

# **Teignmouth Neighbourhood Plan Submission (Reg. 16) Public Consultation**

Index of Respondents to the Regulation 16 Submission Consultation of the  
Teignmouth Neighbourhood Plan which ran from 4 October - 15 November 2023

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## 1. Natural England

Comment relates to: **Whole Plan**

Nature of representation: **Not Specified**

Thank you for your consultation on the above dated 03 October 2023.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

[Response: Comments considered and noted. No modification proposed.](#)

## 2. Environment Agency

Comment relates to: **Vision, Aims & Objectives, Cross-cutting Themes, Built Environment, Housing, Sports, Leisure & Recreation, Community Facilities & Services, Town Centre and Retail, Tourism, Arts and Culture, Natural Environment, Economy, Employment and Business, Renewable & Low Carbon Energy and Waste.**

Nature of representation: **Not Specified**

Table of responses submitted as shown in separate attachment.

### **Specific EA response regarding Fisheries:**

- Although not currently classed as a migratory route for fishes, the Bitton and Brimley brooks should look to be enhanced where appropriate to increase biodiversity and encourage wildlife. This could be de-culverting if possible, re-connecting and creating habitat where it'll be most effective.
- Intertidal and migratory fish species habitat should look to be enhanced where appropriate. The creation of artificial reefs and living sea walls would help improve the habitat and food availability for a variety of fish and eel, salmonids and flounder among others; whilst increasing overall biodiversity in the aquatic environment.
- Wetted areas and pond creation should be sought to improve biodiversity within the urban areas (blue infrastructure gains wherever possible).

- No new construction or activities should hinder the passage of migratory fish species but should seek to aid/improve migration (under SAFFA legislation).

Response: Comments considered and noted. These four points regarding fisheries represent helpful technical supporting detail which is informative for the Built Environment and Natural Environment policy areas but does not require incorporation or revision to the plan. No modification proposed.

### **Response on Design Code, Appendix 2.**

We welcome the incorporation of reference to SuDS and water re-use in the green infrastructure section and the acknowledgement of flood risk although we would advise extending this to include areas at risk from Coastal inundation and wave action/overtopping too.

Response: Comments considered and noted. The additional explanation of Sustainable Drainage Systems in Addendum to the Draft Design Code (Appendix 2a) provides satisfactory guidance on wider SuDS implications for the plan area without the need for further amendment.

We welcome the reference and incorporation of Green infrastructure, especially in relation to its contribution to mitigating Climate change, but suggest blue infrastructure is also referenced here with opportunities to incorporate and improve the existing springs and waterways into spaces and place new water features into green spaces too for public realm, biodiversity and climate change benefits.

Response: Comments considered and noted. The blue infrastructure point is already addressed in the Teignbridge Local Plan 2020-2040, Proposed Submission Addendum under policy DW2 and Teignbridge Design Code and therefore does not need to be replicated in the Neighbourhood Plan. A cross-reference within the Draft Design Code to the Teignbridge Design Code has already been made.

The building heights and roofline section may need to acknowledge the need to raise floor level in some new development for flood resilience reasons.

Response: Comments considered and noted. Fundamental design principles have been covered in 4.2.1 of the Draft Design Code, including building heights and roofline, making references to raised floor level is not relevant to this section. Flood resilience point is adequately covered in third point of Pattern and layout of buildings part of Code, on page 69. No modification proposed.

All development including down to house extensions should not add surface water to the combined sewer and should utilise opportunities to improve the situation where possible

and incorporate water efficiency and water re-use methods proportionate to the development.

Response: Comments considered and noted. The Design Code does address water re-use and managing water in third point of green spaces, public realm & street scape part (on page 67) and favoured SuDS methods in eighth point of Residential Streets part. (on page 66). No modification proposed.

Property Level resilience measures should be incorporated into new builds, extensions etc exploiting the opportunity for resilience but also ensuring they are part of the incorporated design rather than a stuck on later addition, thus improving design quality.

Response: Comments considered and noted. Property level resilience measures have been covered by the provisions of policy BE6 and by Teignbridge Local Plan 2020-2040 Proposed Submission Addendum policy EN6 without the need for further incorporation in the Draft Design Code.

Shop Front Guidance should include Property Level Resilience guidance and a steer as to what is acceptable on heritage shop fronts. These solutions are needed to protect the business but also the heritage asset itself. Providing guidance will ensure opportunities for incorporation aren't missed and that solutions are better designed and incorporated.

Response: Comments considered and noted. Property level resilience guidance has a starting point with third point of Pattern and layout of buildings part of Code, on page 69. These principles are relevant to shop fronts as well as wider forms of development. No modification proposed.

### 3. Historic England

Comment relates to: **Whole Plan**

Nature of representation: **Not Specified**

Our role as a national statutory consultee for Neighbourhood Planning focuses mainly on ensuring there is no risk of undue harm to heritage assets. The most common way that risk of harm emerges in Neighbourhood Plans is when new, site-specific allocations for development are being made.

We note that the Teignmouth Neighbourhood Plan itself is modest in scope and does not make specific site allocations for development, beyond those already designated by the Teignbridge Local Plan. Furthermore, we cannot detect any obvious cause for concern in the suite of emerging policies. Given the limited risk of harm to heritage, we do not wish to make any specific, or detailed comments.

