

DA2, North West Secmaton Lane and DA6 Dawlish Green Infrastructure, Dawlish

Development Framework Plan - Supplementary Planning Document

Statement of Public Participation

March 2016

1.0 Purpose of the statement

- 1.1 This statement has been prepared in accordance with sections 12 and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out the requirements for public involvement in the Supplementary Planning Document process. It also fulfils the Council's consultation and engagement plan for the draft Development Framework Plan and its adopted Statement of Community Involvement (SCI).
- 1.2 The statement sets out:
- The persons / organisations the Local Planning Authority consulted when preparing the supplementary planning document;
 - A summary of the main issues raised by those persons / organisations, and;
 - How those issues have been addressed in the supplementary planning document.
- 1.3 Public participation has included an opportunity for anyone to make comments on the consultation draft of the DA2 Supplementary Planning Document and its supporting Habitat Regulations Assessment and Strategic Environmental Assessment Screening Statement.

2.0 Background

Local Plan

- 2.1 The Teignbridge Local Plan 2013-2033 (Policy NA2) allocates land at DA2 Dawlish, for at least 860 dwellings, 3 hectares of employment, community facilities, and a link road. Complementary green infrastructure is allocated via policy DA6. Policy DA2 also includes a specific requirement for a comprehensive landscape and design led masterplan for the strategic site allocation, produced with meaningful and continued input and engagement from stakeholders.

Development Framework Plan

- 2.2 The Council has prepared a Development Framework Plan that provides greater detail and clarifies the requirements of Policies DA2 and DA6, as well as others in the Local Plan. It will help guide landowners submitting planning applications for the urban extension, and help the Council with decisions on these.
- 2.3 The Development Framework Plan will be adopted as a Supplementary Planning Document and will be a material consideration in determining planning applications. The SPD amplifies and clarifies the requirements of policies within the statutory adopted Teignbridge Local Plan 2013 – 2033.

Habitat Regulations Assessment (HRA)

- 2.4 The preparation of the Development Framework Plan has been subject to a Habitat Regulations Assessment (HRA) at draft and final draft stage to identify whether development at DA2 and DA6 will have a likely significant effect on the protected European Sites (ie Dawlish Warren and Exe Estuary), including in-combination with other development in the area. The HRA at draft stage identified further text was necessary to ensure the protection of water quality flowing into the Exe Estuary, which are incorporated in the Development Framework Plan. The HRA concluded that on the basis that the proposed mitigation set out is adopted as part of the Development Framework Plan, and subsequently secured through appropriate planning mechanisms at such time as individual planning applications are determined then the development of DA2 and DA6 (as indicated in the Development Framework Plan) will not have a 'likely significant effect' on the Special Area of Conservation or Special Protection Area.

Strategic Environment Assessment

- 2.5 The Development Framework Plan has been screened for the purpose of Strategic Environmental Assessment. This indicates there are no new significant effects likely to arise through the implementation of the Development Framework Plan that have not previously been identified through the full Sustainability Appraisal / Strategic Environmental Assessment of the adopted Teignbridge Local Plan.

3.0 Preparation, Consultation and Engagement

- 3.1 The Council commenced the preparation of the development framework plan in 2015, with initial engagement with landowners and interested parties directly affected by the DA2 / DA6 allocations.
- 3.4 The consultation draft development framework plan was published on the Council's website <https://www.teignbridge.gov.uk/nwsecmatonline>
- 3.5 Public consultation on the draft Development Framework Plan took place from 4 September until 16 October 2015.

- 3.6 Copies of the consultation draft Development Framework Plan, the Habitat Regulation Assessment and the Strategic Environmental Assessment Screening Statement were sent to consultees and other organisations that expressed an interest to be kept informed of consultations by the Council on planning documents. These documents were also made available as part of a static display in the Council's main Forde House public reception area. They were also provided to public libraries and to Dawlish Town Council.
- 3.8 Public notification of the consultation draft Development Framework Plan, the Habitat Regulation Assessment and the Strategic Environmental Assessment Screening Statement also included:
- Press release to the local newspaper
 - News article on the Council's website home page
- 3.9 A consultation drop-in event was held on 23 September 2015 at Dawlish Leisure Centre. This was well attended and provided an opportunity for members of the public to meet planning officers and discuss the draft development framework plan.

4.0 Consultation responses

- 4.1 Consultation responses were invited:
- Through the use of an online SNAP consultation survey for people to make online responses
 - By email directed to forwardplanning@teignbridge.gov.uk, and
 - By letter
- 4.2 A total of 88 organisations and individuals sent comments to the Council in the consultation period. A summary of the issues raised are included in the schedule that forms part of this statement of public participation, together with how the issues raised have been addressed in the Development Framework Plan, where relevant.

Draft Dawlish Development Framework Plan (SPD) - Summary of Consultation Responses

This is a summary of the comments received to the North West Secmaton Lane, Dawlish (DA2) and Dawlish Green Infrastructure (DA6) Draft Development Framework Plan (DFP) Supplementary Planning Document.

Consultation took place between 4th September and 16th October 2015 and included a public consultation event at Dawlish Leisure centre. The full responses are available on the Council's website at www.teignbridge.gov.uk

Consultee	Summary of comments or Issues	Response or proposed change
Dawlish Town Council	<ul style="list-style-type: none"> • The infrastructure, particularly the link road, needs to be constructed before the houses are built; • Secmaton Lane must not be used for any construction traffic or any access to new houses; • Objects to the extension for employment land to the North West of Development Area 4; • Consider the development plan consultation was insufficient so an amended plan needs to be circulated for further consultation. 	<ul style="list-style-type: none"> • The link road will be required as early as is feasible. A viability study has been commissioned to determine this. • The Council's position is to minimise traffic onto Secmaton lane. However, in determining planning applications, this is subject to technical evidence and the view of the highway authority. • The use of land adjacent to DA2 to allow for employment uses is necessary to enable delivery of this key policy requirement as part of a viable site. The principle of employment development outside but adjacent to the settlement limit is also compliant with Local Plan policy (EC3). • A revised framework plan will be presented to the planning committee, seeking that they recommend adoption of the SPD by the Council's Executive.
Devon County Council	<ul style="list-style-type: none"> • <u>Education</u> – Need for serviced site to be transferred prior to occupation of 100 dwellings should be stated in section 5.2 and section 3.8. DCC support this trigger point for the transfer, this is for 100 dwellings across the whole allocation and not for the application in which the school site is located. • Uses to be provided will be determined by the primary school and should be made clear 	<p>Education:</p> <ul style="list-style-type: none"> • The reservation of an appropriate parcel of land for education purposes is best achieved by tying delivery to occupation of dwellings on land in ownership of

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	<p>in Framework. To ensure school able to function as single unit, additional school land should be located close to the school. DCC recognises need to maintain and compensate for cirl bunting habitat, but wishes to clarify the extent of the area identified. The eastern extent of this area is land closest to the primary school and potentially most suitable for the additional school land, subject to being able to develop the land at an early stage.</p> <ul style="list-style-type: none"> • Existing schools will need to be expanded, this should be included in table in section 5.2, which currently focuses on new school land. In order to deliver additional pupil places to support the development, Teignbridge CIL will be required. • <u>Minerals and Waste</u> – Page 16 Section 3.8 amend to read ‘Consequently all other policies in the development plan, including the adopted Teignbridge Local Plan and Devon Waste Plan, need to be considered’. Policy W4 of Devon Waste Plan requires major development to have a Waste Audit Statement demonstrating how waste generated during construction and following occupation will be managed sustainability in accordance with the waste hierarchy. This should be included on page 23 in Section 5.1. • <u>Historic Environment</u> – Development will have impact on archaeological deposits associated with the demonstrated Roman-British and prehistoric activity within the application area. Wording suggested for Condition to be attached to any planning permission. DCC will provide applicant with advice on scope of works required. • <u>Employment</u> – Section 3.7 could include reference to any evidence of business unit demand in the area. • <u>Temporary SANGS</u> – Not clear on longer term aspiration for Temporary SANGS area. Should outline what intentions are for this area once the SANGS use has ceased. There is no indication of timeframes of DA7. Section 4.0 is unclear and should be clarified. • <u>Library Services</u> – Current library building in Dawlish is planned to be increased. The cost of installing the systems to enable 24 hour access is currently estimated £50,000. All remaining non-permitted development should make proportional contribution to the provision of the improved library facilities. This is calculated on a per-dwelling basis. • <u>Red Rock</u> – DCC are currently investigating the use of the building for youth support services beyond that which it currently provides; including in particular the delivery of CHANCES support services, which provide focussed support to young people, often 	<p>Development Area 2, so an appropriate threshold will be included in the DFP.</p> <ul style="list-style-type: none"> • Location and use of school land; The framework will state that the area of land reserved for the school is for education purposes (including ancillary uses). The Framework will secure an area close to the existing school campus. • Existing schools - The Council will work with the Education Authority to support the planned expansion of both Westcliff and Gatehouse Primary schools. • Waste – No need to repeat this policy in the DFP if it is already part of the Minerals and Waste Plan. • Historic environment – comments noted. • The SANGS section will be clarified. • Library services – comments noted. • Red Rock – the Council has been in communication with <i>Assist Teignbridge</i> (the charity that manages the Red Rock centre) as well as DCC. The centre can be improved through the provision of a centre manager to provide rooms for hire for wider community uses, in addition to existing youth provision, and the Framework plan will reflect this.

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	<p>during school times. Implications of this with regard to use of the building and its facilities and possible expansions as set out on page 10 will need to be taken into account in revised Framework.</p>	
<p>Devon County Council</p>	<p>Transport Comments; Junction Capacity –</p> <ul style="list-style-type: none"> • Elm Grove Road and Sandy Lane - The assessments undertaken identify the need to improve the access arrangements to the south of the allocation. These revisions will include a banning of the right turn from Exeter Road into Elm Grove Road in favour of the use of Sandy Lane and Elm Grove Drive. The Draft Development Framework should be revised to take account of the assessments detailed here. In particular, the Major Infrastructure Schedule should be revised to include ‘revisions to the Elm Grove Road and Sandy Lane junctions with Exeter Road’. The trigger for these improvements should be before the occupation of the 1st dwelling in development site 2. • Sainsbury’s Roundabout - No specific capacity concerns. <p>Link Road –</p> <ul style="list-style-type: none"> • Critical that each development site is developed in a way which ensures that the various sections of the link road can link together. There are various policy reasons for requiring the delivery of the link road early in the development of each of the development plots as set out in the Draft Development Framework. These include: <ul style="list-style-type: none"> ○ Minimising the traffic impacts on Elm Grove Road particularly around the schools; ○ Enabling walking and cycling journeys (including to the schools) to minimise short distance car trips; and ○ Enabling through bus services to minimise car trips. • The link road should be delivered to the boundary of each development site prior to the occupation of a defined, small number of dwellings in that site to ensure the link road is delivered in a timely manner to provide permeability to the allocation, allow buses to serve the wider site, and minimise trips on the section of Elm Grove Road close to the school and college. • The width of the link road should be 6m with some widening on the bends to allow for 	<ul style="list-style-type: none"> • Elm Grove Road and Sandy Lane – Comments notes on revised DFP. • Sainsbury’s roundabout – Comment noted. • Link Road – Agree with proposals and comments concerning the link road, which will be reflected in the revised DFP.

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	<p>bus services to access the site.</p> <ul style="list-style-type: none"> • As a minimum, the road will require a 2m footway on either side. • There should be flexibility for cycle provision through the development. This will either require a 3m cycleway parallel with the road alignment but segregated from both traffic and the footway, or a totally separate 3m cycleway providing alternative strategic permeability through the site. • Shutterton Bridge - Delivery of the road up to the northern boundary of development site 3 and the southern boundary of development site 4 - This section of the road requires a bridge to connect sites 3 and 4 over two watercourses. The cost of the bridge will be approximately £1m. The cost of the bridge will need to be shared proportionately between all the development sites according to the number of dwellings on each site because the bridge provides the functionality of the link road which is a strategic requirement for the allocation as a whole. Contributions will need to be secured through Section 106 Agreements. • Phasing - Section 3.6 of the draft Development Framework identifies the phasing of link road delivery and also sets out the proportion of the link road bridge cost which should be borne by each development site. <ul style="list-style-type: none"> ○ It would be more appropriate if the contribution proportions were directly based on the numbers of dwellings set out in the planning applications for the various sites as opposed to a fixed proportion. ○ Although there are various delivery mechanisms for delivering the bridge, at this stage it is assumed that the County Council will deliver it. Assuming this is the case, appropriate land within development sites 3 and 4 must be safeguarded to allow the timely delivery of the bridge with appropriate land transfers in place (at nil cost) to allow construction at the relevant bridge landing points. ○ The provision of the land should be made on commencement of development in each development site. Prior to actual commencement, and the transfer of the land, legal rights of access to the landing points will be required to allow surveys and due diligence processes to take place. Following transfer of the land, construction access must be provided to the landing points prior to the commencement of the 25th dwelling within development sites 3 and 4. Finally, the sections of the link road 	<ul style="list-style-type: none"> • Shutterton Bridge – Agree comments. To be reflected in DFP. • Phasing of link road - Agree comments. To be reflected in DFP.

