

TEIGNMOUTH TOWN COUNCIL

**REGULATION 14 PRE-SUBMISSION CONSULTATION ON THE DRAFT NEIGHBOURHOOD PLAN
and associated documentation**

RESPONSE TABLE

31st OCTOBER, 2022

All responses have been cut and pasted or typed verbatim.

Comments repeated in more than one section highlighted in grey.

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
		GENERAL COMMENTS		
1 Bishopsteignton Parish Council		Bishopsteignton Parish Council do not have any comments specific to the content within the draft Teignmouth Neighbourhood Development Plan but wish to congratulate the NP Steering group on the comprehensive document they have produced, obviously the result of much hard work. Bishopsteignton Parish Council support the submission and approval of this plan and its implementation in the future.	Thank you. Comments noted.	None.
6 DEVON COUNTY COUNCIL Historic Environment Team		The plan is generally well thought out and put together. There are good images on the title page but to keep the character of the parish in the readers mind, further images could be added throughout.	Thank you. Comments noted. Additional photographs in the Plan would make it longer so we do not propose to add more. There are more photographs showing the town's character in the Design Code.	None.
8		I agree with the thrust of the plan in terms of the town determining its own future.	Thank you. Comments noted.	None.
11 Historic England		I hope that our advice has been useful. We have no further comments to make at this stage. However, we look forward to having the opportunity to make further comment at the Regulation 16 consultation stage. We wish the steering group well with their ongoing work.	Thank you. Comments noted.	None.
15		I agree with the plan in terms of the town determining its own future.	Thank you. Comments noted.	None.
19 Natural England		"Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan." (see <i>Appendix to this document Section 3</i>).	Thank you. Comments noted.	None.

¹ Individuals have been anonymised

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INTRODUCTION				
6 DEVON COUNTY COUNCIL Historic Environment Team	1.2.1 p..7 1.2.1 p.8	<p>Although the first documentary reference to Teignmouth is in 1044, there is evidence of occupation and activity in the area dating from the prehistoric period.</p> <p>Suggest insert the date of Domesday Book, 1086. Note also the spelling of ‘Domesday’.</p> <p>East and West Teignmouth are not specifically mentioned in Domesday Book but it appears they were parts of the manors of Dawlish and Bishopsteignton respectively. They were two separate parishes until 1909, although they were often referred to as the single settlement of Teignmouth long before then.</p> <p>Lovely picture of the sea front. Suggest add a caption, including illustrator and date, as this is difficult to read on the bottom of the picture.</p>	<p>Thank you. Comments noted.</p> <p>Text to be added to reflect this.</p> <p>Not considered necessary. However, “alt text” will be added to make the Plan more accessible.</p>	<p>Typo to be addressed.</p> <p>Amend accordingly.</p> <p>Add “alt text” to Plan’s pictures, maps and figures.</p>
2 VISION, AIMS AND OBJECTIVES				
7 Environment Agency – Sustainable Place Planning Adviser	2.2 p.14	<p>Thank you for your consultation of 07 July 2022 providing us with the opportunity to comment on the pre-submission version of the Teignmouth Neighbourhood Plan.</p> <p>We support the neighbourhood plan’s overarching vision/objectives. In particular, we are pleased to see that the vision points to the need to respond positively to the climate and ecological emergencies, and proposes sustainable development and an unpolluted environment. We are supportive of objectives 2, 4, 5, 9, 24, 27 and 30 which will ensure that development is sustainable and protects the natural environment. However, under the heading of Natural Environment, we recommend that, as well as an objective in respect of protecting the flood defences, there is also an objective to protect the floodplain from inappropriate development. Making space for water within the town will support the overall vision regarding resilience to climate change. Furthermore, given the importance of the water environment to the history and identity of the community, you may also wish to include an objective around safeguarding water quality. Environmental data showing the ecological/chemical status of waterbodies can be viewed at: http://environment.data.gov.uk/catchment-</p>	<p>Repeated in NE 11.1</p> <p>The proposed additional objectives will help to reinforce one of the key areas of importance for the Plan. Add in objectives as suggested.</p>	<p>Add to objectives as suggested and associated text.</p>

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		<p><u>planning/RiverBasinDistrict/8</u>. With regard to the objectives of the Water Framework Directive, the River Teign and coastal waters are at Moderate Ecological Status in this location. New development must not cause deterioration from the present status and opportunities to achieve a good status should be sought. This would have benefits for the environment, as well as the community and attracting economic investment.</p>		
		<p>3 CROSS CUTTING THEMES</p>		
<p>4 Designing Out Crime Officer Devon and Cornwall Police</p>	<p>Here and Design Code App. 2a</p>	<p>Whilst there is some mention of safety within the Neighbourhood Plan and I note a section relating to the security of business within the Design Code, I could see no specific reference to crime or disorder/anti-social behaviour and designing out crime principles, which I feel should be included within all such Neighbourhood Plans.</p> <p>Whilst these issues are covered in other national and council policies, I think it is beneficial that such principles are reinforced in all such documents to ensure they are embedded in the design of new developments</p> <p>I would therefore suggest that the following statement or similar is included within the NDP where deemed appropriate <i>“All development proposals should consider the need to design out crime and disorder to ensure ongoing community safety and cohesion”</i></p> <p>This should apply to all forms of development not just new housing. Ensuring crime and anti-social behaviour (ASB) are designed out may be just as relevant for car parks, footpaths, play areas, commercial development etc.</p> <p>By designing out opportunities for crime and ASB at the outset will not only hopefully prevent or reduce these but very importantly also help reduce the fear of crime.</p>	<p>Suggest mention in 3.3 Future proofing for community resilience and 4.3 High-quality and Sustainable Design.</p> <p>We will add in references. However, we need to consider re <u>balance</u> with other issues such as heritage, character, etc. across all aspects of design.</p>	<p>Amend as suggested, adding to supporting text.</p>
<p>6 DEVON COUNTY COUNCIL Historic Environment Team</p>	<p>3.2 Notes 18+20 20, pp18/9</p>	<p>The NPPG was revised in July 2021</p>	<p>We use February 2019 – do we need to change or just check reference still obtains.</p>	<p>Amend all 2019 references to the NPPF and update.</p>

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7 Environment Agency – Sustainable Place Planning Adviser	p.16	We are pleased to note the cross-cutting themes in section 3, particularly that Climate Change has been identified as a ‘golden thread’ running through the policies and that section 3.1 recognises the need for the community to adapt to climate change.	Thank you. Comments noted.	None.
		4 BUILT ENVIRONMENT		
4 Designing Out Crime Officer Devon and Cornwall Police		<p>Whilst there is some mention of safety within the Neighbourhood Plan and I note a section relating to the security of business within the Design Code, I could see no specific reference to crime or disorder/anti-social behaviour and designing out crime principles, which I feel should be included within all such Neighbourhood Plans.</p> <p>Whilst these issues are covered in other national and council policies, I think it is beneficial that such principles are reinforced in all such documents to ensure they are embedded in the design of new developments</p> <p>I would therefore suggest that the following statement or similar is included within the NDP where deemed appropriate <i>“All development proposals should consider the need to design out crime and disorder to ensure ongoing community safety and cohesion”</i></p> <p>This should apply to all forms of development not just new housing. Ensuring crime and anti-social behaviour (ASB) are designed out may be just as relevant for car parks, footpaths, play areas, commercial development etc.</p> <p>By designing out opportunities for crime and ASB at the outset will not only hopefully prevent or reduce these but very importantly also help reduce the fear of crime.</p>	<p>Suggest mention in 3.3 Future proofing for community resilience and 4.3 High-quality and Sustainable Design.</p> <p>Yes, add in refs. But need to consider re <u>balance</u> with other issues such as heritage, character, etc. across all aspects of design.</p>	Amend as suggested, Adding to supporting text.
6 DEVON COUNTY	Sect.4 generally	You refer to the Design Code and also to the Teignmouth Town Centre Character Appraisal. We also recommend looking at the Devon Historic	Yes, make refs and add to heritage report too where necessary. Add refs to their weblinks in the Plan.	Amend as suggested.

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COUNCIL Historic Environment Team		<p>Coastal and Market Towns Survey of Teignmouth - Teignmouth Historic Coastal Town Survey , which includes the history and heritage of the town, dividing it into several historic urban character areas (HUCAs).</p> <p>Teignmouth was one of 17 towns included in the survey. More information can be found on our website - Historic Market & Coastal Towns Survey: Devon County Council .</p>		
6 DEVON COUNTY COUNCIL Historic Environment Team	4.2.1 p.22	<p>We are pleased to see a section on Heritage and the Historic Environment, and with reference to the Devon Historic Environment Record. The HER is also available to view as a layer on the Devon County Council Environment Viewer - Devon County Council Environment Viewer .</p> <p>There is good emphasis on the built environment and mention is made of historic monuments and archaeological remains in the final paragraph. The latter should be expanded to include examples of prehistoric and Roman earthworks, cropmarks and artefacts. You could also include more detail on Church Rock wreck, that it's thought to be a 16th century Venetian merchant's ship, possibly involved in the Spanish Armada of 1588.</p> <p>Reference should also be made here to the NPPF. The historic environment will be a material consideration in deciding many of the planning applications submitted in your area. Depending on the individual archaeological potential, some sites may require archaeological work either prior to or as a condition of planning application submission. The National Planning Policy Framework 2021 includes a chapter (16) on conserving and enhancing the historic environment. Section 195 states that:</p> <p>'Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'</p>	Review the supporting text to include additional references suggested here.	Amend as suggested.

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		<p>In addition Section 205 states that: ‘Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.’</p>						
7 Environment Agency Sustainable Places Planning Adviser		We welcome the range of environmental policies set out in the plan. In particular we are supportive of Policy BE3 Sustainable Design.....	Thank you. Comments noted. Repeated at NE section.	None.				
18 DEVON COUNTY COUNCIL Flood Risk Management	Section 4.6 pp.37-9 BE also Hsg	This response is included in its entirety in this document’s Appendix at the end, since it makes little specific contribution to or comments on the contents of this Plan and seems like a “standard response”.	Comments noted.	None.				
11Historic England	BE 1 pp.22-28	<p>Thank you for inviting us to comment on the draft Neighbourhood Plan for Teignmouth. This seems to be our first engagement with the Neighbourhood Plan Steering Group.</p> <p>We welcome the comprehensive thinking around the protection of heritage, particularly Policy BE1: Heritage and the Historic Environment. We also welcome the Teignmouth Local Heritage Assets Report.</p>	Thank you. Comments noted.	None.				
24 Chief Planner DEVON COUNTY COUNCIL	4.6	<p>The Council as Lead Local Flood Authority (LLFA) is generally supportive of the contents of the Neighbourhood Plan. For ease of communication, comments relating to the Floor Risk Management have been included in the following table.</p> <table border="1" data-bbox="409 1385 1357 1490"> <thead> <tr> <th data-bbox="409 1385 913 1422">Policy/Paragraph</th> <th data-bbox="920 1385 1357 1422">Comment</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 1426 913 1490">Executive Summary – Appendix B – Policy BE3 – Point IV</td> <td data-bbox="920 1426 1357 1490">Sustainable Drainage Systems, as per the best practice Management Train</td> </tr> </tbody> </table>	Policy/Paragraph	Comment	Executive Summary – Appendix B – Policy BE3 – Point IV	Sustainable Drainage Systems, as per the best practice Management Train	These are useful comments made to help tighten and clarify elements of the Plan and its intent. We will review the Plan’s text accordingly to take into account the helpful suggestions.	Review and amend accordingly.
Policy/Paragraph	Comment							
Executive Summary – Appendix B – Policy BE3 – Point IV	Sustainable Drainage Systems, as per the best practice Management Train							

