



PlanTeignbridge

LOCAL PLAN REVIEW 2020-2040

Teignbridge Draft Local Plan 2020-2040 Part 2

Consultation Statement

May 2021

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Introduction

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

This Consultation Statement refers **only to the relevant sections included in the Draft Local Plan Part 2 publication** and therefore sets out any engagement linked to developing the strategy and site options for development. It does not repeat the steps taken to develop the policies which were consulted on in the Draft Local Plan Part 1 consultation.

Please note, therefore, that this consultation statement does not refer to the Draft Local Plan Part 1 Consultation which was published in March 2020. This is because Part 1 focused on policy issues only and is not relevant to the development strategy and site options which are included within this current Draft Local Plan Part 2 consultation. Instead, it refers to matters which were consulted on as part of the Issues Consultation in May 2018.

A consultation statement referring to the responses made in both the Part 1 and Part 2 consultations will be published alongside the Proposed Submission version of the Local Plan, currently scheduled for summer 2022.

As such, this consultation statement sets out:

Section 1: Review of Engagement (relevant to the Draft Local Plan Part 2)

Representations made pursuant to the Regulation 18 Issues and Options Consultation (May 2018)

- What we consulted on
- How we consulted
- Who we consulted
- How representations have been taken into account (section 2)

Engagement following Regulation 18 Issues and Options Consultation

- Local Plan Working Group

Site Selection Process

- Independent Stakeholder Panel
- Engagement with Neighbourhood Planning Groups

Duty to Co-operate and key stakeholder meetings

Section 2: Considering Responses (relevant to the Draft Local Plan Part 2)

- How representations have been taken into account

Section 1: Review of Engagement

Representations made pursuant to the Regulation 18 Issues and Options Consultation (May 2018)

What we consulted on:

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

The papers included:

[Local Plan Review Issues Paper](#) - set the scene of the main issues facing the district now and up to 2040 to generate discussion and debate. The paper was divided into topics and contained specific questions for comment. Topics includes: homes, jobs & prosperity, town centres, environmental stewardship, climate change & energy and, communication, movement & infrastructure.

[Settlement Boundary Review](#) – a desktop review of existing settlement boundaries, based on a methodology and using a combination of aerial photos and planning applications to ascertain changes in land use since the last review of the settlement boundaries, approximately 20 years ago.

[Settlement Hierarchy Review](#) – a review of services within settlements. Parish and Town councils were asked to complete a settlement facilities survey, which was supplemented through online research, to produce a set of definitions of role and function of urban area/towns/main villages/defined villages.

[Statement of Community Involvement](#) – sets out what consultation will take place with the community on planning policy documents and planning applications. The Statement of Community Involvement was adopted by the Council in June 2019.

[SA/SEA Stage A Scoping Report](#) required by Planning and Compulsory Purchase Act 2004, and updated by the Planning Act 2008) Strategic Environmental Assessment required by European Directive and Environmental Assessment of Plans and Programmes 2004.

[HRA screening](#) – HRA not required as no policies or allocations were proposed

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

How we Consulted

[Hard copies](#) of the above papers and questionnaires were available for inspection at Teignbridge District Council Forde House offices and at all libraries (Newton Abbot, Dawlish, Chudleigh, Kingsteignton, Kingskerswell, Teignmouth, Bovey Tracey and Devon Mobile Library).

Dedicated webpages on the Council's website:

- Downloadable copies of all documents
- Online questionnaire
- Roadshow exhibition boards
- FAQs
- Call for Sites form

Social Media:

- 22 Facebook posts (21, 23, 29, 31 May 2018, 1, 4, 6, 7, 11, 13, 15, 19, 21, 22, 26, 27, 28 June 2018 and 6, 11 July 2018)
- 19 Tweets (23, 24 May 2018, 1, 4, 5, 6, 7, 11, 13, 15, 18, 19, 21, 26, 27, 28 June 2018 and 6, 9, 10, 11 July 2018)
- Facebook post and/or Tweet prior to each roadshow

Media:

- Online and printed press 7 times: Mid Devon Advertiser - 27 May 2018 & 8 June 2018; Herald Express - 27 June 2018; Devon Live - 3 May 2018, 24 May 2018, 21 June 2018; The Breeze website- 5 June 2018
- Eleven Consultation Roadshows: public roadshows held where people were able to view exhibition boards, discuss issues, get hard copies of the documents, comments cards and contact details (Newton Abbot – Old Forde House and Highweek; Kingskerswell; Kingsteignton; Teignmouth; Dawlish; Chudleigh; BoveyTracey; Exminster; Ipplepen; Tedburn St Mary)
- Posters were produced to advertise the consultation Roadshows. Town and Parish Councils were contacted and asked to display these posters. The letter sent to all Parish and Town Councils requesting that posters be displayed is included at Appendix 1.

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

Who we consulted

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

There was targeted engagement with:

- Teignbridge Affordable Housing Partnership
- Neighbourhood Planning Groups (3 of 5 attended)
- Town and Parish Councils
- District Councillors
- Internal departments
- Gypsy & Traveller forum
- Teignbridge Association of Local Councils

A summarised list of people notified is provided in Appendix 3.

How the Responses received have influenced the Draft Local Plan

Section 2 of this Consultation Statement sets out a summary of how comments have informed the preparation of the Draft Local Plan 2020-2040 Part 2. Full responses are included at Appendix 4.

Engagement following Regulation 18 Issues and Options Consultation

Local Plan Working Group

Seven Member Local Plan Working Groups were held between October 2020 and May 2021 specifically addressing matters relating to the Draft Local Plan Part 2 Consultation.

Membership of the Group has comprised of 9 councillors as follows (with deputies permitted if necessary):

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

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

The purpose of the Local Plan Working Group has been to provide cross-party Councillor involvement in the preparation of the Local Plan. It has acted in the capacity of an informal 'sounding board', giving opinions, advice and guidance to officers to progress the draft Local Plan. For the purposes of this consultation, this has involved Members of the Working Group having early involvement in discussions about:

- Options around how new development might be distributed around the district
- Housing site options
- Employment site options
- Gypsy and traveller pitch requirements
- Low carbon energy generation potential
- Internal review of draft plan prior to consultation

The consultation version of the Draft Plan has been guided by these discussions, informed by the findings of site assessment work, settlement and infrastructure capacity assessments, the sustainability appraisal, Habitats Regulation Assessment screening and consultation feedback from the Issues Consultation.

Site Selection Process

Independent Stakeholder Panels

Two separate 'call for sites' were issued in 2017 (27 February - 10 April) and 2018 (21 May - 31 August). These invited any landowners, site promoters and developers in the area to submit any land within Teignbridge (outside of the Dartmoor National Park) that was available and which they wished to be assessed as a potential site for development. We received over 300 sites through this process, all of which have been assessed as part of the Housing and Economic Land Availability Assessment.

All of the sites were initially assessed by Officers and were then referred to independent stakeholder panels for consideration.

Three separate panels were held.

Residential sites stakeholder panel comprising:

- Maze Commercial Property Agency
- Taylor Wimpey
- Land & Planning
- Baker Estates Limited
- Cavanna Homes
- Marcel Venn Associates
- Greenslade Taylor Hunt
- Andrew Kirby Associates
- Teign Housing
- Highways Agency
- TDC Drainage Manager
- TDC Custom Build Officer
- DCC Highways
- 2 x Elected District Councillors

Commercial land stakeholder panel comprising:

- Midas Group
- Torbay Development Agency
- Maze Commercial Property Agency
- Noon Roberts
- Pinnacle
- Porter Planning Economics
- DCC Highways
- TDC Economic Development
- TDC Drainage Manager
- Elected District Councillor

Gypsy and traveller stakeholder panel comprising:

- Marcel Venn Associates
- Teign Housing
- DCC Project and Policy Coordinator (Travelling and Vulnerable Communities)
- TDC Affordable Housing Manager
- TDC Drainage Manager
- TDC Principal Planner (Development Manager)
- DCC Highways
- 2 x Elected District Councillors

Engagement with Neighbourhood Planning Groups

In preparing the Draft Plan, we have referred to adopted Neighbourhood Plans and liaised with those preparing emerging Neighbourhood Plans to identify any complementary or conflicting issues to site identification. This includes identifying:

- any protected areas of designated Local Green Space

- any protected views and vistas
- any existing or proposed allocations.

These have been taken into consideration in the drafting of the Plan.

Duty to Cooperate

Meetings have taken place and are ongoing with neighbouring local authorities as part of a programme which will satisfy the Duty to Cooperate. Meetings and discussions have taken place and will continue over the plan making process, involving officers from;

Torbay Council

South Hams, Plymouth and West Devon

Dartmoor National Park

Exeter City Council

East Devon District Council

Mid Devon District Council

Devon County Council Education Service

Devon County Council Minerals and Waste Planning.

Section 2: Considering Responses (relevant to the Draft Local Plan Part 2)

How representations have been taken into account

The questionnaire published with the 2018 Issues Plan Consultation contained 35 questions to which responses were received. Comments in relation to the formation of planning policies were taken into account during the preparation of the draft Local Plan 2020-2040 Part 1 and the Consultation Statement published alongside the Plan in March 2020 set out how these responses had helped to shape the policies within the draft Part 1 Plan.

However, some of the questions related to issues being dealt with in Part 2 of the draft plan. These issues include:

- Allocation of small sites
- Strategic distribution of housing
- Creation of “Main Villages” within hierarchy of Heart of Teignbridge, towns and villages
- Preferences between allocating development in urban areas and towns, allocating development in villages with higher levels of service provision, allocating development in all villages with a Settlement Limit, or a new settlement
- Whether allocations for particular types of residential uses should be included, such as older people’s accommodation only or custom and self build only
- Whether opportunity areas for potential renewable energy developments should be included, and
- Infrastructure to support development and viability

At this stage, as the draft Local Plan is setting out site options and does not contain specific allocations, some comments cannot yet be fully responded to. They will be taken into account, along with comments received during the consultation on the draft Local Plan 2020-2040 Part 2, and a Consultation Statement outlining how comments have helped to shape the Submission version of the Plan will be published alongside the Submission Local Plan 2020-2040.

The full responses to the comments received can be found at Appendix 4. A summary of how comments received during the 2018 Issues Consultation is set out below:

Allocation of small sites:

You said – you were generally supportive of including small to medium sites within the Local Plan, subject to infrastructure being able to be provided and subject to Neighbourhood plan policies. There was some concern that the focus should not solely be around small sites, as larger sites are able to provide greater levels of infrastructure. Concern was raised about the ability of infrastructure within certain areas to cope with additional development and about development within the Greater Exeter Strategic Plan (GESP).

We did - The NPPF requires that 10% of the Council’s housing requirement is provided on sites of 1ha or less to encourage the diversification of the market and speed up delivery. At this stage, we are just consulting on a range of site options which include both strategic (large) scale sites through to sites as small as 10 units. No decisions on which sites are allocated will be made until the Submission Local Plan is submitted but we will be required to conform with the NPPF requirements when including final sites in the Submission Plan.

Neighbourhood Plans are a material consideration in plan-making and have informed the selection of site options proposed in the Draft Plan.

Individual developments may be required to make S106 payments towards any infrastructure required in association with the development. This would be determined on a site by site basis with infrastructure requirements being identified through the Local Plan process and set out in the Submission Local Plan.

The Draft Local Plan (Part 2) notes settlement and site specific constraints ,and decisions on which sites to take forward will be further informed through the Draft Plan stage of consultation and will be reflected in the next stage (Submission version) of the Local Plan.

GESP is no longer being prepared. Each partner authority is now preparing its individual Local Plans. Nevertheless, strategic sites are still being considered and work on a non-statutory joint strategy is ongoing to help manage development across the wider area. The proposed development strategy for Teignbridge has been based on a set of key principles which are set out in Chapter 2 of the Draft Plan

Strategic distribution of housing:

You said – you were supportive of proportionate growth of villages, however, some concern was expressed about development in rural areas. There was mixed support and concern for development in Newton Abbot, with some considering that the town had expended too much already and others acknowledging that development should happen in places where existing services and facilities exist and, where people can walk, cycle and use public transport. Support for development in other towns, including Teignmouth and Dawlish and development on the edge of Exeter.

You also said that our development strategy should take account of existing services and facilities, infrastructure capacity, sustainability, ecology constraints and landscape/protection of rural areas.

We did – Our development strategy options contain opportunities for development within and on the edges of the district’s towns (excluding Chudleigh because of significant ecological sensitivities), and on the edge of Exeter, where there are higher level services and facilities, a wider range of day-to-day services and facilities and a greater choice of public transport. Ecology and landscape constraints have been taken into account when assessing sites. Our development strategy options also contain proportionate growth in villages, reflecting the support for growth of villages, but concern about the extent of enlargement allowed.

Creation of “Main Villages” within hierarchy of Heart of Teignbridge, towns and villages

You said - there was a mixed response in relation to the creation of a separate “tier” of “Main Village” within the “villages” category. There was support for the idea of identifying villages where a greater level of service provision was available, but there was also concern about the effect of large scale development on villages, in terms of infrastructure capacity, including education and roads, and about the effect on the character of villages and surrounding landscape. Comments in relation to specific settlements included both support for and concern about development in particular areas.

We did – we did not progress the identification of “Main Villages”, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed. In this

way, we are locating greater levels of development where there are more services and facilities, but we are restricting overall levels of development to prevent large scale expansion and harm to the character of the district's villages. Specific concerns relating to particular towns, villages or sites, are reflected in the constraints and sensitivities set out in the draft Plan.