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	<p>within sites 3 and 4 must be delivered up to the respective boundaries of the bridge landing points before the occupation of an appropriate number of dwellings within each development site.</p> <ul style="list-style-type: none"> • As a minor point, the last item within the Major Infrastructure Requirements Schedule on page 25 relating to the site access should refer to ‘vehicle’ movements as opposed to just ‘car’ movements. <p>Need for a link between development sites 3 and 5 –</p> <ul style="list-style-type: none"> • It will be necessary for a vehicular and pedestrian/cycle link to be provided crossing the stream and green infrastructure corridor which runs north to south. <ul style="list-style-type: none"> ○ It would be appropriate for development site 5 to be accessed for vehicles from Secmaton Lane as an interim position. ○ An access must be delivered to the western boundary of development site 5 on the occupation of 15 dwellings within that site. ○ The eastern part of development site 3, east of the north/south stream, will require access for vehicles, pedestrians and cyclists to the rest of this development site to allow permeability to the wider allocation. This will require some form of bridge or other structure. The layout of development site 3 must allow for this. This access must be in place prior to the occupation of any dwellings within this part of site 3. This site must also provide vehicular and pedestrian/cycle access to the eastern site boundary to provide a link to development site 5 prior to the occupation of 15 dwellings within this eastern part of development 3. ○ Once the access across the stream is in place, and assuming that development site 5 has been delivered, the interim, vehicular access from Secmaton Lane to development site 5 must be converted to serve pedestrians and cyclists only. ○ Because the requirement for this link is directly related to these two development sites, funding will need to be secured on per dwelling, pro-rata bases from these sites. • The County Council has reviewed the potential improvement of the existing NHS access point which will serve the employment land within the development. There would be no 	<ul style="list-style-type: none"> • Link between sites 3 and 5 - Agree comments. To be reflected in DFP. The trigger point for delivery of the link may be set slightly higher (25 units) to ensure Development Area 5 can viably deliver the link road to the western boundary of the site. • Access to employment land – comments noted.

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	<p>in principle objections to this concept, although careful consideration will need to be given to the detailed access proposals to ensure appropriate functionality of the highway network in this location.</p> <ul style="list-style-type: none"> • As a general principle, construction traffic will need to be managed carefully as the site develops out. Particular consideration will need to be given to construction traffic impacts on Elm Grove Road around the primary school and college. Construction Management Plans will be required to ensure that construction access is not permitted during school drop off and pick up times. • Public Transport – important to ensure that the development is appropriately served by public transport. The precise nature of the bus services through the site will be determined through discussions with the local operators. <ul style="list-style-type: none"> ○ Services are anticipated to use the link road which should therefore be designed at an appropriate width to accommodate larger vehicles which means a width of 6m with widening on the bends will be required. ○ Three bus stops in either direction will be required within the development, one each in development sites 2, 3 and 4. Bus stops will need to include high quality waiting facilities including poles, bus flags, timetable displays and a variety of shelters. Bus stops at key locations should include enclosed, lit shelters (both roof and sides). ○ There is also a requirement to provide a formal stop for Dawlish / Teignmouth bound services on the A379 in close proximity to this site on the southbound side of the road. This will need to be supported by an informal crossing such as an island. ○ Development will be required to provide funding towards public transport services. Contributions will be applied consistently across the site. The full bus service will need to commence on the opening of the full link road. • Development allocation should be designed in a way to maximise permeability for walking and cycling. Avoiding cul-de sacs would be an appropriate to achieve this. If cul-de sacs are included, links between these roads should be provided to facilitate walking and cycling access in a safe and direct manner. Overlooking and/or lighting will be required. • Formalising additional access to Gatehouse Primary school will provide improved access 	<ul style="list-style-type: none"> • Construction traffic on Elm Grove Road – comments noted. Agree Construction Environment Management Plan would be appropriate to manage amenity and safety on existing residential streets. • Public Transport – Comments agreed and reflected in DFP. • Public Transport Bus contributions – Given the existing commercial routes passing close to the development along the A379. The Council considers it likely that these operators will want to use the link road to serve the new DA2 dwellings once the link road is in place. Therefore no need for developer contributions towards bus services. • Permeability – Agree with comments which will be reflected in DFP. • Access to Gatehouse Primary - Agree with comments which will be reflected in DFP.

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	<p>to the school for development across the whole allocation. In this regard, it would be reasonable and appropriate to secure proportionate contributions to fund its delivery from each development site within the DA2 allocation. Initial estimates suggest this scheme may cost in the region of £50,000.</p> <ul style="list-style-type: none"> • The DFP should require travel plans and car club parking spaces in order to support sustainable travel. 	<ul style="list-style-type: none"> • Travel plans - Agree with comments which will be reflected in DFP.
Marine Management Organisation	<ul style="list-style-type: none"> • No Comment. 	
Natural England	<ul style="list-style-type: none"> • <u>Renaming the ‘Temporary SANGS’ to Dawlish Warren and Exe Estuary SANGS</u> – no certainty that another SANGS will materialise over time. Text under 3.1 should state SANGS must be provided associated with the development. Indicate that in future an alternative, more strategic SANGS solution may be provided. • <u>The draft SPD deals with SANGS in a disjointed manner.</u> The SANGS section on page 17 is oddly placed between Education and Green Infrastructure. The Biodiversity section starts to discuss the need for compensation habitat and then continues with Education before the SANGS heading. The SANGS section itself needs an introduction which explains what SANGS is (the acronym is first explained in 4.0) and why it is needed. It should also explain how SANGS relates to, and integrates with green infrastructure provision. • <u>The Biodiversity section</u> on page 16 refers to a Biodiversity Mitigation Strategy on page 22. A Biodiversity Mitigation Strategy could however not be found in the document. The Major Infrastructure Requirements Schedule also refers to the Biodiversity Mitigation Strategy (p. 26) and mentions biodiversity mitigation strategies for each development area (which are still to be completed?). A more coherent approach should be taken to biodiversity mitigation throughout the SPD. • <u>Effect of employment development on the Exe Estuary SPA</u> - The Habitats Regulations Assessment screening matrix identifies that the additional employment development outside the DA2 boundary will drain in to the Exe Estuary SPA, leading to potential pollution of the estuary. The conclusion therefore is that appropriate measures must be 	<ul style="list-style-type: none"> • The Council is committed to providing a permanent strategic SANGS site in the Dawlish area. The provision of temporary SANGS within or adjacent to DA2 will ensure appropriate mitigation is provided in the interim period. • SANGS and Green Infrastructure – The Council understands the inter-relationship between different elements of GI. However the DFP needs to clearly set out and justify distinct planning policy requirements. The text will be redrafted to be clearer about the complementary roles of SANGS and GI. • Biodiversity – DFP will clarify that each development area shall require a biodiversity site assessment and appropriate mitigation strategy when a planning application is made. • Employment land and SPA - The text refers to the need for the employment development to ensure no pollution reaches the estuary. This text will be amended to refer to both potential water and air pollution. A reserved matters planning application will provide the necessary reports to establish the certainty over the deliverability and timing of effective measures.

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	<p>provided to prevent any pollution of the estuary arising from this development. Whilst this conclusion is added to the draft SPD on page 15, it is not clear whether the options for and deliverability of these measures have been explored. We would require certainty about the deliverability and timing of effective measures. The SPD text needs to make clear that the appropriate measures must be in place prior to any potentially polluting employment development going ahead. This could be done by means of phasing the development.</p> <ul style="list-style-type: none"> • <u>Green Infrastructure</u> - The draft SPD should place greater emphasis on the multifunctional nature of Green Infrastructure. The text of the document portrays SANGS and Biodiversity as quite separate from green infrastructure for the area. SUDS and Sustainable Movement should also be considered as key considerations in developing green infrastructure. It would be beneficial if the document provided an explanation of the benefits of comprehensive green infrastructure planning and how the different functions such as biodiversity provision and mitigation, landscape, SUDS, and sustainable travel were integrated in the plan. 	<ul style="list-style-type: none"> • Green Infrastructure - The Council appreciates the multi-functional nature of Green Infrastructure, and this matter is dealt with in the Local Plan. For the purposes of this land use document it is necessary to set out broadly what, when, where, and how each element shall be provided.
South West Water	<ul style="list-style-type: none"> • South West Water have already been approached on a number of the areas in question and identified sewerage improvements required to support those developments. • Remaining areas upon which we have yet to be approached will for your information require further investigations with regard to the provision of foul drainage improvements. 	<ul style="list-style-type: none"> • The Council is working with the relevant bodies to ensure past and future development is considered during the upgrade of the sewerage system in the area.
Starcross Parish Council	<ul style="list-style-type: none"> • Highways – Since the adoption of the Local Plan traffic volumes have ‘increased markedly’ especially at peak times on both the A379 and B3361. DCC Highways should carry out an updated traffic survey on both roads and reconsider the likely impact of further development at Dawlish. • Medical Services – The Westbank Practice Starcross catchment area extends to The Catholic Church in Dawlish, which includes the whole of the DA2 area. Westbank has already signed up patients from new housing and will be expected to take on patients from DA2 development. Westbanks list is virtually full and without part of the £400.00 Section 106 money for the Barton Surgery in Dawlish then Westbank will have to turn away patients who wish to sign up with them. 	<ul style="list-style-type: none"> • The Highway Authority have provided further junction modelling evidence for the A379/Sainsbury’s roundabout, and the Elm Grove Road and Sandy Lane junctions onto Exeter Road. • Health providers wish to consolidate medical services in the centre of Dawlish. The extension to Barton surgery will meet the needs of the DA2 residents. • The Council is not aware of proposals for major

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	<ul style="list-style-type: none"> Conclusion - To date, no consideration or financial investment has been made to alleviate the impact of the DA2 development on Starcross and therefore Starcross PC looks to TDC to review the above issues with appropriate partners. 	<p>upgrades to the A379 at Starcross.</p>
<p>DARE for the Environment of Dawlish</p>	<ul style="list-style-type: none"> <u>Masterplan</u> – Lack of detail, not possible to comment <u>Landscape Gateway Development</u> – High density housing will create urbanised vista. Do not consider this welcoming approach to a holiday/tourist destination. <u>Housing</u> – 3rd bullet point on top page 9 ‘should’ needs to be replaced with ‘must’. ‘Tenure split’ and ‘custom build plots’ not enough detail to comment. Housing figures ‘at least 860 dwellings’ fails to reflect accurately the housing growth for Dawlish over the plan period. <u>50 Bed Extra Care Housing Scheme</u> – Support - Unclear if such a scheme is deliverable as private sector may not provide funding/construction is not considered viable. Unclear wording – ‘...will make up part of affordable housing provision’. <u>Multi-purpose building</u> – Ongoing discussions taking place it appears unlikely Red Rock premises would be available to meet the needs set in the consultation draft. Extensions to hospital and doctors surgeries would be ‘fast tracked’ through the planning process to aid early provision of much needed facilities. <p><u>Transport and Highways</u> –</p> <ul style="list-style-type: none"> <u>Langdon Hospital Entrance</u> – Entrance / exit on to the A379 utilising entrance opposite an extremely dangerous junction with Shutterton Lane. The location of the bus stop and very limited visibility are a problem. <u>Link Road</u> – Should be constructed before large scale development takes place. Funding sources to be secured by landowners. <u>Elm Grove Road</u> – Traffic control on EGR has potential to put delivery of Dawlish Cycle Way in doubt. Could cause grid lock through Iddesleigh Terrace and Tucks Plot. Increase in stationary/queuing will increase already poor air quality area with more pollution. <u>Secmaton Lane</u> – increase in traffic movement wholly unacceptable. All new housing developments must be served/accessed by new road. <u>Employment</u> – Employment should not be located in Development Area 4. This location 	<ul style="list-style-type: none"> Gateway – The gateway policy encourages high quality urban design and architecture. Housing – Local Plan sets out the affordable housing target and the self build policy. The target of at least 860 relates specifically to the DA2 allocation. Extra care housing – The DFP notes that Extra Care can be considered as affordable housing where the dwellings comply with the relevant definitions of affordable housing (eg: rent or shared equity below market value). Red Rock – the Council has clarified the position with the organisation responsible for managing the Red Rock. Wider community use will be possible subject to improvements funded by S106. Upgrades to the Barton Surgery in Dawlish are underway. Langdon Hospital Entrance - The Council will seek the views of the Highway Authority. Link Road - The link road shall be funded by the landowners/developers, and will be delivered as early as is feasible and viable. The Council will place a limit on the number of homes developed before the road is in place, based on independent advice on when this is achievable. EGR cycleway - The cycle way is already under construction. The Highway Authority has proposed measures to ensure the junction is safe. Secmaton Lane - The Council will seek to minimise