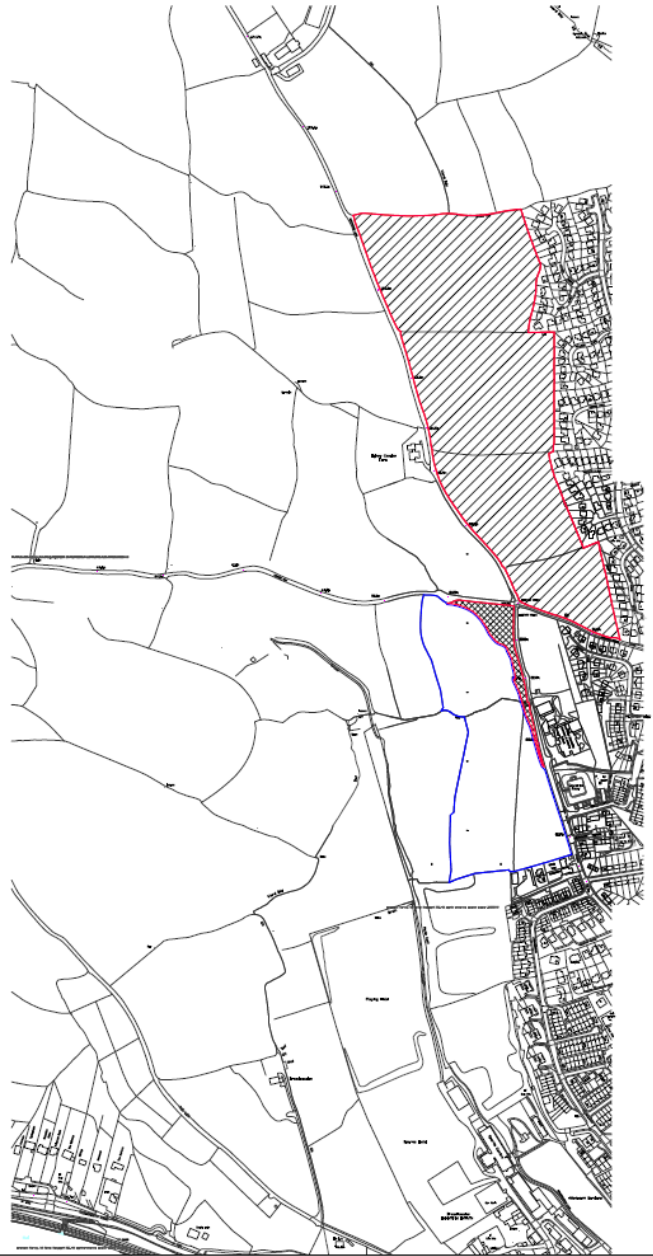
Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment		Steering Group Response	Change to Plan text, policy, or evidence base, if any
			outlined in the CIRIA's The SuDS Manual (C573 should manage rainfall in above ground SuDS as close as possible to where it falls to the ground. As such, the Neighbourhood Plan Group may wish to consider the removal of the reference to "off-site solutions" and rewording the point in a similar manner to the NPPF paragraph 167 point C.		
		Executive Summary – Appendix B – Policy SLR1 and Policy NE 2	It is worthwhile when considering the long-term future for green spaces and habitats whether there is a wish to explicitly support Natural Flood Management Measures. Further details of this can be found online at www.devon.gov.uk/floodriskmanagement/document/nfm-guidance-for-devon/		
		General (also in Design Code.	Overall, the Neighbourhood Plan may benefit from referring to existing guidance and local policy such as Devon County Council's Sustainable Drainage Guide https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/ and the CIRIA SuDS Manual (C753) https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx	Overall, the Neighbourhood Plan may benefit from referring to existing guidance and local policy such as Devon County Council's Sustainable Drainage Guide https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/ and the CIRIA SuDS Manual (C753) https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx	
		5 HOUSING			
5 PCL Planning on behalf of Waddeton Park Ltd.	Housing	<p>On behalf of Waddeton Park Ltd (who have an interest in land at Shepherds Lane, Teignmouth, as shown on the enclosed location plan- Appendix 1) we write to provide representations in relation to the above consultation.</p> <p>On behalf of our clients, PCL Planning Ltd have provided representations to the previous draft Teignbridge Neighbourhood Plan consultation (May/June</p>	Much of the site referenced by the respondent is outside of the Plan area. The Teignmouth Neighbourhood Plan cannot have policies which determine proposals outside of the Plan area boundary. As such the site should be and is recognised by the respondent as a strategic site	None.	

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		<p>2021), Teignbridge Local Plan and the Bishopsteignton Neighbourhood Plan. This site is situated towards the north west of the town of Teignmouth and, whilst within Bishopsteignton Parish, it directly adjoins, and is more related to, Teignmouth than Bishopsteignton.</p> <p>The Neighbourhood Planning (General) Regulations 2012 require Neighbourhood Plans to be subject to an examination by an Independent Examiner appointed by the local planning authority. Unlike Local Plans (which have to be tested for 'soundness') Neighbourhood Plans must meet a number of 'basic conditions' before they can be put to community referendum.</p> <p>The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, and state that a Neighbourhood Plan is required to:</p> <ol style="list-style-type: none"> a) Have regard to national planning policies and advice contained in guidance issued by the Secretary of State; b) Contribute to the achievement of sustainable development; c) Be in general conformity with strategic policies contained in the Development Plan for the area; and d) Not breach, and is otherwise compatible with, EU obligations and human rights requirements. <p>The Development Plan (DP) for the area currently comprises the adopted Teignbridge Local Plan (adopted May 2014), not the current review that is being undertaken into that plan. Paragraph 2.57 of the Local Plan identifies the strategic policies which Neighbourhood Plans will need to be in general conformity with, and this includes:</p> <ul style="list-style-type: none"> • all Strategic Policies, Strategic Places, Prosperous Economy, Wellbeing and Quality Environment policies from S1A through to EN12 (in particular policies S1A, S1, S4, S13 and S18) <p>We would encourage the Town Council to carefully consider the comments made in this representation in order to meet the basic conditions and ensure general conformity with the DP policies set out above.</p> <p>Our particular concern with the TNP is its failure to understand the strategic role that the town plays within South Devon and the associated housing requirements that need to be met to underpin</p>	<p>identified in the Teignbridge Local Plan review consultation.</p> <p>The suggested requirement for the neighbourhood plan to introduce a trigger or development sites is not appropriate in the Teignmouth context. There is no requirement in national policy whatsoever for neighbourhood plans to have to allocate housing development. It is also our understanding that the example cited of the Torbay Local Plan and its related neighbourhood plans is not comparable with the position taken for housing delivery in Teignbridge. In Torbay, there was a clear aspiration, expressed through the Local Plan, to see the neighbourhood plans, which covered the whole local authority area to help deliver the strategic housing numbers across the Bay. There is simply not the same relationship in Teignbridge between the Local Plan and neighbourhood plans and the example cited is therefore not relevant. Further, the Teignbridge Local Plan, as already highlighted by the respondent, is being prepared at the current time. Strategic sites are expected to come forward through that process and so there is no requirement, or even implication, that it is the responsibility of the neighbourhood plan process in Teignmouth to take on the responsibility of providing for strategic growth. The position in the emerging neighbourhood plan is clear with regard to the areas within the Plan boundary which it seeks to protect and the reasoning and justification behind doing so.</p>	

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		<p>that role. As we set out in our representations to the Teignbridge Local Plan, Teignmouth is the second largest town in the District and performs an important strategic role, with a wide range of services and facilities, serving residents in the wider coastal area. Given its sustainability credentials, it is our view that the level of housing currently proposed to be delivered at Teignmouth (340 dwellings in the adopted Local Plan) is low and additional greenfield land will be required in order to meet identified housing needs.</p> <p>Due to Teignmouth’s coastal location, the options for future development of the town are limited (to the north and west). Land to the west – (on land within Bishopsteignton Parish) is considered the most sustainable location. In particular, land at Shepherds Lane (which was previously identified by the District Council as a preferred site for development - Policy TE2 – see Appendix 2) but was omitted from the current Development Plan at a late stage, without clear justification.</p> <p>A section of this site has since been considered in the emerging Local Plan (Part 3) Small Sites consultation document, with a yield between 17 and 26 units. Whilst we support this allocation, we continue to consider that the site can, and should, facilitate a greater level of development for Teignmouth. The wider site should still be delivered, and an allocation to enable this can be provided through the TNP.</p> <p>We consider that this is a suitable site for growth that has been overlooked by the Town Council, possibly due to cross-boundary issues with Bishopsteignton Parish, with no reference to the potential for development in this location.</p> <p>The site is adjacent to the built-up settlement boundary of the town and in close proximity to local services and transport facilities. It is well placed to deliver much needed market and affordable housing, public open space and infrastructure improvements. Development of the site would represent a natural extension to this predominantly residential part of the town.</p>		

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		<p>Paragraph 2.16 of the Teignbridge Local Plan recognises the need for a degree of flexibility in the Local Plan to allow for increases in demand or delay in sites coming forward. Policy WE1 identifies the need to monitor the delivery of market and affordable housing in the District and states that if housing completions fall behind, development of additional dwellings in strategically appropriate locations should be encouraged. This issue is not considered at all in the Neighbourhood Plan. On this basis, the TNP is not therefore considered to meet criteria a) to c) of the basic conditions outlined above.</p> <p>Whilst we understand that the current draft of the TNP has not committed to providing additional housing sites, we consider that this position should be re-assessed. Of the existing allocations in the Local Plan, a reserved matters application has been approved in May of this year (2022) for 255 dwellings at site allocation TE3. No significant progress appears to have occurred in seeking permission for residential development in the other allocations (TE3a, TE4) in Teignmouth. As a result, it therefore seems necessary that additional site allocations need to be made to ensure a suitable supply of housing for the full TNP period.</p> <p>In the examination of the Torbay Local Plan the Inspector raised some important points regarding the relationship between Local and Neighbourhood Plans. Torbay Council proposed to rely on Neighbourhood Plans to deal with the spatial distribution of development in the medium and long term. The Inspector identified (in his Further Findings, dated 23rd December 2014) the need for a “trigger point” to be included in the Plan to identify when and in what circumstances development sites would be brought forward, in the event of Neighbourhood Plans failing to deliver the Council’s strategy. The Inspector also stated the need to adopt a flexible and highly responsive approach to housing delivery and to allow for reviews whenever necessary.</p> <p>Similarly, in this case, the Neighbourhood Plan should include some form of “trigger” to allow for additional land to be brought forward for development in the plan period, without conflicting with the Plan.</p>		

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		<p>It is suggested that the Town Council consider identifying a 'fringe zone', or similar, for land adjacent to the town, where residential development may be appropriate. In doing this, the site can then be identified as a future expansion zone.</p> <p>Appendix 1</p>		










Area

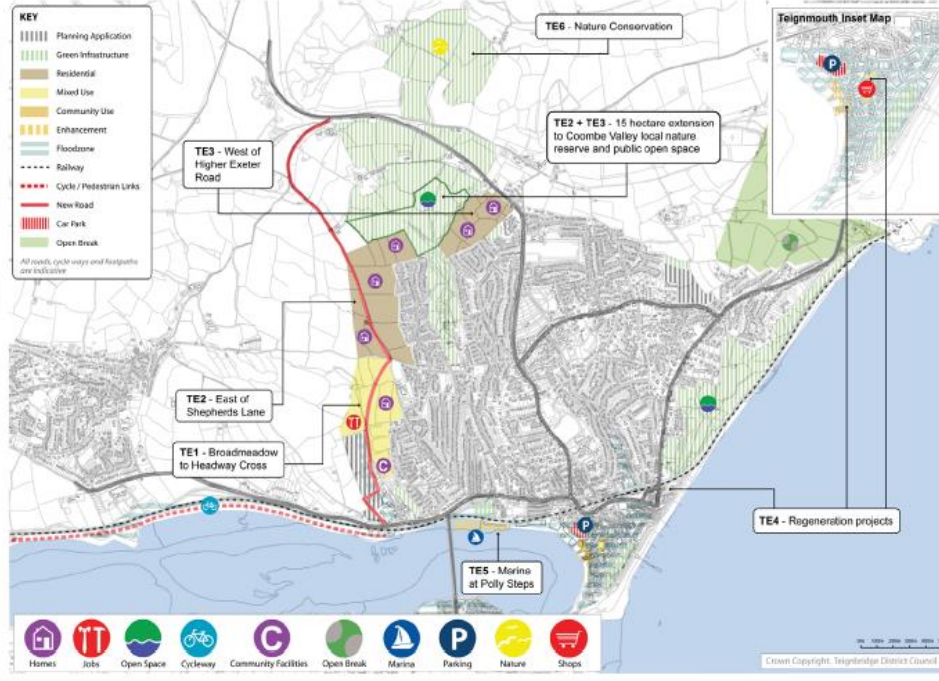
- Project Application boundary
- Land already used for similar purposes
- Land already used for other purposes
- Proposed water area