Response: Comments considered and noted. No modification proposed.

## 4. Devon County Council – Historic Environment Team

Comment relates to: **Foreword, Introduction, Cross-cutting Themes, Built Environment**  
Nature of representation: **Not Specified**

Foreword First line: the word 'but' doesn't really need a comma before it.  
Para 2, line 2: should 'forwards' be 'forward'?  
Para 3, last line: suggest change to 'for completion by six months or more'.

[Response: Foreword, Page 5 – Propose that all recommended amendments are made to the Neighbourhood Plan.](#)

1. Introduction 1.2.1 Para 2, first line: suggest adding the 1044 reference, when Edward the Confessor granted Dawlish and East Teignmouth to Leofric, in brackets or as a footnote.

[Response: About Teignmouth, Page 7 - The recommended change does not improve the meaning of the historical derivation. No modification proposed.](#)

Para 4, first line: suggest change to 'reflects Teignmouth past and present'. You can't have a present history.

[Response: About Teignmouth, Page 7 – Propose that recommended amendment is made to the Neighbourhood Plan.](#)

Para 4, lines 2-6: This is a very long sentence. Suggest splitting into shorter ones. For example, 'The long and wide promenade never fails to conjure up days gone by, of Victorian ladies and gentlemen promenading along the seafront, making use of the bathing huts on the beach to protect their modesty. The quaint old fishing cottages reflect the success of Teignmouth's past inshore and transatlantic fishing trade, which included crossing the treacherous waters to take advantage of the Newfoundland Cod trade during the 18th century. Then today....'.

[Response: About Teignmouth, Page 8 – Propose that recommended amendment is made to the Neighbourhood Plan.](#)

Para 7: You could also mention here that prehistoric settlement is evidenced by cropmarks and archaeological investigations northwest, north and northeast of the town. (The cropmarks represent possible round barrows, a long barrow and enclosures. Archaeological investigations have brought to light a multi-phase settlement adjacent to Shepherd's Lane dating from the Neolithic through to the Post-Medieval period and an Iron Age triple ditched enclosure with internal settlement at Higher Exeter Road. Further evidence in the parish includes the recovery of a Palaeolithic axe and at least three Bronze Age axes. Flint knapping debitage was also found near Higher Holcombe).

Response: About Teignmouth, Page 8 – The recommended change although of interest in a contextual sense for explaining local archaeological assets is not considered essential for this introductory part of the plan. No amendment made.

3.'Cross-cutting' themes 3.2 n18 and n20 The NPPF was updated in September 2023. The references should be checked to make sure they are still correct.

Response: Sustainable Development, Page 18 – Propose that recommended amendment is made to the Neighbourhood Plan. Footnote references changed to September 2023, para numbers of NPPF remain same.

4.Built Environment 4.2.1 p24-25 The section starting 'However, we are conscious..' could be subtitled eg Local listing

Response: Heritage and the Historic Environment, Page 24 – Propose that recommended amendment is made to the Neighbourhood Plan. Add subtitle 'Local Listing' after Map 6.

P25 line 1 planning policy - is this a reference to local listing" Line 2 policy protection - is this through the neighbourhood plan? Lines 1-4 Suggest that the sentences here be reordered so that the heritage assets within the Town Centre Conservation area are mentioned first, then that there are also heritage assets outside the Conservation Area. Finally, that several are included on the Historic Environment Record.

Response: Heritage and the Historic Environment, Page 25 – Concur with initial points about local listing and through neighbourhood plan method. Propose that recommended amendment made to the Neighbourhood Plan as follows: *'... protection through planning policy. Some, but not all, are identified in the Conservation Area Appraisal for the town centre as providing a positive contribution to the area. There are also some heritage assets which are outside of Conservation Areas and require policy protection. Several of these are included within the Historic Environment Record where details exist of their value.'*

Para 3 Are these items also to be included on the local list? The link to the evidence base given in n30 and n32 does not appear to work.

Response: Heritage and the Historic Environment, Page 25 – Items mentioned are not included in list of locally important assets but are covered in the evidence base report as stated. Link to n30 and n32 to be reset.

Policy BE1.2 As well as Conservation Area appraisals and the Historic Environment Record, NPPF and Local District policies should also be considered where proposed development may affect local heritage assets, designated and non-designated heritage assets.

Response: Heritage and the Historic Environment, Policy BE1, part 2, Page 28 – The recommended change to reference NPPF and local district policies is not required, given that such policy sources are taken into account where necessary for policies in the neighbourhood plan. No modification proposed.

## 4a. Devon County Council – Planning and Development

Comment relates to: **Vision, Aims and Objectives, Cross-cutting Themes, Built Environment, Sports, Leisure and Recreation, Transport, Accessibility and Parking**

Nature of representation: **Not Specified**

2.Vision, Aims and Objectives 4.2.1, Aim 20, Page 15 - The encouragement and facilitation of sustainable transport modes align with the types of current schemes DCC are pursuing in Teignmouth and across the county including the Teign Estuary Trail.

**Response: Comments considered and noted. No modification proposed.**

3.Cross cutting themes, 3.1 Climate Change: the Golden Thread, Page 16 - Consideration of decarbonisation as the 'golden thread' of the plan aligns well with wider DCC net-zero ambitions, however Teignbridge District Council (the District Authority under which Teignmouth is a Town Council) has declared a climate emergency with ambitions to reaching net-zero emissions by 2030. The transport interventions that can contribute to reaching net-zero may be delivered in line with the DCC/ Devon Carbon Emergency 2050 target rather than TDC 2030 target.