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	<p>should be used and enlarged to provide a SANGS location, thus providing a safe buffer zone between housing and Langdon hospital.</p> <ul style="list-style-type: none"> • <u>Biodiversity</u> – Off-setting habitat losses with mitigating measures and relocation/allocation recommendations. Many sites probably in areas where the next 20 years supply of housing will be built. • <u>Education</u> – It is of utmost importance to assess needs with the total growth of Dawlish during the plan period. • <u>SANGS</u> – The temporary SANGS location should be enlarged and made permanent in DA2 site, and combined with Community Park, Sports area and Allotments. • <u>Green Infrastructure</u> – Support but delivery remains to be seen. • <u>Flooding</u> – Proposed growth will increase flooding and flood risk. Especially true of the lower reaches to Shutterton Brook. • <u>Archaeology</u> – Landowners and developers to have regard and respect to this matter. • <u>General comments</u> – Local Plan seriously flawed and do not support much of contents. Houses alone do not achieve what is reflected in Vision for Dawlish. 	<p>traffic onto Secmaton lane. The DFP will secure a link between DA2 development areas 3 and 5, with only an interim vehicle access from Secmaton lane into area 5.</p> <ul style="list-style-type: none"> • Employment land - The use of land adjacent to DA2 to allow for employment uses is necessary to enable delivery of this key policy requirement as part of a viable site. • Biodiversity - The details of the off-setting sites are yet to be agreed or determined. • Education - The Council is working with the Education Authority and relevant schools to ensure school places are provided. • SANGS – It is the Councils intention to deliver a permanent strategic SANGS in the Dawlish area. • Flooding - The Councils drainage manager will work with the developers and the Environment Agency to minimise and mitigate impacts.
Dawlish Transition	<ul style="list-style-type: none"> • Position of the Temporary SANGS is good idea to protect Warren and close enough to DA2 housing to prevent dog walkers getting in to cars and driving to Warren. Emphasise the need to provide green routes through housing developments in order that SANGs land can be reached more safely and easily, and which will also provide wildlife corridors. • The location of the employment land is a security buffer zone between Langdon Hospital and residential areas. • Concern re current and future capacity of Shutterton Brook to deal with run off from both residential and employment development and the effect on flooding. • The effect of pollution from increased housing and employment in DA2 on Dawlish Warren is big issue. 	<ul style="list-style-type: none"> • SANGS and green corridors – Agree with comments. • Location of Employment – employment is located as proposed to provide a suitable separate access in the long term. • Flood risk - The Council’s drainage manager will work with the developers and Environment Agency to eliminate or manage run-off and mitigate any downstream impacts via specific measures funded by S106. These measures will also need to address risk of pollution.

Consultee	Summary of comments or Issues	Response or proposed change
	<ul style="list-style-type: none"> “Now there is a Dawlish Neighbourhood Plan under development a full Landscape assessment needs to be carried out before any further designation of land as increased development area beyond the Teignbridge Local Plan”. 	
<p>Ian Jewson Planning on behalf of Alf Jeffery (Development Area 3)</p>	<ul style="list-style-type: none"> <u>Housing</u> – Essential to include table that sets out minimum number of dwellings required in each development area. Early applications could ‘use up more than their fair share of the 860 dwellings’, this could jeopardise the viability of the later phases. <u>Transport and Highways</u> – <u>Avenue Specification</u> – Text should state that alignment not yet decided, Plan 2 (Draft Land Use Plan) is simply illustrative. <u>Phasing – Access</u> – Strongly support adoptable highway to be provided to the northern and southern boundaries of Area 3 early in the development of both areas 2 and 4. <u>Bridges across Shutterton Brook</u> – Strongly support sharing proportionally across the allocation the cost of the bridge that is required to cross the stream that passes through from west to east (see map provided). If the costs are not shared affect viability of Area 3. Object to absence of reference to <u>second bridge</u> required to cross the stream that passes through Area 3 north to south (see map). This bridge is essential in order to both: 1) Provide vehicular and pedestrian access to Area 5 which is long term aim of allocation (page 12) 2) Enable the delivery of the eastern half of Area 3. The Framework requires cost of second bridge to be met solely by Area 3. Should the provision of the bridge fall solely on Area 3 the cost involved would mean that it is not viable to provide the bridge which could result in 1) Eastern section Area 3 not accessible. Reduce numbers of dwellings that could be delivered by around 30 units. 2) Area 5 will not be able to connect to the rest of DA2. This will mean that the temporary vehicular access from Secmaton Lane will become permanent. Cost of second bridge should be shared proportionally across allocation. <u>Temporary SANGS</u> – Do not object to the requirement for a Temporary SANGS but the Draft SPD should set out what will be permitted on the land when the Dawlish Coastal Park is completed. 	<ul style="list-style-type: none"> Housing - the policy is clear that DA2 should deliver ‘at least 860’. Therefore this is not necessary. Avenue Specification - Agree that link road Alignment is currently illustrative. More details will be provided concerning the expected specification. Phasing – Agree. Bridge over Shutterton Brook - The primary bridge across Shutterton Brook is essential for the delivery of the link road and is therefore a strategic site requirement. The cost will be shared amongst all Development Areas on a per dwelling basis. Secondary structure to cross stream in area 3 – It is accepted that a culvert or bridge across a stream within Development Area 3 is necessary to deliver part of the site. As with costs for the other development areas, it is regarded as an on-site cost specific to that site. The cost of this smaller bridge over a stream should be shared proportionately across development areas 3 and 5. This DFP will note the need for contributions from Development Area 5. SANGS – Temporary SANGS will revert to alternative uses once a strategic permanent SANGS is delivered. However, the proportionate area of green infrastructure required to satisfy and deliver policies including WE11 and DA6 will still be required.

Consultee	Summary of comments or Issues	Response or proposed change
Wadderton Park Ltd on behalf of the NHS	<ul style="list-style-type: none"> • Para 3.2 the last sentence says that it is expected that housing will be the main use in the gateway area. As you know our indicative masterplan shows this to be the location of a Care Home (the optimum location as operators tend to require main road frontage) and such a building would lend itself well to forming a high quality gateway feature, so please amend to allow flexibility on this. Of course a care home is housing but in the interests of clarity this would help. • Para 3.3 we are concerned that the requirement for 5% Custom Build is too much and unjustified. This could lead to unsightly and empty plots. There needs to be some review mechanism to confirm the success of the first few plots before more are required. • Para 3.4 the Policy is clear that there can be “and/or other appropriate elderly housing provision”. This paragraph should also refer to the possibility at least of a Care Home in Area 4. The requirement for extra care housing needs to be qualified as subject to an identified need and provider being identified. We have experience of significant problems in delivery of this type of accommodation and we understand the site at Shutterton Lane may be providing some as well so there is a risk of oversupply? • Para 3.5 the figures of £400 and £1000 per dwelling will need to be justified to comply with the CIL Regulations. There is no such justification that we have seen. The draft document refers to compliance with CIL Reg 123 re pooling, but also need to refer to tests set out in Reg 122. We also need clarification on why some of the site is subject to the contributions but the 96 and the 75, for instance, were not. In addition, would any other proposals, e.g. site for dwellings on site near Red Rock where impact would be the same as from DA2, be subject to the £400 and £1000. • Para 3.6 the DCC Highway Capacity Assessment concludes there is limited capacity on Elm Grove Road. Even with the junction improvements, it must be the case that there are capacity limits and/or highway safety concerns relating to the amount of development which can take place without the full link road in place. An additional trigger should be introduced therefore. As drafted there is nothing to stop the entirety of areas 1, 2 and 3 and 5 as well as all the permitted development being developed and all with access only to the south via Elm Grove 	<ul style="list-style-type: none"> • Gateway – The Council agrees that extra care and other forms of housing for older people is housing, and would be suitable and appropriate in the gateway area. • Custom build - The custom build policy in the Local Plan (WE7) sets out the requirement for 5% open market custom/self build dwellings, marketed for 12 month minimum. Details concerning marketing are set out in the emerging Custom Build SPD. • Extra Care - The Council will support delivery of housing for older people, both in the form of extra care housing (especially where this is considered as affordable housing) and other open market care homes. The DFP is likely to suggest a cascade where Extra Care cannot be provided, requiring alternative forms of housing for older people. • S106 - Contributions towards community facilities and GP services are justified and required, and comply with CIL regulation 122. • Link Road – Each site has a trigger before the link road is required to the boundary of the site. This trigger for each site acts as a limit, after which the link road will be deliverable. • Elm Grove Road – The DCC Junction modelling Report concludes that Elm Grove Rd and Sandy Lane are able to accommodate the additional traffic levels with 50% of the development completed, and 100% completed when the link road is complete.

Consultee	Summary of comments or Issues	Response or proposed change
	<p>Road/Sandy Lane. As highlighted previously we would expect this to be technically and politically unacceptable.</p> <ul style="list-style-type: none"> • Para 3.6 the proposal to apportion the costs of the bridge across the whole site does not seem to comply with the CIL regulations. It is not required for example to mitigate the effects of the development of any part of area 4. The costs should be apportioned between the number of dwellings which require the bridge in order to access them (this relates to item 5 above). • Para 3.7 Please would you build in flexibility to allow the Phase 1 employment land to be located somewhere with area 4 and not as prescribed on the plan? As you know the intention is that this will, in part at least, be met by the provision of a Care Home which is an highly efficient employment provider and which is likely to be located at the gateway. • Para 3.7 the “Types of uses” should refer to a Care Home and other employment generating uses as per the policy. • Para 3.8 The concept of Temporary SANGS needs to be agreed with Natural England? How does concept of temporary SANGS, partially now provided on DA6 in the plan, sit with the policy for 6ha of DA6 to provide permanent SANGS? DA6 policy text does not refer to it performing a SANGS function or being required as such. • As far as the Draft Land Use Plan is concerned it would be helpful to explain the locations of LEAPs for example is indicative to provide flexibility. 	<ul style="list-style-type: none"> • Bridge - The link road (including the bridge) is a strategic requirement, necessary and directly related to the delivery of DA2, in the interests of the proper planning of the area. • Location of Employment land – The employment land is identified in a specific location apart from residential uses. If an alternative layout is proposed this will be considered on its merits. • Employment land and Extra Care - The Council does not agree that C2 or C3 residential uses are likely to generate the same employment opportunities as ‘B’ business uses. Therefore the Council is unlikely to agree that a care home can substitute for employment land. Therefore 3 ha of employment land is required separately to the provision of extra care dwellings. • SANGS - The SANGS section will be clarified. The principle of temporary SANGS is accepted by Natural England. The delivery of any permanent SANGS at DA6 should be delivered in partnership with the Council and would not be a S106 requirement. • Location of Play - Whilst the precise location of LEAP/NEAPs are indicative, they should be located in these broad locations, which have been identified based on maximum walking distances from dwellings, and adjacent to areas which reduce the necessary land-take required for noise buffers (between play and residential uses).
Mike New WWA Surveyors on behalf of	<ul style="list-style-type: none"> • Page4, para 2, line 2 –the use of the phrase "high level of weight" would be better replaced with "significant level of weight". The Council needs to take due consideration between the SPD and the Policy in terms of delivery of the 	<ul style="list-style-type: none"> • Weight - The SPD provides further detail regarding the policies set out in the Local Plan. The recent evidence that has informed the SPD will give it significant weight.