Shepherds Lane, Shepherds Lane Farm
 11100 L St Rev A 1:2000 @A1

CliftonEmerydesij

11100 L St Rev A 1:2000 @A1
 AUG 2025

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		<p>Appendix 2</p> <p>Key Proposals</p> <p>A new neighbourhood to the west of Teignmouth which will provide open space, homes and jobs for local residents as well as community facilities and a green buffer to soften the visual impact of the urban extension in this sensitive landscape setting. It will also provide new pedestrian and cycle routes and a new road to help relieve traffic in the town and improve air quality along Bilton Park Road. The new neighbourhood will also be supported by land to provide habitat management for protected wildlife (T5).</p> <p>The new neighbourhood is in three phases:</p> <ul style="list-style-type: none">  Phase 1 (TE1) at Broadmeadow to Headway Cross for about 270 families including 80 or more homes subsidised by the developer to be affordable for local people. There will be opportunities for new businesses employing about 300 people and built space for vocational training. This phase also includes children's and youth play facilities and a community building.  Phase 2 (TE2) East of Shepherds Lane with room for 560 new homes. About 170 of the homes will be affordable to help local people have a place of their own. This area will have enhanced public access to open space for informal play and recreation. A green buffer will respect the amenities of residential properties on the Lovell Estate to the east.  Phase 3 (TE3) West of Higher Exeter Road. This will provide for about 290 new homes including 85 or more which will be affordable. Additional public open space and informal play and recreation space will also be provided in the Coombe Valley as well as enhancement of Frobisher Woods. A green buffer will respect the amenities of existing residential properties to the south.  Policy TE4 proposes a number of exciting regeneration proposals within the town including Brunswick Street / Northumberland Place and along the River / Back beach and Fish Quay areas that will help fulfil the town's vision for the future. Enhanced parking will be provided at Quay Road.  A private sector marina (TE5) at Polly Steps will help boost tourism in the area associated with water sports and recreation, and enhance Teignmouth's strong maritime culture. <p>There are a number of ways to view the plan and get involved:</p> <p>Online: www.teignbridge.gov.uk/plansteignbridge Facebook: facebook.com/PlanTeignbridge Twitter: @PlanTeignbridge</p> <p>You can also view the document at Council offices, Information centres and Libraries</p> <p>Please submit your comments to us by 4.30pm on Friday 2nd March 2012.</p> <p>If you need this information in a different language or format phone 01626 361101 or e-mail info@teignbridge.gov.uk</p>	 <p>Core Strategy Preferred Options</p> <p>Summary Leaflet for Teignmouth</p>  <p>The Core Strategy Preferred Options (January 2012) is a step in the direction of a 20 year plan for Teignbridge. It sets out a proposed set of policies, proposals and actions to meet the challenge facing the area.</p> <p>This leaflet summarises the proposals at Teignmouth. Leaflets outlining proposals for other parts of the District are also available. For full details of the policies and to comment on the proposals go to www.teignbridge.gov.uk/plansteignbridge and submit your comments to us by 4.30pm Friday 2nd March 2012.</p> <p>There will be a Drop-In Event at Teignmouth Heritage Centre (Museum) on Saturday 28th January 2012 between 10am and 4pm.</p> <p>Teignmouth's 20 year vision is set out in policy S18 and can be summarised as follows:</p> <p>In a protected coastal setting enclosed by rolling hills and red sandstone stone cliffs Teignmouth will regain its pride as a regenerated place to support new homes, jobs and services, a seaside resort that is well connected and accessible, a centre for watersports, leisure, music, arts and culture and a well designed town, safe from flood risk, adapted to climate change and with reduced carbon dependence.</p> 	

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		<p>Teignmouth</p> 		
7 Environment Agency – Sustainable Places	HO 2 5.3 p.44	With regard to policy HO2 Flats above retail and other town centre premises, we suggest the addition of a bullet point which requires the access/egress route be safe from flooding for the safety of the flats for future residents.	This is a helpful, but minor, change which can be made to the policy.	Amend HO2 accordingly.
23	HO2 5.3 p.44	We think that there are far too many vacant floors above existing ground floor shops etc which have not been properly utilised for years. We therefore find the reasoning in the draft that they need to be kept vacant just in case an expansion might be needed in future to be unsound. The need for town centre residential accommodation which is affordable, convenient and meets local housing needs is paramount, especially for young people who want to continue living or working here to support the local economy and bring a broader age group spectrum to the area. We can think of no specific examples which support the reluctance shown in the draft to adopt a more decisive approach to town centre accommodation provision and nor are any given in	No text or policy in the TCR section or which justifies policy HO2 says that upper floors need to be kept vacant. If anything, policies in the Plan are supportive of change, to help increase footfall in the town centre, subject to various reasonable criteria being met. Page 78 states that “While policy should be proactive in encouraging greater footfall and use of town centre premises, including upper floors at a time when the number of premises may contract	None.

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		the draft plan.	<p>more permanently, flexibility is still required in use of upper levels above shops to ensure that shop owners can adapt to the changing nature of retail, for example, a local retailer may need additional storage space on upper floors if they establish a higher number of sales through “click and collect” or internet based shopping. We therefore support greater and more active use of upper floors in existing premises but the need for this should be considered flexibly and be appropriate to the needs of the business. In many cases this type of change to use of an upper floor is unlikely to require planning permission and therefore does not require a policy to support it.” In this part of the Plan, the text is saying that the use of upper floors should be treated flexibly, for use by businesses and change of use as flats. Policy TCR2 allows change of use to a dwelling on upper floors, as long as the tests set out are met. These tests are reasonable, to allow the opportunity for such spaces on upper floors to be brought into a commercial use in the first instance. This priority is appropriate for the town centre to help manage change should the town centre “offer” change and contract in the coming years. Policy HO2 is clear in the support it offers for change of use to residential in the town centre area. Reasoning in the Plan is therefore not considered to be “unsound”. We do not consider that any changes are necessary as a result of the comments made.</p> <p>Comments copied in TCR section.</p>	
15	General hsg/devt + TAP	The town’s roads and transport infrastructure are often busy, congested and sometimes overburdened, not just in summer, but sometimes throughout the year. Significant further development that would exacerbate these need to be	Comments noted. We agree that this is an issue in the town. The Plan does not propose additional development.	None.

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		avoided, with solutions found to ease some of the existing transport and car-parking issues.		
15	General hsg + Flood Risk/NE	There is little to no room for further new development on steep slopes around the town that could be developed, without further adding to strains on road travel, car parking, school places, medical facilities and in particular adding to flood risk. Many higher parts of the town are the source of springs, which if built on would be displaced elsewhere, potentially increasing flood-risk in a steeply sloping community. Recent developments in the town have displaced springs and caused flooding and water ingress issues on some neighbouring properties on New Road – other sites in the town are similarly located. Redevelopment, or more efficient use of some less attractive already developed parts of the town could be a solution if further living accommodation is required.	Comments noted. We agree that this is an issue in the town. The Plan does not propose additional development.	None.
8	General hsg + Flood Risk/NE	There is little to no room for further new development on steep slopes around the town that could be developed, without further adding to strains on road travel, car parking, school places, medical facilities and in particular adding to flood risk. Many higher parts of the town are the source of springs, which if built on would be displaced elsewhere, potentially increasing flood-risk in a steeply sloping community. Recent developments in the town have displaced springs and caused flooding and water ingress issues on some neighbouring properties on New Road – other sites in the town are similarly located. Redevelopment, or more efficient use of some less attractive already developed parts of the town could be a solution if further living accommodation is required.	Comments noted. We agree that this is an issue in the town. The Plan does not propose additional development.	None.
11Historic England	Also in SLR	<p>As a statutory consultee, we would have expected to have been consulted on the screening document for the Strategic Environmental Assessment (SEA) that was prepared in February 2022. Had we been consulted, we would not have concurred with the local authority's consultant's screening decision that an SEA was not required.</p> <p>When reviewing a neighbourhood plan, our main concern is potential negative impact to heritage assets, caused by any proposed new development. Where there are formal site-allocations for development,</p>	We have contacted Teignbridge District Council (TDC) on this matter. We requested a screening opinion, as required by the process and received the screening report in response, concluding that no SEA was required on the Plan. We have done all we are required to and are dependent upon TDC as the local planning authority to progress SEA matters and advise accordingly. On sharing the Historic England concerns with TDC, their response is that they have used the	Changes to be made to address Historic England concerns.

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
		<p>or where development in-principle is being supported on named sites, we would expect:</p> <p>a thorough heritage evidence base; an assessment of potential harm to heritage assets; a formal justification of the policy that confirms that no harm will be caused.</p> <p>Ordinarily, this work would be achieved by the preparation of a full Strategic Environmental Assessment (SEA). However, a suitable evidence-base and justification for development could well be achieved by other means.</p>	<p>same method and process for SEA for several recent Neighbourhood Plans, with Historic England aware that they are, in effect, consulted at the Regulation 14 stage.</p> <p>We will make changes to the Plan to reflect and address Historic England’s concerns, and consider that the helpful suggestions will help to strengthen policies in relation to heritage. This includes a review of how heritage assets could be further protected. Initial review has indicated that one such asset, identified in the Heritage Assets Assessment Report could merit further protection by virtue of it being on an area of green space in the town centre. Market Cross in Regent Street is a listed structure and the area of land on which it sits merits designation as a Local green Space. The LGS assessment report will be updated to reflect the designation, demonstrating that it passes the NPPF tests for inclusion. Section 4.8 of the Plan could also identify an action to highlight that encouragement needs to be given to protect heritage assets and their setting from harm. TDC has confirmed that, once these proposed changes have been made, that they will consider them and comment on whether they meet Historic England concerns prior to Submission of the Plan. TDC also confirmed that a full SEA is undertaken by their consultants on their behalf for all Neighbourhood Plans and so this will provide further opportunity to ensure that sustainable environment issues and potential impact of policies on the environment are considered further and addressed if necessary.</p>	
25		<p>Housing – reasonable first-time single occupants as well as couples/families – out of town, eco – passivehouses. Options – please. Thank you.</p>	<p>The Plan supports provision of dwellings of various types to meet the local needs of the town’s residents. Other housing options are also expressed through Teignbridge District Council’s</p>	None.

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
			<p>adopted Local Plan policies. Our Plan cannot repeat policy already set out in the Local Plan. Policies BE2 and BE3 relate to the design of sustainable housing, as does the Design Code. These include criteria to help make houses more energy efficient, within the limitations that are placed on the planning system by the Government to deliver higher standards.</p>	
<p>16 Local Planning Auth Engagement Team Torbay / South Devon NHS Trust Estates +Facilities Management</p>	<p>Section 5 Objectives 6 & 7</p> <p>See 7. COM1 and 2 p.61</p>	<p>The Teignmouth Neighbourhood Plan 2018-2033 “Pre-submission Consultation Draft” has been reviewed on behalf of NHS Devon Integrated Care Board (ICB) in response to the Regulation 14 Consultation requirements.</p> <p>NHS Devon ICB notes that Teignmouth is served by two GP practices, Channel View Surgery and Teign Estuary Medical Group within the town itself. Barton surgery is three and half mile’s from the town centre and serves the neighbouring town of Dawlish.</p> <p>As is the case with education whereby new housing developments lead to additional demands for school places, the same is true for the provision of healthcare services. New development brings new residents into GP practice catchment areas and where there are or will be patient capacity issues created by the influx of new residents, then mitigation of these capacity issues must be met by developer contributions to help future proof GP practices for the existing and new population.</p> <p>The two Teignmouth GP practices are, as of July 2022 at 84% capacity when the total patient list size is measured against the total gross internal area of the surgeries.</p> <p>The ICB is aware that the latest review of the Teignbridge Local Plan has identified potential sites for 210 dwellings within Teignmouth. This will increase town’s population by approximately 470 people. However, the same Local Plan review has also identified potential sites in the Dawlish area for 2,400 possible dwellings that will increase Dawlish’s population by nearly 5,400 people. Dawlish is served by one surgery, Barton Surgery, which has</p>	<p>Objective 6 ii) raises this issue. However, text could be strengthened, given the concerns expressed. It would appear that the Trust has no plans to increase surgery provision in Dawlish. The last 2 paragraphs of comments could be reflected in the Plan, for example, “if you keep increasing housing numbers coherent infrastructure contributions should be made.” The impact of housing development on the town’s infrastructure must be recognised. However, it is recognised that there are limitations in what a Neighbourhood Plan can do about this position. It will be considered a strategic infrastructure issue and financial contributions are regulated / gathered through both section 106 obligations and Community Infrastructure Levy processes / mechanisms.</p>	<p>Amend supporting text to emphasise concerns.</p>