Preferences between allocating development in urban areas and towns, allocating development in villages with higher levels of service provision, allocating development in all villages with a Settlement Limit, or a new settlement:

You said – there was mixed support and concern for all development options. Support for development in towns, where there is existing infrastructure and services, where development is more likely to include brownfield land and support town centres and, will help to protect the countryside was contradicted by views that some of our towns are saturated with development. There was some support for focussing a greater level of development in villages that have higher levels of services (those previously proposed as “Main Villages”), but there was a lot of support for small scale development on the edges of all villages. This was seen as a way of supporting existing rural communities and their facilities, but there was acknowledgement that this approach would need to be combined with development in towns in order to accommodate our development needs. There was also concern about the scale of development that could be proposed for villages. There was a mixed response to the idea of allocating a new settlement. The advantages were that it was seen as a way of providing comprehensive infrastructure from the start and that it would be more sustainable, however, disadvantages of the time a new settlement takes to deliver, the cost of providing all new infrastructure, the complications arising from multiple land owners and the risk of this approach – “putting all your eggs in one basket”.

We did – We have included options for development strategy within the draft Plan, but have not allocated sites. Site options include those within and adjacent to towns (with the exception of Chudleigh due to significant ecology constraints), sites on the edge of Exeter, and sites on the edges of villages. Options to include a proportionate approach to development on the edges of villages reflects the comments in support of small scale expansion of villages to help rural communities to be sustained. The restriction of this development to between 5% and 15% of the size of the existing village will prevent new development overwhelming existing communities and addresses concerns over the extent of development that may be allocated. Comments on the draft Local Plan 2020-2040 Part 2 will inform the sites allocated within the Submission Local Plan alongside those comments that have not yet fully been taken account of.

Whether allocations for particular types of residential uses should be included, such as older people's accommodation only or custom and self build only:

You said – it would be good to allocate some sites for particular types of residential development, or to allocate parts of larger sites for particular residential uses, as this would provide a greater degree of clarity, meet localised needs and help to provide a mix of accommodation. However, there was also concern that this could be too prescriptive and may prevent larger sites being developed. There was also concern about the division between types of housing and that an overall mix is better.

We did – As we are not allocating sites in the draft Local Plan 2020-2040 Part 2, we are not identifying sites for particular uses – with the exception of differentiating between housing and

employment sites. However, when we start to allocate sites for the Submission plan, we will consider whether any sites, or parts of sites, should be allocated for particular types of residential development. This will be further informed by comments received to the draft Plan.

Whether opportunity areas for potential renewable energy developments should be included:

You said – There was general support for the principle of identifying opportunity areas for renewable energy development, and no comments specifically against their identification. Comments made in relation to renewable energy policy were included in the Consultation Statement published alongside Part 1 of the draft Local Plan and are not summarised here.

We did - The draft Local Plan 2020-2040 Part 2 is not allocating sites for renewable energy. However, technical evidence has been collected that identifies the potential wind and solar resource in the district. Further work will be undertaken on how the district could support renewable energy through Local Plan site allocations in liaison with local communities. We aim to run a consultation on potential wind sites in 2021. The Submission Plan will contain any sites chosen to accommodate either wind or solar generated renewable energy.

Infrastructure to support development and viability

You said – that the requirements set out for allocated sites must be realistic so they can be delivered to serve the development, that allocated development sites should contain community facilities, new education provision and healthcare and, that all infrastructure should be delivered in a timely manner.

We did - The site requirements for each site option contained in the draft Local Plan 2020-2040 Part 2 are set out, along with opportunities and sensitivities. These requirements will be further informed through the draft Plan consultation and the Submission version of the Local Plan will contain specific and full infrastructure requirements for each allocated site to ensure that infrastructure is provided to serve new development. Draft Local Plan 2020-2040 Part 1, Policy SC5 ensures that appropriate infrastructure is provided in the development as early on as possible. Where there are specific site requirements about timing, these will be included within the site allocations in the Submission Plan. The Submission Plan and sites will be viability tested to ensure they are deliverable.

Appendix 1

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

Dear Parish Council

Teignbridge Local Plan Review 2020-2040 – Display of Posters

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

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

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

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

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

Yours faithfully

Spatial Planning

Consultee letter

Dear consultee,

Review of the Teignbridge Local Plan 2013 - 2033

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

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

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

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

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

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

Make Your Views on the Local Plan Review Known:

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

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

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

Any comments received through consultation must be in writing which can be done through the completion of our **online questionnaire at:** www.teignbridge.gov.uk/localplanreview

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

in the post to:

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

You can view the above documents online at: www.teignbridge.gov.uk/localplanreview

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

Teignbridge District Council	Forde House Brunel Road Newton Abbot TQ12 4XX	Mon- Fri 9am-4pm Sat-Sun- Closed
Newton Abbot Library	Passmore Edwards Centre Market Street Newton Abbot Devon TQ12 2RJ	Mon- Thurs- 9am- 6pm Fri- 9am- 5pm Sat- 9am- 4pm
Kingsteignton	Newton Road Kingsteignton Devon TQ12 3AL	Mon- 2pm- 5pm Tues & Thurs- Closed Weds- 10am- 6pm Fri- 10am-5pm Sat- 10am- 1pm
Kingskerswell	1 Newton Road Kingskerswell TQ12 5EH	Mon- 10am- 1pm Tues & Weds- 2pm-5pm Thurs- Closed Fri- 2pm- 5pm Sat- 10am – 1pm
Dawlish Library	Lawn Terrace Dawlish Devon EX7 9PY	Mon- 9am-1pm Tues- 9am- 5pm Weds- closed Thurs- 9am- 6pm Fri- 9am- 5pm Sat- 9am- 1pm
Teignmouth Library	Fore Street Teignmouth Devon TQ14 8DY	Mon & Weds- 9am- 6pm Tues- 9am- 5pm Friday 9am- 5pm Sat 9am- 1pm
Bovey Tracey Library	Abbey Road Bovey Tracey Devon TQ13 9HZ	Mon & Weds-Closed Tues- 10am-6pm Thurs- 10am-5pm Fri & Sat- 10am-1pm
Chudleigh Library	Market Way Chudleigh Devon TQ13 0HL	Mon- 10am-1pm Tues- 3pm- 6pm Weds- 10am- 1pm Thurs- Closed Fri- 2pm- 5pm Sat- 10am- 1pm

Response Guidance

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

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

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

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

Call for Sites

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

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

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

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

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

If you wish to submit your site for assessment as part of the Local Plan Review, please fully complete the **Call for Sites Submission Form** at: www.teignbridge.gov.uk/callforsites

Please follow the instructions and guidance notes on the website and ensure you provide a map of the site at suitable scale, preferably a land registry document. Land registry records can be accessed at the following website:

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

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

Appendix 3

List of People Notified

Town and Parish Councils (including Parish Meetings)

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

All Ward Members

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

Other Consultees:

474 other consultees were contacted (282 businesses/organisations and 192 members of the public).

Appendix 4

Full responses to comments made on the Local Plan Issues Consultation 2018

Q2. Do you agree that the Local Plan Review should focus on allocating for small to medium sites to encourage smaller builders and increase housing delivery?

Summary of Main Points Raised	Responses to Main Points Raised
<p>Agree, the Review should focus on allocation of small to medium sites</p>	<p>The NPPF requires that 10% of the Council’s housing requirement is provided on sites of 1ha or less to encourage the diversification of the market and speed up delivery. At this stage, we are just consulting on a range of site options which include both strategic (large) scale sites through to sites as small as 10 units. No decisions on which sites are allocated will be made until the Submission Local Plan is submitted but we will be required to conform with the NPPF requirements when including final sites in the Submission Plan.</p>
<p>Don’t agree that the review should focus on allocation of small to medium sites</p>	<p>See above – there is a national policy requirement to provide at least 10% of the Council’s requirement on sites of 1ha or less.</p>
<p>Agree on the proviso:</p> <ul style="list-style-type: none"> • neighbourhood plans are fully considered • they are not seen as components to a future agglomeration into a larger whole • building would be the same as what is currently there • there is an infrastructure focus to support all housing • consideration of affordable housing through provision or cash contribution • Housing is suitable for the local area • On safeguards on character, appearance, design and quality- particularly in the rural area • existing residents are not adversely affect in terms of infrastructure burdens 	<p>Neighbourhood Plans are a material consideration in plan-making and have informed the selection of site options proposed in the Draft Plan.</p> <p>Individual developments may be required to make S106 payments towards any infrastructure required in association with the development. This would be determined on a site by site basis with infrastructure requirements being identified through the Local Plan process and legal agreements signed during the planning application process.</p> <p>Issues of landscaping, design, biodiversity, heritage etc. are all managed through the policies of the Local Plan. Site specific allocations (made through Part 2 of the Local Plan) will also contain site specific requirements in relation to these matters. Any relevant neighbourhood planning policies or allocations (including emerging policies and allocations) would also be a material consideration in the determination of planning applications. Whilst we are happy for Neighbourhood Plans to take the</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • negative consequences are fully considered at application stage • It forms part of delivering the overall plan • They are in different locations and not linked • Landscaping is carefully considered • Design is relevant to the area • It is achieved locally and for local people • Located on the edge of small-medium sized settlements • They are only allocated through NDP's 	<p>lead in allocating sites, we cannot require them to do so and therefore could not guarantee that sufficient land would be identified to meet our housing need if left solely to NPs.</p>
<p>The distribution strategy/Review must have regard to:</p> <ul style="list-style-type: none"> • The likely cross over between allocations and windfall sites and ensuring the windfall allowance is adjusted to prevent double counting • The key role small to medium sized sites play in housing delivery, particularly in light of the increase in housing delivery requirements • The very limited suitable space for sustainable development in the Bishopsteignton Parish • The uniqueness of the Teign Estuary and underlying geology which makes Bishopsteignton parish sensitive to major housing developments • Considering each site on its own merit and the potential benefits a scheme could bring • how to increase housing delivery rates to ensure the OAN is planned for and met throughout the plan period • the viability of the approach or find ways to share costs over a wider pool of sites 	<p>A windfall allowance of 130 homes per year is proposed in the Draft Plan, based on past records and evidence of potential future windfall supply.</p> <p>A significant focus of the Local Plan is to ensure there is enough available land to meet the Districts objectively assessed need prescribed through the standard method and to meet this requirement through improved delivery rates to ensure the housing delivery test is met.</p> <p>The Proposed Submission version of the Local Plan will be subject to a whole plan viability assessment to ensure chosen allocations are deliverable and viable.</p> <p>The Draft Local Plan (Part 2) proposes site options in the majority of the defined settlements of the district (i.e. the main towns and villages). Settlement and site specific constraints are noted in the plan itself and decisions on which sites to take forward will be further informed through the Draft Plan stage of consultation and will be reflected in the next stage (Submission version) of the Local Plan.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<p>A mix/balance of options/site sizes will be required to:</p> <ul style="list-style-type: none"> • deliver the full market and affordable housing needs effectively • appeal to a range of developers • assist in short term deliverability • provide a continued supply of sites with a longer lead-in time • ensure all types of housebuilders have access to suitable land to offer the widest possible range of products • diversify the market • Increase and maintain delivery 	<p>Noted. It is increasingly accepted that to enhance the affordability of housing we need to open up the market to a wider range of small and medium sized housebuilders.</p> <p>At this stage, we are just consulting on a range of site options which include both strategic (large) scale sites through to sites as small as 10 units. No decisions on which sites are allocated will be made until the plan is submitted but we will be required to conform with the NPPF requirements when including final sites in the Submission version of the Local Plan.</p>
<p>Alternative suggestions include:</p> <ul style="list-style-type: none"> • More than 50% of housing should be on sites of less than 5 hectares • Increase building height on brownfield sites • Maintain a focus on medium sites (9-200 units) as they've successfully been shown to encourage a range of builders, increase housing supply and delivery • challenging central government targets as they are not statutory provisions and ask them to show local need 	<p>The NPPF requires that 10% of the Council's housing requirement is provided on sites of 1ha or less to encourage the diversification of the market and speed up delivery. At this stage, we are just consulting on a range of site options which include both strategic (large) scale sites through to sites as small as 10 units. No decisions on which sites are allocated will be made until the plan is submitted but we will be required to conform with the NPPF requirements when including final sites in the Submission Plan.</p> <p>We are only able to challenge central government housing requirements where there are 'exceptional circumstances'. Work to date does not suggest that these 'exceptional circumstances' apply to Teignbridge and therefore we are proposing to meet our housing requirement in full.</p>
<p>Large sites in sustainable locations will play a significant role in ensuring increased housing targets are met</p>	<p>The Draft Plan proposes that the majority of new homes are provided in the largest settlements where the greatest range of facilities and public transport links are located. However, a mix of small, medium and large sites are being consulted on in order to ensure NPPF requirements are met and to help speed up overall delivery.</p>
<p>If any sites come forward for residential in Bishopsteignton they will be small, encouraging development by local builders</p>	<p>Noted.</p>
<p>Large sites around Bishopsteignton would decimate an already harmed village and should not be contemplated</p>	<p>Noted. Various site options are included for Bishopsteignton within the Draft Plan and comments are welcomed on each of the proposed sites.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<p>A mix approach should be taken with a focus on building new communities searching across the whole GESP area to find most appropriate sites and prevent inappropriate development of existing communities and landscapes</p>	<p>GESP is no longer being prepared. Each partner authority is now preparing its individual Local Plans. Nevertheless, strategic sites are still being considered and work on a non-statutory joint strategy is ongoing to help co-ordinate development across the wider Greater Exeter area. The proposed development strategy for Teignbridge has been based on a set of key principles which are set out in Chapter 2 of the Draft Plan.</p>
<p>Highly likely GESP will be responsible for identifying the largest sites within Teignbridge, which will continue to make up the majority of the District's housing land supply across the plan period.</p>	<p>GESP is no longer being prepared and the responsibility for allocating all sites will fall to individual Local Plans. Therefore, all future development needs required are included within this Draft Plan consultation.</p>
<p>Despite GESP, the remaining housing requirement may be of a scale that one or more additional large sites may need to be allocated</p>	<p>GESP is no longer being prepared and the responsibility for allocating all sites will fall to individual Local Plans. Therefore, all future development needs required are included within this Draft Plan consultation.</p>
<p>2480 dwellings (20% of 620 dwellings pa x 20 years) would be required on 138 new small independent allocations (based on 18 dwellings per site) which is totally unrealistic.</p>	<p>This calculation is based on our previous housing number which has since increased from 620 to 760. It is acknowledged that it would be very difficult to identify such a large amount of small sites and therefore a mix of small, medium and large sites are more likely going to be required to accommodate the need.</p>
<p>Impossible to determine site capacity without understanding developers margins and build costs (which change daily). Capacity would be better encompassed through a net developable area to provide a more accurate figure. Site capacity is potentially affected by:</p> <ul style="list-style-type: none"> • Poor ground conditions • TPO's on site • Sewers, cables or watercourses running through the site • Lower densities affecting returns 	<p>Detailed work has been undertaken and continues to take place to determine both the settlement and site specific constraints that will affect where and how development takes place. Site promoters and communities are encouraged to comment on the options presented in the Draft Plan to help further inform the allocations process.</p>
<p>This approach should not become the focus at the expense of continuing to consider larger sites required for larger developers</p>	<p>It is acknowledged that it would be very difficult to identify such a large amount of small sites and therefore a mix of small, medium and large sites are more likely going to be required to accommodate the need, including conforming to the NPPF</p>