Consultee	Summary of comments or Issues	Response or proposed change
Chris Jeffery	<p>development and therefore any changes which will impact on the Policy requirements as well. Which is the key consideration when a Proposal is assessed, Policy or Framework?</p> <ul style="list-style-type: none"> • Page 6, para 2.3 line 3 -The Land Use Plan has been produced taking account of the constraints and new evidence. Please can the Framework be more specific and must explain what this "new evidence" is so that interested parties and at the very least the Landowners can make informed comment? • Page 10, section 3.5, para 2 – Evidence is required to understand the basis of the GP contribution and if it is for capital works? • Page 10, section 3.5 para 3 – Evidence is required on what basis the contribution of £1,000 per dwelling has been calculated towards the Red Rock Centre. Is it for the Capital Cost of expansion? • Page 10, section 3.6, para 1–There is reference to an overall assessment of highway capacity matters taking account of the impact of the whole of the DA2 allocation. Is this Assessment available in the public domain for inspection? • Page 11, Avenue Specification refers to vehicle access in the "form of an avenue". We believe that the second paragraph is far too descriptive at this stage and it is for the development management process to identify and consider the detail taking account of future development proposals, statutory changes as well changes in bus technology, road safety etc. • Page 11-Phasing-Although in principal phasing of development to achieve connectivity is accepted the restriction on completion/occupation of dwellings for infrastructure to be in place needs to take account of the ability to fund. The basis of the number of dwelling occupied needs to be explained • Page 13/14–Employment –The DA2 Policy does not indicate that the Employment uses need to be restricted to certain locations. Furthermore nor does it indicate that it should be combined into one location, although this could be a way of delivering where viability is an issue. If a landowner believes appropriate employment development can be developed within their ownership there is nothing to suggest this cannot happen. It should be made clear within the Framework given that the policy says "at least 3 	<p>The SPD will be a material consideration in decision making.</p> <ul style="list-style-type: none"> • New evidence - Evidence including the Bridge Feasibility Study and Junctions Capacity Report have/will be made available. • Health contribution - The Dawlish Barton GP surgery is undergoing significant upgrade works costing in the region of £1.4m in order to meet the needs of growth at DA2. • The Red Rock Centre – The requirement set out in the DFP is based on an assessment of the cost of improving the existing building to make it available for wider community uses. • Junction Capacity Study – This shall be circulated shortly. • Avenue specification – Disagree. The Council believe it is essential that the DFP sets out the vision and specification for the quality of this street, which is to include development facing onto the street, cycle and pedestrian provision, a road suitable for cars and buses, street trees and car parking. Delivering a high quality street is essential to good planning and place making. • Phasing – Agree. The Council has commissioned an independent viability study to assess the feasibility of the phasing trigger point for the link road. • Employment – Agree that some small scale employment uses may be appropriate elsewhere on the site, particularly along the main avenue link road. • • The Framework plan shall encourage an area of mixed-use development to come forward.

Consultee	Summary of comments or Issues	Response or proposed change
	<p>hectares should be delivered"</p> <ul style="list-style-type: none"> Page 16 – Biodiversity – The stipulation that Area 2 will be the last phase of Development Area 2 is too descriptive at this stage as the extent and exact location of the Cirl Bunting Habitat is yet to be identified. We are currently undertaking an up to date survey which will provide more detailed evidence and therefore the Framework is too rigid to actually accurately safeguard the habitat pre-mitigation or compensation contribution. The third paragraph requires "if the developer chooses" prior to "that the compensation land is providing" in line 5 to allow the option for the developer to provide an alternative habitat. Page 17 – Provision of Temporary SANGS remains very unclear and should indicate that it is a requirement prior to the delivery of allocation DA7. There is no provision in the framework to explain what happens once DA7 is delivered as far as retention. In addition clarify Temporary SANGS and its allocation within DA6 should be indicated (referred to on Page 24?) as well as who is responsible for provision of the associated infrastructure within it. <p>Infrastructure provision:-</p> <ul style="list-style-type: none"> The responsibility and cost for the bridge across Shutterton Brook has shifted from the two owners whose land it serves to a position whereby a majority contribution of the cost is now proposed from my client? There is an inconsistency of approach on the part of the Council, if it intends to apportion the cost of infrastructure for the whole DA2 allocation, then the costs to be incurred by my client should be apportioned amongst the other owners, so that each land owner contributes towards those costs or alternatively each landowner meets its own costs for infrastructure on its land. Contributions must be on an equitable basis (see item 3 below). How has the contribution indicated for the bridge been calculated? The Council are keen to progress the development of the allocation, yet on the basis of the timings and agreement for infrastructure locations, how is a ransom to be avoided if agreement cannot be reached on the locations of infrastructure at the boundary of land ownerships? As a consequence these provisions need reconsideration 	<ul style="list-style-type: none"> Biodiversity – The use of a phasing mechanism for land that has previously been identified as having Cirl Bunting activity is a reasonable precautionary approach. Where further assessment and any necessary mitigation measures demonstrate this phasing is no longer necessary, this can be dealt with via the development management process. SANGS – The SANGS section will be clarified. Appropriate temporary SANGS land or permanent strategic SANGS shall need to be secured prior to the occupation of dwellings. <p>Infrastructure:</p> <ul style="list-style-type: none"> Apportionment of Shutterton Bridge costs - The Shutterton Bridge is part of the strategic link road requirement. The cost will therefore be shared equally on a per dwelling basis. All landowners shall be responsible for delivering the link road from boundary to boundary across their site. Bridge cost – the DCC Bridge Feasibility Study has estimated the cost of the Bridge. Development shall only be permitted on the basis of agreement of bringing the link road to an agreed point on the boundary. The occupation of dwellings within each development area shall be restricted to ensure the road is delivered to the boundary.

Consultee	Summary of comments or Issues	Response or proposed change
	<ul style="list-style-type: none"> 3. Linked to my comments on point 1- Are you willing to recognise allocation wide contributions for specific abnormals on all sites in the allocation in the same way that has been applied for the Bridge? 4. On what basis as the trigger points for contributions been made and has any regard been made to ensure that development can financially support them? Clearly there has to be recognition of the economics of carrying out developments of this nature, and how cash flow and borrowing can be utilised to meet effective trigger points that can be delivered. At present the arrangements are not workable. 5. How will you deal with provision of Temporary SANGS if my client cannot secure control of the land outside of his ownership? 	<ul style="list-style-type: none"> Land Equalisation – The Council would have no objection to landowners using land equalisation methods across the site to share costs/benefits. The DFP shall ensure the delivery of essential policy requirements and strategic infrastructure through the use of S106 and conditions. Viability of Trigger points - The Council has commissioned an independent viability study to assess the feasibility of the phasing trigger points for the link road. SANGS - There is sufficient land within Development area parcels 2, 3 and 4 to provide SANGS.
Devon Countryside Access Forum	<ul style="list-style-type: none"> Two position statements submitted 1) Local Development Frameworks and Major Developments and 2) Neighbourhood Plans. TDC should take these into account when developing the site. DCAF advise early consultation with landowners is imperative and should be incorporated in SPD. In addition to on-site areas of green infrastructure and linear access routes, it is important that the developers explore connectivity to surrounding public rights of way and other recreational routes and green areas. Section 106 negotiations with the developer should include such connections and the installation of appropriate path furniture allowing for easy access, particularly by wheelchair/ mobility scooter users and dog walkers. Such negotiations should include close consultation with any affected landowners. These aspects could also be considered under the Community Infrastructure Levy. 	<ul style="list-style-type: none"> DCAF position statements - Comments noted. Early consultation – The Council has undertaken early consultation with the main landowners. Wider site connectivity - These aspects have and will be considered to the extent that they can be under CIL regulation 122.
RSPB	<ul style="list-style-type: none"> Fully supports Biodiversity elements of DA2. Temporary SANGS (pg17-18), unclear why the minimum criteria are qualified with 'likely'. They are essential; without meeting these, the development risks failing to comply with the Habitats Regulations. Recommend that 'likely' is replaced with 	<ul style="list-style-type: none"> SANGS – This section will be clarified. The Council is working with Developers and Natural England to ensure that SANGS provision is effective.

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	<p><i>'essential'</i>. SANGS must also be attractive – conventional agricultural land is unlikely to qualify as SANGS, and the minimum criteria list fails to reference quality of provision. We recommend that the minimum criteria list includes wording along the following lines: <i>'High quality landscapes with variations in habitat type to provide an interesting and diverse space'</i>.</p> <ul style="list-style-type: none"> • Welcome DA6 • Table 5.1 Pre-requisites for Infrastructure Delivery. Biodiversity Mitigation Strategy (for each Development Area) – Support the requirement for the Strategy to be produced 'prior to the determination of the first planning application which seeks approval for access, in order to ensure biodiversity and habitats are considered in the detailed design of the scheme. Recommend that text is added along the following lines: <i>The Strategy should include a timetable for delivery that secures functional habitat is in place ahead of development commencing.</i> • Table 5.2 Major Infrastructure Requirements Schedule. We recommend that the requirement for Site specific biodiversity measures includes wording along the following lines: <i>including at least 5 Cirl Bunting territories across the whole of DA2.</i> • Plan 1-should show the whole of the triangular northern field included in the Newlands boundary. 	<ul style="list-style-type: none"> • Biodiversity Mitigation – Comments noted. • Cirl Buntings – The DFP acknowledges likely Cirl Bunting territories within Plan 1. • Plan 1 – The DFP does not consider this area in detail because the development is already permitted and underway with the appropriate mitigation secured.

COMMENTS FROM INDIVIDUALS – GROUPED INTO THEMES

Theme	Summary of comments or Issues	Response or proposed change
3.1 Criterion (a) Masterplan	<ul style="list-style-type: none"> • Considering whole site at once is not detailed enough, needs to be properly broken down to prevent poor design. Teignbridge should adopt a design guide to ensure good quality development and not left to housing developers 'poor imagination'. • Design led masterplan for whole area not happening, individual landowners doing own thing • Development Area 4 – the hill which the hospital stands is very prominent in the wider 	<ul style="list-style-type: none"> • Masterplanning - The Framework plan explains policy DA2. The remaining detail shall be agreed via a Reserved Matters planning application. Any Full or Reserved Matters planning application will have to address urban design / landscape issues. • Design quality - Teignbridge is producing a separate design guide SPD.

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	<p>landscape, buildings have been laid out in a sensitive way and trees help them merge into countryside. New buildings should be sensitively located. Alternatively this south facing slope good place for community orchard.</p> <ul style="list-style-type: none"> • Masterplanning should be strengthened to ensure that any application at outline, reserved matters and even those <u>with</u> detailed planning permission are included. 	<ul style="list-style-type: none"> • Landscape – comments noted.
<p><u>3.2 Criterion (b) Gateway</u></p>	<ul style="list-style-type: none"> • Sounds vague, needs careful consideration as route past Sainsburys currently an eyesore • Need to take steps to hide Shutterton Industrial Estate where it borders the road. Little point providing elegant ‘gateway’ if when gone through the gate you are met with eyesore. • Concern that high quality design will not happen as developers won’t ‘play ball’ • b) I suspect phrases like 'Landmark gateway development'. Until a scheme is offered which demonstrates HIGH QUALITY architectural content I see such a label as developer speak for getting planning approval on a suspect site. Look back at the facile first Planning Application by Redrow at the site alongside Sainsbury's which offered an 'Arts & Crafts' themed development while making no mention whatsoever about wallpaper elevations applied only to front elevations of house designs. Show me where the developer emphasised the zero-energy approach to housing design. • Should reflect Dawlish as a resort in the regency era not modern or modernist architecture which would be totally inappropriate • Most of Area 4 and through to Area 3 will be visible on approach from Exeter because of the lie of the land. Important that the whole of that visible area is done to a high quality, rather than a token strip called “Gateway” bordering the A379. 	<ul style="list-style-type: none"> • The gateway criterion of DA2 emphasises the need for the development to take the opportunity in this location, to create a high quality place. • This DFP only addresses matters directly relating to DA2 allocation.
<p><u>3.3 Criterion c) Housing</u></p>	<ul style="list-style-type: none"> • Need affordable housing for young and single people. Not affordable for many. 25% target for affordable homes is not high enough. • SHMA identified need for 41.5% affordable housing but currently due to get only 15% resulting in substantial shortfall – this cannot be reduced again. • Need to take on board new Gov housing policies which have been published since drafting Framework. New definition of affordable housing by government = 20% discount for first time buyers. 	<ul style="list-style-type: none"> • Proportion - The Local Plan affordable housing target is 25% in Dawlish. • The raw SHMA figures did not consider wider development and infrastructure costs. • ‘Starter Homes’ are not as yet defined as affordable housing. • Extra care – The Council will do everything it can to