**Response: Comments considered, there is no need to change explanatory text as first para of 3.1 remains accurate regarding years quoted.**

4.Built Environment, 4.1 Aim 5, Page 22 - This aim aligns with the DCC ambition to increase the provision of Electric Vehicle Charging across the county, with the emerging Devon Electric Vehicle Charging Strategy ambition to have 2000 publicly accessible charge points (requiring DCC intervention)) in Devon by 2030. The policy identified in the Plan for the provision of charging points in new developments is a positive step.

**Response: Comments considered and noted. No modification proposed.**

4.Built Environment, 4.3 High Quality and Sustainable Design, Policy BE2, Page 31 - The objective of this policy aligns with DCC ambitions to promote and facilitate safe active travel however it should be noted that the commitment to segregated routes may not always be feasible due to spatial and construction constraints. Furthermore, providing 'Desire line' access may not always be feasible, particularly when designs are subject to Road Safety Auditing. Liaison and engagement with Highway Development Officers during the planning stage of developments is encouraged to ensure that these policy goals are met.

**Response: Comments considered and noted. No modification proposed.**

4.Built Environment, 4.3 High Quality and Sustainable Design, Policy BE3, Page 32 - This policy aim aligns well with DCCs wider strategic ambitions to improve health and wellbeing whilst also responding to the climate emergency.

**Response: Comments considered and noted. No modification proposed.**

4.Built Environment, 4.3 High Quality and Sustainable Design, Page 32 - Electrification of private transport is a key step in reaching Devon's carbon reduction ambitions for transport. The emerging Devon Electric Vehicle Charging strategy outlines how DCC will help 'fill the gaps' in the private sector charge point provision, and identifies that residential charging integrated with developments is the preferred means to increase electric vehicle uptake.

[Response: Comments considered and noted. No modification proposed.](#)

4.Built Environment, 4.4 Location of New Development, Policy BE4, Pages 33-34 - This policy aligns with the current planning requirements for developments to provide a travel plan and undertake transport assessments/ transport statements as part of planning applications.

[Response: Comments considered and noted. No modification proposed.](#)

6.Sports, Leisure and Recreation, 6.1 Introduction, Aim 11, Page 48 - The Teign Estuary Trail is a key ambition for active travel provision for DCC. Progress with design of the sections running into and out of Teignmouth has been made in recent years. The delivery of the Teign Estuary Trail is dependent on identifying and securing external funding, as well as securing land.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.2 Improving Transport, Accessibility and Connectivity, TAP1, part 2 Page 96 - This policy aim aligns with DCCs net-zero carbon by 2050 target. Transport strategies, policies and schemes being progressed by DCC are planned, designed and constructed with the aim to contribute to a reduction in carbon emissions by reducing the need to travel, shifting trips to sustainable transport options and using technology and innovation to reduce emissions (all in alignment with the Devon Carbon Plan)

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.2 Improving Transport, Accessibility and Connectivity, Policy TAP1, part 3. Page 96 – This policy aim aligns with DCCs ambitions to ensure transport is accessible for all and contributes to wider strategic goals to improve health and wellbeing, tackle inequality, connect communities and support a sustainable economic recovery. The specific design features identified in this policy may however not always be deliverable where there are spatial and construction constraints.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.2 Improving Transport, Accessibility and Connectivity, Policy TAP1, part 4. Page 96 - It should be noted that should schemes to improve pedestrian and cycle accessibility and road safety be carried out across



Teignmouth, there would likely be both temporary disruption to traffic flow and parking capacity (during construction for example) and longer-term changes to highway capacity.

For example, the provision of signalised crossings, wider footways, desire line crossing points, and speed reduction schemes will generally result in reduction in highway capacity or an interruption to flow. Where highway space is limited, compromises would have to be made regarding modal priority.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, Environmental Enhancements in Opportunity Areas, Policy TAP2 Page 100 - This opportunity aligns with DCC ambitions of tackling air quality issues in AQMAs, in partnership with district council. Considering highway space reallocation would require assessment of current and predicted vehicle flows in the area, as well as road safety and other design standard constraints. DCC currently has no funding package available to support the design and delivery of such a scheme.

[Response: Comments considered and noted.](#)

10.Transport, Accessibility and Parking, Environmental Enhancements in Opportunity Areas, Policy TAP3 Page 100 - This junction has historically seen a number of collisions, including a serious collision in 2020. The ambitions to improve this junction, its crossings and the public realm around it align with DCC aspirations to improve sense of place and address health and wellbeing issues through transport interventions.

The issues identified demonstrate a number of existing design features which would now contradict guidance on street and route design (e.g. LTN 1/20, Manual for Streets) and would benefit from improvement.

However, DCC currently has no funding package available to support the design and delivery of such a scheme.