Summary of Main Points Raised	Responses to Main Points Raised
	requirement for 10% of the housing requirement to be provided on sites of 1ha or less.
Large sites still required and should be encouraged to strengthen the role of key towns including Newton Abbot and Kingsteignton to support the range of existing services and role of the town centres	It is acknowledged that it would be very difficult to identify such a large amount of small sites and therefore a mix of small, medium and large sites are more likely going to be required to accommodate the need, including conforming to the NPPF requirement for 10% of the housing requirement to be provided on sites of 1ha or less.

Q4. Do you think the current spatial strategy's distribution of housing should be maintained through the Local Plan Review?

Summary of Main Points Raised	Responses to Main Points Raised
Support for current approach/strategy	Noted.
Support the need for proportionate growth to be allocated in main villages	The Draft Plan proposes that proportionate growth is distributed around all villages in the district which have a settlement limit (excluding Bickington). The level of growth proposed is based on a set of factors including base number of properties, level of service provision, connectivity, education capacity and theoretical site capacity.
Concerns raised over further steps towards total urbanisation of the Newton Abbot area and suburbanisation of its surroundings with concerns raised on: <ul style="list-style-type: none"> • The environment • Quality of life of inhabitants • Little to no acknowledgement that agriculture and tourism are principal employers or that retirement pensions are a major source of income 	Further growth in Newton Abbot is proposed in the Draft Plan consultation. This includes both urban regeneration site and greenfield site development. There are a number of constraints within and around the town which affect where and how development will take place, and which limit the amount of site options. Nevertheless, Newton Abbot is the districts largest settlement with an excellent range of services and with key employment and public transport connections. The co-location of new homes with services is important both for social sustainability and for mitigating the impacts of climate change. As such, any new development will need to be carefully planned to ensure that supporting infrastructure is in place for new and existing residents of the town. The Newton Abbot Garden Communities project will help to secure long lasting benefits for the wider community and ensure that new development is well connected to the existing centre and key facilities.
The current strategy should not be maintained because: <ul style="list-style-type: none"> • Needs to be spread out better 	There are many benefits to the 'Business as Usual' Scenario (i.e. the current strategy), particularly in relation to access to services and biggest opportunities to mitigate for the impacts of climate change. However, it has been recognised through the work

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Newton Abbot has been overdeveloped • Investment in infrastructure not matched by level of development • A change in the distribution strategy would address concerns over the long timescales associated with large strategic allocations • Travel times are made longer for those entering Newton Abbot at peak times due to traffic and lack of infrastructure • distribution of housing is biased to urban areas • housing should be directed where there is little growth such as Bickington, Liverton, Broadhempston and Ashburton • smaller distributions of housing could be sustainable in the majority of rural villages with appropriate infrastructure • Presently no evidence to confirm the distribution should be maintained at current levels • The infrastructure of Kingskerswell cannot sustain large scale development (200+ homes) and should be restricted to infill • a more even distribution is needed as many hamlet and villages are becoming enclaves • it misses an opportunity to allocate growth to prevent the risk of unplanned, sporadic development 	<p>done to date (consultation, site assessments and sustainability appraisal) that a slightly different pattern of development may have more benefits for the district. As such, the Draft Plan picks up on many of the comments raised here, including providing a proportion of development within the smaller settlements (i.e. villages) of the district. This will help to address any unmet housing need in the rural areas, support rural services (but not overburden them) and provide more opportunities for family and social support networks to live in close proximity to each other.</p> <p>There is also an emphasis on brownfield regeneration as part of the new strategy, particularly in Newton Abbot.</p> <p>Further details relating to associated infrastructure requirements will be provided in the Proposed Submission Plan as allocations are progressed. Site options included within this Draft Plan consultation contain indicative site requirements that are likely to be needed should the site be pursued to allocation.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<p>should Teignbridge not deliver on their emerging targets</p> <ul style="list-style-type: none"> • development should be scattered throughout towns and villages through infill and settlement boundary extensions • it should be reconsidered with growth directed elsewhere • Small housing developments in villages should be considered • every settlement should see some amount of growth proportionate to the settlements size with the following benefits: <ul style="list-style-type: none"> ○ Opportunity to deliver affordable homes ○ Can provide homes to suit people’s needs without having to move to urban areas due to a lack of housing in places they want to live. ○ Allowing settlements to grow would help support local services which are closing in rural areas due to viability ○ Development brings improvements from S106 and CIL ○ If the strategy is continued, rural areas will become too remote, dilapidated and 	

Summary of Main Points Raised	Responses to Main Points Raised
<p>unserved for existing residents</p> <ul style="list-style-type: none"> Newton abbot and its environs is out of proportion to other towns and villages 	
No	See above
<p>Strategy should be maintained because:</p> <ul style="list-style-type: none"> Rural areas should stay rural Over-development should not be permitted To prevent the elimination of the landscape It is line with the essential character of the area and particularly villages is more sensible as there is more brownfield land available near existing towns and urban areas people can walk, cycle or use local transport it ensures development is accessible and has good connectivity with existing facilities and amenities Focusing new development toward isolated rural locations would be poorly served by facilities and amenities and have detrimental impacts on the natural environment Development of newton abbot is a huge plus and has been well considered it is important for new development to be in areas with sufficient infrastructure 	<p>Through the work done to date (consultation, site assessments and sustainability appraisal) it has been identified that whilst there are many benefits of the current strategy (particularly in relation to access to services and biggest opportunities to mitigate for the impacts of climate change) a slightly different pattern of development may have additional benefits for the district. This includes providing a proportion of development within the smaller settlements (i.e. villages) of the district. This will help to address any unmet housing need in the rural areas, support rural services (but not overburden them) and provide more opportunities for family and social support networks to live in close proximity to each other.</p> <p>In addition, there are constraints in the main towns which limit development opportunities there and it is therefore necessary to look at other locations where development might be sustainably located. The emphasis remains on the majority of development being located in the larger centres where the most of our physical, social and community infrastructure exists, but small/proportional amounts of development in rural areas are also being proposed.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Given its size and role within Teignbridge, Newton Abbot is clearly a sustainable location for further strategic scale development • Small villages don't have the capacity to accommodate large scale development without costly infrastructure • Large scale development should be focused where the majority of physical, social, community and green infrastructure exists or is planned for- undoubtedly in and around Newton Abbot 	
<p>Support for</p> <ul style="list-style-type: none"> • Exminster as a Main Village • Dawlish as a suitable focus for development as it performs highly in terms of the provision of services and facilities • Further allocations in Teignmouth due to its high level of service provision (2nd in District) and significant affordable housing needs • Directing higher levels of growth to Dawlish and Teignmouth through greenfield allocations • Apportioning a broad minimum quantum of development to the highest order towns to meet their needs • Newton Abbot remaining as the principal settlement in the hierarchy, as 	<p>The proposed strategy in the Local Plan seeks to allocate 'proportional' growth in the villages. This proportionality is based on a set of factors including base number of properties, level of service provision, connectivity, education capacity and theoretical site capacity. As such, it has not been considered necessary to pursue the separate categorisation of "Main Villages" and instead retain the current hierarchy which classifies 'Towns' and 'Defined Villages'.</p> <p>Dawlish is considered to be a sustainable location for growth given its level of service provision and railway access, although it's close proximity to the Dawlish Warren SAC is recognised and any recreational impacts arising from new development will need to be mitigated. A moderate level of development is therefore proposed for Dawlish.</p> <p>Teignmouth is also considered to be a sustainable location for growth given its level of service provision and railway access. However, it is highly constrained in terms of its surrounding geography and therefore development opportunities are extremely limited. As such, only a limited amount of development is able to be proposed there.</p> <p>The proposed strategy continues to focus the majority of growth in the larger settlements, where there is capacity to do so. Alongside this, smaller/proportional</p>

Summary of Main Points Raised	Responses to Main Points Raised
<p>the most sustainable in the District with continued growth enabled</p> <ul style="list-style-type: none"> • Considering a higher proportion of growth to most sustainable main villages such as Bishopsteignton (as well placed in terms of access to road network and proximity to employment, services and facilities in nearby towns) • allocating more growth in Newton Abbot, already identified centres and within the new Main village category to seek as many sources of housing supply as possible • Smaller scale, eco-friendly homes such as Straw Bale with lime render in rural areas (where in keeping) • Planned and proportionate growth in the sustainable settlement of Ipplepen • Small additions of affordable housing to villages (no more than a dozen) which would help small places keep going and support independent builders • identifying opportunities for villages to grow and thrive, especially where this will support local services in line with the Draft NPPF • Development of smaller settlements at an appropriate scale which help maintain and revitalise those settlements and shouldn't be precluded, these shouldn't be limited to self-build or affordable homes and 	<p>levels of development are proposed in the rural villages to support local facilities and meet local rural housing needs.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<p>should include a mix to provide an incentive for development and maintain viability</p> <ul style="list-style-type: none"> • Small development projects which provide housing for local people • Expansion of smaller villages to provide housing for local people to work locally and not available to commuters, particularly within rural agricultural areas 	
<p>Agree in principle but with consideration to the following:</p> <ul style="list-style-type: none"> • For limited further development elsewhere • Reduced development levels in Teignmouth and Dawlish due to overdevelopment, congestion and loss of character • Discouragement of tourism due to overdevelopment • Quality of development- ensuring slums of tomorrow are not created • Allocating Brownfield sites over greenfield with a survey to establish the extent of brownfield sites • infrastructure as roads are already congested at peak times with more housing making this worse • more infrastructure for Bovey Tracey parish prior to further development • Wildlife and protected species 	<p>Teignmouth is proposed to take only a small amount of additional growth due to its geographical constraints.</p> <p>Dawlish is proposed to take a moderate level of development. Issues relating to congestion will be considered as part of any future progression of allocations in the town and specifically how they relate to new development.</p> <p>Quality of development/design has been considered through Part 1 of the Draft Plan (consultation March 2020) with a suite of policies proposed to ensure a higher level of design in the district.</p> <p>Extensive work has been done to identify brownfield potential in the district and various town centre redevelopment site options are included within the Draft Plan consultation. However, these sites have numerous constraints, may not be deliverable until later in the plan period, and do not on their own meet the housing need required for Teignbridge.</p> <p>Further details relating to associated infrastructure requirements will be provided in the Proposed Submission Plan as allocations are progressed. Site options included within this Draft Plan consultation contain indicative site requirements that are likely to be needed should the site be pursued to allocation.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> The capacity of existing infrastructure in Newton Abbot because it cannot sustain high levels of additional growth 	
<p>The strategy/distribution should:</p> <ul style="list-style-type: none"> recognise the difficulties facing rural communities, particularly housing supply and affordability be reviewed in the context of GESP and a higher housing requirement provide sufficient opportunities to allow identified housing needs to be met in full meet the needs of both urban and rural communities consider a different approach to the percentage distribution in Teignmouth and Dawlish due to their sustainability, range of services and unmet housing needs, particularly affordable housing, offering a higher ability to accommodate growth continue to place South West Exeter at the top of the hierarchy support development in sustainable locations support moderate development to supplement village needs such as affordable solutions maintain the village status of Kingskerswell and Abbotskerswell with encouragement of natural beauty between towns and villages 	<p>The proposed development strategy includes some provision in rural areas to help address issues of accessibility and affordability of rural housing.</p> <p>The Draft Plan proposes to meet our housing requirement in full. There are extra sites included within this consultation than those we will need to allocate to ensure there is choice and flexibility.</p> <p>Teignmouth and Dawlish are both considered to be sustainable and suitable locations for development. However, because of Teignmouth’s geography it only has a limited amount of capacity for further development.</p> <p>A large amount of development is proposed to take place around the edge of Exeter, recognising the opportunities in terms of connectivity to key services in the city.</p> <p>There are a number of strategic open breaks designated in the current Local Plan which we propose to carry forward in the new Local Plan. However, it is possible that some site options are located within Strategic Open Breaks and they are being assessed on their individual merits. We welcome comments during this consultation on how these sites may affect the landscape character and coalescence of settlements if development is located here.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • ring-fence Bishopsteignton as a separate village as its strategic breaks are sacrosanct and need to be preserved • ring fence Bishopsteignton, Shaldon and other villages as separate conurbations with their open areas must be preserved • redevelop disused brownfield sites for extra housing • Direct a lower proportion of development to coastal towns due to poor infrastructure • Distribute development across the plan area in a way which enables communities to become and remain sustainable • be informed by the new Standard Methodology because this will identify where housing need is greatest and where development can be accommodated • be focused on the sustainable growth and expansion of existing primary settlements • Identify multiple housing allocations of between 350-800 dwellings which are of a scale which enables significant on-site infrastructure and affordable housing delivery • Consider Exeter’s urban edge as the most sustainable part of the district 	