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	<ul style="list-style-type: none"> • Extra Care – Given new Gov’t housing policies will this still be funded via S106? If not, where will money come from to fund it? • Lack of consistency/clarity in the document re total housing numbers – para 3.3 delivering 860 homes, on page 17 refer to 916 homes. Similarly clarification on 50 bed extra care housing as 3.4 states 25% towards affordable housing provision. Does this mean only 165 affordable and 675 market houses. • c) Housing numbers for Dawlish can not be allowed to expand unless (a) there is a town centre to support the numbers living in Dawlish, and (b) there is local employment. Strong feeling TDC abandoned any effort to improve the quality and facilities in Dawlish town centre while pouring money into projects in Teignmouth, and use building land around Dawlish as a dormitory for Teignmouth's expansion. • The Framework should set out that no more than a 5% increase will be permitted from the target of 860 in the local plan. Setting an upper limit would discourage developers from submitting applications to build on areas designated for Green Infrastructure or community amenities. • Framework should state maximum number of houses, not just minimum. Phase over 20 years so impact on town spread out. Dawlish community didn’t agree to nearly 1000 houses. • Bungalows should be required within open market and affordable housing allocations, perhaps 5% • Buildings should be sympathetic to shape and contours of the land. Particularly relevant re Area 5 where the land slopes steeply upwards and housing in that area will overshadow the existing dwellings on other side of Secmaton Lane. • <u>Custom Build</u> – Dawlish Town Council should have major ‘say’ on any planning applications for Custom Build so in keeping with design of dwellings in the area. • Mentions of self build are unclear. What is the ‘alternative approach’ referred (pg 9)? – just more market housing on the 5% of dwelling plots allocated? • If Custom Build located on perimeter of site as Framework states should respect landscape setting 	<ul style="list-style-type: none"> support and enable the delivery of extra care housing, to be negotiated between the landowner and housing associations or other partners. • Total housing number - The DA2 allocation should deliver <i>at least</i> 860 dwellings, with 25% affordable. Extra care can be regarded as affordable housing where it complies with the definition. • Supporting Dawlish Town Centre - The Council is working with Town Councils to do the best for all the town centres. • An upper limit on housing numbers – do not consider this is necessary. • Ensuring delivery of Green Infrastructure - The development management process will ensure delivery of green infrastructure in line with policy WE11. • Bungalows - There is no policy requirement for bungalows. But developers are able to propose these if they believe there is a market for them. • Building heights - This shall be agreed at the reserved matters planning application stage. • Self build dwellings – These dwellings will be open market housing, and otherwise comply with all other relevant policies of the Local Plan.

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<p><u>3.4 Criterion (d) Extra Care</u></p>	<ul style="list-style-type: none"> • Extra Care Housing would be better in Development Area 4, closer to the A379 and bus service to Exeter and hospital. • If Redrow at Shutterton Lane provide extra care then this one not needed. • People in addition to being elderly should also meet all criteria normally applied to applicants for affordable housing generally. Should be locally based old people. • What type of service will this be? Planning Inspector said large proportion of housing need in Teignbridge was for older people moving into the area from Exeter and further afield. Hub to support older people in their own suitable homes as they become ill or frail. • Prefer retirement villages more than Extra Care Housing which integrate different age groups, with different types of housing and levels of support. 	<ul style="list-style-type: none"> • Location - Agree that extra care housing may be appropriate both next to the A379 and near the mixed-use hub area. • Extra care is not being provided at Shutterton. • Definition - Extra care housing is housing for older people with additional support services to those found in sheltered housing.
<p><u>3.5 Criterion (e) Multi Use building</u></p> <p><u>Health</u></p>	<ul style="list-style-type: none"> • Medical services for extra 2000+ people. Need new surgery and other facilities. Extending Barton not viable. Barton surgery – people with mobility problems cannot walk up hill from main car park. Limited car parking. Poor access. • Framework needs more detail on predicted health needs. • Will the extended surgery be able to cope with all new development across Dawlish? GP surgeries already struggling • Emergency facilities and doctors not adequate. • Need more smaller doctors and dentists to make health more personal • £400 per dwelling not enough to serve Barton Surgery • New multi use building including health in DA2 , expansion of Barton Surgery not sufficient as people from east side of town will have to travel to west causing more traffic • Need dedicated doctors surgery on NE side of town as Barton Surgery is at capacity. Expand surgery at Dawlish Warren or use Red Rock Centre. • Multi use building would have provided a supportive centre within the huge new housing developments on this side of town. Barton Surgery is not within walking distance for sick 	<ul style="list-style-type: none"> • Health - Providers wish to consolidate medical services in the centre of Dawlish. Proposed extension to surgery will meet the needs of the DA2 residents. The proposals in the Framework have been produced with the relevant partners including NHS, who favour the proposed approach of supporting and improving existing facilities.

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	<p>older people without a car. GP facilities and early years support should be reinstated within DA2. LOCAL infrastructure and not just become a new estate on the edge of town.</p>	
<p><u>3.5 Criterion (e) Multi Use building</u> <u>Red Rock / Youth / Community</u></p>	<ul style="list-style-type: none"> • The uncertainty over continued funding of the Red Rock Centre is currently under discussion. It is unlikely that the building will thereafter be available in place of the multi-purpose building envisaged on the DA2 site. In any event, the Red Rock Centre was specifically intended for use by the youth of the area and this requirement would limit its general use by the community as a whole. • Need continuing funding of these payments not just one off or Dawlish will be left with the building having to close. • Clarity should be given so services are delivered, not just propping up a building • Community centres and art centres are lacking in Dawlish. Need funding for staff so buildings can be used to their potential • Youth of Dawlish let down by TDC and DCC. Money raised from new houses will disappear into TDC coffers and will only pay for building upkeep and not staffing of building • How will one time payment of £1000 per dwelling ensure the continued operation of the Red Rock Centre which will have ongoing revenue support. DC should set aside money for ongoing support. • Health and Early Years facility been lost in draft Framework 	<ul style="list-style-type: none"> • Red Rock - Widening use of the Red Rock centre - Further discussions have resolved that the Red Rock centre can be available for wider community use, subject to the necessary improvements funded via S106. • Funding - The proposals in the Framework have been produced with the relevant partners, who favour the proposed approach of supporting and improving existing facilities. • Services delivered – the Red Rock would be a community centre available for any wider community uses. • S106 – contributions towards the community centre may only be spent as set out in the legal agreement. • Contribution amount - S106 contributions have to be justified, reasonable and proportionate. • Early years - Improvements to early years facilities can be provided at the Gatehouse school campus.
<p><u>3.6 Criterion f) Transport and Highways</u> 'SECMATON AVENUE'</p>	<ul style="list-style-type: none"> • There must be much more effort put into STARTING 'SECMATON AVENUE' FROM EXETER ROAD (Sainsbury's roundabout) and ensuring that development can be serviced from that road at the outset. This would mean there are no construction vehicles on EGR (Elm Grove Road). IT IS NOT ACCEPTABLE to allow developers/land owners to drive the process. It MUST be controlled by the planning authorities, including the County Council. Residents are already suffering from the impact of developments by Barrett, Bovis and Cavanna. It is not something that should be left to be considered when determining future applications as suggested in the Draft Framework page 11. • Form of 'Secmaton Avenue' – not completed road with verges, pavements, cycle track 	<ul style="list-style-type: none"> • Phasing of link road and delivery - The Council does not have sufficient grounds to insist on access to all the DA2 development only from the north and to prevent any access to development land from the south until the link road is in place. However, the Council has sought independent advice on the timing and viability of road phasing and delivery, and is working with landowners and DCC to bring forward the link road as soon as possible.

Theme	Summary of comments or Issues	Response or proposed change
	<p>but hardcore surface for construction traffic from Sainsburys roundabout. 'Secmaton Avenue' could be used for access and extended as appropriate, minimising disruption to residents especially on EGR.</p> <ul style="list-style-type: none"> • Wide "link road" needed from Sainsburys roundabout to Development Area 3 and Development Area 2 boundary then stopping. From that point on it is only necessary to be permeable, thus avoiding channelling traffic onto EGR. Traffic from areas 3,4,5 should be encouraged to only travel northwards not down EGR. • Contradiction in Avenue specification. Secmaton Avenue should be 7 metres as people will park along it. • 'Secmaton Avenue' should be funded from Council financial reserves or Government or bank loan, reclaimed from developers as proceeds. • TDC fund construction of bridge over Shutterton Brook /Development Area 3 if it doesn't come forward early to prevent delay in the road construction or chance will never happen. • If 'Secmaton Avenue' constructed first then Development Area 5 could be linked in, thus avoiding temporary access onto an almost blind bend in Secmaton Lane. • Turning right onto Secmaton Lane from Gatehouse Barns already hazardous, increase in traffic will make more dangerous. Exacerbated at school times when drivers park on double yellow lines. Framework should include traffic calming and enforcement measures. • Concern if 'Secmaton Avenue' not built first Langdon Lane/Hensford Road would be used as a shortcut/ alternative to EGR. • Occupancy of 50 houses has no impact on the number of houses being built at the time • 'Secmaton Avenue' and new sewage system combined. • It's a 20 year plan - houses be built in 10 years time when 'Secmaton Avenue' built. Wide enough for two cars to pass a parked car. Should be designed as an alternative route to A379 for residents living in the vicinity of Gatehouse Farm. • Northern end cyclists, walkers and horse riders need safe access from the north east end of Secmaton Lane by the A379 to the public bridleway leading to Port Road. 	<ul style="list-style-type: none"> • Construction Access from the north - Land in development area 3 and 2 would require the construction of the road bridge across Shutterton Brook before access from the north would be achievable. This is unlikely to happen immediately due to the viability implications. • Selective permeability onto EGR – The link road should be permeable to all vehicle traffic including cars and buses. Once the link road is completed, much traffic is likely to opt to use the Sainsbury's junction, such as residents travelling towards Exeter. • Council should fund the link road / bridge - Unfortunately this is not possible at present. The bridge will be required as a S106 contribution, and limits will be put on number of homes build before link road and bridge is complete. • Access into Area 5 – The Council agrees with the need to minimise traffic on Secmaton lane. The DFP shall require a link between Areas 3 and 5, with only an interim access onto Secmaton lane from Area 5. • Shortcut via Hensford Road – Acknowledge this is possible, but given the narrow nature of the road, consider limited numbers will favour this option. • Trigger point of 50 – The trigger point of 50 to require the link road ensures this is constructed to the boundary of the site, allowing link road to come forward as soon as possible. • Sewerage – This will be a matter for the developers to agree with SWW. • Specification of Secmaton Avenue – More detail will be included in the DFP.

Theme	Summary of comments or Issues	Response or proposed change
		<ul style="list-style-type: none"> • Cycle provision - The link road will be designed to an appropriate specification to provide a suitable highway with a safe pedestrian and cycle route.
ELM GROVE ROAD (EGR) (INCLUDING SCHOOLS)	<ul style="list-style-type: none"> • At present, use of EGR to access new developments will mean passing two schools, EGR too narrow for passing construction traffic. It is ABSOLUTELY ESSENTIAL to relieve EGR from construction traffic, both at the present time with agreements with developers, and certainly for new developments. There are MAJOR SAFETY ISSUES with two schools as well as significant housing schemes opening to EGR and it must be recognised that traffic movement is a threat to personal safety of children. • Council should survey traffic at school start and finish times and witness mayhem – parents picking up, school buses, teachers arriving and leaving and construction traffic. • Baseline traffic counts (Oct 14) are unreliable and out-of-date. Many more dwellings have been and are still to be occupied thus increasing traffic congestion. • Cars speed in EGR (including past Gatehouse farm). At the end of the school day cars are usually parked around the school with no regard for parking restrictions adding to the dangers at junction around Gatehouse Farm. • Traffic chaos outside schools when school opens and closes. Cannot cope with further construction traffic. When school expands problems will be exacerbated. • Construction traffic outside houses on EGR from 7am until 8am when site opens. • Around Gatehouse Primary/into Development Area 2 priority should be given to pedestrians/cyclists, maybe strategically sited pedestrian crossings? • Concern re traffic on EGR - lorries, workers vans, supplies being delivered. All cause additional noise,dirt and air pollution on surrounding residential area. Road narrowed due to residents parking on EGR. Traffic calming needed on EGR. 	<ul style="list-style-type: none"> • Construction Traffic – a Construction Environment Management Plan shall need to be agree to manage construction traffic on local roads. This should have regard to operating times. • Traffic Survey - The County Council has produced a Junction modelling report. Road safety matters will be addressed via a traffic regulation order on the EGR/Exeter Road junctions, and • Traffic at school opening/closing times – accept point that traffic volumes are high during certain times. A construction management plan should have regard to this matter. • Pedestrians and cyclists – Agree safe crossing points and provision should be made for these users.
ADJOINING ROUTES	<ul style="list-style-type: none"> • Once Carhaix Way is open it will be a rat run to the Exeter Road. Traffic lights at junction of Carhaix Way / Exeter Road. Framework expects current traffic to decrease when the link to Carhaix Way completed but this only be true for those going in Exeter direction. Cars accessing Exeter Road by turning left from EGR via Sandy Lane expose children using 	<ul style="list-style-type: none"> • Carhaix Way – Comments noted. • Sandy lane – Comments noted.