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
		<p>capacity for a further 2,400 patients. At this time only 300 Dawlish residents are registered with Channel View surgery or Teign Estuary Medical Group. As time goes on and the number of dwellings increase in Dawlish there is a real possibility that the increased population in Dawlish may wish to register with the Teignmouth surgeries for convenience to avoid long waiting times that may occur at Barton Surgery due to capacity issues.</p> <p>Engagement with the Council on the preparation of the new Neighbourhood Plan will provide the ability for the ICB to build forecast demands on healthcare services into its capital programme and also an opportunity for it to make requests to the Council, through the new Local Plan, supported by the local Neighbourhood Plan, to request developer contributions for critical infrastructure. These contributions can help fund additional healthcare provision arising from that planned new development.</p> <p>Support from the Neighbourhood Plan for these contribution requests will help the NHS to future proof the local medical practices against increases in the town's population.</p>		
18 DEVON COUNTY COUNCIL Flood Risk Management	Hsg general +Section 4.6 pp.37-9 BE	This response is included in its entirety in this document's Appendix at the end, since it makes little specific contribution to or comments on the contents of this Plan and seems like a "standard response".	Comments noted.	None.
		6 SPORTS, LEISURE AND RECREATION		
11 Historic England	Also in Hsg	<p>As a statutory consultee, we would have expected to have been consulted on the screening document for the Strategic Environmental Assessment (SEA) that was prepared in February 2022. Had we been consulted, we would not have concurred with the local authority's consultant's screening decision that an SEA was not required.</p> <p>When reviewing a neighbourhood plan, our main concern is potential negative impact to heritage assets, caused by any proposed new development. Where there are formal site-allocations for development,</p>	<p>We have contacted Teignbridge District Council (TDC) on this matter. We requested a screening opinion, as required by the process and received the screening report in response, concluding that no SEA was required on the Plan. We have done all we are required to and are dependent upon TDC as the local planning authority to progress SEA matters and advise accordingly.</p> <p>On sharing the Historic England concerns with TDC, their response is that they have used the</p>	Changes to be made to address Historic England concerns.

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
		<p>or where development in-principle is being supported on named sites, we would expect:</p> <p>a thorough heritage evidence base; an assessment of potential harm to heritage assets; a formal justification of the policy that confirms that no harm will be caused.</p> <p>Ordinarily, this work would be achieved by the preparation of a full Strategic Environmental Assessment (SEA). However, a suitable evidence-base and justification for development could well be achieved by other means.</p>	<p>same method and process for SEA for several recent Neighbourhood Plans, with Historic England aware that they are, in effect, consulted at the Regulation 14 stage.</p> <p>We will make changes to the Plan to reflect and address Historic England’s concerns, and consider that the helpful suggestions will help to strengthen policies in relation to heritage.</p> <p>TDC has confirmed that, once these proposed changes have been made, that they will consider them and comment on whether they meet Historic England concerns prior to Submission of the Plan. TDC also confirmed that a full SEA is undertaken by their consultants on their behalf for all Neighbourhood Plans and so this will provide further opportunity to ensure that sustainable environment issues and potential impact of policies on the environment are considered further and addressed if necessary.</p>	
11 Historic England		<p>Although there are no explicit site allocations for the development of housing, within the Plan, there seems to be a number of policies that support development in-principle on named sites, for example:</p> <p>Policy SLR3 - Marine related activities Policy SLR4 - Water Sports Centre - which specifically names Poly Steps.</p> <p>Furthermore, although not expressed as a formal policy, the Teignmouth Hospital site is potentially being promoted for development, including an affordable housing provision. We are concerned that these policies, in favour of development, are not yet supported by an assessment of any potential harm to heritage. Therefore, we suggest that the Neighbourhood Planning Group seek to add a form of words to these policies that requires the protection of heritage assets. Furthermore, in the absence of an SEA, we suggest some form of evidence-base and justification concerning potential harm to heritage assets on these named sites.</p>	<p>We have contacted Teignbridge District Council (TDC) on this matter. We requested a screening opinion, as required by the process and received the screening report in response, concluding that no SEA was required on the Plan. We have done all we are required to and are dependent upon TDC as the local planning authority to progress SEA matters and advise accordingly.</p> <p>On sharing the Historic England concerns with TDC, their response is that they have used the same method and process for SEA for several recent Neighbourhood Plans, with Historic England aware that they are, in effect, consulted at the Regulation 14 stage.</p> <p>We will make changes to the Plan to reflect and address Historic England’s concerns, and consider that the helpful suggestions will help to strengthen policies in relation to heritage.</p> <p>TDC has confirmed that, once these proposed</p>	Changes to be made to address Historic England concerns.

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
		We recommend the Local Authority conservation officers work with the Neighbourhood Plan Steering Group to put in place the required evidence-base and justifications that would support the various policies that promote development in names places.	changes have been made, that they will consider them and comment on whether they meet Historic England concerns prior to Submission of the Plan. TDC also confirmed that a full SEA is undertaken by their consultants on their behalf for all Neighbourhood Plans and so this will provide further opportunity to ensure that sustainable environment issues and potential impact of policies on the environment are considered further and addressed if necessary.	
7 Environment Agency – Sustainable Places	SLR4 6.3 pp. 56-7	We are pleased that policy SLR4 for the Watersports Centre includes requirements for an ecological assessment and flood mitigation.	Thank you. Comments noted.	None.
22	SLR 1 Map on Board 7	A MoP was very disappointed/concerned that one of the maps was wrong - Board 7 the Green spaces one..... it's dated 2021 but apparently doesn't show the full extent of the housing development now in place north of new road, which according to him, now reaches right up to the smaller bit of green space on the top right of the map, where currently there is just blank space above a ribbon of development along New Road. Keith confirms (having rung someone who lives up there) - he called in to keep me company after Jamie left, that that is the case - and that people have been trying to develop the green bit but there's no access without coming up through the other development. Don't know if this is anything significant enough to make a change - we could just annotate? I'll no	The accuracy of the maps is a known issue. We have used the most up-to-date maps available at the time of drafting the Plan. If these are not updated by Ordnance Survey to reflect recent development we will not have up-to-date maps. The OS do not update maps as soon as every development is completed or they would forever be changing them. We can add a note about this in the Plan.	Add a note in the Plan about OS maps.
17 Sport England, planning south	Section 6	This response is included in its entirety in this document's Appendix at the end, since it makes little specific contribution to or comments on the contents of this Plan and seems like a "standard response".	Comments noted.	None.
		7 COMMUNITY FACILITIES AND SERVICES		

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
16 Local Planning Authority Engagement Team Torbay / South Devon NHS Trust Estates and Facilities Management	7.1 Comm 1 and 2 See 5 Hsg too	<p>The Teignmouth Neighbourhood Plan 2018-2033 “Pre-submission Consultation Draft” has been reviewed on behalf of NHS Devon Integrated Care Board (ICB) in response to the Regulation 14 Consultation requirements.</p> <p>NHS Devon ICB notes that Teignmouth is served by two GP practices, Channel View Surgery and Teign Estuary Medical Group within the town itself. Barton surgery is three and half mile’s from the town centre and serves the neighbouring town of Dawlish.</p> <p>As is the case with education whereby new housing developments lead to additional demands for school places, the same is true for the provision of healthcare services. New development brings new residents into GP practice catchment areas and where there are or will be patient capacity issues created by the influx of new residents, then mitigation of these capacity issues must be met by developer contributions to help future proof GP practices for the existing and new population.</p> <p>The two Teignmouth GP practices are, as of July 2022 at 84% capacity when the total patient list size is measured against the total gross internal area of the surgeries.</p> <p>The ICB is aware that the latest review of the Teignbridge Local Plan has identified potential sites for 210 dwellings within Teignmouth. This will increase town’s population by approximately 470 people. However, the same Local Plan review has also identified potential sites in the Dawlish area for 2,400 possible dwellings that will increase Dawlish’s population by nearly 5,400 people. Dawlish is served by one surgery, Barton Surgery, which has capacity for a further 2,400 patients. At this time only 300 Dawlish residents are registered with Channel View surgery or Teign Estuary Medical Group. As time goes on and the number of dwellings increase in Dawlish there is a real possibility that the increased population in Dawlish may wish to register with the Teignmouth surgeries for convenience to avoid long waiting times that may occur at Barton Surgery due to capacity issues.</p>	<p>Objective 6 ii) raises this issue. However, text could be strengthened, given the concerns expressed. It would appear that the Trust has no plans to increase surgery provision in Dawlish. The last 2 paragraphs of comments could be reflected in the Plan, for example, “if you keep increasing housing numbers coherent infrastructure contributions should be made.” The impact of housing development on the town’s infrastructure must be recognised. However, it is recognised that there are limitations in what a Neighbourhood Plan can do about this position. It will be considered a strategic infrastructure issue and financial contributions are regulated / gathered through both section 106 obligations and Community Infrastructure Levy processes / mechanisms.</p>	Amend supporting text to emphasise concerns.

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
		<p>Engagement with the Council on the preparation of the new Neighbourhood Plan will provide the ability for the ICB to build forecast demands on healthcare services into its capital programme and also an opportunity for it to make requests to the Council, through the new Local Plan, supported by the local Neighbourhood Plan, to request developer contributions for critical infrastructure. These contributions can help fund additional healthcare provision arising from that planned new development.</p> <p>Support from the Neighbourhood Plan for these contribution requests will help the NHS to future proof the local medical practices against increases in the town's population.</p>		
11 Historic England	7.6 Hospital site +hsg+SLR	<p>Furthermore, although not expressed as a formal policy, the Teignmouth Hospital site is potentially being promoted for development, including an affordable housing provision. We are concerned that these policies, in favour of development, are not yet supported by an assessment of any potential harm to heritage. Therefore, we suggest that the Neighbourhood Planning Group seek to add a form of words to these policies that requires the protection of heritage assets. Furthermore, in the absence of an SEA, we suggest some form of evidence-base and justification concerning potential harm to heritage assets on these named sites.</p> <p>We recommend the Local Authority conservation officers work with the Neighbourhood Plan Steering Group to put in place the required evidence-base and justifications that would support the various policies that promote development in names places.</p>	<p>We have contacted Teignbridge District Council (TDC) on this matter. We requested a screening opinion, as required by the process and received the screening report in response, concluding that no SEA was required on the Plan. We have done all we are required to and are dependent upon TDC as the local planning authority to progress SEA matters and advise accordingly. On sharing the Historic England concerns with TDC, their response is that they have used the same method and process for SEA for several recent Neighbourhood Plans, with Historic England aware that they are, in effect, consulted at the Regulation 14 stage. We will make changes to the Plan to reflect and address Historic England's concerns, and consider that the helpful suggestions will help to strengthen policies in relation to heritage. This includes a review of how heritage assets could be further protected. Initial review has indicated that one such asset, identified in the Heritage Assets Assessment Report could merit further protection by virtue of it being on an area of green space in the town centre. Market Cross in Regent Street is a listed structure and the area</p>	Changes to be made to address Historic England concerns.

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			of land on which it sits merits designation as a Local green Space. The LGS assessment report will be updated to reflect the designation, demonstrating that it passes the NPPF tests for inclusion. Section 4.8 of the Plan could also identify an action to highlight that encouragement needs to be given to protect heritage assets and their setting from harm. TDC has confirmed that, once these proposed changes have been made, that they will consider them and comment on whether they meet Historic England concerns prior to Submission of the Plan. TDC also confirmed that a full SEA is undertaken by their consultants on their behalf for all Neighbourhood Plans and so this will provide further opportunity to ensure that sustainable environment issues and potential impact of policies on the environment are considered further and addressed if necessary.	
23	7.6 Hospitl Site	Similarly, the continued reluctance to plan for the conversion of the hospital site to residential is unjustified given the absence of any specific or costed proposals for continued health use by the NHS. The site is well placed for transport and local services; would be attractive and affordable for young people whose accommodation needs are not currently met, and would alleviate pressure on development of out of town sites with no or very few facilities and prevent the environmental damage which would result from the development of Higher Holcombe or Buddleford farm sites.	See p.69 which outlines preference which include “affordable and local housing needs”.	None.
12	7.7 COM 1 p.61	Important to keep Den Toilets as a facility for public.	Thank you. Comments noted. Policy COM1 seeks to protect these.	None.
		8 TOWN CENTRE AND RETAIL		
23	TCR 2 +3 Copied in Housing	We support much of the Plan but do not agree with the following: TCR 2 and TCR 3 We think that there are far too many vacant floors above existing ground floor shops etc which have not been properly utilised for years. We therefore find the reasoning in the draft that they need to be kept vacant just in case an expansion might be needed in future to be unsound. The need for town centre	No text or policy in the TCR section or which justifies policy HO2 says that upper floors need to be kept vacant. If anything, policies in the Plan are supportive of change, to help increase footfall in the town centre, subject to various reasonable criteria being met. Page 78 states that “While policy should be proactive in	None.