[Response: Comments considered and noted. It is not necessary to make any changes to TAP3, as the policy and policy justification covers an open-ended timescale which goes beyond immediate position concerning the gateway area given by DCC.](#)

10.Transport, Accessibility and Parking, Environmental Enhancements in Opportunity Areas, Policy TAP4 Page 101 – Improvements to station access is an ambition across Devon, with interventions underway at a number of other stations in the county. Improving the connections between the Station to the Town Centre align well with DCC ambitions to encourage sustainable transport usage, as well as wider ambitions to facilitate a sustainable economic recovery in our market towns. However, DCC currently has no funding package available to support the design and delivery of such a scheme.

[Response: Comments considered and noted.](#)

10.Transport, Accessibility and Parking, Environmental Enhancements in Opportunity Areas, Policy TAP5 Page 102 - DCC currently has no specific intervention or scheme under brief addressing the The Triangles, Regent Street, The Esplanade and Hollands Rd junction. There have not been any collisions recorded at this junction. There is currently no funding identified for improvements to the highway network at this location.

[Response: Comments considered and noted. It is not necessary to make any changes to TAP5, as the policy and policy justification covers an open-ended timescale which goes beyond immediate position concerning the junction area given by DCC.](#)

10.Transport, Accessibility and Parking, 10.4 Teign Estuary Cycle and Multi-Use Trail, Policy TAP6 Page 102 - A segregated cycle route is not currently possible due to the constraints of the urban environment in Teignmouth. It is proposed that for the time being the Teign Estuary Trail strategy does not prioritise sections within the Teignmouth urban environment beyond the junction of the A381 with the entrance to Morrisons. This section of route is omitted from the current Teign Estuary Trail strategy so as to not stall the delivery of the route as a whole.

LTN 1/20 best practice guidance encourages development of a connected network, and one which is coherent, direct, safe, comfortable and attractive.

[Response: Comments considered and noted. It is not necessary to make any changes to TAP6, as the main two parts and policy justification does allow for the particular route sections to be considered, as outlined.](#)

10.Transport, Accessibility and Parking, 10.6 Parking in Residential Development, Policy TAP8 Page 104 - Further discussion with the Local Member and Traffic Orders and Policy Team would be required to progress potential Residential Parking Zones.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.7 Car Parking Capacity for Public Use, Policy TAP10 Page 108 - Consideration should be made that if other aspirations of the plan i.e. improving junction safety and provision of a segregated cycle route as part of the Teign Estuary Trail, are to be achieved, on-street parking may have to be sacrificed.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.7 Car Parking Capacity for Public Use, Policy TAP11 Page 108 - Quay Road Car Park and Teign Street Car Park are Teignbridge District Council car parks, and as such DCC does not have authority to either recommend or discourage extension or decking. It should be however noted that increasing parking provision in Teignmouth has the potential to induce demand from private cars, potentially contributing to congestion and demand on the local highway network.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.8 Electric Charging Points for Plug-in Vehicles, Policy TAP12 Page 109 - The points in this policy align well with the recommendations in the emerging Devon Electric Vehicle Charging Strategy, which provides more guidance and detail about the specific options for publicly available EV charging.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.9 Protecting Footpath, Bridleway and Cyclepath Network, Policy TAP13 Page 110 – This policy aligns well with DCC aspirations to facilitate active travel, however some of the specific details e.g. lighting provision and footway widths would be subject to funding availability (where not captured in funded development proposals). DCC does not currently have a programme of interventions identified to fulfil policy TAP13.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.10 Community Actions and Projects, second action, Page 111 –

As noted above, there is currently no specific intervention underway to address this congestion, beyond efforts to encourage modal shift away from private car usage through investment in public transport and active travel.

The proposals to introduce a 20mph limit across the whole of Newton Abbot were withdrawn following a public consultation, however 20 mph limits have been introduced outside many of Newton Abbot's schools during school opening hours, and the framework for assessing and prioritising 20mph speed limits was approved by DCC Cabinet in 2021, offering an opportunity for elected Members to make representations for their community if it is felt that a 20mph speed limit would be beneficial.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.10 Community Actions and Projects, third action, Page 111 – This ambition is supported by DCC, which has undertaken a number of school safety schemes in recent years where funding has been available.

[Response: Comments considered and noted. No modification proposed.](#)

10.Transport, Accessibility and Parking, 10.10 Community Actions and Projects, third action, Page 111 - In July 2022, the Teignbridge Highways and Traffic Orders Committee resolved that the Upper Den Carriageway would remain closed throughout the summer period.

[Response: 10.10 Community Actions and Projects, Page 111, Delete third action point.](#)

## 5. Sport England

Comment relates to: **Sports, Leisure & Recreation**

Nature of representation: **Not Specified**

Government planning policy, within the **National Planning Policy Framework (NPPF)**, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing\\_fields\\_policy](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy)

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

[https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning\\_applications](https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications)

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the

development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>  
Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

Response: Sports, Leisure and Recreation, Pages 48-60 - Generic comments in relation to Sports, Leisure and Recreation section of the Neighbourhood Plan acknowledged.  
No modification proposed.

## 6. Network Rail

Comment relates to: **Transport, Accessibility & Parking**

Nature of representation: **Support**

Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts.

The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. London Main Line runs through the Neighbourhood Plan Area. There are no public level crossings within the area.

Policy TAP1: Improving Transport, Accessibility and Connectivity. Where development requires improvement to existing rail infrastructure, developer contributions would be required to fund such improvements. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development.

We would appreciate the council providing Network Rail with an opportunity to comment on any future planning policy documents. We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.