Theme	Summary of comments or Issues	Response or proposed change
	<p>leisure centre to increased risk. Further development in the Gatehouse area will only increase this problem. Better visibility coming out on Exeter Road when compared to EGR/Exeter Road junction.</p> <ul style="list-style-type: none"> • Traffic being pushed to go through Elm Grove Drive and then Sandy Lane, with play-park, leisure centre, playing fields, bowling club, football clubs and skate park. Problems at peak times and weekends turning right onto Exeter Road from Sandy Lane. • f) As regards accessibility in the longer term, measures must be in place to ensure that (i) there are no easy rat run routes built, and (ii) that as much private vehicle traffic is taken directly to Exeter Road and not via Elmgrove Road. 	
EGR JUNCTION	<ul style="list-style-type: none"> • EGR/ Exeter Road junction needs improvement as difficulty turning right now onto Exeter Road during peak times. • Shouldn't have traffic lights because cause back up down Iddsleigh Terrace, especially in the summer months. Even with traffic lights unless link road completed at the Sainsburys end the problems will still be there. • Zebra crossing better solution. Mini roundabout suggested. 	<ul style="list-style-type: none"> • The County Council has produced a Junction modelling report. Junction functionality will be addressed via a traffic regulation order on the EGR/Exeter Road junction. • Traffic lights – No traffic lights proposed at present. • Pedestrian crossing – comments noted.
SECMATON LANE	<ul style="list-style-type: none"> • Access to Secmaton Lane from any DA2 development should not be allowed and specifically Development Area 5 (35 houses) must exit through Secmaton Avenue. The proposed extra households using the lane and mixing with more construction traffic is safety concern (especially school children using lane daily). Blind bend onto Exeter Road causing visibility problems. Secmaton Lane single track road with restricted visibility for those driving onto it from private driveways. Secmaton Lane should be used for cycle/pedestrian and existing residences only. • Temporary access should not be granted planning permission for 35 dwellings onto Secmaton Lane. DCC Highways state not suitable for permanent, then why at all if no date given for 'Secmaton Avenue'. If Secmaton Lane access allowed for Development Area 5 other landowners could apply to use that access rather than wait for 'Secmaton Avenue' and pay towards it. That would leave Secmaton Lane and EGR taking brunt of traffic from development. Further information supplied – photos showing safety issues, plus traffic and pedestrian survey. 	<ul style="list-style-type: none"> • Access into Area 5 – The Council agrees with the need to minimise traffic on Secmaton lane. The DFP shall require a link between Areas 3 and 5, with an interim access onto Secmaton lane from Area 5 whilst the link road is under construction.

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	<ul style="list-style-type: none"> • Could see 51 new houses being built accessing the Lane at the same time! DCC Highways promised access would not be permanent and would revert to pedestrian/cyclist access only with traffic using 'Secmaton Avenue'. But if Development Area 3 doesn't get built then temporary will become permanent. 	
SURROUNDING ROUTES	<ul style="list-style-type: none"> • 1,000 additional houses will cause traffic problems getting to Teignmouth and Newton Abbot. • Road links very poor already with traffic congestion especially in summer months. Traffic problems on A379 at Starcross need to be resolved with additional route for heavy delivery vehicles. Could put road next to new railway, inland from coast, joint funding keep costs down. • Pollution from extra traffic causes air quality problems around schools and houses. • A379 Dawlish to Exeter needs to be improved all the way. • Route around Exminster at capacity, waiting 20-30 mins in traffic not uncommon. Recent development at Exminster exacerbated this, new Dawlish development should not follow suit and funds should be available to make commuting easier. 	<ul style="list-style-type: none"> • Traffic in wider area and in the summer – comments noted. • Pollution – comments noted. • Commuting – The railway station is less than 2km from the allocation.
PARKING	<ul style="list-style-type: none"> • Parking already problem in town, no mention of parking in the Framework • Parking on new developments not sufficient so people park cars where they can irrespective of breaking parking laws (which are not monitored). Access for emergency vehicles difficult. Junction at Gatehouse Rise should be looked at. Need parking enforcement officers in the area. • TDC need to enforce no construction traffic is allowed outside school at arrival and departure times 	<ul style="list-style-type: none"> • Parking – Masterplan section has had further detail added regarding the role of design in meeting policy S2. This includes reference to need for appropriate car parking provision. • Construction traffic – A construction environment management plan is proposed.
<u>3.7 Criterion (g) Employment</u>	<ul style="list-style-type: none"> • Keep to original DA2 settlement limit, any additional land should be permanent SANGS • Dawlish needs year round employment opportunities. Make employment a 'high' priority'. • Employers won't find site desirable if accessed through mental hospital. How will the hospital site be split from access road and where will they locate all plant machinery currently services on land being allocated for employment? Employment area needs to 	<ul style="list-style-type: none"> • Employment Land outside settlement limit - The employment land extension beyond the settlement limit is required to ensure the delivery of a viable site that delivers sufficient employment land and housing. • Desirability of employment land – Comments noted. • Cirl Bunting - The Local Plan includes policies which seek to deliver no net loss of biodiversity, via various

Theme	Summary of comments or Issues	Response or proposed change
	<p>be attractive for employment to make Dawlish sustainable. Not the most attractive location to encourage new investment in the town.</p> <ul style="list-style-type: none"> • Concern that 3 hectares of employment land is a wintering zone for cirl buntings and loss of fertile agricultural land. Mitigation measures are in place to deal with disturbance but cannot just ‘create’ ecosystems artificially. Ecosystems and wildlife must be given full respect. • Concerned re encouraging large firms to Dawlish as drain on local economies. Small localised businesses are ideal as they benefit the local economy. • Unreasonable to extend DA2 boundary and use existing access road. Cause more traffic issues on A379 and reduce effectiveness of roundabout. Exit by bus stop, obstructing vision on junction. Traffic turning right into site would cause blockage on main road. • Concern about closeness of new residents to high security hospital / danger to public. • Lack of employment opportunities causing more unwaged living in Dawlish • Langdon Lane not suitable for large amounts of traffic. Concerned land designated for employment will become housing as in site adjacent to Sainsburys. Should wait until 5 year review stage of the Local Plan to consider whether land use changes are necessary. There must be doubts about the viability of employment land on the grounds that it ‘is required to be serviced/ready to develop’ (p 15) with the implication that funding for this is uncertain. Perhaps anticipating an excuse to allow market housing if employment land not taken up. • The road system into Dawlish does not encourage business to the town. The suggested employment land and its uses e.g. storage will not employ many people. • Lack of demand – change of use at Dawlish Business Park from dedicated employment land to parking and caravan storage. • More suitable provision for larger businesses with better road access already exists at rear of Sainsburys – although approval for variety of units in 2008, remains only partly developed. • By separating off the employment land to one side of DA2 and making the SANGS only temporary Framework makes it difficult to achieve the Dawlish Vision of progressing 	<p>mechanisms including Biodiversity Offsetting. New habitat will be created should there be an impact on Cirl Bunting breeding territories.</p> <ul style="list-style-type: none"> • Encouraging large firms – comments noted. • Access to employment land - The Council will include a contingency proposal to ensure that access to the employment land can be secured. The first preference is for safe access to be secured from Langdon/A379 junction, which may require improvements to that junction. • Proximity of residential development to secure hospital – comments noted. • Unemployment - The Council’s priority is to promote and enable job creation. The delivery of serviced employment land for a range of business sizes will help to achieve this. • Certainty of delivery of employment land - The Framework Plan includes requirement for the delivery of employment land, phased in association with occupation of dwellings. • Employment generating uses – comments noted. • Parking and Caravan storage – comments noted. • Lack of demand – All the employment land / units adjacent to Sainsbury’s are let or sold. • Sustainability – comments noted. • Location of employment land – Access will be upgraded as necessary. Preference is to segregate employment land traffic from residential area. • Working from home – comment noted.

Theme	Summary of comments or Issues	Response or proposed change
	<p>towards sustainability, regeneration and self reliance.</p> <ul style="list-style-type: none"> • Object to location of employment land at western edge of Development Area 4 as difficult to screen. Current access narrow; opposite Shutterton Lane so could cause traffic problems. Current Shutterton Industrial Estate underutilised, so may never need new phase 2 and 3. Should include employment land within surplus hospital land in Development Area 4 with further new access road off Sainsburys roundabout (won't need to use existing narrow access). • Dawlish experiencing low take up of employment land. People working from home. Those seeking employment are prepared to commute as required. 	
<p><u>3.8 – Other Policy Requirement S- Biodiversity</u></p>	<ul style="list-style-type: none"> • Should not build on Cirl Bunting protected areas. • Cirls need proper detailed programme that is fully worked up with the RSPB to ensure that the future of these creatures guaranteed. • Page 16 – good biodiversity approaches need to be maintained and followed to the letter, especially last bit re timing of development in southern part of Development Area 2. The population of cirl bunting in the area of DA2, especially southern end is a highly significant population at northern end of the range of this protected and recovering species within the UK. • To achieve net gain in biodiversity developers and nature conservation interests should now be working together. • Should utilise natural features, such as hedgerows. Gardens and other green spaces should back onto green corridors, this brings nature into closer proximity to residents. Good for general health. • Money earmarked for cirl bunting 'compensatory habitat' should be used to establish a community farm with sustainable local food growing, school activities, care placements, adult learning. This sort of initiative could provide real asset and community hub as an integral part of the new urban extension. • Reference is made to a 'Biodiversity Mitigation Strategy on page 22' (pg 16), but this item is not mentioned on pg 22; it is mentioned briefly on pg 25 	<ul style="list-style-type: none"> • Cirl Buntings - The Local Plan policies will provide the basis for seeking to ensure no net loss of biodiversity. This includes requirements for biodiversity offsetting or mitigation, to provide replacement habitat. • Cirl Buntings – DFP allows for development to be phased if necessary, to allow Cirl Buntings to successfully move off relevant land. • Using Natural Features – Agree, the Local Plan and DFP support this approach. • Community farm – comment noted. • P22 – comment noted.

Theme	Summary of comments or Issues	Response or proposed change
<p><u>3.8 – Education</u></p>	<ul style="list-style-type: none"> • Gatehouse Primary school extension – where? Split school site not good idea as construction lorries speed around without consideration of young children. School needs to retain green space on same site as school. If parking elsewhere no issue. • New education land needs to be close to Gatehouse primary. • Gatehouse primary school should be relocated as no available land to expand. Not good enough to expand existing schools, should build new schools. Framework should have more detail. • Concern re loss of greenspace / playing fields – important for pupils health and behaviour. Move ancillary uses i.e. pre-school to adjacent site so pupils can still use playing fields and don't have safety issues of split site. • Additional capacity needed at schools – where will staff park? EGR? • Need to extend both primary and secondary provision. Merely providing extra funding to existing schools will not be sufficient to enable them to cope with future demand. • Framework needs more detail on expected numbers of children needing schooling • Existing playing fields inadequate due to drainage issues • Need negotiations between School, DCC Education and TDC, increased funding from developers to ensure on site development allowing green space to also be retained. 	<ul style="list-style-type: none"> • Split site – Location to be determined. Agree safe access is required between the two sites. • Education land - The Education Authority has requested the safeguarding of 0.7ha of land close to Gatehouse primary in Development Area 2. How this land is used will be determined by the Gatehouse Academy. • Relocating primary school – this option is not affordable. • Loss of playing fields – the education land will ensure playing fields are provided. • How education campus is used - Relocating the pre-school (early years provision) onto the new campus may be an option the Education Authority and the Academy wish to explore. • Demand for places – comments noted. • Drainage of pitches – comments noted.
<p><u>3.8 – Temporary Suitable Alternative Natural Green Space (SANGS)</u></p>	<ul style="list-style-type: none"> • SANGS should be permanent not temporary, as can be walked to, easily accessed and therefore reduces footfall on Dawlish Warren Special Area of Conservation (SAC) • Temporary should be made permanent then no need for coastal park. Permanent site for SANGS (DA7) does not link into Dawlish Warren and Exe Estuary. Also Temporary SANGS is not next to sewage works so should be made permanent SANGS. • Should be made permanent as next to houses and more convenient than Warren Farm which is car drive away. Delivery and management of the SANGS very vague which is completely different to Warren Farm with compulsory purchase and strict management guidelines • Will there be a financial transaction between TDC and landowners in form of rent? If TDC is paying landowners rent then amount should be made public as its tax payers 	<ul style="list-style-type: none"> • Permanent SANGS at DA2 – comment noted. • SANGS delivery - The Council is working closely with Natural England and neighbouring local authorities to ensure the delivery of appropriate strategic SANGS areas. The provision of a SANGS in Dawlish is one of a suite of measures to mitigate the impacts of increased recreational pressure on Dawlish Warren and the Exe Estuary. • Convenient location of SANGS at DA2 – comments noted. • SANGS funding - The Council will only fund permanent SANGS sites.