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		<p>residential accommodation which is affordable, convenient and meets local housing needs is paramount, especially for young people who want to continue living or working here to support the local economy and bring a broader age group spectrum to the area. We can think of no specific examples which support the reluctance shown in the draft to adopt a more decisive approach to town centre accommodation provision and nor are any given in the draft plan.</p>	<p>encouraging greater footfall and use of town centre premises, including upper floors at a time when the number of premises may contract more permanently, flexibility is still required in use of upper levels above shops to ensure that shop owners can adapt to the changing nature of retail, for example, a local retailer may need additional storage space on upper floors if they establish a higher number of sales through “click and collect” or internet based shopping. We therefore support greater and more active use of upper floors in existing premises but the need for this should be considered flexibly and be appropriate to the needs of the business. In many cases this type of change to use of an upper floor is unlikely to require planning permission and therefore does not require a policy to support it.” In this part of the Plan, the text is saying that the use of upper floors should be treated flexibly, for use by businesses and change of use as flats. Policy TCR2 allows change of use to a dwelling on upper floors, as long as the tests set out are met. These tests are reasonable, to allow the opportunity for such spaces on upper floors to be brought into a commercial use in the first instance. This priority is appropriate for the town centre to help manage change should the town centre “offer” change and contract in the coming years. Policy HO2 is clear in the support it offers for change of use to residential in the town centre area. Reasoning in the Plan is therefore not considered to be “unsound”. We do not consider that any changes are necessary as a result of the comments made.</p> <p>See p.69 which outlines preference which include</p>	

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		<p>Similarly, the continued reluctance to plan for the conversion of the hospital site to residential is unjustified given the absence of any specific or costed proposals for continued health use by the NHS. The site is well placed for transport and local services; would be attractive and affordable for young people whose accommodation needs are not currently met, and would alleviate pressure on development of out of town sites with no or very few facilities and prevent the environmental damage which would result from the development of Higher Holcombe or Buddleford farm sites.</p>	<p>“affordable and local housing needs”.</p>	
		<p>9 TOURISM, ARTS AND CULTURE</p>		
2	p.3 App.3 TAC	<ul style="list-style-type: none"> CONTINUE TO SUPPORT AND ACTIVELY PUBLICISE THE HUGE VARIETY OF EVENTS AND COURSES HELD AT TEIGNMOUTH PAVILIONS TO ENSURE ITS CONTINUED OPERATION. <p>Why has Pavilions Teignmouth been given special mention for support? There are plenty of other organisations mentioned as locally valued community facilities in the document executive summary Appendix B policy COM1 add Pavilions to this list</p> <ul style="list-style-type: none"> Can this ststaement be reworded CONTINUE TO SUPPORT AND ACTIVELY PUBLICISE THE HUGE VARIETY OF EVENTS AND COURSES HELD AT OUR COMMUNITY FACILITIES TO ENSURE THEIR CONTINUED OPERATION 	<p><i>N.B. The Chair of the Neighbourhood Plan Steering Group contacted the respondent to ask for clarification re some comments made, as follows.</i></p> <p><i>I wonder if you could clarify what you have said in your response form please? On closer inspection, in the page/section/policy reference column you quote: Page 3, Appendix 3 - Theme Tourism, Arts, Culture. I get your points made in the Comments column, but I cannot relate them to any page 3, Appendix 3 that I can find in the documents whatsoever. Nor the executive summary, Appendix B, policy COM 1 which you also refer to.</i></p> <p><i>The statement you refer to, as far as I can see appears on p.88 of the Plan (to which you make no reference at all), in section 9.7 Community Actions and Projects at the end of Section 9 on Tourism Arts and Culture where it is the last sentence - it has taken me a long time to find it since none of your references seem to agree.</i></p> <p><i>Can you please confirm that this sentence is actually all that you wish to be changed please</i></p>	None.

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment	Steering Group Response	Change to Plan text, policy, or evidence base, if any
		<p>Hi Joan</p> <ul style="list-style-type: none"> Continue to support and actively publicise the huge variety of events and courses held at Teignmouth Pavilions to 	<p><i>and also confirm that there is nothing to be followed up on these other references above, copied from your response which don't seem to exist but I just want to be sure I've got it right. COM 1 on p.61 mentions TAAG as a community facility along with others and COM2 commits to maintaining and enhancing community facilities and the Arts Quarter is referenced a number of times in the TAC section along with the commitment in TAC1 to supporting the arts and cultural offer in the town (and Arts Quarter) so I'm not quite clear whether I have actually understood your wishes.</i></p> <p><i>Perhaps you would let me know at our earliest convenience so I can complete your entry to the responses. Many thanks in advance.</i></p> <p><i>Appendix B Policy COM1 is on page 17 of this document and it is here that the pavilions should be mentioned along with all the other community amenities.</i></p> <p><i>You refer to page 88 of the plan. the only document on the consultation page on the website that has over 88pages is the design code and page 88 is street tree design. So I am confused as to what you are referring to.</i></p> <p>Policy COM1 protects a very wide range of community facilities, apart from the Pavilions. The Pavilions is not singled out for protection above other community or arts facilities. It is not considered necessary to offer the same policy protection for the Pavilions as for the other facilities listed in COM1. Support is given,</p>	

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		<p>ensure its continued operation. This is on Page 3 Appendix C of the executive summary.</p> <p>Policy COM1: Protecting Community and Health Facilities, Amenities and Assets</p> <p>1. Our locally valued community facilities and amenities are identified in Map 16, page 63, and are:</p> <ol style="list-style-type: none"> 1. i) Alice Cross Centre; 2. ii) TAAG (Northumberland Place); 3. iii) Bitton House; 4. iv) Richard Newton Hall; 5. v) The Heritage Centre; 6. vi) Kingsway Meadow Centre; 7. vii) St Michael's Parochial Parish Church; 8. viii) The Ice Factory Studio Theatre; 9. ix) Teignmouth Library; 10. x) Teignmouth Lido; 11. xi) Teignmouth Orangery; and, 12. xii) Public conveniences (Eastcliff Shelter, Lower Brook Street, The Den and The Point). <p>This is Executive summary Appendix B Policy COM1 Page 17</p> <p>My point is that the pavilions have been mentioned individually when in my opinion they should be in the list of valued community assets. Page 3 Appendix C of the executive summary. appendix should have been C not 3 on feedback form apologises all other references to documents on website seem correct on checking.</p> <p>the bullet point Continue to support and actively publicise the huge variety of events and courses held at Teignmouth Pavilions to</p>	<p>through a community action, in section 9.7, for the Pavilions.</p>	

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		<p>ensure its continued operation. Page 3 Appendix C of the executive summary. <u>Should be changed to</u> TO SUPPORT AND ACTIVELY PUBLICISE THE HUGE VARIETY OF EVENTS AND COURSES HELD AT OUR COMMUNITY FACILITIES TO ENSURE THEIR CONTINUED OPERATION. I hope it is now clear as to what I am referring and changes that could be made to address this.</p>		
15	9.4 ?	<p>I would welcome the retention of Brunel's existing historic seawall if this is possible and as much beach as possible, although I realise that this is primarily the responsibility of Network Rail.</p>	<p>Thank you. Comments noted. Aim 27 recognises this need to protect the sea wall, as does policy NE7. However, the Plan is limited on the policy protections it can introduce on Network Rail's land, as noted in the Plan at 10.2.1.</p>	None.
		<p>10 TRANSPORT, ACCESSIBILITY AND PARKING</p>		
21 National Highways		<p>Thank you for providing National Highways with the opportunity to comment on the pre-submission draft of the Teignmouth Neighbourhood Plan. National Highways is responsible for operating, maintaining and improving the strategic road network (SRN), which in this case comprises the A38 trunk road approximately 5km west of the Plan area. Following a review of the draft Plan we are satisfied that the proposed policies within the plan are unlikely to result in development which will adversely impact the SRN and we therefore have no specific comments to make. This does not however prejudice any future responses National Highways may make on site specific applications as they come forward through the planning process, and which will be considered by us on their merits under the prevailing policy at the time.</p>	<p>Thank you. Comments noted.</p>	None.
24 Chief Planner DEVON COUNTY COUNCIL	<p>Transport & Highways</p> <p>Also in App 2 Design Code</p>	<p>Devon County Council as the Highway Authority is generally supportive of the aspirations set out within the Neighbourhood Plan in relation to transport and highways matters. There are three elements of the supporting Design Code that could be a cause for concern when considering adoption of new highways. These are: - reference throughout the Design Code (and elsewhere in the Plan) to trees in the highway;</p>	<p>Comments noted. The Design Code is guidance and does not have the same statutory weight as policy. As with all components of good design, "one size will not fit all". Good design is about a balance, something which will be reiterated in the main body of the Plan itself and in Appendix 2a.</p>	<p>Strengthen reference in the Plan and Appendix 2a to good design being about a practical balance of</p>

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		<p>- the image on page 66 of the Design Code shows a 12-18m wide highway, including 5.5m parking areas and a central reservation of trees; and</p> <p>- page 68 of the Design Code states that permeable surfaces must be specified for all residential parking</p> <p>The County Council would be willing to discuss these matters further in order to advise on how the adoption standards can help to achieve the aspirations set out in the Neighbourhood Plan and Design Code.</p>	<p>The are many references to trees in the Design Code, and rightly too. They play an important role in improving air quality, for habitat and biodiversity, urban cooling in the summer, long-term carbon sequestration and enhancing the quality of surroundings for good mental health. The street tree guide in the Design Code suggests and recognises the need to ensure that the planting of trees has to work within the context of the urban environment and the highway. It recognises that the right planting systems are essential within urban environments. There is no need to remove reference to street trees in the Code. We recognise the concerns about trees in the highway from a highway engineering perspective and we will ensure that this concern is reflected in Appendix 2a which prefaces the Design Code.</p> <p>We would like to understand the full concerns about the guideline dimensions highlighted on page 68 of the Design Code and will approach DEVON COUNTY COUNCIL for clarification. The illustration is for guidance and will clearly not apply in all occasions. Highway standards will clearly continue to need to be met. Appendix 2a can emphasise this point.</p> <p>Page 68 of the Code does not state that permeable surfaces must be specified for all residential parking. The illustration gives an example, guidelines, only. Bullet two, under “Residential streets” is clear that “Streets must meet the technical highways requirements”. While bullet five in this section states that “Streets must incorporate landscaping elements and green infrastructure (GI).”, it follows by</p>	<p>elements for it to work in design and practical terms. Also add reference to the fact that the Code is guidance and that it does not seek to demote or replace Highways standards and that permeable SuDS solutions are not always appropriate in all situations.</p> <p>We recognise the concerns about trees in the highway from a highway engineering perspective and we will ensure that this concern is reflected in Appendix 2a which prefaces the Design Code.</p>

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			<p>stating “Sustainable urban drainage (SUDS) should be incorporated in the form of...”. The sentence does not set a requirement, only saying “should”. It goes on to say that “development should incorporate permeable surfaces”, again, not “must”.</p> <p>We will discuss these comments with DEVON COUNTY COUNCIL for clarification.</p>	
8	TAP etc, as below	The town’s roads and transport infrastructure are often busy, congested and sometimes overburdened, not just in summer, but sometimes throughout the year. Significant further development that would exacerbate these need to be avoided, with solutions found to ease some of the existing transport and car-parking issues.	Comments noted. We agree that this is an issue in the town. The Plan does not propose additional development.	None.
15	TAP general + Hsg	The town’s roads and transport infrastructure are often busy, congested and sometimes overburdened, not just in summer, but sometimes throughout the year. Significant further development that would exacerbate these need to be avoided, with solutions found to ease some of the existing transport and car-parking issues.	Comments noted. We agree that this is an issue in the town. The Plan does not propose additional development.	None.
25	10.4 p.100	<p>Teign Estuary Cycle and Multiuse Trail:</p> <ul style="list-style-type: none"> - Newton Link would be good for cyclist and offroad walkers, yet not to be instead of town links and bike rack. - Cycle links to East/West – train station, Kingsway (Shaldon Bridge) Library if possible. - Dawliish Link and NA if at all possible 	The Plan supports the Estuary Trail with the exact route to be determined outside of the Neighbourhood Plan. The Plan’s text and policy TAP6 already refer to the need for the trail to link through to Newton Abbot and Dawlish. The reference to the “Teign Estuary Cycle Trail” in objective 11 iii) will be amended to the term used throughout the rest of the Plan “Teign Estuary Cycle and Multi-use Trail”.	Amend accordingly.
15 and 8 re 1 st sentence only	10.4p.100 TAC	Due to the hills in the town, cycling is only a solution in the flattest, lowest central parts of the town. I would very much welcome the completion of the Teign estuary trail between Teignmouth and Newton Abbot, taking advantage of the views wherever possible (it will become a tourist attraction, if the views are maximized) – the route to Dawlish is less of a priority to me, due to the steep terrain involved.	The Plan supports the Estuary Trail with the exact route to be determined outside of the Neighbourhood Plan. The Plan’s text and policy TAP6 already refer to the need for the trail to link through to Newton Abbot and Dawlish. The reference to the “Teign Estuary Cycle Trail” in objective 11 iii) will be amended to the term used throughout the rest of the Plan “Teign Estuary Cycle and Multi-use Trail”.	Amend accordingly.