[Response: Transport, Accessibility & Parking, Policy TAP1, Pages 96/97 – Comments in relation to section 10 acknowledged. The provisions of TAP1 exclude any reference to contributions from Network Rail being sought to fund rail improvement necessitated by commercial development. No modification proposed.](#)

## 7. Dawlish Town Council

Comment relates to: **Natural Environment**

Nature of representation: **Support**

Dawlish Town Council would like to endorse Teignmouth's Neighbourhood Development Plan with particular note to policies NE2 and NE3 and endorse their conclusions.

[Response: Natural Environment, Policies NE2 and NE3, Pages 116-121 – Comments considered and noted. No modification proposed.](#)

## 8. Teignbridge DM Team

Comment relates to: **Built Environment, Housing, Community Facilities & Services**

Nature of representation: **Support**

It shall be noted that whilst I support the adoption of the Plan, I have included comments for consideration and potential alterations.

Policy BE2 High-quality Design Paragraph 5 of this policy requires major development to go through a 'design review process' prior to submission of a planning application - this can be

undertaken in many different ways and thus the term 'review process' introduces ambiguity. It is suggested that the process is clearly defined within the policy or supporting text. Would the minimum requirement be simply submitting a pre-application where the design review would be undertaken by the Planning Officers or otherwise does this requirement seek a more comprehensive solution in form of a Design Review Panel?

Response: Built Environment, Policy BE2, Pages 31/32 – Details concerning the design review process which is identified in part 5 of BE2 is explained further in the policy justification section 4.3.1, second paragraph, including footnote 37. It would be helpful to provide some additional text in policy justification accompanying the policy to provide ease of understanding for the reader. In addition, the Teignbridge Local Plan 2020-2040 Proposed Submission Addendum sets out more guidance about what is required from the design and wellbeing process in paras 3.1-3.6 and Policy DW1.

Policy BE3 Sustainable Design. It is suggested that the policy should refer to a specific version of the Building Regulations or make reference to the 'current adopted/ implemented version' to avoid ambiguity and ensure clarity in the future. It is suggested that the policy or supporting text makes reference to the energy hierarchy and perhaps requires the submission of carbon calculators to demonstrate compliance with aspects of this policy.

Response: Built Environment, Policy BE3, Pages 32 – A specific reference to 'current Building Regulations' within item (viii) would be helpful to clarify position. There is no particular value in making reference to energy hierarchy or carbon calculators in the supporting text as these components are comprehensively covered by the Teignbridge Local Plan 2020-2040 Proposed Submission within CC2 of the Climate Change section. Propose that recommended amendment is made to the Neighbourhood Plan.

Policy BE4 Location of New Development. The policy appears to focus on residential development and makes limited reference to other uses - it would be beneficial to ensure that other acceptable uses are clearly defined including the requirements that such proposals would be expected to meet.

Response: Built Environment, Policy BE4, Pages 33/34 – It is necessary to clarify the position for non-residential uses, as suggested. The following change to part (1) 'and *employment* development should be focussed' would be helpful to gain fuller understanding. Propose that recommended amendment is made to the Neighbourhood Plan.

Policy HO2 Flats above retail and other town centre premises. It is suggested criterion (i) is too onerous – residential development in town centres is often found acceptable without parking due to access to car parks.

Response: Housing, Policy HO2, Pages 44/45 – Given the particular limitations on existing parking capacity within Teignmouth town centre (Which is detailed in Transport, Accessibility and Parking section of the plan, 10.1, page 92, third para and Aims 21 & 22 on

page 93) it is considered that the requirement of criterion (i) remains necessary and therefore, no change be made to the Neighbourhood Plan.

**Policy HO3 Annexes to dwellings** It is suggested criterion (i) is too onerous – annexes in rear gardens are generally acceptable in principle and such often ensures that there is a physical connection with the host dwelling retaining the annex as true ancillary accommodation. In addition, location in rear gardens reduces the impact on the character of the area and the street scene. It is suggested Criterion (ii) is too onerous – whilst applicants are often asked by Planning Officers who the accommodation is intended for this Policy criteria would step out of the planning remit as the annex/ancillary use (regardless of who occupies it) to the host dwelling would be secured and controlled as such via a suitably worded condition.

**Response: Housing, Policy HO3, Page 46** - In relation to criterion i) the case made that terms given for allowance for scheme proposals in rear gardens should be maintained is consistent with wider policy context, including adopted Local Plan Policy WE8 which contains protective amenity space caveats under item c) and Policy H12 of Proposed Submission Local Plan.

Therefore, following amendment is proposed to: 1. *i) are developed as infill, ~~located between existing dwellings rather than in back gardens and include separate driveways, or, where located within the curtilage of an existing dwellinghouse, applicants should provide an analysis of the proposal's plot size and building footprint in relation to dwelling density and garden areas in the surrounding area to demonstrate that the character of the built environment will not be eroded;~~*

On the second point about demonstration of evidence for resident of annex, this will be secured by planning condition and does not require the terms set out in criterion 1. ii) to deliver through the development management process.