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • support new development in sustainable locations including adjoining existing main towns • be informed by impacts on ecology and wider environment • consider access to public transport hubs as a primary consideration • preserve the character of Bishopsteignton and not let it get lost in urban sprawl along the estuary • ensure development is done in a manner which causes the least damage to Newton Abbot residents • Identify and recognise the western edge of Exeter for suitable pockets of growth as highly a sustainable location, particularly due to its proximity to transport, social and green infrastructure in addition to South West Exeter • Direct future growth towards defined settlements which need to maintain a degree of sustainable growth, as appropriate (by at least) maintaining existing allocations and should not be lost to Exeter • Provide smaller communities with smaller schemes • Consider the deliverability of sites • Acknowledged that the rural as well as the urban areas need to sustain 	

Summary of Main Points Raised	Responses to Main Points Raised
<p>communities and should include a community-led and viability sections</p>	
<p>The review evidence should define the settlement strategy and hierarchy to give full consideration to:</p> <ul style="list-style-type: none"> • Assessing evidence of housing need • Understanding the level of development required to support local services and facilities • Availability of land • Assessing implications of delivery in areas the Framework indicates development should be restricted • Recognising value of the plan to deliver a greater percentage of the overall OAN within the most sustainable communities • The impacts of any housing overspill from Exeter • the needs and function of the Towns which accommodate a significant proportion of the districts population • establishing the local need with more emphasis placed on local provision rather than attracting buy to let or holiday lets • the scale of growth appropriate for each settlement and should not preclude development in smaller villages where it helps sustain those communities and is of an appropriate scale 	<p>The proposed distribution strategy takes account of existing services and facilities, proposing greater growth in areas where higher level and a greater range of services and facilities are available.</p>

Summary of Main Points Raised	Responses to Main Points Raised
Concern regarding the over-reliance on 1000+ dwelling allocations controlled by single landowners/developers. Relying on a small number of extremely large sites to meet housing requirements could potentially lead to increases in house prices, reduced delivery rates and limit developer competition	Noted. The draft Local Plan is not allocating sites, but does include possible site options where development may exceed 1,000 homes. Mechanisms to assist the comprehensive delivery of large sites in multiple ownership may be considered, such as Masterplans, should large sites in multiple ownership be included in the Submission version of the Local Plan.
Don't agree with rural locations being the target for more building unless amenities and infrastructure are put in place	Only proportionate growth in rural areas is being set out in the distribution strategy, varying between 5% and 15% depending on the level of local service provision.
Boundaries of rural areas/villages and local plans should be respected with direction given by neighbourhood plans	Whilst we are happy for Neighbourhood Plans to take the lead in allocating sites, we cannot require them to do so and therefore could not guarantee that sufficient land would be identified to meet our housing need if left solely to NPs.
The visual aspect of larger developments should be reconsidered with estates near Teign Bridge being decidedly ugly and extremely boring	Standards of design are set out in the raft of design policies published in the draft Local Plan 2020-2040 Part 1. These set higher standards of design and layout.
Mainly agree but projected growth percentages are skewed with Dawlish having a disproportionate level of growth for its size and lack of infrastructure improvement. Any additional housing requirements should recognise those areas which have suffered from a disproportionate percentage of growth.	The extent of development allocated in the existing Local plan in Dawlish is acknowledged, however, Dawlish is one of the District's main towns and provides a good level of services and facilities, along with access to railway stations. Therefore, it provides a potential sustainable location for development.
An acceptable policy where infrastructure upgrades are made to meet the needs of new households- housing is currently outstripping infrastructure with adverse impacts on the Towns	The draft Local Plan 2020-2040 Part 2 contains a list of site requirements for each site being considered and, following consultation and further work, a full list of specific requirements for development of each allocated site will be included within the Submission Local Plan.
The environment costs of urban sprawl is not acceptable against the backdrop of the districts unique countryside	The open countryside is protected from development with a restrictive policy, following the NPPF approach.

Summary of Main Points Raised	Responses to Main Points Raised
A proliferation of suburban housing is not the most effective way of providing more housing and low rise, three or four storey blocks with support facilities is likely to be more cost effective	Town centre sites are more likely to be able accommodate taller buildings. Design requirements for specific sites will be included in the Submission version of the Plan.
The potential to create new communities on the Exeter hinterland and main villages should be used to offset some of the additional growth proposed for Newton Abbot	Development on the edge of Exeter is being considered.
Large developments in rural locations maybe ok as stand-alone settlements with proper infrastructure but when tacked onto small village's it unbalances existing communities and should be banned.	Noted. Proportionate enlargement of villages is being proposed, between 5% and 15% increase in size.
Village envelopes should be expanded to deliver more land for local housing	Noted. Proportionate enlargement of villages is being proposed, between 5% and 15% increase in size.
Support of acknowledgement that greenfield land will need to be considered as it plays an important role in maintaining land supply in the early part of the plan period but development on brownfield land does not automatically make it more sustainable than greenfield land, as the latter may be better connected to existing infrastructure and services	The draft Plan contains both greenfield and brownfield sites, acknowledging the pros and cons of both.
Development on a few greenfield sites destroys great swathes of farmland and puts significant pressure on local infrastructure, particularly roads which can lead to congestion	There is insufficient brownfield land within Teignbridge to accommodate our development needs.
Link road between Ogwell Cross and the A380 should be built before any houses to accommodate the additional traffic and allow new occupants to get to work in Exeter without	The availability of highway infrastructure would be taken account of should development be allocated in the Submission Local Plan.

Summary of Main Points Raised	Responses to Main Points Raised
going through existing parts of town. Building the road afterwards will cause traffic chaos on existing roads for many years and result in deterioration in health from pollution	
The second home blight is becoming more evident	Noted.
Hele park is too far from the Town Centre with little take-up of the extended bus service. A new or expanded local centre is needed	A new local centre is provided as part of development allocated in the existing Local Plan at NA1 Houghton Barton.
Ideally there should be green space and trees separating developments so to create distinct neighbourhoods and a sense of community	Noted – this is supported by the suite of design policies set out in Part 1 of the draft Local Plan.
Limits should be dictated by sensitive ecological receptors including avoiding developing land required to functionally support the South Hams SPA and indirect impacts arising from the local residential and visiting population on the Exe Estuary SPA and Dawlish Warren SAC.	Ecological constraints have been taken account of when assessing sites. Some ecological constraints have ruled out certain sites and some are noted as sensitivities in the draft Local Plan Part2 that would need to be mitigated.
Infrastructure has lost out and more pedestrian and cycle ways could be included	The draft Local Plan Part 1 contains policies that require sustainable travel routes to be provided for larger scale developments.
DNPA welcome a conversation around Ashburton and Buckfastleigh to support these communities through the provision of new development which is needed locally, is well related to the settlements and constitutes sound planning and place making.	Liaison with adjoining local authorities has taken place as part of the Council’s Duty to Cooperate. Further conversations will be had before the Submission version of the Local Plan 2020-2040.
Denbury has very few facilities with the private car required for most journeys. Denbury’s diminutive nature doesn’t provide for the services required to sustain extra development and would have a negative environmental effect.	Only a proportionate expansion of villages is proposed in the development strategy options.

Q5. Should the Local Plan Review include a main villages category as an additional tier of the hierarchy?

Summary of Main Points Raised	Response to Main Points Raised
<p>Agree/Support for Tier because:</p> <ul style="list-style-type: none"> • It would offer flexibility in development distribution to meet local need • It would reduce the need to travel • They are sustainable locations • These are places people want to live • Main villages should be apportioned a level of planned growth • This will extend new housing into villages • This proportionate growth will benefit local people • Traffic will be reduced • Local business will be supported • It will spread housing growth within otherwise falls on Newton Abbot • Encourages sustainable development 	<p>The options for development distribution contain proportionate growth for villages. This proportion is dependent on the level of service provision within the village. Therefore, whilst a separate “tier” of Main Villages has not been progressed, the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.</p> <p>See above response</p>
<p>Concerns raised on the following grounds:</p> <ul style="list-style-type: none"> • Primary schools in main villages may not have capacity • School transport implications if local primary schools cannot accommodate extra pupils • Designation labels these villages as targets for development • Little weight given to character, ability to accept development and infrastructure issues • Bishopsteignton suffers lack of parking and narrow lanes • Smaller villages with larger levels of facilities are excluded 	<p>Capacity of primary schools and highway infrastructure has been taken account of in the development strategy. Development outside allocated land on the edge of villages would remain protected through the restrictive countryside policy, thereby not setting a precedent for development and all villages with a Settlement Limit have been included where suitable land is available.</p> <p>The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed. Area specific constraints and site specific sensitivities are contained within the draft plan.</p>

Summary of Main Points Raised	Response to Main Points Raised
<ul style="list-style-type: none"> • Exminster voted to remain a village in 2012 with no more large-scale development • Exminster cannot provide extra space for the increased car parking that would be required • May set precedent for development 	
<p>Agree on the proviso:</p> <ul style="list-style-type: none"> • Secondary schools receive funding for transportation from new developments • A full study on the capacity of settlements to accommodate further housing is carried out. • That Ipplepen becomes a main village • That infrastructure investment is made to meet increased demand in main villages • That Broadhempston and Abbotskerswell maintain their services and are not denied development • There would be provision for substantial housing allocations in these locations • That Exminster accommodates a higher proportion of development than other main villages due to its sustainability • That this would not detract from importance of developing on the edge of Exeter • Depends on which settlements • Villages be encouraged to produce Neighbourhood Plans and allocate their own sites • That all villages grow • If this provides small affordable rental properties • That main villages don't automatically receive development • That main villages don't become mini towns • Housing is provided for local people 	<p>Education capacity or lack of education capacity has been taken account of and the draft Plan proposes new site options for school provision. Infrastructure capacity has also been assessed and individual site requirements set out in the draft Plan.</p> <p>Proportionate growth in all villages is proposed, enabling development within Broadhempston, Abbotskerswell and Exminster.</p> <p>All sites of 5 or more dwellings in villages will be required to provide affordable housing (national and local policy), including rented properties.</p> <p>Communities are encouraged and supported to produce Neighbourhood plans and include housing allocations within them. However it should be noted that only one of the six adopted NP's in the district have chosen to allocate for residential development.</p> <p>Concern over the extent of enlargement of villages is noted and that is why only proportionate growth is suggested as an option.</p>

Summary of Main Points Raised	Response to Main Points Raised
<ul style="list-style-type: none"> • That main villages don't become commuter villages • That substantial housing allocations be made in Main Villages • If infrastructure is adequate to meet need • If identity and vibrancy are protected • That housing numbers are limited to prevent pressure on facilities • That road infrastructure is considered 	
No	The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.
<p>No because:</p> <ul style="list-style-type: none"> • A village should stay a village • Main villages an excuse for overdevelopment in these villages • Village public transport links are poor • Each village should be treated on a case-by-case basis • Traffic issues in lanes • It will destroy the character of villages • Schools, GPs and emergency services cannot cope • Those not designated as main villages will see their services and amenities eroded further • Forms a presumption in favour of development • Danger of creating mini towns • Loss of village character • Services cannot cope • Implications of biodiversity • Villages will stop being villages 	The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed. This relatively low level of development should help to overcome concerns relating to inappropriately large increases in size, infrastructure capacity and character.