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		<p>I would welcome the retention of Brunel's existing historic seawall if this is possible and as much beach as possible, although I realise that this is primarily the responsibility of Network Rail</p>	<p>We do not agree that cycling is only a solution in the flattest parts of the town. Bikes can be pushed up hills, some cyclists can and do cycle up them and e-bikes (becoming more popular and which will reduce in cost over time) enable hills to be climbed more easily without much effort. Hills should not, on their own, act as an impediment to all cyclists.</p> <p>Thank you. Comments noted. Aim 27 recognises this need to protect the sea wall, as does policy NE7. However, the Plan is limited on the policy protections it can introduce on Network Rail's land, as noted in the Plan at 10.2.1.</p>	<p>None.</p> <p>None.</p>
20 Teign Estuary Trail Campaign Group	<p>Exec Summ. App C, p.3</p> <p>Sn 10.4, p.100, TAP 6</p> <p>Sn 10</p> <p>10.9, 10.10 TAP13</p> <p>10.8 TAP 12</p>	<p>The Teign Estuary Trail Campaign Group supports the policies relating to transport, particularly TAP 6. However, we are concerned that the community actions identified in Appendix C to take this forward are wholly inadequate. There is no detail on what the town council or local community will do to promote and support delivery of the Teign Estuary Trail, including the route through Teignmouth town centre which has yet to be identified and agreed. A concrete action plan is needed which clarifies the role that the town council will play in supporting the delivery of TAP6.</p> <p>In addition, the contribution of TAP6 to improving air quality in Bitton Park Rd needs to be recognised. It is clear that, if there were a safe route for cyclists, pedestrians and users of mobility scooters and wheelchairs to make local journeys to and from the town centre, this would significantly reduce the number of people travelling in and out of Teignmouth by car.</p> <p>Reference is made to exploring an electric vehicle hire scheme such as co-bikes with TDC. However, DEVON COUNTY COUNCIL have in the past decided not to locate co-bikes in Teignmouth because there are no safe places for people to cycle in and out of Teignmouth. Therefore, the trail needs to be put in place as a priority before use of electric bikes can be promoted.</p>	<p>The latest statement from DEVON COUNTY COUNCIL (31 Aug) on the progress of the TET is as follows:</p> <p>Teign Estuary Trail (& Dawlish – Teignmouth)</p> <ul style="list-style-type: none"> ○ This is a strategic project that is a priority for both Devon County Council & Teignbridge District Council, which will link the Exe Estuary Trail from Dawlish to the Stover Trail at Kingsteignton/Newton Abbot via Teignmouth and Bishopsteignton. ○ There is a huge amount of stakeholder support locally and an active Teign Estuary Trail Campaign Group, who attend quarterly meetings hosted by Bishopsteignton Parish Council, with DEVON COUNTY COUNCIL & TDC attendance. ○ Anyone who has a keen interest in the Trail, and wants to support in a positive way, can request to join the Campaign 	

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			<p>Group, send a message via their Facebook page: Teign Estuary Trail Campaign - Home Facebook</p> <ul style="list-style-type: none"> ○ The planning approval (with associated conditions) was granted in December 2021. ○ The project was reviewed alongside other options for Levelling Up Fund round 2, but due to the funding spend date remaining at March 2025 (the same spend date as for LUF round 1), the timeframe is not achievable for the Teign Estuary Trail. ○ The key focus during 2020-2021 was on preparing the planning application. ○ The off-road land required for the Trail has not been secured, though negotiations are ongoing with all landowners. ○ The project will need to be delivered in phases due to cost and other demands required for each stretch. ○ Current actions are to review design plans for Dawlish – Teignmouth to ensure accordance with the latest government guidance (LTN1/20) and to develop the design plans for Morrisons to Bishopsteignton. To also continue the landowner process. ○ A Strategic Outline Business Case may be progressed with the current actions. ○ DEVON COUNTY COUNCIL & TDC meet with the MP (who is very supportive of the route) on a regular basis, and to emphasise to central govt. the need for suitable funding pots being made available for strategic multi-user trails such as the Teign Estuary Trail. 	

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			<ul style="list-style-type: none"> ○ The Teign Estuary Trail has not been forgotten or paused, and efforts are continuing. <p>The Town Council has no power in this area other than to keep the TET alive and provide support to major stakeholders where possible.</p> <p>The role of the trail in contributing towards achieving lower pollution levels in Bitton Park Road can be referenced in the supporting text before TAP6.</p> <p>We agree that the trail should be a priority for the town. The Plan recognises this. Action outside of the Plan itself will enable delivery.</p>	<p>None.</p> <p>Text to be added to 10.4.1 in the Plan.</p> <p>None.</p>
26	10.10, bullet point 4, p.109	<p>The wording needs to be changed since DEVON COUNTY COUNCIL HATOC has now decided that the Upper Den Carriageway cannot be opened in the summer to traffic for safety reasons. Since the Council has refrained from further debate on the refusal of their proposal at this time, perhaps the wording should be something along the lines of “in the UDC area” because it would appear that if you have an event or a business there, involving vehicles, in the summer, you are allowed to use the UDC..... And Teignbridge are clearly in favour of keeping it closed so that the food concessions can extend out across the road – Halulu and Beachcomber seem to be being given serious advantage.</p>	<p>Agree that introducing the word “area” after reference to the Upper Den Carriageway in 10.10, page 109 is appropriate.</p>	<p>Amend accordingly.</p>
13 Network Rail	TAP !, p.94	<p>Thank you for consulting us on the pre-submission draft Teignmouth Neighbourhood Plan.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country’s railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of</p>	<p>Thank you. Comments noted.</p>	<p>None.</p>

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		<p>development plan policy is important in relation to the protection and enhancement of Network Rail’s infrastructure.</p> <p>Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. With this in mind any planned future development (both residential and employment) should take into account any adverse impact on railway. This might be an increase in the use of an existing level crossing. It could be that the predicted growth, may increase future demands at nearby stations which may, in turn, necessitate the need for enhancements to existing facilities such as waiting rooms, toilets and parking. Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process.</p> <p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.</p> <p>We would therefore appreciate the Council providing Network Rail with an opportunity to comments on any future pre-application or planning applications should they be submitted for sites adjoining the railway or within close proximity to the railway as we may have more specific comments to make (further to those above).</p> <p>We trust these comments will be considered in your preparation of the forthcoming validation documents. Wales and Western Network Rail</p>	<p>Network Rail assume that providing an opportunity for them to comment on pre-applications and applications for proposals in the areas they suggest is within the gift of the Town Council. It is not. It is Teignbridge District Council which ensures that consultation is carried-out appropriately when it registers pre-applications and planning applications. We will therefore pass this comment onto TDC for their consideration.</p>	<p>Refer the Network Rail comment to TDC.</p>

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		11 NATURAL ENVIRONMENT		
25		More trees planted if possible, Woodland Trust seem to have them if needed.	We agree with the benefits of planting trees. The Plan does what it can to encourage and support such planning, within the context of land-use and responding to planning proposals through policies.	None.
12	General 11	<p>No agricultural land to be forfeited without creation of new. (forfeited)</p> <p>Understand of food security sustainable products B.S stuff from abroad.</p> <p>Timber from UK.</p>	<p>We appreciate the focus of these comments. They are important matters.</p> <p>The planning system does not currently allow a Neighbourhood Plan to propose this as mitigation of loss to development. National policy (the National Planning Policy Framework) sets out the parameters for how best and most versatile agricultural land should be treated.</p> <p>As a land-use planning document, food security and provision of timber from within the UK, as broad subject areas, much of which cannot be dealt with through the planning system, is not a matter that the Plan can directly influence.</p>	None.
15	NE Section, p110 Ridge Line	The natural environment and surroundings of Teignmouth form a frame for the town, which overall makes it an incredibly attractive place to live, work and visit. The green spaces within the town (listed in the plan) and the settlement boundaries on all sides of the town between Teignmouth, Bishopsteignton and Holcombe all form part of this and need preservation and enhancement, as do the ridge lines which are visible from much of the town and from Shaldon, which itself is a significant and economically important visitor destination for the entire area.	Thank you. Comments noted. We agree with the statement made and the Plan seeks to do what it can through policies to protect the environment within and outside the town.	None.
8	NE Section, p.110 Ridge Line	The natural environment and surroundings of Teignmouth form a frame for the town, which overall makes it an incredibly attractive place to live, work and visit. The green spaces within the town (listed in the plan) and the settlement boundaries on all sides of the town between Teignmouth, Bishopsteignton and Holcombe all form part of this and need preservation and enhancement, as do the ridge lines which are visible from much of the	Thank you. Comments noted. We agree with the statement made and the Plan seeks to do what it can through policies to protect the environment within and outside the town.	None.

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		town and from Shaldon, which itself is a significant and economically important visitor destination for the entire area.		
23		<p>NE 3 We support the need to maintain a separate and proportionate distance between Teignmouth, the ancient village of Holcombe and the nearby town of Dawlish. Failure to grasp this now will quickly result in unchecked urban sprawl as seen in what is in effect now the small city of Torbay where the once separate towns have in reality lost all sense of identity and individuality. There are now only a few small fields separating these three distinct settlements in the Teignmouth area and the Plan could usefully be strengthened in this regard.</p> <p>The whole draft seems to lack sufficient mention of climate change and the need to promote public concerns into realistic policies and actions which the public want to see from local authorities on this matter. Proposals to build on high quality farm land where there are no nearby facilities should be opposed in order to maintain Teignmouth's identity.</p>	<p>We agree with the need to protect the town's identity. The local gap has been proposed to help maintain the gap. The Plan cannot, however, propose protection of areas of land outside the Plan area (Town Council) boundary. The area, for example, between Teignmouth and Holcombe along the Dawlish Road is within Dawlish's parish boundary and a desire to see this area introduced as a local gap through a neighbourhood plan should be raised with Dawlish Town Council.</p> <p>Chapter 3 Cross Cutting Themes 3.1 The Golden Thread: Climate Change deals with climate change as a key issue of relevance throughout the Plan's topics. The Plan seeks to do what it can through policies to protect the environment within and outside the town.</p>	None. None.
7 Environment Agency – Sustainable Places	p.110 NE 11.1	However, under the heading of Natural Environment, we recommend that, as well as an objective in respect of protecting the flood defences, there is also an objective to protect the floodplain from inappropriate development.	The proposed additional objectives will help to reinforce one of the key areas of importance for the Plan. Add in objectives as suggested. Repeated in 2.2.	Add to objectives as suggested and associated text.
7 Environment Agency – Sustainable Place Planning Adviser	NE section, p.110	We welcome the range of environmental policies set out in the plan. In particular we are supportive of Policy BE3 Sustainable Design, NE2 Locally Valued Areas of Biodiversity Geodiversity and Habitat, NE5 Marine Conservation, NE6 Coastal Erosion and NE7 Sea Wall and Groynes. The long term policy for the defended shorelines of the Teign Estuary set out in the Shoreline Management Plan is hold the line. As highlighted above, an additional consideration is water quality, and we would recommend that a	Repeated at BE3. A useful recommendation. However, no policy wording has been suggested by the respondent, which would have been helpful to fully understand the suggested requirement. The Local Plan already has strategic policy (e.g. EN4	None. None.