Therefore, following deletion is proposed to: 1. *~~ii) are for family members to live in as their permanent residence (elderly or young adults) who are related to the main household living in the existing property as their permanent residence or for full-time carers; and, .~~*

## 9. PCL Planning / Waddeton Park

Comment relates to: **Housing**

Nature of representation: **Objection**

On behalf of our clients, PCL Planning Ltd have provided representations at all previous consultation stages of the draft Teignmouth Neighbourhood Plan as well as making representations on the Teignbridge Local Plan and Bishopsteignton Neighbourhood Plan.

Our clients' site at Shepherds Lane, Teignmouth (as shown on the enclosed location plan – Appendix 1) is relevant to the planning context of all three elements of the proposed



development plan for the area. This is because the site lies within the Bishopsteignton Parish but directly adjoins, and is more related to, Teignmouth than Bishopsteignton.

## General Comments

The Neighbourhood Planning (General) Regulations 2012 provide for neighbourhood plans to be subject to an examination by an Independent Examiner appointed by the Local Planning Authority. Unlike Local Plans which have to be tested for 'soundness', neighbourhood plans must meet a number of basic conditions before they can be put to community referendum.

These basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990, as applied to neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004.

The basic conditions are:

- a) have regard to national policies and advice contained in guidance;
- b) have special regard to the desirability of preserving listed buildings;
- c) have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas;
- d) contributes to the achievement of sustainable development;
- e) conforms with the strategic policies contained in the development plan for the area;
- f) does not breach, and is otherwise compatible with, EU obligations and human rights requirements; and
- g) meets prescribed conditions in relation to the plan

The adopted Teignbridge Local Plan (adopted May 2014) remains the Development Plan (DP) for the area (and not the emerging draft Local Plan). Paragraph 2.57 of the Local Plan identifies the strategic policies which Neighbourhood Plans will need to be in general conformity with, and this includes:

- all Strategic Policies, Strategic Places, Prosperous Economy, Wellbeing and Quality Environment policies from S1A through to EN12 (in particular policies S1A, S1, S4, S13 and S18)

It is in this context that we make our representations, much of which we have consistently raised previously. It is essential that these concerns are weighed against the need to meet the basic conditions and ensure general conformity with the DP policies set out above.

## Failure to Recognise the Strategic Role of Teignmouth

We have responded to all the consultation opportunities of the three plans mentioned above to raise concerns regarding the lack of recognition of the strategic role that Teignmouth plays in South Devon. However, it is clear that these concerns have not been responded to or addressed. Instead, Teignmouth continues to 'fall between the cracks' of the three plans, particularly in respect of this strategic role and the insufficient provision of housing to meet the significant unmet market and affordable housing needs of the town.

Teignmouth is the second largest town in the district and performs an important strategic role, with a wide range of services and facilities, serving residents in the wider coastal area. We have consistently raised concerns regarding the approach of the adopted Teignbridge Local Plan in respect of the low levels of growth identified for the town (340 dwellings), given its clear sustainability credentials. This is despite earlier versions of that Local Plan acknowledging the need for growth at Teignmouth, with the Shepherds Lane site being identified as a preferred site but subsequently withdrawn without justification from the final adopted plan.

The issue is compounded by the emerging (Proposed Submission) Local Plan (including the soon to be consulted upon draft Local Plan Addendum) which makes no provision for residential allocations for Teignmouth, instead relying on the clearly insufficient provision within the adopted Local Plan. This raises substantial concerns regarding the ability of Teignmouth to meet its housing needs or for the Neighbourhood Plan to contribute to sustainable development in that context.

#### Lack of Provision for Housing

Chapter 5 of the Neighbourhood Plan sets out the approach towards housing. It correctly identifies the need for the plan to be in conformity with the Local Plan and not to reduce the scale of housing proposed or allocated and recognises the opportunity for the Neighbourhood Plan to increase the housing provision. However, the plan concludes that “there is little appetite to see additional housing come forward.”

The same chapter of the Plan recognises there will be a growing population within the town; that house prices continue to rise; and that there is support for the provision of affordable housing and where it enables people to remain living in the town. However, without facilitating housing growth in the town none of these issues will be addressed by the plan nor will it support sustainable development.

In our previous representations we have identified the need for some flexibility within the Neighbourhood plan to recognise opportunities for future housing growth. This is particularly in response to non-delivery of sites within the adopted Local Plan or final housing requirements established through the emerging Local Plan when finally adopted. In doing so we have highlighted the recognition for flexibility within Policy WE1 of the adopted Local Plan to ensure there is a strategic response to non-delivery. As previously stated the Neighbourhood Plan is worryingly silent on this and provides no flexibility or consideration of contingency.

We have previously advised that whilst the Neighbourhood Plan has distanced itself from providing additional housing sites, we believe this to be misguided and will significantly narrow the value and role of the Plan as a whole and its ability to meet its aims for Teignmouth or to deliver sustainable development. Responses to our concerns have consistently deferred housing provision to the District Council and the Local Plan, stating:

*“The Teignbridge Local Plan is being prepared at the current time. Strategic sites are expected to come forward through that process and so there is no requirement, or even implication that it is the responsibility of the neighbourhood plan process in Teignmouth to take on the responsibility of providing strategic growth.”*

We now know that the emerging Local Plan is not suggesting any allocation of housing at all within Teignmouth and therefore failing to meet ours and the Neighbourhood Planning Group’s expectations regarding housing provision. Therefore, if stated aims in respect of meeting local and affordable needs for housing are to be realised through the Neighbourhood Plan process there is a critical need to reassess its position in respect of identifying potential sites.