Theme	Summary of comments or Issues	Response or proposed change
	<p>money.</p> <ul style="list-style-type: none"> • Young families from DA2 travel by car to reach Warren Farm. DA2 SANGS families within walking and cycling distance • No to development – keep green fields then SANGS not necessary • SANGS provision not enough, needs to provide for all development needs in the area and as such is undersized. Ownership needs to be clarified and secured over 80 years. • A substantial green space within DA2 is clearly required, irrespective of whether or not the ‘Coastal Park’ come to fruition. • SANGS should connect with and link in with the paths in the DA2 and DA6 areas. • Shortfall of strategic Green Infrastructure land and SANGS- figure based on 860 houses not higher level of 951 as stated in Framework. SANGS should rise with housing provision. Should be 35 hectares if provide 951 houses; 21 Hectares at DA7 with 6 hectares of complementary SANGS at DA6, this is a shortfall of at least 6 hectares. A figure of 6 hectares represents land provision set aside for 350 homes at Shutterton Park. Expected that commensurate SANGS will be delivered. • DA6 could form part of Temporary SANGS. SANGS should be permanent to provide quality footpaths, footbridge, planting and landscaping attracting public to these SANGS. 	<ul style="list-style-type: none"> • Principle of development – this has already been established in the Local Plan. • Size and ownership of SANGS – permanent SANGS sites will meet the Natural England criteria. • Green space at DA2 – policy DA6 will provide the majority of the public green space close to DA2, with additional on-site play spaces and green corridors. • Provision of GI - Green infrastructure and SANGS provision will be proportionate to number of homes in new planning applications determined against the local plan.
<p><u>3.8 – Green Infrastructure</u></p>	<ul style="list-style-type: none"> • Green Infrastructure and play areas should be incorporated into each new development, not encroach on existing farmland • No mention of facilities for older people. Provide just ‘footpaths’ not ‘shared’ cycle paths’ as difficult for those with sight and hearing problems. Network needs to be safe for all users. • Community Orchard – Allotments shown on Plan 2 but not reference to community orchard, concerned been dropped from Plan. • Landscape – Impact substantial due to sheer scale of DA2 development. Protect ridgeline on NW side of Development Area 2 so invisible from the western side of the ridge. • There is shown a line of green corridor tracking narrowly across the land in a NW direction. It is too straight, too thin and isn’t making enough use of the NS and EW 	<ul style="list-style-type: none"> • Green Infrastructure - The green infrastructure on the Land Use Plan is shown indicatively. The Local Plan requires an area of green infrastructure to be delivered in line with policy WE11, DA2 and DA6. The precise boundaries and distribution / location / management of specific green infrastructure uses (such as allotments, orchards, etc) shall be determined via Reserved Matters applications. • Shared paths, Community orchard, Landscape – comments noted. • Green corridor – this route is indicative. • DA6 – Area is entirely allocated for GI uses. The

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	<p>existing hedgerows.</p> <ul style="list-style-type: none"> • Need to get the best out of the design, to better link small gardens, nature corridors, green spaces and work on structural planting and wildflower areas that really deliver nature (e.g. hedgehog entry points). Say explicitly about wildflower areas, butterfly banks etc • Allotments, sports pitches, cycle tracks, equipped play areas are unsightly and should be located away from prominent locations in the landscape. Too much provision of equipped play in Framework. • More clarity needed on proposed use of remaining portion of DA6 and areas unspecified on map • When will the footpaths and cycle paths be in place? Plan 2 shows footpath and cycle path crossing each other – if constructed first how will public access SANGS? • DA2 allocation will mean serious loss of good agricultural land. Land should be reserved for food growing within all new clusters of houses. • Rates of other provision requiring land space become meaningless when house numbers are unbounded. • Space for local neighbourhood projects to build community spirit. • Public bridle way leading to Port Road should be moved to west side of unoccupied lodge house to avoid users having to go onto A379. • Policy S17 e) refers to community park – not mentioned in Framework 	<p>detailed design and layout of specific green infrastructure uses will be determined later.</p> <ul style="list-style-type: none"> • Footpaths and cycle links – broadly, these will be in place as development is built out. The link road will also provide a cycle route. • SANGS access - SANGS will need to be publically accessible. • Food growing – DA6 will include allotments. • Space for Neighbourhood Projects – comment noted. • Community park – DA6 will form a community park, as will SANGS.
<p><u>3.8 – Sewage/flooding</u></p>	<ul style="list-style-type: none"> • Development should not be allowed to proceed without sufficient new or upgraded infrastructure in place. Sewage system already struggling to cope with existing number of houses, let alone new houses adding onto the system. Health concerns. • Need upgraded system before new houses built. 1) Have regular discharges of raw sewage into sea 2) Sewers on Exeter Rd cannot cope with volume of water when it rains. Water often seen coming out of manhole covers and drains along road. • During past 18 months re-occurring problems in Secmaton Lane area - system is failing and pumping station inadequate at Shutterton Bridge. 16 dwellings approved on Secmaton Lane plus 350 houses commenced near Sainsburys (Redrow). These will also 	<ul style="list-style-type: none"> • Concerns over sewerage - The Council is aware of the sewerage problems in the area and has been working to support SWW to investigate options to ensure that new development does not have an adverse impact on the existing residents. SWW are proposing to deliver an upgrade to the existing sewer during the 2016/2017 financial year. • Flood risk - With regards to rain water run-off and downstream flooding matters, the Council is working

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	<p>feed into the Shutterton Bridge pumping station in the future. Endless flooding of sewage in Secmaton Lane, Secmaton Rise, field opposite Secmaton Rise, Exeter Road and Burch Close. Awful stench of sewage – serious health hazard. Sewage system and pumping station cannot take anymore without investment into additional capacity. Relieved SWW acknowledge sewage system cannot cope without further investment into additional capacity re Planning application 15/02468/MAJ.</p> <ul style="list-style-type: none"> • There are no fire hydrants from Secmaton Lane/Secmaton Rise north to A379 – with 35 extra properties this could be a problem. • Guarantees need to be sought from SWW re provision of new sewerage systems. Need joined up approach between number of organisations – SWW, TDC, EA and various developers so can't "pass the buck". • No mention of lack of capacity in the foul sewer network on this side of Dawlish. SWW asked an independent consultancy firm to review capacity around this side of Dawlish and expect their recommendations to be made over Winter. TDC should engage immediately with SWW on these problems so that their concerns are understood before Framework is finalised. • Para on drainage is naive. Frequent flooding on fields behind Gatehouse, cycle path along the brook by Sainsburys, houses on Secmaton Lane. Proposed development needs to deal with it properly and upgrade the system further down the 'line' as well. • Numerous problems from Strongvox and Bovis/Cavanna site. System through Secmaton Lane is overloaded and DA2 development needs new system that does not use Secmaton Lane in addition the outlet from Bovis/Cavanna should be divided into new system that should follow the link road to a new pumping station. • Drainage and water storage system built and in place early on in the life of the site. Up front capital investment • Independent study should be commissioned, not prepared by developers whose results may not be objectively reported. 	<p>with the Environment Agency to increase the volumetric capacity in the Shutterton Brook, which will be partially funded by the development if it cannot deal with all surface water flows via on-site infiltration.</p> <ul style="list-style-type: none"> • Fire hydrants – comments noted. • Strongvox pumping station – the Council understands that SWW are advising the developer and the pumping station is being upgraded to the necessary standard. • Drainage and SUDS – the development will be designed to reduce flood risk, though use of water storage and permeability/infiltration.
<p><u>5.0 Public Infrastructure</u></p>	<ul style="list-style-type: none"> • Schedule (pg 25-27) does not provide any indication of the extent of the costs these funds are expected to cover, or any timetable or plan showing when funds need to be 	<ul style="list-style-type: none"> • Cost of delivering infrastructure - The framework sets out the required \$106 (developer contributions) on a per dwelling basis. In addition, developers will pay CIL

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	<p>available</p> <ul style="list-style-type: none"> • People of all ages are going to need facilities, churches, clubs, health needs, a pharmacy. • The proposed developer contributions will not nearly be sufficient to fund everything identified as essential or desirable. As a result, the existing infrastructure, community services and natural environment will be placed under greater pressure from the increased local population, inevitably leading to a failure to meet the stated strategic objectives in the 'Vision for Dawlish'. • BT will not provide sufficient bandwidth to existing and new properties, not sufficient in 2015. Similarly, need to improve mobile signal in the area. Framework should refer to this. 	<p>which shall fund education, SANGS and other infrastructure requirements.</p> <ul style="list-style-type: none"> • Community facilities – the DFP encourages a mixed-use hub in Development Area 2. Other community facilities such as the Red Rock, Leisure centre, schools, railway station and Sainsbury's are located close to the site. • Broadband – comments noted.
<p><u>Consultation process</u></p>	<ul style="list-style-type: none"> • Very disappointed TDC not followed due process as set out in "Technical Note for Development Framework Plan" Sept 2014. Local residents been totally excluded from participating and no information has been made available. Consultation on a draft is not early engagement. • TDC should engage again with major stakeholders – Highways, SWW, Health, Education as well as landowners and public and local residents. • Document not written for residents but on side of landowners/developers. Public exhibition didn't record who attended, no notes taken of what people saying, not enough officers present. No clarity in the display and information. • Poor venue choice at Dawlish Leisure Centre, could not cope with amount of people attending, at times chaotic which restricted people viewing boards and speaking to officers. Disappointed not to see newly elected TDC ward councillors. • Document is wrong in principle as says 'amplifies and clarifies the requirements of Policies DA2 and DA6' but makes late variations to housing numbers, extent of employment land etc. Draft Framework should reflect the contents of the Local Plan – Policy S17, DA2 and DA6 not change this as approved by Inspector. • Framework is not a comprehensive document but a piecemeal approach to development. We already see piecemeal applications in the pipeline that will not mean a coordinated and comprehensive Plan being delivered. 	<ul style="list-style-type: none"> • Public consultation - The Council has involved key stakeholders throughout the development of the Framework. The Council has consulted and listened to the views of the public, and sought to reflect these in the document. • Consultation event - Dawlish Leisure Centre was an appropriate local venue. Officers listened to views. • Changes to document – the DFP amplifies and explains policies in Local Plan, and only varies from Local Plan policy where justified. • Piecemeal development – Disagree. DFP is ensuring delivery of infrastructure including link road, rather than large cul-de-sac developments. • Neighbourhood Plan – comments noted. • SEA – comments noted.

Theme	Summary of comments or Issues	Response or proposed change
	<ul style="list-style-type: none"> • Due to lack of options within urban area DA2 represents opportunity to create part of Dawlish which fulfils the 'Vision' but if adopted as is, Framework makes it difficult to produce Neighbourhood Plan. • The 'Strategic Environmental Assessment' referred to (pg 6) identified no concerns, which is surprising given the changes in the Framework are considerable. 	

Appendix 1 – Persons and Organisations Consulted

The Council maintains a database of individual persons and organisations who wish to be notified of planning documents that are being prepared for the Teignbridge planning area. All individual persons and organisations on this database have been notified of the consultation on the Supplementary Planning Document. Individual persons have not been named in this Statement of Public Participation.