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		<p>water quality policy is added to Natural Environment section to ensure this precious resource is protected and enhanced.</p> <p>We welcome the inclusion of a policy on Flood Risk and understand that you do not want to replicate what is required by existing national and local plan policies. We would however suggest that policy BE6 should have a greater emphasis on avoiding development within flood risk areas, unless no alternative sites are available. Avoiding developing in the floodplain is a robust way of preventing flooding and also supporting the vision in respect of the climate and ecological emergencies. The NPPF requires that where there is no alternative to developing within a flood risk area, new development must be designed to be safe from flooding, not increase flood risk elsewhere and, where possible, reduce flood risk over all. The neighbourhood plan policy could strengthen this locally, by stating that where necessary development is proposed in the floodplain, as well as being safe from flooding over its lifetime, development must also contribute to reducing the overall flood risk of the town.</p>	<p>Flood Risk and S6 Resilience) which seeks to prevent pollution of the water environment and it is not clear the policy requirement that the Plan could introduce without further guidance from the Environment Agency.</p> <p>The policy could be strengthened by introducing the wording suggested.</p>	<p>Amend policy BE6 accordingly.</p>
15	p.110 NE Flood Risk + Hsg	<p>There is little to no room for further new development on steep slopes around the town that could be developed, without further adding to strains on road travel, car parking, school places, medical facilities and in particular adding to flood risk. Many higher parts of the town are the source of springs, which if built on would be displaced elsewhere, potentially increasing flood-risk in a steeply sloping community. Recent developments in the town have displaced springs and caused flooding and water ingress issues on some neighbouring properties on New Road – other sites in the town are similarly located. Redevelopment, or more efficient use of some less attractive already developed parts of the town could be a solution if further living accommodation is required.</p>	<p>Comments noted. We agree that this is an issue in the town. The Plan does not propose additional development.</p>	<p>None.</p>

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		<p>12 ECONOMY, EMPLOYMENT AND BUSINESS</p>		
14 Imerys Minerals Ltd	EEB 4 T'mth Port, Docks	<p>Teignmouth Port / Docks: It is a key hub for the construction, agriculture and ball clay markets. It currently handles around 460,000 tonnes of cargo each year, around half of which is ball clay.</p> <p>The port has relied heavily upon local ball clay exports. Ball clay from the Bovey Basin is exported mainly to the European market through Teignmouth.</p> <p>Ball Clay is recognised as a mineral of national importance in the UK as well as international importance. Ball Clay has a high export value and comparatively rare occurrence, not only in Britain but also in the world. The Bovey Formation is one of the most important areas in terms of volumes, and owing to its white firing and rheological properties, is also a major source of material for the sanitaryware market.</p> <p>The protection of mineral resources is supported by the following policies and guidance.</p> <p>Devon Minerals Plan (February 2017)</p> <p>The Devon Minerals Plan seeks to safeguard mineral resources and infrastructure, in accordance with the NPPF.</p> <p><u>Objective 2: Safeguarding Mineral Resources and Infrastructure</u></p> <p>Safeguard from other forms of development Devon’s current or potential economic mineral resources, together with the infrastructure needed for their processing and sustainable transportation and the capacity required for the tipping of mineral waste, to ensure their continued availability to meet the needs of future generations.</p> <p><u>Policy M2: Mineral Safeguarding Areas</u></p>	Thank you. Comments noted. We will add reference to the status of the Quay as a Safeguarded Mineral Site within the Devon Minerals Plan in EEB4.	Amend text and policy to reflect the comments.

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		<p>Mineral resources and infrastructure within the Mineral Safeguarding Areas defined on the Policies Map will be protected from sterilisation or constraint by non-mineral development within or close to those Areas by permitting such development if:</p> <p>(a) it can be demonstrated through a Mineral Resource Assessment and in consultation with the relevant mineral operators that the mineral resource or infrastructure concerned is not of current or potential economic or heritage value; or</p> <p>(b) the mineral resource can be extracted satisfactorily prior to the non-mineral development taking place under the provisions of Policy M3; or</p> <p>(c) the non-mineral development is of a temporary nature and can be completed and the site restored to a condition that does not inhibit extraction or operation within the timescale that the mineral resource or infrastructure is likely to be needed; or</p> <p>(d) there is an overriding strategic need for the non-mineral development; or</p> <p>(e) it constitutes exempt development, as set out in the exemption criteria.</p> <p>The supporting text, (para 3.3.10) states “Consideration in Policy M2 (criterion (d)) of whether non-mineral development has “an overriding strategic need” should take account of the hierarchy of mineral resources in Table 8.1, together with the strategic or local importance of the non-mineral development and evidence on the availability of alternative locations for that development. Where a safeguarded resource underlies land allocated for non-mineral development in an adopted or made Development Plan, that allocation will normally amount to “an overriding strategic need” for the purposes of criterion (d) of Policy M2.” As such it is imperative that the</p>		

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		<p>strategic need for the development is assessed now, rather than when any application is made in respect of that allocated site.</p> <p>Mineral Safeguarding SPD (January 2018)</p> <p>Paragraph 5.2.13 of the SPD is relevant to the Local Plan Review, stating that “Preparation of Local Plans and Neighbourhood Plans allows for consultation by the responsible council with Devon County Council and the minerals industry where allocation of land within a Mineral Consultation Area is being considered for non-mineral development. This consultation process, together with the subsequent examination, enables potential objections regarding sterilisation or constraint of mineral resources or infrastructure to be raised and considered.”</p> <p>NPPF (July 2021)</p> <p>Paragraphs 212 requires that “Local planning authorities should not normally permit other development proposals in Mineral Safeguarding Areas if it might constrain potential future use for mineral working”.</p> <p>Teignmouth Quay is recognised as a Safeguarded Mineral Site within the Devon Minerals Plan and therefore regard should be taken of this within Policy EEB4.</p>		
24 DEVON COUNTY COUNCIL Chief Planner	EEB4 Docks	<p>Minerals Planning</p> <p>The Teignmouth Port and Docks are allocated within the Devon Minerals Plan (adopted February 2017) as a Mineral Safeguarding Area, with Policy M2 of the Plan seeking to safeguard the availability of the docks for the movement of ball clay and avoid the introduction of nearby new development that may constrain the use of the docks for that purpose. It would be helpful for Section 12.5.1 of the Neighbourhood Plan to make reference to this designation.</p>	Thank you. Comments noted. We will add reference to the Mineral Safeguarding Area in 12.5.1 as suggested.	Amend text to reflect the comments.
		13 RENEWABLE & LOW CARBON ENERGY AND WASTE		

Respondent number ¹ and / or Organisation	Section / Page / Policy	Respondent Comment		Steering Group Response	Change to Plan text, policy, or evidence base, if any
14 MONITORING AND REVIEW					
15 APPENDICES and other documents – Individually named where applicable					
15	Lcl Heritage Assets Rpt And Green Spaces Rpt	I believe that the town needs to ensure that heritage and historic assets are preserved, or noted, where these are not already protected. The town has a lot of individual character that needs to be preserved (some of which is not already) and is an asset which needs to be protected and is attractive in terms of drawing in visitors and making Teignmouth a community that people are proud of and wish to live in. The post-Covid economy of Teignmouth hinges on its individuality. The town’s architecture is mixed and a design code that draws on the best of local character and vernacular architecture within Teignmouth and the surrounding areas of southern and eastern Devon are to be encouraged.		The Plan does identify local heritage assets not already protected through national or other designation. The Heritage Assets Report explores these additional assets worthy of protection. The Plan is also accompanied by a Design Code which seeks to protect character through high quality design. Both the Design Code and Heritage Report were available for consultation alongside the Plan.	None.
24 Chief Planner DEVON COUNTY COUNCIL	APP 2 Design Code	Policy/Paragraph	Comment	We agree with the thrust of the comments being made but do not agree that such measures are being prescribed. The term “should” does not have the same implied emphasis as “must”. However, terms like “for example” and “such as” could be introduced into the Design Code and / or emphasised in Appendix 2a which prefaces the Design Code to give reassurance and introduce the desired flexibility as we agree that not all forms of SuDS referenced will always be appropriate in every circumstance or proposal. We would also, however, emphasise that the Design Code is guidance.	Make appropriate amendments.
		Design Guide	It may be useful to list examples of desirable SuDS measures rather than explicitly state which types of measure should be used. The success or otherwise of SuDS measures depend on a wide variety of factors and therefore the measures prescribed in the Design Guide may not be suitable in all locations.		
		Design Guide	The LLFA is supportive of the use of property flood resilience/resistant measures as a positive design option for flood resilience. It would be helpful to refer to this on page 62 where the guide makes reference to “seafront areas susceptible to flooding should include	The Design Code could introduce this minor change and / or emphasise the point in Appendix 2a which is the preface to the Design Code.	Make appropriate amendments.

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			construction details and protection elements integrated within the design of the building to ensure resilience.		
	General		Overall, the Neighbourhood Plan may benefit from referring to existing guidance and local policy such as Devon County Council's Sustainable Drainage Guide https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/ and the CIRIA SuDS Manual (C753) https://www.ciria.org/Memberships/The_SuDs_Manual_C753_Chapters.aspx	This is helpful and we agree that adding in these references will strengthen the Plan.	Add references to the Plan accordingly.
24 DEVON COUNTY COUNCIL Chief Planner	Transport and Highways in DESIGN CODE, App2		<p>There are three elements of the supporting Design Code that could be a cause for concern when considering adoption of new highways. These are:</p> <ul style="list-style-type: none"> - reference throughout the Design Code (and elsewhere in the Plan) to trees in the highway; - the image on page 66 of the Design Code shows a 12-18m wide highway, including 5.5m parking areas and a central reservation of trees; and - page 68 of the Design Code states that permeable surfaces must be specified for all residential parking <p>The County Council would be willing to discuss these matters further in order to advise on how the adoption standards can help to achieve the aspirations set out in the Neighbourhood Plan and Design Code.</p>	<p>Comments noted. The Design Code is guidance and does not have the same statutory weight as policy. As with all components of good design, "one size will not fit all". Good design is about a balance, something which will be reiterated in the main body of the Plan itself and in Appendix 2a.</p> <p>There are many references to trees in the Design Code, and rightly too. They play an important role in improving air quality, for habitat and biodiversity, urban cooling in the summer, long-term carbon sequestration and enhancing the quality of surroundings for good mental health. The street tree guide in the Design Code suggests and recognises the need to ensure that the planting of trees has to work within the context of the urban environment and the highway. It recognises that the right planting systems are essential within urban environments. There is no need to remove reference to street trees in the Code. We recognise the concerns about trees in the highway from a highway engineering perspective and we will ensure that this concern is reflected in Appendix 2a which prefaces the</p>	Strengthen reference in the Plan and Appendix 2a to good design being about a practical balance of elements for it to work in design and practical terms. Also add reference to the fact that the Code is guidance and that it does not seek to demote or replace Highways standards and that permeable SuDS solutions are not always appropriate in all situations.