Paragraph 14 of the National Planning Policy Framework is clear that where the presumption in favour of sustainable development applies:

*“the adverse impacts of allowing a housing scheme that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:*

- (a) the neighbourhood plan became part of the development plan 2 years or less before the date on which the decision is made;*
- (b) the neighbourhood plan contains policies and allocations to meet its identified housing requirement;*
- (c) the local planning authority has at least a 3 year supply of deliverable housing sites (against its 5 year housing supply requirement, including the appropriate buffer as set out in paragraph 74); and (d) the local planning authority’s housing delivery was at least 45% of that required 10 over the previous 3 years.*

In the absence of the Neighbourhood Plan addressing part (b) of Paragraph 14 of the Framework, there is a real risk that the Neighbourhood plan will fail in its purpose to establish a clear strategy for Teignmouth. Instead by the plan remaining silent on this important issue the town will be vulnerable to ad hoc application or appeal decisions in the face of an insufficient housing supply at District level.

### The Role of the Shepherds Lane Site

Again, we have through previous representations to this and the other relevant plans highlighted the role our clients’ site at Shepherds Lane should play in supporting the housing aims and priorities of Teignmouth.

The Shepherds Lane site is located adjacent to the built-up settlement boundary of the town and is in close proximity to local services and transport facilities and is well placed to deliver much needed market and affordable housing, public open space and infrastructure improvements. Development of the site would therefore represent a natural extension to this predominantly residential part of the town.

The site was previously identified as a preferred site for development by the District Council during the preparation of the adopted Local Plan but unfortunately was not taken forward on the basis of the lack of need at the time. As discussed above we believe this to have been based on a misjudgement of the strategic role of Teignmouth, which appears to have continued through Local Plan and Neighbourhood Plan processes since.

Previous responses to our representations on the Neighbourhood Plan, promoting the Shepherds Lane site, have not identified any inherent problem with the site but instead have focussed on two issues. Firstly, that the Neighbourhood Plan is not required to identify strategic sites and instead it should be promoted through the Local Plan process. I have set out in detail above why we believe this approach will significantly undermine the value of the neighbourhood plan, particularly in light of the approach of the emerging Local Plan in respect of Teignmouth.

Secondly, responses to our previous representations have referred to the site being outside of the Neighbourhood plan area. We have again consistently emphasised that Teignmouth's current and future housing requirements may not be constrained to the Neighbourhood Plan area and flexibility will be required to deal with this. Indeed, the Neighbourhood Plan itself recognises the limitations of considering only sites within the Plan area, stating in Chapter 5 that *"the area of land within the Plan area which is outside of the settlement boundary has significant constraints."*

The Shepherds Lane site is clearly well related to Teignmouth, immediately adjoining the existing built-up area and would be naturally contained by Shepherds Lane as the western edge of the town. Whilst the site lies within Bishopsteignton parish it is clearly more relevant to Teignmouth in planning terms.

In terms of the site's suitability for residential development, as set out above the site featured as a potential strategic allocation for the town in the preparation the now adopted Teignbridge Local Plan. More recently part of the site was identified within the residential site options consulted upon between November and January 2022 (Draft Local Plan Review – Part 3) where it was recognised as a residential opportunity, well related to the town with limited landscape impact. It has therefore been consistently seen as a residential option for Teignmouth without any overriding site constraint having been identified.

Finding a way to flexibly identify the site within the Teignmouth Neighbourhood Plan should it be required within the plan period if (as we are predicting) a land supply issue arises would support the aims and priorities of the Neighbourhood plan rather than conflict. Such an approach would raise no conflict with the Bishopsteignton Neighbourhood Plan given the focus of that plan is on Bishopsteignton. We have previously suggested a "trigger" approach to releasing additional land or the inclusion of a "fringe zone" or "future expansion zone" and we believe these remain appropriate ways that the Neighbourhood Plan can facilitate sustainable development in the town. We are concerned that the benefits of finding a more flexible approach have not been given proper consideration.

Without such a mechanism the Neighbourhood plan will be inflexible and overly reliant on the poor strategic decisions being made at the Local Plan level that fail to recognise the

strategic role of Teignmouth or its clear sustainability advantages. The Neighbourhood plan in turn will be unable to deliver on its stated aims and priorities to support access to housing for a growing population in the context of rising house prices, resulting in increased levels of unmet need.

It is critical in meeting the basic conditions and in particular demonstrating the plan's contribution to sustainable development that the Plan is reassessed in respect of its approach to housing provision. Deferring this important matter to the District Council and the Local Plan will significantly reduce the value of the Neighbourhood Plan in determining the future development strategy for Teignmouth.

Response: Housing, Omission, Pages 42-47 – The proposed land at Shepherds Lane, Teignmouth has not been included in the Submission Version of the Neighbourhood Plan. It lies outside the defined Teignbridge neighbourhood area (shown in Map 3 of the Neighbourhood Plan) bordering the western parish boundary with Bishopsteignton.

