset of the
	preparation process to allow decisions to be made that accord
	with sustainable development objectives.
Sustainable	Any efficient, safe and accessible means of transport with overall
transport modes	low impact on the environment, including walking and cycling, low
	and ultra low emission vehicles, car sharing and public transport.
"Teignbridge	This phrase refers to the requirement, as set out in the Adopted
Rule"	Local Plan, for 5% custom and self build plots to be provided on
	all developments of 20 or more.
Town centre	Area defined on the local authority's policies map, including the
	primary shopping area and areas predominantly occupied by
	main town centre uses within or adjacent to the primary shopping
	area. References to town centres or centres apply to city centres,
	town centres, district centres and local centres but exclude small
	parades of shops of purely neighbourhood significance. Unless
	they are identified as centres in the development plan, existing
	out-of-centre developments, comprising or including main town
	centre uses, do not constitute town centres.
Travellers	See Gypsies and Travellers
Vacant Building	Where a vacant building is brought back into any lawful use, or is
Credit	demolished to be replaced by a new building, the developer
	should be offered a financial credit equivalent to the existing
	gross floorspace of relevant vacant buildings when the local
	planning authority calculates any affordable housing contribution
	which will be sought.
Viability	A process of assessing whether a site is financially viable, by
Assessment	looking at whether the value generated by a development is more
	than the cost of developing it.

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