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			<p>Design Code.</p> <p>We would like to understand the full concerns about the guideline dimensions highlighted on page 68 of the Design Code and will approach DEVON COUNTY COUNCIL for clarification. The illustration is for guidance and will clearly not apply in all occasions. Highway standards will clearly continue to need to be met. Appendix 2a can emphasise this point.</p> <p>Page 68 of the Code does not state that permeable surfaces must be specified for all residential parking. The illustration gives an example, guidelines, only. Bullet two, under “Residential streets” is clear that “Streets must meet the technical highways requirements”. While bullet five in this section states that “Streets must incorporate landscaping elements and green infrastructure (GI).”, it follows by stating “Sustainable urban drainage (SUDS) should be incorporated in the form of...”. The sentence does not set a requirement, only saying “should”. It goes on to say that “development should incorporate permeable surfaces”, again, not “must”.</p> <p>We will discuss these comments with DEVON COUNTY COUNCIL for clarification.</p>	<p>We recognise the concerns about trees in the highway from a highway engineering perspective and we will ensure that this concern is reflected in Appendix 2a which prefaces the Design Code.</p>
15	APP 2 Design Code	<p>I believe that the town needs to ensure that heritage and historic assets are preserved, or noted, where these are not already protected. The town has a lot of individual character that needs to be preserved (some of which is not already) and is an asset which needs to be protected and is attractive in terms of drawing in visitors and making Teignmouth a community that people are proud of and wish to live in. The post-Covid economy of Teignmouth hinges on its individuality. The town’s architecture is mixed and a design code that draws on the best of local character and vernacular architecture within</p>	<p>The Plan does identify local heritage assets not already protected through national or other designation. The Heritage Assets Report explores these additional assets worthy of protection. The Plan is also accompanied by a Design Code which seeks to protect character through high quality design. Both the Design Code and Heritage Report were available for consultation alongside the Plan.</p>	<p>None.</p>

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		Teignmouth and the surrounding areas of southern and eastern Devon are to be encouraged.		
8	APP 2 Design Code	I believe that the town needs to ensure that heritage and historic assets are preserved, or noted, where these are not already protected. The town has a lot of individual character that needs to be preserved (some of which is not already) and is an asset which needs to be protected and is attractive in terms of drawing in visitors and making Teignmouth a community that people are proud of and wish to live in. The post-covid economy of Teignmouth hinges on its individuality. The town’s architecture is mixed and a design code that draws on the best of local character and vernacular architecture within Teignmouth and the surrounding areas of southern and eastern Devon are to be encouraged.	The Plan does identify local heritage assets not already protected through national or other designation. The Heritage Assets Report explores these additional assets worthy of protection. The Plan is also accompanied by a Design Code which seeks to protect character through high quality design. Both the Design Code and Heritage Report were available for consultation alongside the Plan.	None.
4 Designing Out Crime Officer Devon and Cornwall Police	App 2a	<p>Whilst there is some mention of safety within the Neighbourhood Plan and I note a section relating to the security of business within the Design Code, I could see no specific reference to crime or disorder/anti-social behaviour and designing out crime principles, which I feel should be included within all such Neighbourhood Plans.</p> <p>Whilst these issues are covered in other national and council policies, I think it is beneficial that such principles are reinforced in all such documents to ensure they are embedded in the design of new developments</p> <p>I would therefore suggest that the following statement or similar is included within the NDP where deemed appropriate <i>“All development proposals should consider the need to design out crime and disorder to ensure ongoing community safety and cohesion”</i></p> <p>This should apply to all forms of development not just new housing. Ensuring crime and anti-social behaviour (ASB) are designed out may be just as relevant for car parks, footpaths, play areas, commercial development etc.</p> <p>By designing out opportunities for crime and ASB at the outset will not only hopefully prevent or reduce these but very importantly also help</p>	<p>Suggest mention in 3.3 Future proofing for community resilience and 4.3 High-quality and Sustainable Design.</p> <p>We will add in references. However, we need to consider re <u>balance</u> with other issues such as heritage, character, etc. across all aspects of design.</p>	Amend as suggested, adding to supporting text.

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		reduce the fear of crime.		
		GREEN SPACE DOC plus SLR 1		
15	Natural Environment & Green Spaces Assmt Rpt	The natural environment and surroundings of Teignmouth form a frame for the town, which overall makes it an incredibly attractive place to live, work and visit. The green spaces within the town (listed in the plan) and the settlement boundaries on all sides of the town between Teignmouth, Bishopsteignton and Holcombe all form part of this and need preservation and enhancement, as do the ridge lines which are visible from much of the town and from Shaldon, which itself is a significant and economically important visitor destination for the entire area.	Thank you. Comments noted. We agree with the statement made and the Plan seeks to do what it can through policies to protect the environment within and outside the town.	None.
9	p.31 SLR1, p.51	<p>Kingsway Meadow and park as a Green Space</p> <p>I support the plan to continue with the request to make the above area a Local Green Space. I, along with others, have fought since 2016 to stop the decimation of this woodland. Teignbridge have known about this and TPOs have been put on the trees. Several petitions have been handed in over the past six years so how the fact that this was private land got overlooked, I find hard to understand.</p> <p>With regards to the comments made on behalf of Terrance Stone Ltd, I should like to make the following points:</p> <p>Having lived next to this woodland for 44 years, there has been public access to this and. The entry points have been blocked at the Kingsway end for the past 3 years due to Teignbridge using the top ends of the car park for office and workshops space for the renovations on the flats.</p> <p>There is wildlife in the woodland. I have photographic evidence. I had planned to attach it to the Response Form but the Form would not download, hence having to write everything. We regularly see deer, foxes, fieldmice woodpeckers, bats and birds nest there.</p>	<p>Kingsway Park is designated as a Local Green Space. Kingsdown woodland is designated as a locally valued area of biodiversity, geodiversity and habitat. It had been a LGS in the community draft Plan but the Steering Group felt that the landowner's objections merited reconsideration of the LGS area, although not of the protection as a woodland.</p> <p>There is a TDC report, it appears, on this area which will be attached as an Appendix indicating the examiners comments on the previous Local Plan consultation for 2013 – 2033.</p>	None.

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		<p>One of the reasons the TPOs were put on the tress was because Bitton Park Road was one of the most polluted roads in the area and the trees would oxygenate the area – another reason is should be a local green space.</p> <p>I also see that a plan has been leaked for 172 houses to be built on this site 21/01236/PEMAJ. (No further details on website).</p> <p>Prior to the entrances being blocked, there were several pathways through the woodland and even a BMX track built further down. These are now overgrown and one elm tree has died and is covered in ivy. No one has ever tended to this site and I have spoken to Mr Terence Stone about it many years ago when he was in a home.</p> <p>There were 2 petitions; one online and one was handed in at Forde House to: Cllr Avril Kerswell, 3rd Sept 2018. 700 on handwritten, 1,225 online.</p> <p>Please put this area forward for LGS status.</p> <p>Please see attached Teignbridge Reason for granting Temporary TPO – now Permanent 2019. (Attached in APPENDIX document separately.)</p> <p>Please confirm receipt of this form.</p>	<p>Receipt was confirmed as requested.</p>	
10	<p>SLR1 p.51</p> <p>Following previous consultation :NE& Green Spaces Assmt Rpt</p>	<p>SLR1 P.31</p> <p>This woodland is vital to the area of west teignmouth. We live near one of the most polluted roads in the country apparently and the trees would be soaking up harmful carbon dioxide from the area. In a year an acre of mature trees absorbs the same volume of carbon monoxide as produced from a 26,000 mile car journey. The owner has said that this area is not used by the public but there is evidence by locals that this area has been used for recreation for years when possible. Also the owner claims</p> <p>“there is no tranquillity to be enjoyed within the 4.04 site, which is in private ownership with no public access. There is no justified reasons and evidence</p>	<p>Cllr Henderson has been referred to the Steering Group. responses to the previous Consultation and also that the Green Space designation was removed at the request of the landowner but the habitat was included in Sctn 11.3 Natural Environment as Kingsdown Woods and now p.116 at NE 2: Locally Value Areas of Biodiversity, Geodiversity and Habitat, as a habitat that should be protected but he has restated his objection to that decision for reconsideration.</p> <p>The previous campaign of protest in 2018 did result in a TPO being made across the site by Teignbridge (attached – in APPENDIX docs) and</p>	None.

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		<p>presented within the Report to explain why the site holds any wildlife value of demonstrable value”.</p> <p>This is simply not true, as people who live near the site enjoy the wildlife contained in the area on a daily basis. Lots of the residents that live near the woodland have pictures of deer, bats, birds and lots of other wildlife that are contained in the woodland not to mention the cirl bunting breeding area which is adjacent to this woodland and no doubt houses some in its scrubland. I have previously sent information to the steering group about a petition that had been set up by me and other residence to try to stop this developer building on this site. At the moment the petition stands at 1,991 signatures, thats without the other 800+ signatures on paper signed by hand by local residents that was given to Teignbridge district council in 2018. I would hope that this would be taking into serious consideration. While the residents are not against the building of houses this area just isn't suitable. There would be a problem with access, and as with other sites that have been chosen in the area such as TE3 there is no sign of any infrastructure being put forward. I understand that this land is privately owned but this doesn't stop the area being put forward as an LGS, and granting this I believe would give the woodland another level of protection. I would like conformation of receipt of this email please.</p>	<p>there is an ongoing petition.</p> <p>Kingsway Park is designated as a Local Green Space. Kingsdown woodland is designated as a locally valued area of biodiversity, geodiversity and habitat. It had been a LGS in the community draft Plan but the Steering Group felt that the landowner's objections merited reconsideration of the LGS area, although not of the protection as a woodland.</p> <p>Receipt of the response was confirmed as requested.</p>	
		HISTORIC ENGLAND'S RESPONSE IN FULL		
11 Historic England		<p>Thank you for inviting us to comment on the draft Neighbourhood Plan for Teignmouth. This seems to be our first engagement with the Neighbourhood Plan Steering Group.</p> <p>We welcome the comprehensive thinking around the protection of heritage, particularly Policy BE1: Heritage and the Historic Environment. We also welcome the Teignmouth Local Heritage Assets Report.</p> <p>As a statutory consultee, we would have expected to have been consulted on the screening document for the Strategic Environmental Assessment (SEA) that was prepared in February 2022. Had we been consulted, we would not have concurred with the local authority's</p>	<p>We have contacted Teignbridge District Council (TDC) on this matter. We requested a screening opinion, as required by the process and received the screening report in response, concluding that no SEA was required on the Plan. We have done all we are required to and are dependent upon TDC as the local planning authority to progress SEA matters and advise accordingly. On sharing the Historic England concerns with TDC, their response is that they have used the same method and process for SEA for several recent Neighbourhood Plans, with Historic</p>	Changes to be made to address Historic England concerns.

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		<p>consultant's screening decision that an SEA was not required.</p> <p>When reviewing a neighbourhood plan, our main concern is potential negative impact to heritage assets, caused by any proposed new development. Where there are formal site-allocations for development, or where development in-principle is being supported on named sites, we would expect:</p> <p>a thorough heritage evidence base; an assessment of potential harm to heritage assets; a formal justification of the policy that confirms that no harm will be caused.</p> <p>Ordinarily, this work would be achieved by the preparation of a full Strategic Environmental Assessment (SEA). However, a suitable evidence-base and justification for development could well be achieved by other means.</p> <p>Although there are no explicit site allocations for the development of housing, within the Plan, there seems to be a number of policies that support development in-principle on named sites, for example:</p> <p>Policy SLR3 - Marine related activities Policy SLR4 - Water Sports Centre - which specifically names Poly Steps.</p> <p>Furthermore, although not expressed as a formal policy, the Teignmouth Hospital site is potentially being promoted for development, including an affordable housing provision. We are concerned that these policies, in favour of development, are not yet supported by an assessment of any potential harm to heritage. Therefore, we suggest that the Neighbourhood Planning Group seek to add a form of words to these policies that requires the protection of heritage assets. Furthermore, in the absence of an SEA, we suggest some form of evidence-base and justification concerning potential harm to heritage assets on these named sites.</p>	<p>England aware that they are, in effect, consulted at the Regulation 14 stage.</p> <p>We will make changes to the Plan to reflect and address Historic England's concerns, and consider that the helpful suggestions will help to strengthen policies in relation to heritage. This includes a review of how heritage assets could be further protected. Initial review has indicated that one such asset, identified in the Heritage Assets Assessment Report could merit further protection by virtue of it being on an area of green space in the town centre. Market Cross in Regent Street is a listed structure and the area of land on which it sits merits designation as a Local green Space. The LGS assessment report will be updated to reflect the designation, demonstrating that it passes the NPPF tests for inclusion. Section 4.8 of the Plan could also identify an action to highlight that encouragement needs to be given to protect heritage assets and their setting from harm. TDC has confirmed that, once these proposed changes have been made, that they will consider them and comment on whether they meet Historic England concerns prior to Submission of the Plan. TDC also confirmed that a full SEA is undertaken by their consultants on their behalf for all Neighbourhood Plans and so this will provide further opportunity to ensure that sustainable environment issues and potential impact of policies on the environment are considered further and addressed if necessary.</p>	

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		<p>We recommend the Local Authority conservation officers work with the Neighbourhood Plan Steering Group to put in place the required evidence-base and justifications that would support the various policies that promote development in names places.</p> <p>I hope that our advice has been useful. We have no further comments to make at this stage. However, we look forward to having the opportunity to make further comment at the Regulation 16 consultation stage. We wish the steering group well with their ongoing work.</p>		
3 The Coal Authority		<p>Thank you for your notification below regarding the Teignmouth draft Neighbourhood Plan, reg. 14 pre-submission Consultation.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As you are aware, Teignbridge District Council lies outside the coalfield, therefore there is no requirement for you to consult us on your emerging neighbourhood plans.</p> <p>This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.</p>	Thank you. Comments noted.	None.