Summary of Main Points Raised	Response to Main Points Raised
<p>Alternative suggestions include:</p> <ul style="list-style-type: none"> • A hierarchy is not required • Each village should be treated on a case-by-case basis • Do not adopt a Main Villages category 	<p>The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.</p>
<p>General</p> <ul style="list-style-type: none"> • Cannot comment until know which settlements included • Intention of additional tier unclear • Settlement hierarchy should provide opportunities for additional housing need to be met • Requires more consideration • Unsure • Main villages are where the local young wishing to stay close to home and those wishing to downsize want to live 	<p>Noted</p>

Q6. Are there any settlements that should be added, removed or moved to a different category? (in the settlement hierarchy)

Summary of Main Points Raised	Responses to Main Points Raised
<p>Agree with Proposed Hierarchy</p> <ul style="list-style-type: none"> • Ipplepen should be main village • Appropriate that Bovey Tracey and Heathfield included as a town • Agree with Teignmouth and Dawlish as towns in 2nd tier • These medium-sized villages should see development without putting a strain on resources • Chudleigh and Teignmouth play an important function 	<p>The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.</p> <p>No changes to the “Town” tier is proposed within the draft Local Plan, with Teignmouth, Dawlish, Bovey Tracey and Chudleigh remaining to be classed as towns.</p>
<p>Yes – should be added:</p> <ul style="list-style-type: none"> • Exwick should be recognised as important due to its proximity to Exeter • Haccombe with Coombe as village with a boundary to prevent stagnation 	<p>The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Ashburton should be added to take housing as market town with good access 	<p>Sites on the edge of Exeter and adjacent to Ashburton are included as site options in the draft Plan.</p> <p>Hacombe-with-Combe village lacks the services and provisions to be considered as a sustainable location for new development and therefore is not included as a Defined Village with a Settlement Limit.</p>
<p>Yes – should be removed</p> <ul style="list-style-type: none"> • Bishopsteignton due to: <ul style="list-style-type: none"> ○ Narrow streets/inaccessibility of Main Street ○ Limited car parking with little scope to improve ○ Pubs are closing or are closed ○ No cycle path ○ No high speed broadband ○ Sewerage, power and water supplies are inadequate ○ Poor public transport links ○ Unable to compete with Dawlish ○ Challenging topography making development unviable ○ No flat fields to develop ○ Can't improve infrastructure without damage to heritage • Bovey Tracey should be moved down a tier as struggling with current numbers • Kingskerswell due to current strain on infrastructure 	<p>The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.</p> <p>Other technical constraints specific to towns, villages or sites, have been considered when assessing sites and are included within the draft Plan as site sensitivities.</p>
<p>Yes – should be moved</p> <ul style="list-style-type: none"> • Bovey Tracey and Chudleigh should be moved down to 3rd tier as provide fewer sustainable options for development • Kingskerswell should be put into villages rather than heart of Teignbridge • Shaldon should be a main village as it also has a doctors (currently omitted) • Bickington, Liverton, Chudleigh Knighton, Ashburton and Ide for housing distribution 	<p>The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.</p> <p>Constraints within both Bovey Tracey and Chudleigh have been acknowledged in the draft Local Plan and no site options for Chudleigh have been included due to significant ecology constraints.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> Chudleigh Knighton and Ipplepen as main villages to reflect good infrastructure Broadhempston should become a main village 	<p>No sites in Shaldon are included due to highways constraints of narrow roads and no footways.</p> <p>Site options within Chudleigh Knighton are included within the draft Plan and site options, that reflect the sites contained in the draft Ipplepen Neighbourhood Plan, are included.</p>
No	The Main Villages tier has not been progressed, but the level of service provision available has influenced whether a 5%, 10% or 15% enlargement of the village is proposed.
<p>No because:</p> <ul style="list-style-type: none"> Bovey Tracey is struggling with numbers of new housing 	Noted.
<p>Alternative suggestions include:</p> <ul style="list-style-type: none"> Include undefined settlements close to Main Villages to accommodate small amounts of growth Strategy should be based on neighbourhood plans Villages should make decisions via Neighbourhood Plans All villages should be de-categorised All settlement should take new housing to lower the impact 	<p>The allocation of development in undefined settlements close to towns would encourage car use, due to the lack of public transport, cycle provision and pedestrian footways, and the poor highway network serving rural areas.</p> <p>Where Neighbourhood Plans have allocated sites for development, they are included within the Local Plan. However, there is only one Neighbourhood Plan that has allocated development, which would not meet the needs of the entire district.</p>
<p>General/Concerns</p> <ul style="list-style-type: none"> The categorisation should be considered part of the review Retain green break between Kingskerswell and Newton Abbot and Torquay Some villages could take more housing if impacts minimised Towns should be preventing from merging Unsure- further evidence required Denbury no longer has a shop Highweek traffic is a nightmare 	<p>Comments on the retention of green breaks between Newton Abbot, Kingskerswell and Torquay, and between villages, are noted. The assessment of sites has taken account of landscape impacts, such as the potential reduction in the physical separation between settlements and is set out in the individual site sensitivities.</p> <p>The loss of Denbury's shop is noted.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> Boundaries should be retained to prevent villages and towns merging Chudleigh Knighton & Ipplepen have good transport links, capacity, infrastructure and access to employment 	<p>Whilst Chudleigh Knighton and Ipplepen have been highlighted as having particularly good transport links, infrastructure and access to employment, they are less well served than the district's main towns and this is reflected in development distribution options.</p>

Q7. Which of the following options or combination of options would best address meeting the district's additional housing requirements of, up to or around, 6457 dwellings?

A: Maintain current strategy of primarily allocating housing sites in urban areas and towns

B: Allocate some growth to villages which have a higher level of service provision in addition to urban areas and towns i.e. main villages

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

D: A new settlement

Summary of Main Points Raised	Responses to Main Points Raised
<p>Agree with Option A (current strategy) because:</p> <ul style="list-style-type: none"> Option A should be maintained Deliverable options exist to facilitate growth in towns Would best address additional requirement Due to existing infrastructure To protect the countryside Likelihood of using brownfield sites Would help revitalise town centres <p>Agree with Option A provided that:</p> <ul style="list-style-type: none"> Ensure current infrastructure is not overloaded Ensure environment is not destroyed Large allocations are made adjoining settlements Development contains low-rise multi-storey blocks Development is limited to affordable housing 	<p>The development strategy options include a large proportion of development needs being met within and on the edges of the district's towns, including suitable brownfield sites.</p> <p>Capacity of infrastructure, such as education, highways and drainage, impacts on landscape and proximity of sites to existing settlements, have been taken account of when assessing sites.</p> <p>It will not be appropriate for all development to contain low-rise multi story development. However, in sites where it is appropriate, a higher density of development will be required.</p> <p>Due to viability, it is normally not possible to develop affordable housing only and, in order for it to be provided, it normally has to be funded through market development.</p>
<p>Disagree with Option A because:</p> <ul style="list-style-type: none"> Visually Newton Abbot, Kingskerswell and Kingsteignton will merge if allocated any more development Towns already have too much development 	<p>Comments on the retention of green breaks between Newton Abbot, Kingskerswell and Torquay, and between villages, are noted. The assessment of sites has taken account of landscape impacts, such as the potential reduction in the physical</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Newton Abbot already has enough development and congestion • If Option A was pursued significant infrastructure investment would be required 	<p>separation between settlements and is set out in the individual site sensitivities.</p> <p>Comments about congestion in Newton Abbot are noted. New development will be required to provide sustainable travel links in order to prevent making congestion worse, or reduce air quality within an area that is designated an Air Quality Management Area.</p>
<p>Agree with Option B (growth in main villages) because:</p> <ul style="list-style-type: none"> • Ipplepen is capable of supporting growth • Most sensible option <p>Agree with options A & B</p> <p>Agree with Option B provided that:</p> <ul style="list-style-type: none"> • There is minimal development • Its supported by community involvement • It is for affordable, self-build, homes for older people or small market housing developments 	<p>The designation of “Main Villages” has not been pursued. However, the level of service provision within each village has informed the level of enlargement that would be acceptable, with a maximum of 15% enlargement for villages with the most facilities.</p> <p>Any development of 5 or more home will need to provide an element of affordable housing alongside market housing and, the policies contained within the draft Local Plan 2020-2040 Part 1 require accessible homes.</p>
<p>Disagree with Option B because:</p> <ul style="list-style-type: none"> • Infrastructure in Exminster cannot be expanded • Medium and large scale development around Exminster cannot be supported • Poor levels of services/facilities and environmental considerations 	<p>Infrastructure constraints in Exminster are noted within the draft Plan.</p> <p>It is not possible to consider that all of the proposed Main Villages have poor levels of services/facilities and environmental considerations – these vary between settlements.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<p>Agree with Option C (no comment)</p> <p>Agree with Option C (growth in all settlements with a boundary) because:</p> <ul style="list-style-type: none"> • All settlements have capacity to grow in proportion to their size • Wider dispersal may reduce impact on landscape and infrastructure • Would help villages survive <p>Agree with Option C provided that:</p> <ul style="list-style-type: none"> • Properties built are affordable • Developments are small and in keeping with village • Developments reflect the size of existing settlement • Allocations come through local communities • In conjunction with allocations around urban areas, towns and main villages 	<p>The draft Local Plan contains opportunities for small scale proportionate development on the edges of all villages (with the exception of Shaldon because of highway constraints) to help the sustainability of villages.</p> <p>All development of 5 or more homes will include affordable housing and will be subject to design policies along with site specific requirements.</p> <p>The majority of site submissions have come from local landowners. No sites are being allocated in the draft Plan, and comments received from local communities will help to identify the sites that are included for allocation in the Submission Local Plan.</p> <p>Village development is proposed alongside development in and around towns.</p>
<p>Disagree with Option C because:</p> <ul style="list-style-type: none"> • Poor levels of services/facilities and environmental considerations • Services and facilities need to be planned before population growth 	<p>The level of proportionate development proposed for villages is dependent on the level of service provision where villages with poor provision are restricted to a 5% enlargement. Planned development takes account of predicted population growth.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<p>Agree with Option D (new settlement)</p> <ul style="list-style-type: none"> • Villages are saturated • Local infrastructure cannot cope • Additional infrastructure cannot be provided in villages • Development will increase traffic and pollution in villages • New settlement towards Heathfield • Planned infrastructure to better cope with numbers • Newton Abbot, Kingskerswell and Kingsteignton will merge if allocated any more development • Would allow for new infrastructure • A new settlement where facilities could be provided from the start would best • More sustainable than extending existing settlements • Would form a defined place rather than peripheral growth <p>Agree with Option D provided that:</p> <ul style="list-style-type: none"> • Any new settlement should come through GESP • New settlement should be allocated within GESP area not just Teignbridge • A new settlement be located close to the A38 or A380 close to rail links • Infrastructure be given careful consideration prior to houses being built 	<p>The option of accommodating some of the district’s housing needs within anew settlement is being consulted on, however, as no sites are being proposed within the draft Plan, the responses received will help to inform whether this option is investigated in further detail.</p> <p>Whilst it is agreed that new settlements can be a way of providing comprehensive infrastructure from the start, they can also be costly, meaning things like affordable housing provision may need to be reduced, or less green infrastructure provided, and they take a long time to deliver, meaning that the Council may be at risk from a lack of a 5 year housing land supply, meaning that development on unallocated sites could be allowed.</p> <p>The Greater Exeter Strategic Plan is no longer being progressed and all development will be allocated through the Local plan of each authority.</p>
<p>Disagree with Option D because:</p> <ul style="list-style-type: none"> • No proven need for new developments on greenfield sites • Concerns regarding the length of delivery time • Concern regarding impact on spatial strategy • Concern regarding relationship to existing settlements • Concern over cost of providing infrastructure • Cannot identify where new settlement could be located 	<p>Comments are noted and constraints of delivery acknowledged. Whilst the idea of a new settlement has been included within strategy options, This does not mean it will be included within the Submission Plan.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Complicated and expensive to deliver • A significant risk a new settlement wouldn't be sustainable or self-contained 	
<p>Agree with a combination of all Options:</p> <ul style="list-style-type: none"> • A combination of all must be considered to avoid over-reliance on one option • All options should be considered • Only effective way to accommodate large growth in numbers • In order to reduce costly proposals and discussions • With particular emphasis on a new settlement • All options have merit 	<p>All of the options are being included for consultation within the draft Plan.</p>
<p>Agree with a combination of Options B & C:</p> <ul style="list-style-type: none"> • In order to reflect the accessible position of many villages • to maintain family groups • to support village growth • Would help villages survive • Provided developments were small and provided affordable housing • Would reduce further expansion in Newton Abbot 	<p>This general support for some development in villages is acknowledged through the option of allocating proportionate growth on the edges of villages, the level of which reflects the services available. This helps to sustain rural communities and will be required to provide an element of affordable housing where development are for 5 or more homes.</p>
<p>Agree with a combination of Options A & C:</p> <ul style="list-style-type: none"> • All existing settlements should take 20-30 houses to boost school numbers 	<p>The proportion expansion of villages reflects this.</p>
<p>Agree with a combination of A & D:</p> <ul style="list-style-type: none"> • Village road networks do not have capacity 	<p>Highway constraints have been taken account of in individual site assessments. The only village with such significant highway constraints to have prevented sites being included within the Plan is Shaldon.</p>
<p>Agree with a combination of Options A, C & D:</p> <ul style="list-style-type: none"> • If suitable land can be located 	<p>The lack of support for development in villages that were not proposed to be Main Villages is noted. However, proportionate growth of all villages, dependant on the level of service provision, is considered a way of sustaining rural communities and supporting the services within the village.</p>
<p>Agree with a combination of A, B & C:</p> <ul style="list-style-type: none"> • Where there are jobs and services • Neighbourhood Plans should bring forward growth in defined villages • Main village growth should be supported by community involvement 	<p>The lack of support for a new settlement is noted. The option of accommodating some of the district's housing needs within a new settlement is being consulted on, however, as no sites are being proposed within the draft Plan, the responses received will</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> All settlements should be considered for affordable, self-build and homes for older people Providing Option C only delivers affordable housing Provide accessible, sustainable locations 	<p>help to inform whether this option is investigated in further detail.</p>
<p>Agree with a combination of A, B & D:</p> <ul style="list-style-type: none"> Long term sustainability and ability to provide services and facilities Development must be commensurate with size and location of settlement 	<p>The lack of support for development in villages that is noted. However, proportionate growth of all villages, dependant on the level of service provision, is considered a way of sustaining rural communities and supporting the services within the village.</p>
<p>Agree with a combination of B, C & D:</p> <ul style="list-style-type: none"> These areas have better capacity to cope Will reduce further expansion of Newton Abbot and provide new infrastructure 	<p>The lack of support for development in towns is noted. The risks of relying on a new settlement to provide a large proportion of the district's housing need are set out above and villages are not considered to have better capacity for new development. The district's towns contain the widest range of services and facilities and better public transport options than villages, making development more sustainable.</p>
<p>Alternative suggestions include:</p> <ul style="list-style-type: none"> Support development in sustainable locations with access to services and public transport Most towns have derelict areas which could accommodate high-rise development Utilise disused accommodation above high-street shops Small-scale affordable housing to meet locally assessed need Brownfield sites should be used Potential to allocate growth to Peamore/Exwick and around all towns and villages The Council should buy a plot of land at agricultural value, develop the infrastructure and sell off serviced plots for development 	<p>The accessibility of sites to services and public transport by sustainable travel has been assessed for each site. The draft Plan includes brownfield sites and sites on the edge of Exeter. The suitability of sites to accommodate high rise development will be further considered once sites are allocated in the Submission Plan. Small scale affordable housing sites would be permitted as Rural Exception sites and should not be allocated in a Local Plan. (Once allocated the land value will increase, reducing the likelihood of 100% affordable housing).</p> <p>The Local Plan relates to land use, not ownership.</p>
<p>General/Concerns</p> <ul style="list-style-type: none"> Housing growth must be spread across the District Local Plan should not rely on large-scale sites alone to provide housing requirement 	<p>Housing growth will be spread across the District and is unlikely to be focussed on large scale sites alone, due to the NPPF requirement for smaller sites and due to the support for the inclusion of small to medium sites. This may include the sub-</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Scale of development in Ipplepen should not create a town • Developing in urban areas increases strain on facilities • Public transport is difficult to operate with larger estates • Large allocations abutting existing settlements must be favoured • Contingency of 20% requirement should be made to reduce risk of housing numbers not being achieved • Neighbourhood Plans can/should allocate housing • Decision for new settlement should be informed by site availability • Growth must be properly planned with delivery of correct infrastructure • Smaller pockets of development faster to build • Smaller pockets of development put less strain on infrastructure • Kingskerswell has been allocated too much development • Defined villages must currently rely on Neighbourhood Plan to allocate for housing but very few do • Allocations should be made in defined villages where Neighbourhood Plans are not allocating • The vitality of rural communities should be supported • New settlements take a long time to develop • New settlements are expensive to deliver in terms of infrastructure in contrast to expanding villages • Other options should be considered but Newton Abbot should take the most growth • Far better to develop in those area that have capacity or in new settlements • Housing targets should be challenged • Land adjacent to Dawlish Country Park should not be developed • New developments should be allocated close to infrastructure and employment • Much new build development is not affordable to local people • Not enough scope to build on brownfield sites • Empty properties should be renovated • Limited reference to historic environment 	<p>division of larger sites into smaller areas. In addition, a range of site sizes have been included within the draft Local plan as options for development.</p> <p>The scale of development in Ipplepen reflects what is set out in the draft Ipplepen Neighbourhood Plan.</p> <p>Comments about the capacity of infrastructure and public transport are noted. New infrastructure will be provided alongside new development. The draft Plan sets out site requirements and further work will be undertaken that will inform the specific site requirements of allocated sites in the Submission Plan.</p> <p>A 20% buffer is included.</p> <p>Only one (draft) Neighbourhood Plan has allocated Development, seven have not. Therefore, it is not possible to rely on Neighbourhood Plan allocations to meet the district’s development needs. However, Neighbourhood planning Groups cannot be forced to allocate land for development.</p> <p>Unavailable sites will not be included within the Submission Plan.</p> <p>The issue of challenging housing targets has been pursued by the Council.</p> <p>Concern about the unaffordability of “affordable housing” is addressed through the affordable housing policy in Part 1 of the Plan, which seeks a percentage of social rented properties instead of affordable rented.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Thorough assessment needed on all sites to determine suitability • Local distinctiveness and character should be protected • Heritage assets and their setting should be protected • No evidence that master-planning larger sites has worked • Urban sprawl should not be allowed as puts pressure on facilities and damages communities • Tourism will suffer due to urban sprawl • Where is the evidence that there is not enough brownfield land? • Survey of all sites within towns and villages should be commissioned • Towns and roads are saturated • Lack of infrastructure is impacting on Newton Abbot and Kingskerswell • Development should only be carried out in tandem with infrastructure delivery • Housing figures should be viewed with suspicion • Government views large scale house building primarily as a stimulus to the economy • A solution to the housing crisis is unachievable while immigration numbers are so high • Dawlish allocated site too far away from doctors surgery and new surgery that was promised has never materialised. • Need to link development with new infrastructure provision • Long term damage may be done by development to estuary of national importance • Need methodology and GESP numbers before informed comment can be made • Illsington parish would support some growth within the village envelope • Additional growth must be supported by new infrastructure • Infrastructure and employment must come first, especially water supply and drainage • School, medical facilities and emergency services must come before development 	<p>Although brownfield sites are included within the draft Plan, there is insufficient brownfield land to accommodate the district's development needs.</p> <p>The Local Plan cannot influence the renovation of empty properties.</p> <p>Constraints presented by heritage assets have been assessed in each site assessment and the Local Plan includes any constraints as site sensitivities.</p> <p>Comments about urban sprawl and masterplanning are noted, but as sites are not being allocated, no response can be provided.</p> <p>Urban Capacity Studies have been undertaken for all towns.</p> <p>The Plan only contains possible site options. It does not allocate specific sites. Therefore comments in relation to specific land are not responded to here. If such land is allocated, responses will be made within the Consultation Statement published alongside the Submission Plan.</p> <p>Comments about national government views and immigration are opinions and are not responded to.</p>