Organisation	Organisation
4th Teignmouth Scouts	Historic England, SW Region
Abbotsbury School	Holcombe Residents Association
Active Devon	Home Builders Federation
Aggregate Industries UK Ltd	Homes and Communities Agency
Albany Surgery	H-S Hire & Sales Limited
Aldens Farm	Hymec Aerospace (hd) Ltd
All Saints Church of England Primary School	I W Dental Lab Ltd
Alphington Primary School	Ian Atkinson Window Cleaning
Alphington Village Forum	Ian Green Advertising
Amanda's Bakery	Imerys Minerals Ltd
Arts Council England	In Line Kitchens
Arup	International Dance Supplies
Ashburton Community Development Trust	Islamic Centre For The South West
Ashcombe Community Association	Job Centre Plus
Associated British Ports Teignmouth	Karen O'Neil & Co Family Solicitors
Austins	Kingskerswell Alliance
Ball Clay Heritage Society	Kingskerswell C of E Primary School
Barn Owl Trust	Kingskerswell Library
Barton Willmore	Kingskerswell Village Hall
BCT Ltd	Kingsteignton Community Implementation Group
Beachcomber Restaurant	Kingsteignton Swimming Pool & Recreation Association
Bearnes Voluntary Primary School	Kingsteignton Veterinary Group
Bell Cornwell LLP	Kingsteignton Village Trust
Benbow Group	League of Friends Bovey Tracey Hospital
Bennett Coach Travel	Leonard Coombe
Bickington Residents	Lms Highways Ltd
Bishopsteignton Residents Association	Local Government, Fire & Assessment Directorate
Black Swan Printers (Dawlish) Ltd	Manorial Borough of Newton Abbot
Bovey Climate Action	Marina Bowling Club and Dawlish Indoor Bowling Club
Bovey Tracey Activities Trust	Marine Management Organisation
Bovey Tracey Amenity Society	Matford Mews Management Co. Ltd
Bovey Tracey Business Association	Maybe Teignmouth Probus Club
Bovey Tracey Heritage Society	MayFlair Hair Stylists
Bovey Tracey Library	Member of Parliament for Newton Abbot
Bovey Tracey Methodist Church	Mid Devon District Council

Organisation	Organisation
Bovey Tracey Neighbourhood Watch Forum	Mid-Devon Cycling Club
Bovey Tracey Primary School	Milestone Cattery
Bovey Tracey Youth Action	MIND
Bradley Barton Primary School & Nursery	Ministry of Justice
Bradley Evangelical Church	Mobile Operators Association
Brantano	Moorskating
BREEAM	Moretonhampstead Information Centre Ltd
Bridge Civil Engineering Ltd	MP Warren & Associates
British Horse Society	National Housing Federation - South West
British Trust For Conservation Volunteers	National Landlords Association
Broadhempston Community Woodland	Natural England
Buckfastleigh West Parish Council	Network Rail Ltd
Buckland Residents Group	New Golden Crown Limited
Buckland Surgery	Newton Abbot & District Chamber Of Trade & Commerce
C K Commercials	Newton Abbot & District Co-operative Allotment Association
CABE	Newton Abbot & District Rambler's Association
Campaign for Better Transport (Devon Group)	Newton Abbot Chamber of Trade & Commerce
Casa Software Ltd	Newton Abbot College
Castle Inn	Newton Abbot Community Interest Company
Centek Ltd	Newton Abbot Conservatives
Central Devon Conservatives	Newton Abbot Pre School
Chamber of Trade	Newton Abbot Racecourse
Channel View Medical Practice	Newton Abbot Recreational Trust
Choice Words	Newton Abbot Town & GWR Museum
Chudleigh & District Amenity Society	Newton Abbot Town Council
Chudleigh Business Guild	NFU in the South West
Chudleigh CE Community Primary School	NHS Devon, Cornwall & Isles of Scilly
Chudleigh Sports Centre	NHS Northern Eastern and Western Devon Clinical Commissioning Group
Chudleigh Town Centre Enhancement Advisory Committee	Oaklands Park School
Chudleigh Town Council	Office of Rail and Road
Church of England Parishes of Kingsteignton and Teigngrace	Palmer & Radclyffe
Climate Positive	Parish Church of St Peter, St Paul and St Thomas of Canterbury
Coast & Country Properties	Park Holidays UK
Cockhaven Manor Hotel	Pavilion Amusements Ltd
Cockwood Residents' Association	PCL Planning
Cofton Country Holiday Park	Permaculture Education Project
Cofton Country Holidays	Personal and lead co-ordinator of Neighbourhood Watch Bovey Tracey
Community Council of Devon	Pete's People

Organisation	Organisation
Community Hall	Pheonix Model Products
Conway Business Systems	Plymouth School of Creative Arts
Coombes Wood House	Post Office Ltd
Coombesend Road Residents Association	Pre School/After School/Village Hall Trustee
Coombeshead College	Preliminary Planning Professionals Ltd
Corpdata Ltd	Preston Down Trust
Country Bus	QA South West Limited
County Councillor - Bovey Tracey Rural	R E Bath Travel Service Ltd
County Councillor - Dawlish	Rackerhayes Pre-School
County Councillor Chudleigh Rural	Rail Freight Group
County Councillor Kingsteignton	Ratcliffe School
County Councillor Newton Abbot North	Regen Southwest
County Councillor Teignbridge South	RIBA South West
County Councillor Teignmouth	RICS
County Rugby	Riverside Surgery
CPRE Devon	RNLI
CPRE Teignbridge Branch	Roadform Civil Engineering Co Ltd
Crafts At Bovey Tracey	Rockwood Composites Ltd
Cricketfield Surgery	Royal Casino
Crosscountry Trains	RSPB
Dainton Portable Building Systems Limited	Ryders Hot Bread Shop
Dame Hannah Rogers Trust	Rydon Primary School
DARE	Scott Cinemas South West Ltd
Dartmoor Local Access Forum	Scott Richards & Co Solicitors
Dartmoor National Park Authority	Seale Hayne Area Residents Endeavour (SHARE) & Western Option Residents Group
Dartmoor Preservation Association	Seale-Hayne Future Group
Dawlish & District Chamber of Commerce	Seale-Haynians Club (alumni)
Dawlish Action for Youth	Senior Voice/Regeneration
Dawlish Community College	Silbelco
Dawlish Community Transport	Smirthwaite
Dawlish Community Trust	Snr Council for Devon (Teignmouth, Shaldon & Bishopsteignton Branch)
Dawlish Garden Society	SOUL (Save Our Undeveloped Landscape)
Dawlish Impact Project	South Dartmoor College
Dawlish Learning Partnership	South Devon and Torbay Clinical Commission
Dawlish Learning Partnership	South Devon College
Dawlish Medical Group	South Devon Railway
Dawlish Transition Ambition	South Devon Railway Trust
Dawlish Warren Life Saving Club	South Hams District Council
Dawlish Warren Tourism	South West HARP Planning Consortium
Dawlish Warren Tourism Group	South West RP Planning Consortium

Organisation	Organisation
DCC Childrens Services	South West Tenant Farmers Association
DCC Public Transport	South West Water
Decoy Primary School	South Western Ambulance Service NHS Foundation Trust
Devon & Cornwall Probation Trust	Southwest Technical Mouldings Ltd
Devon & Somerset Fire & Rescue Service	Specsavers Optical Superstores Ltd
Devon and Cornwall Police	Sport England
Devon Countryside Access Forum	St Catherine's - Heathfield
Devon County Council	St George's Holcombe
Devon County Football Association	St Mary's Garage
Devon Federation Of Young Farmers Clubs	St Paul's Dental Practice
Devon Gardens Trust	Stover Canal Society
Devon Lawn Tennis Association	Sunflower Day Nursery
Devon Rose Estates Ltd	Sustainable Bishopsteignton
Devon Rural Housing Partnership	Sustrans
Devon Senior Voice	Synergy PHR
Devon Senior Voice (Teignmouth Branch)	Teign Estuary Partnership
Devon Square Surgery	Teign Estuary Transition
Devon Towns Forum	Teign Estuary Transition and Renewables
Devon Wildlife Hospital	Teign School
Devon Wildlife Trust	Teignbridge Access Group
Devon Youth Services	Teignbridge Branch of the Senior Council of Devon
Diocese of Exeter and Churches Together in Devon	Teignbridge CAB
District Councillor - Bovey Ward	Teignbridge Community and Voluntary Services
District Councillor - Dawlish Central and North East	Teignbridge District Council
District Councillor - Dawlish South West	Teignbridge Friends Of The Earth
District Councillor - Kenn Valley	Teignbridge Gypsy & Traveller Forum
District Councillor - Moorland	Teignbridge Propellers Ltd
District Councillor - Teignmouth East	Teignbridge Youth Council
District Councillor - Teignmouth West	Teignmouth & Dawlish Ramblers
District Councillor Ambrook	Teignmouth Art Society
District Councillor Ashburton and Buckfastleigh Ward	Teignmouth Arts Action Group
District Councillor Bishopsteignton Ward	Teignmouth Chamber of Commerce
District Councillor Chudleigh	Teignmouth Community College
District Councillor Dawlish Central and North East	Teignmouth Community Development Trust (Teignmouth Regeneration)
District Councillor for Kingsteignton East	Teignmouth Harbour Commission
District Councillor for Shaldon and Stokeinteignhead	Teignmouth Learning Centre
District Councillor Haytor Ward	Teignmouth Local Learning Community
District Councillor Ipplepen Ward	Teignmouth Medical Practice

Organisation	Organisation
District Councillor Kenn Valley Ward	Teignmouth Residents Against the Destruction of the Environment by Development
District Councillor Kenton with Starcross	Teignmouth Swimming Club & Torbay Sunday Football League
District Councillor Kerswell with Combe	Templar Academy Schools Trust
District Councillor Kingsteignton West	Tesco Stores plc Community Champion
District Councillor Kingsteignton East	TFWA Teign Fishermen & Watermen's Association
District Councillor Newton Abbot Bradley	The Avenue Church
District Councillor Newton Abbot Buckland and Milber Ward	The Benbow Group Ltd
District Councillor Newton Abbot Bushell	The Boathouse/Freetime Catering Ltd
District Councillor Newton Abbot College	The Body Shop
District Councillor Teign Valley Ward	The Coal Authority
District Councillor Teignbridge North Ward	The Co-operative Group Ltd
District Councillor Teignmouth Central Ward	The Devon Guild of Craftsmen
Dornafield Touring Park	The Devon Karst Research Society
East Devon District Council	The Devon Racial Equality Council
El-Nashar Dental Care	The Health Centre
England Hockey	The Kebab Shop
English Table Tennis Association	The National Federation of Gypsy Liaison Groups
Environment Agency	The National Trust
Exe Estuary Partnership	The Open Daw
Exeter Airport	The Showmen's Guild of Great Britain (Western Section)
Exeter and East Devon Growth Point	The Stover Canal Trust
Exeter and East Devon Low Carbon Task Force	The Theatres Trust
Exeter City Council	Thomas Eggar LLP
Exeter Civic Society	Tincknells Fuels Ltd
Exeter, Coast & Country Circuit - Methodist Church	Torbay Council
Exminster Primary School	Totnes Conservative Association
Exminster Village Action Group	TRACE
Federation Of Small Businesses	TRACE (Teignmouth Residents Action Committee for the Environment) and TRADED
Firbank Garage	Trade Winds Restaurant
Forestry Commission	Transition Newton Abbot
Freight on Rail	Transition Newton Abbot CIC
Friends of Dawlish Hospital	Travis Perkins
Friends Of The Earth	Turley Associates
Garden History Society	Twinning Group
Gatehouse Primary School	Unison
Gilpin Demolition Ltd	United Schools Federation (St Michaels' & St Catherine's Primary Schools)

Organisation	Organisation
GIP Services	University of Plymouth
Girl Guiding Dawlish and Starcross	Venture Court - Business Units - Bradley Lane, Newton Abbot
Gove Marble Ltd	Village Plan Group
Grafton Childcare	Waddeton Park Ltd
Greener Teign	Wales and West Utilities
H B D Floors Ltd	West Devon Borough Council
H M Coastguard	West Teignmouth Community
Hacombe Renewable Energy Community Interest Compay	Westaway Sausages Ltd
Hand in Hand Teignmouth West Neighbourhood Partnership	Westbank
Hannahs at Seale Hayne	Westcliffe Primary School
Harbour Fish Bar	Western Power Distribution
Harding & Sons Ltd t/a Fairway Furniture	White Young Green Planning
Haytor View Community Primary School	Wolborough CofE Nursery and Primary School
Hazeldown School	Wolborough Residents Association
Heart of the South West Local Enterprise Partnership	Woodland Trust
Heltor Ltd	Wotton Printers
Heynes Planning Ltd	WWD Ltd
Highways Agency	Yeo Valley Farms (Production) Ltd
Highweek Community Primary & Nursery School	Young Devon
Highweek Residents Association	Youth Enquiry Service
Hillside Product Design Ltd	