Summary of Main Points Raised	Responses to Main Points Raised
<ul style="list-style-type: none"> • Services and facilities should be planned at the earliest possible point • Important to engage with service providers at an early point • Secondary schools on new developments should be paid for by Teignbridge out of CIL • Development is focussed on a number of small areas to minimise the numbers of voters that are upset- planning strategy shouldn't be allowed to be influenced in this way • Local housing targets should be developed and take precedence over central government targets • Bovey Tracey's infrastructure is struggling under current new housing numbers • Developments should be appropriately designed, developer margins sensible and CIL not too onerous • Should be a national unified CIL levy 	

Q12. Four potential options are presented to achieve the mix and type of housing required in Teignbridge:

1A: Through stand-alone allocations

1B: Through specific allocations within larger residential and mixed use schemes for specific housing

2A: Requiring a general mix as prescribed through local plan policy

2B: Via a percentage requirement for developers to meet

Which of the above options or combination of options would best address meeting an appropriate mix in the district's additional housing requirements?

Summary of Main Points Raised	Response to Main Points Raised
<p>Support for Option 1A because:</p> <ul style="list-style-type: none"> • Would promote mixed communities • Useful in helping deliver affordable housing when done alongside a clear, criteria-based policy defining scale of local housing need through a numerical housing target 	<p>The use of stand alone allocations for specific types of housing will be considered in the Submission version of the Local Plan, which will allocate development sites.</p>

Summary of Main Points Raised	Response to Main Points Raised
<ul style="list-style-type: none"> • It can meet an identified localised need and demand on a location by location basis • Others are too prescriptive and in the past, rarely adhered to • Some benefits for older people • To meet specific criteria of people’s needs with affordable housing continued to be provided via S106 and agreed mix and tenure with developers • Can address certain localised need and demand on a locational basis • to enable market demand and housing needs assessments to be combined with planning policy from a design perspective with a more prescriptive mix likely to lead to housing delivery issues • would work quite well for bungalows for the elderly • can be informed by a range of evidence on local housing needs to stimulate landowner discussion regarding addressing a range and mix of housing • Mortgage lenders are not prepared to lend to purchasers on sites with combined uses given volatility of house prices in close proximity 	
<p>Support for Option 1A with Option 1B utilised for affordable and starter homes for locals</p>	<p>Policies H7: Rural Exception Sites, H8: Entry Level Exception Sites and H9: Local Needs Housing will provide opportunities for the development of affordable housing. Policy H1: Affordable Housing Targets will ensure that a percentage of all new residential development, above 4 units, will be provided as social housing.</p>
<p>The following concerns raised over Option 1A:</p> <ul style="list-style-type: none"> • Too prescriptive/inflexible • wouldn’t result in the appropriate mix of housing or risk the entire site not coming forward • would create an unhealthy separation of people of the same age or ability rather than mixed communities • not an appropriate approach as the market rarely delivers this • could result in undeveloped sites, if insufficient evidence/market research is undertaken to support the allocation 	<p>The use of stand alone allocations for specific types of housing will be considered in the Submission version of the Local Plan, which will allocate development sites.</p>

Summary of Main Points Raised	Response to Main Points Raised
<p>Combination of options supported:</p> <ul style="list-style-type: none"> • 1A & 1B & 2A • No reason why the review can't allocate a range of sites using all the approaches • 1A & 2A to allow delivery of a full range of affordable housing tenures • 1B & 2A applied with a flexible approach will support a mix of housing to meet needs whilst not placing restrictions which would impact deliverability • 2A & 2B equally justified as options 1A & 1B where local needs are not evidenced • 1A & 1B with rigorous implementation by the LPA if it is to survive appeals. 	<p>The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand.</p> <p>The use of stand alone allocations for specific types of housing will be considered in the Submission version of the Local Plan, which will allocate development sites.</p>
<p>Support for Option 1B because:</p> <ul style="list-style-type: none"> • Provides certainty for developers and local communities • Provide a stronger basis for negotiations with developers • Requirements for less profitable housing should be placed within bigger schemes if the policy to encourage small schemes is to get mileage • if you leave allocations to developers they will always opt for the most commercially viable option which doesn't reflect the needs of communities • can be informed by a range of evidence on local housing needs to stimulate landowner discussion regarding addressing a range and mix of housing • to allow for specific allocation of affordable and starter homes (only to be sold to locals and not investors) 	<p>This approach has been followed and Policy H4: Homes Suitable for All, ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand.</p> <p>The use of stand alone allocations for specific types of housing will be considered in the Submission version of the Local Plan, which will allocate development sites.</p>
<p>The following concerns raised over Option 1B:</p> <ul style="list-style-type: none"> • would probably encourage developers to cram too many houses into a development • too prescriptive and wouldn't result in the appropriate mix of housing or risk the entire site not coming forward 	<p>These concerns are noted. The policy applies to all residential development, so does not preclude small sites and the approach to provide a range of sizes, types and tenures of housing to address identified needs and market demands is not considered an overly prescriptive approach. The efficient use of land is encouraged through Policy DW19: Residential Density, but this is expected to be delivered</p>

Summary of Main Points Raised	Response to Main Points Raised
<ul style="list-style-type: none"> • should not be relied upon solely as this would exclude smaller sites which deliver a significant proportion of housing • not appropriate because this approach already occurs • Overly prescriptive and unnecessary 	<p>through good urban design, not through cramming of houses, as will be secured through the raft of design and wellbeing policies contained in the draft Local Plan.</p>
<p>Support for Option 2A because:</p> <ul style="list-style-type: none"> • It is the most suitable and flexible approach when the mix is agreed on a site by site basis with the LPA • Most sensible choice/suitable method • mixed communities are important for vibrant and positive community life with planners assisting on the mix and developer profit not determining mix • other options are specific and would place a restriction on the way development is brought forward with an ever-changing market • More practical and efficient to enable flexibility for developers and the Council to identify what is needed in a specific area and how best to address it at that time • Health and social care evidence suggests a mix of housing ensures people mix which is best for well-being and maximising health gains • Most practical • Provides a degree of flexibility in line with local and market demand • Allows for diversity 	<p>The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand. This will also help to deliver mixed communities.</p>
<p>Support for Option 2A</p>	<p>The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand.</p>
<p>None of the options supported:</p> <ul style="list-style-type: none"> • None of the options address social housing demand • None of the options- building good quality small homes would attract elderly living in larger homes and provide a nest egg towards care 	<p>Demand for social housing is addressed through policy H1: Affordable Housing Targets and through Policies H7: Rural Exception Sites and H8: Entry Level Exception Sites, which permit development adjacent to settlement limits where it is providing for affordable housing needs.</p>

Summary of Main Points Raised	Response to Main Points Raised
There should not be a mix of housing	The housing needs of different sections of society varies, and therefore so should the housing that is built to meet those need
<p>The following concerns raised over option 2A:</p> <ul style="list-style-type: none"> • Doesn't work at present • not sustainable and is a lazy slap-dash approach • not sustainable and is an inappropriate approach to plan making • often used too prescriptively and to the detriment of viable developments 	The draft Local Plan contains Policy H4: Homes Suitable for All, which ensures that, to achieve a range of housing sizes and specifications that meet a wider range of needs, residential development will provide a range of sizes, types and tenures of housing to address identified needs and market demand. The policy is not considered "slap-dash" or overly prescriptive, as it relates to the evidenced needs of residents, and is considered wholly appropriate to plan making and the shaping of development.
<p>The following concerns raised over Option 2B:</p> <ul style="list-style-type: none"> • Too prescriptive/inflexible • Would discourage developers, especially SME's • Creates targets which tend to lead to abuse and inequality with 'deliverers' and can quickly become out of date and not fit for purpose • wouldn't work as developers would use feasibility studies to get out of providing the percentage • too prescriptive and wouldn't result in the appropriate mix of housing or risk the entire site not coming forward • not favourable as such requirements are easily overridden by viability claims • lacks flexibility and ability to react to changing needs and the needs of different areas of the district • considered inappropriate 	The approach set out in Option 2B – to set out percentages of different types of houses – has not been followed.
Support for Option 1B	Noted.
<p>Support for Option 2B because:</p> <ul style="list-style-type: none"> • Can meet the areas needs such as social housing, smaller affordable homes for the young and suitable housing for the elderly • Ensures developers give thought to the overall package rather than cherry picking to maximise profit 	The approach set out in Option 2B is considered overly prescriptive. Setting a percentage target for different types of housing could mean that the policy is inflexible to change in Teignbridge residents' needs or is regarded as a barrier to development.

Summary of Main Points Raised	Response to Main Points Raised
<ul style="list-style-type: none"> alternatives allows too much wriggle room for developers to avoid building smaller units suitable for the young and older downsizers easier to enforce allow for diversity required mix is provided rather than developer-led 	<p>The plan contains opportunities for small scale social and affordable housing through Policies H7: Rural Exception Sites and H8: Entry Level Exception Sites.</p>
<p>The following questions raised:</p> <ul style="list-style-type: none"> How can you go against option 2a which follows local plan policy? By categorising this different housing types aren't we assuming how people want to live? How do we define older people and who decides what type of housing they want to live in? Why is this required because if 10,000 4 bed houses were built people would move up, sideways and down and allocation of housing would be filled? 	<p>The approach set out in option 2A – to provide a general mix – has been followed, with an additional requirement to ensure that the mix addresses identified needs and market demands.</p> <p>The policy does not try to assume the type of housing that people may wish to live in, but to provide a mix of housing that is suitable for the mix of residents of the District.</p> <p>The NPPF defines older people as the following: <i>“People over or approaching retirement age, including the active, newly-retired through the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.”</i></p> <p>If only 4 bed roomed houses were built, properties would remain unaffordable for the vast majority of Teignbridge’s residents.</p>
<p>Gypsy and traveller sites should be secured through stand-alone allocations in appropriate locations and/or delivered by the council through financial contributions from other developments. They should not be secured through the delivery of larger sites.</p>	<p>The delivery of gypsy and traveller sites in stand alone allocations will be considered in Part 2 of the Local Plan.</p>
<p>Paramount Gypsy and Traveller evidenced need for pitches is met on stand-alone allocation</p>	<p>In addition, Policy H9: Homes for the Travelling Community sets out when new gypsy and traveller pitches can be permitted, including in lieu of when they would have otherwise been provided on an allocated site, along with other residential or mixed use development.</p>
<p>Combining open market housing and Gypsy and Traveller sites is not feasible under any circumstance and is objected to on the strongest possible grounds due to impact on market sales, sales rate and delivery making the combined land use unviable.</p>	

Summary of Main Points Raised	Response to Main Points Raised
Worries over social engineering by local planners	The policies of the Local Plan have been designed to deliver healthy mixed communities.
There should be more than four potential options available	Noted.
Review omits executive retirement housing and this would free up family sized accommodation	Policy H4 does not prevent the building of executive retirement housing, where there is local need or market demand for this.
<p>The policy on housing Mix should:</p> <ul style="list-style-type: none"> • remain flexible/not overly restrictive to ensure it does not stifle development and meets acute demand for all types of housing • allow for changes in circumstances considering the length of the proposed plan and natural changes to economic circumstances and cycles • be based and shaped to meet the districts requirements which may include publicly owned housing • include evidence of need built up from local surveys and consultation • be based on an up-to-date SHMA • have flexibility to allow developers to respond to the market situation, so as to encourage and facilitate development • let the open market determine market needs 	<p>Policy h4 is considered flexible, in that it requires the mix to address identified needs and market demands, which allows for changes in circumstance, but is based on the District’s requirements and evidence, including the Council’s Housing Strategy, Local Housing Needs Assessments (where available) and Housing Market Needs Assessments.</p> <p>If the open market alone determined the type of houses delivered, it is likely to be those most profitable to housing developers, irrespective of whether they meet the local housing needs.</p>
<p>The existing housing mix policy is: letting down first time buyers and those struggling to get on the ladder as new housing estates have more non-affordable than affordable properties</p>	Affordable and social housing will be delivered through Policy H1: Affordable Housing Targets.
<p>Experience of retirement villages in the USA, New Zealand and Canada highlighted fenced, gated oases of calm. Growth in the private sector and housing association renting is very visible as many renters have a very different culture to those with a mortgage and have a much higher churn rate</p>	Noted.
<p>Virtually every settlement could take on average 20 additional houses with no detrimental effect on local services, infrastructure etc. and would provide a welcome boost to the local primary school. This would produce 1600 houses for 80 settlements which combined with existing permissions would be more than enough to satisfy demand. Creates a political problem as far easier to focus to</p>	<p>The distribution of development will be contained in Part 2 of the Local Plan.</p> <p>Teignbridge does not contain 80 settlements.</p>

Summary of Main Points Raised	Response to Main Points Raised
development in a few areas to minimise the number of upset voters but politics is not a planning issue and should not influence planning strategy	
<p>All new housing should:</p> <ul style="list-style-type: none"> • be easily adaptable to enable people to remain in their homes through advancing age/disability with minimum adjustments • include a mix of properties to buy and rent- renting enables people to move closer to work, reducing travel congestion and cost 	<p>Policy H4: Homes Suitable for All requires 100% of new housing to be accessible.</p> <p>Policy H1: Affordable Housing Targets seeks to ensure that affordable housing includes social rented properties as well as discount market/shared ownership.</p>
<p>Options not presented:</p> <ul style="list-style-type: none"> • Option A- Development should be relative to local needs- developers won't consider this • Both options • Option B as it would target the actual needs of the community rather than a generalised plan which may not • Maintain boundaries and have a small increase where local services can cope 	<p>Policy H4: Homes Suitable for All will ensure that the mix of housing addresses identified needs and market demand.</p>
Depends on area, site size and particularly local need	<p>Policy H4: Homes Suitable for All will ensure that the mix of housing addresses identified needs and market demand.</p>
All communities should be encouraged to complete regular Housing Needs Surveys to determine their requirement.	Noted.
Council should be allowed to borrow in order to build an adequate supply of social homes which should remain in public ownership in perpetuity	Noted. This is not a matter for the Local Plan.
Where appropriate reference should be made to local neighbourhood plans and housing needs surveys to identify appropriate need within a local area.	Reference is made within criteria 2 of Policy H4: Homes Suitable for All to the use of Local Housing Needs surveys.
Housing for people over a certain age produces ghettos	Noted. The Local Plan policies will deliver mixed communities.
Support for mixed housing to meet the requirements of the whole community	This is the approach contained within Policy H4: Homes Suitable for All.
TDC have tried moving families out to villages but it doesn't work and urban vs country people have different requirements and outlook	Noted. The Local Plan provides opportunities for rural housing to meet affordable housing needs.

Summary of Main Points Raised	Response to Main Points Raised
Affordable housing should be placed on brownfield sites close to Town Centres but must be designed carefully to avoid creating ghettos with development on the outskirts for the better off	The Local Plan aims to deliver mixed communities with social cohesion.
A high percentage of apartment blocks should be placed on the outskirts to avoid spoiling the countryside. We need developers who can build high-rise buildings and incentivise them to build affordable housing on brownfield sites	Noted.
The open market mix must remain open and responsive to market conditions, an over prescriptive policy will sterilise the response of developers to need and demand	Policy H4: Homes Suitable for All allows for market demand to be taken into account as well as identified housing needs.
The delivery of dwelling types such as bungalows is incredibly inefficient with apartments and maisonettes equally able to meet this need	Noted. Policy DW18: Residential Density sets out guides for residential density in order to efficiently utilise land resources.
Care home developers have a fixed criteria of requirements which PLC house builder are unable to provide or meet and forcing such uses together will negatively impact on delivery and must be kept separate	Noted.
We should only be building affordable homes on green belt land as these are necessary whereas second homes are not	Teignbridge District does not have any greenbelt land.
We need cheap and expensive homes and not just a mixture in range of housing due to policy. Consideration needs to be given to location and surroundings	A mix of housing sizes, types and tenures will provide cheap and expensive homes.
Additional requirements for certain types of housing could impact on deliverability of small sites with greater onus on larger sites to deliver	All residential development will be subject to Policy H4, however, the policy is not onerous or overly prescriptive and, the Plan will be viability tested to ensure that the totality of its requirements do not render development unviable.
Support for additional housing for younger adults is positive	Noted. Policy H5: Subdivision of Existing Dwellings allows for the creation on non-self contained accommodation, which can help to provide accommodation for those under 35, who would not receive housing benefit for self-contained accommodation.
Difficult to envisage how an upper age limit (such as 35 proposed in Review) would work in reality	It is unlikely that any planning consent would limit occupancy to a maximum age of 35.
Suitable accommodation for young adults shouldn't be limited to studio or 1 bedroom apartments as it limits adaptability, flexibility and these housing types don't allow for life changes	Suitable accommodation for young adults is not limited in any way through Local Plan policies.

Summary of Main Points Raised	Response to Main Points Raised
Council should focus on ensuring appropriate sites are allocated to meet the needs of specifically identified groups without seeking a specific housing mix of individual sites	The use of stand alone allocations for specific types of housing will be considered in the Submission version of the Local Plan, which will allocate development sites.
The local plan should ensure suitable sites are available to meet the need of older people for a wide range of developments across a wide choice of appropriate locations	The use of stand alone allocations for specific types of housing will be considered in the Submission version of the Local Plan, which will allocate development sites.
Government downgrading affordable housing requirements from 30% to 10% to encourage housebuilding but will cause its own problems. Allowance should be made for LA's to have funding to create their affordable housing and rebuild the public stock of housing	The NPPF 2019 expects major developments to provide 10% of homes to be available for affordable homeownership unless this would significantly prejudice the ability to meet the identified housing needs of specific groups.

Q16. Which of the following options or combination of options would best meet the growing demand for custom & self build plots?

- A: Increase the percentage requirement of Local Plan Policy WE7
 B: Custom and self-build exception sites
 C: Permitting custom and self-build infill development in the rural area

Summary of Main Points Raised	Response to Main Points Raised
Preference for allocation specific Custom & Self Build sites (no exception sites): <ul style="list-style-type: none"> Current 5% policy requirement should be removed and replaced with stand-alone self-build sites with potential of S106 contributions pooled towards stand-alone allocations 	The draft Local Plan 2020-2040 Part 2 contains possible site options and does not allocate development sites nor identify sites for a specific type of residential development. Development sites will be allocated within the Submission Local Plan.
Smaller sites (custom & self-build sites) could also help to contribute toward the target of 20% of sites as 0.5 hectares or less.	The draft Local Plan 2020-2040 Part 2 contains possible site options and does not allocate development sites nor identify sites for a specific type of residential development. Development sites will be allocated within the Submission Local Plan.
A strategy based approach would also clearly set out the key projects that are required to meet identified needs which in	The draft Local Plan 2020-2040 Part 2 contains possible site options and does not allocate development sites for development. However, the

<p>turn can be incorporated within CIL Regulation 123 Lists and Infrastructure Delivery Plans.</p>	<p>likely infrastructure needs of each site has been assessed and the site assessments include a list of site requirements.</p> <p>Development sites will be allocated within the Submission Local Plan, which will be informed by the comments received on the draft Plan..</p>
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Ecology, Biodiversity and Flood Risk comments in relation to site allocation and Development Strategy

Summary of Main Points Raised	Responses to Main Points Made
<p>Include a spatial distribution of housing dictated by sensitive ecological receptors, including avoiding development of land required to functionally support relevant areas of the South Hams SAC and avoiding indirect impacts arising from local residents and visitors enabled by the plan on the Exe Estuary SPA and Dawlish Warren SAC;</p>	<p>The distribution of housing has not yet been decided, although options are contained within the draft Plan. The constraints of each site included as an option has been assessed, including ecological sensitivity, and both direct and indirect impacts upon European Wildlife Sites, including the Exe Estuary SPA, Dawlish Warren SAC and the South Hams SAC, which the Council has a statutory duty to ensure remain at a favourable conservation status.</p>
<p>Questioning how further development will impact on the wildlife and protected species in Teignbridge and raising the lack of information to show how the strategic priority of protecting and enhancing biodiversity including international wildlife sites has been met.</p>	<p>The distribution of housing has not yet been decided, although options are contained within the draft Plan. The constraints of each site included as an option has been assessed, including ecological sensitivity, and both direct and indirect impacts upon European Wildlife Sites, including the Exe Estuary SPA, Dawlish Warren SAC and the South Hams SAC, which the Council has a statutory duty to ensure remain at a favourable conservation status.</p> <p>All sites have been assessed by way of a Strategic Environmental Assessment and Sustainability Appraisal as well as assessment under the Habitats Regulations.</p>

Summary of Main Points Raised	Responses to Main Points Made
<ul style="list-style-type: none"> Encourage the designation of further County Wildlife Sites; 	<p>The Local Plan Review cannot designate new County Wildlife Sites. County Wildlife Sites are designated by a panel of experts using strict criteria and are monitored by Devon Biodiversity Records Centre.</p>
<p>Ensure that indirect impacts from the increased population will not harm Teignbridge’s internationally important wildlife sites - an assessment of whether the proposed new growth can be accommodated without risking any adverse effect on the integrity of Dawlish Warren SAC and Exe Estuary SPA will need to be undertaken</p>	<p>The individual site assessments have taken account of ecology sensitivities in determining their potential. Sites with overriding ecology constraints have not been included within the draft Plan. Further work will be undertaken on ecology constraints, along with all other constraints affecting sites that are chosen to be progressed and allocated in the Submission Local Plan.</p>
<p>Questioning how further development will impact on the wildlife and protected species in Teignbridge and raising the lack of information to show how the strategic priority of protecting and enhancing biodiversity including international wildlife sites has been met.</p>	<p>The distribution of housing has not yet been decided, although options are contained within the draft Plan. The constraints of each site included as an option has been assessed, including ecological sensitivity, and both direct and indirect impacts upon European Wildlife Sites, including the Exe Estuary SPA, Dawlish Warren SAC and the South Hams SAC, which the Council has a statutory duty to ensure remain at a favourable conservation status.</p> <p>All sites have been assessed by way of a Strategic Environmental Assessment and Sustainability Appraisal as well as assessment under the Habitats Regulations.</p>
<p>With regard to flood risk:-</p> <ul style="list-style-type: none"> Overall flood risk should be reduced; Development in the floodplain or low lying catchment areas should be avoided and these areas used to create GI networks, valley parks and habitats; The impact of increased flood risk should also consider the risk from surface water and groundwater 	<p>The NPPF requires Local Plans to take a sequential, risk-based approach to the location of development in order to steer development to areas with the lowest risk of flooding. In order to be considered sound, the Local Plan Review must comply with the NPPF.</p>

Summary of Main Points Raised	Responses to Main Points Made
<p>and the risk of flooding from surface water mapping should be used alongside the Flood Zone 2 and 3 maps</p> <ul style="list-style-type: none"> • Surface water should be managed in a more natural way; • The Local Plan Review should recognise the aim to achieve mitigation in flood risk wherever possible through growth for both existing and proposed homes, businesses and the environment; • The Local Plan Review should also consider how flooding is not just about the floodplain; it is also about run-off from the landscape and the role that land management elsewhere in a catchment plays in this; • There should be collaboration with the Environment Agency over the Strategic Flood Risk Assessment of the Local Plan Review; • Housing distribution will need to consider water supply, foul drainage and pressure on environmental infrastructure and development located where foul drainage can connect to the existing sewer network; 	<p>Policy EN6: Flood Risk sets out that there will be a sequential approach to all new development, guiding it to areas at lower risk of flooding.</p> <p>Sites within the draft Plan have been assessed in relation to their flood risk. Sites wholly within functional floodplain have been ruled out. Where there is a high likelihood of flooding this has weighed against the development potential of sites. Where any flood risk issues and any issues are included as site sensitivities.</p> <p>It is not always appropriate to use floodplain areas for green infrastructure for use by people, however, its use for wildlife is set out as an opportunity for some of the development site options contained in the draft Plan.</p> <p>Other flood risk issues, including groundwater issues and surface water run-off have been considered when assessing sites. Sites have been assessed in liaison with South West Water, the Environment Agency and drainage and flood risk officers from Teignbridge District Council and Devon County Council. Further work on the preparation of the Submission Plan will continue this liaison.</p>
<p>Biodiversity evidence suggests expansion into the neighbouring countryside is not a good thing</p>	<p>The concern about expansion of existing settlements into the countryside is noted. However, the Local Plan needs to identify land for additional development up to 2040. Whilst the re-development of brownfield land is preferred, there is insufficient brownfield land to meet the needs of the District. This has been established through the assessment of sites identified through an Urban Capacity Study of all towns.</p>

Q.27 Should the Local Plan Review provide additional guidance and support for renewable and low carbon energy development through one of the following options, a combination of both or through and alternative approach?

A. a bespoke renewable energy policy

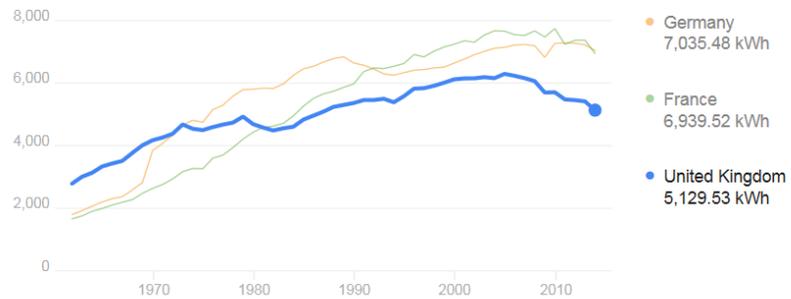
B. Identifying opportunity areas for potential renewable energy developments

Summary of Main Points Raised	Responses to Main Points Made
Yes – through a combination of A and B	The support for both a bespoke renewable energy policy and the identification of opportunity areas is acknowledged.
A. - through a bespoke renewable energy policy.	<p>The draft Local Plan contains Policy CC5: Renewable and Low Carbon Energy, which supports the principle of low carbon and renewable energy schemes and smart energy networks.</p> <p>The draft Local Plan 2020-2040 Part 2 is not allocating sites for renewable energy. However, technical evidence has been collected that identifies the potential wind and solar resource in the district. Further work will be undertaken on how the district could support renewable energy through Local Plan site allocations in liaison with local communities. The Submission Plan will contain any sites chosen to accommodate either wind or solar generated renewable energy.</p>
Option A (a bespoke renewable energy policy) may be better as offers more flexibility given that renewable energy technology is developing rapidly.	<p>The draft Local Plan contains Policy CC5: Renewable and Low Carbon Energy, which supports the principle of low carbon and renewable energy schemes and smart energy networks.</p> <p>The Local Plan is reviewed every 5 years years to ensure that it remains up-to-date.</p>
B. - through identifying opportunity areas	The draft Local Plan 2020-2040 Part 2 is not allocating sites for renewable energy. However, technical evidence has been collected that identifies the potential wind and solar resource in the district. Further work will be

	<p>undertaken on how the district could support renewable energy through Local Plan site allocations in liaison with local communities. The Submission Plan will contain any sites chosen to accommodate either wind or solar generated renewable energy.</p>
<p>The Local Plan Review should:-</p> <ul style="list-style-type: none"> • Encourage solar panels on public buildings; • Support inconspicuous solar panels; • reflect the Newton Abbot Neighbourhood Plan Policy NANDP1 by offering support for Community Energy Initiatives; • be flexibility in any policy to adapt and move with technology changes; • consider the use of air source and ground source heat pumps; • Consider roof mounted solar PV to be generally acceptable; • Identify high electricity consumption areas (eg industrial estates) and enable renewable energy developments in these areas; • Recognise that electricity will become the main source for transport and heating, so energy demand per household will double, particularly given the increase in housing planned for the area; • Acknowledge that it is hard to deliver carbon reduction targets through renewable energy generation only; • Consider any renewable energy requirements in combination with delivering other policy aspects (eg affordable housing, CIL etc); • Ensure that renewable energy development does not harm historic interests. 	<p>The draft Local Plan contains Policy CC5: Renewable and Low Carbon Energy, which supports the principle of low carbon and renewable energy schemes and smart energy networks.</p> <p>Local Plans are required to be reviewed every 5 years, which gives the opportunity to update policies as technologies change.</p> <p>Solar PV, solar thermal equipment, ground source heat pumps, water source heat pumps, air source heat pumps and flues for biomass heating systems or combined heat and power systems are already permitted development under the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).</p> <p>The draft Local Plan 2020-2040 Part 2 is not allocating sites for renewable energy. However, technical evidence has been collected that identifies the potential wind and solar resource in the district. Further work will be undertaken on how the district could support renewable energy through Local Plan site allocations in liaison with local communities. The Submission Plan will contain any sites chosen to accommodate either wind or solar generated renewable energy.</p> <p>Acknowledged, although there is a shift to greater use of electricity in comparison to other energy sources, the UK's consumption of electricity is actually decreasing.</p>

United Kingdom / Electricity consumption per capita

5,129.53 kWh (2014)



It is acknowledged within the adopted Local Plan (para 2.32) that tackling carbon reduction will require a combination of decarbonising energy production through a mix of technologies, increased carbon prices in the longer term, new technologies such as electric vehicles, energy efficiency of buildings and sustainable transport provision.

Whilst the Building Regulations apply certain standards for the conservation of fuel and power, the work that is being undertaken on the Local Plan Review will consider evidence to require higher standards of energy efficiency in new buildings, whilst acknowledging that this can have impacts on development viability.

National and local tiers of policy combine to conserve historic interests that is relevant to renewable energy development along with other forms. Legislation through S66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local authorities in exercise of planning functions to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

	The NPPF explains how heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations. This is echoed and added to within Policy EN16: Heritage Assets of the draft Local Plan.
Wind farms should be avoided due to harm to the landscape	The draft Local Plan 2020-2040 Part 2 is not allocating sites for renewable energy. However, technical evidence has been collected that identifies the potential wind and solar resource in the district. Further work will be undertaken on how the district could support renewable energy through Local Plan site allocations in liaison with local communities. The Submission Plan will contain any sites chosen to accommodate either wind or solar generated renewable energy.

Q.31 Should the Local Plan support the reopening of Heathfield Railway Line ?

Summary of Main Points Raised	Responses to Main Points Made
<p>The Local Plan should:-</p> <ul style="list-style-type: none"> • Support the reopening as a means of encouraging employment in the heart of Teignbridge and reducing reliance on motor vehicles and helping ease congestion; • Consider creating a park & ride facility at Heathfield, linked to bus routes to the town centres; 	<p>Whilst the reopening of Heathfield railway line, or the provision of a park & ride facility would be supported as a way of increasing sustainable travel, insufficient sites have been submitted to fund such a project. In the absence of external funding to support such a scheme, it is unlikely to be achievable and will not be further considered for allocation in the Submission Plan.</p>

Summary of Main Points Raised	Responses to Main Points Made
<ul style="list-style-type: none"> • Simply acknowledge this might happen; • Encourage businesses to help make this happen; • Provide funding opportunities for this; • Encourage new development by stations on the line. 	<p>Noted</p> <p>The Local Plan is a land use document and would not be able to influence local business to financially support the re-opening of the railway line.</p> <p>It is highly unlikely that the Council would be able to offer funding for the re-opening of the railway line, unless a large amount of Government assistance was received.</p> <p>If the railway line was re-opened, development would be encouraged in appropriate places where new residents would have access to it as a sustainable mode of transport and alternative to the private car.</p>

Infrastructure Comments in relation to site allocation and development strategy

Summary of Main Responses	Responses to Main Points Raised
<p>The Local Plan Review should:-</p> <ul style="list-style-type: none"> • apply caution when setting multiple onerous Policy requirements on new developments as this may frustrate the ability for sites to come forward as planned and result in failure to deliver the Districts specified housing needs; • not allow urban sprawl which creates areas with minimal facilities, places additional pressures on existing facilities and damages rather than enhances communities; • Ensure the speed of development does not exceed the ability of a community to match the increased demands for education, healthcare and social provision; 	<p>The plan making process will address this concern by requiring a viability check to be carried out of emerging policies and site requirements. It will ensure that the whole plan can be delivered; viability can be updated if necessary after completion of the plan to reflect local market conditions amongst other factors. The site requirements contained in the draft Plan have not been subject to viability testing.</p> <p>The importance of providing sufficient infrastructure, that is delivered as early in the development as possible is set out in draft Local Plan Part 1 2020-2040 Policy SC5. Further work will be undertaken to identify site specific requirements for sites that will be proposed in the Submission Plan.</p>

Summary of Main Responses	Responses to Main Points Raised
<ul style="list-style-type: none"> • Ensure that the infrastructure promised by developers is delivered in a timely manner – ideally community facilities provided early on – to prevent harm to existing communities; • Ensure that infrastructure for individual developments are joined up to provide better planned communities; • Require road infrastructure to be in place prior to houses • Ensure provision of reliable, super-fast broadband for all employment sites and new houses; • ensure that new infrastructure links with existing village infrastructure, such as footpaths; • Ensure sufficient infrastructure is in place or planned to support residential and visitor populations; • Focus more on the provision of local services and education. 	<p>Policy SP5: Infrastructure of the draft Local Plan ensures that new development is provided with appropriate infrastructure as early in the development as possible. It requires connections to existing footpaths and cycleways should be delivered prior to occupation.</p> <p>The infrastructure requirements for each site option contained in the draft Local Plan 2020-2040 Part 2 are set out, along with opportunities and sensitivities. These requirements will be further informed through the draft Plan consultation and the Submission version of the Local Plan will contain specific and full infrastructure requirements for each allocated site to ensure that infrastructure is provided to serve new development early on as possible. Where there are specific site requirements about timing, these will be included within the site allocations in the Submission Plan.</p>