The reasons for the current position regarding non-allocation of sites is clearly expressed in sub-section 5.1 Introduction to the Housing section. These include outstanding allocations which remain to be developed in the adopted Teignbridge Local Plan, in terms of West of Higher Exeter Road (TE3) and North of New Road (TE3A) for 250 and 50 homes respectively. Furthermore, there is no further specific requirement to meet identified housing need in the Teignbridge plan area where overall supply for the period up to 2038/39 has been met. Relevant information is contained in the Housing Topic Paper which was published with the Addendum Plan. [www.teignbridge.gov.uk/media/p0cnciv0/housing-topic-paper.pdf](http://www.teignbridge.gov.uk/media/p0cnciv0/housing-topic-paper.pdf)

The land has previously been considered for inclusion following a response to the Neighbourhood Plan Pre-Submission consultation stage of the plan by the same agents (as shown in page 66 of the Consultation Statement [www.teignbridge.gov.uk/media/d0pnia2t/teignmouth-np-consultation-statement-x\\_compressed.pdf](http://www.teignbridge.gov.uk/media/d0pnia2t/teignmouth-np-consultation-statement-x_compressed.pdf) ) and also the emerging Teignbridge Local Plan 2020-2040 which is acknowledged by the representation. In the case of the latter, the reasons for not taking forward as a housing allocation are given in Appendix C of the supporting Sustainability Appraisal (Nov 2023) on page 43. [www.teignbridge.gov.uk/media/fe4lc3e2/appendix-c-discounted-sites.pdf](http://www.teignbridge.gov.uk/media/fe4lc3e2/appendix-c-discounted-sites.pdf)

It is clear that circumstances have not changed and reasons for non-allocation equally relevant to the Neighbourhood Plan. No modification proposed.

## 10. Deborah Bascombe

Comment relates to: **Tourism, Accessibility and Parking**

Nature of representation: **Objection**

Cycle route continues to be a great idea, however cycle parking at the proposed site in Bank Street will exclude many shops on Teign street from passing trade.

I would like to suggest a site near Quay Road car park or Teign Street Carpark as an alternative. I would hope the route would become as popular as the Camel Trail, where the cycle parking out of the centre and plentiful.

[Response: Improving Transport, Accessibility and Connectivity, Map 22: Transport and Accessibility Plan, Page 98 – Comments considered and noted. No modification proposed.](#)

In addition, with regards to parking accessibility, in and out of the tourist season, I would like to suggest that for people like us, who in Shaldon and are of increasing age, the lack of parking in Teignmouth is off putting. The decision to go to Morrisons, rather than to shop local in Teignmouth is sadly too easily made due to lack of easy parking in Teignmouth.

I would like to suggest that a free locals parking permit with clock, allowing 1-2 hours parking to support local shops would be beneficial to all, except perhaps the coffers of Teignbridge.

[Response: Car Parking Capacity for Public Use, Page 105 – Comments considered and noted. No modification proposed.](#)

## **11. Martin Brown**

Comment relates to: **Sports, Leisure and Recreation, Housing, Natural Environment**

Nature of representation: **Objection**

From what I can see there is nothing in the Plan about maintaining what we already have. Like Mules Park, is now overgrown in many places, encroached by brambles, rarely is the grass cut for people to enjoy the leisure intended after the Spring growth, cutting down the dead trees, someone I suspect the Council have recently removed a large circular picnic bench, which still needs replacing, this was a popular place to sit and chat and enjoy a drink, yet it has all been removed, totally against the intended policy of use for leisure. Also in my view reducing its use as a Dog's toilet to reduce the health hazard to children. Last year the drains in the footpath were replaced, but have not been maintained since, they are now almost all blocked, and thus do not work, hence a waste of money? I can see nothing about planning to look after this.

[Response: Sports, Leisure and Recreation, Local Green Space, Pages 49-52 – Mules Park has been identified as a Local Green Space in Policy SLR1. Part 3 of the policy does require that development proposals should maintain or enhance the existing use and amenity value of the space which along with other items ii\) – vi\) which meets some of the concerns raised.](#)

There are limits to how far maintenance work is within scope of a Neighbourhood Plan. No modification proposed.

Similarly looking after the existing infrastructure. We had toilets at the Den, the District Council sold them off/leased them out, they have known about it for several years before, yet we still have temporary toilets on what was green grass, totally contradictory to the intended use. The Council should show when these will be replaced by proper toilets fit for the Quality of Town suggested by your Vision and Objectives. Brunswick St toilets are still closed out of use. Last time the Teign Yacht club block at Eastcliff was painted the toilets were deliberately left unpainted. The toilets on the front near the lighthouse, are still in situ, but also closed. This shows a complete lack of coordination. I would like to see something about keeping the town cleaner and removing or discouraging the dog poo. Almost without exception, every time I (or a visitor) walk along the front we come across dog poo on the paving, this looks terrible to encourage visitors. The brick walls on the sea front are saturated with dog wee, yet we expect visitors to come and sit on the wall and enjoy an ice cream.

Response: Protecting, Maintaining and Enhancing Community and Health Facilities, Amenities and Assets, Pages 62-64 - Public conveniences have been identified as local valued community facilities in Policy COM1. Part 2 of the policy identifies that *'Existing community facilities and amenities will be protected from loss, unless redevelopment or change of use demonstrate that: replacement improved provision is made in a suitable location to mitigate loss;* amongst other caveats. There are limits to how far maintenance work is within scope of a Neighbourhood Plan. No modification proposed.

Sprey Point comes within the Plan but seems to have no mention. Again, like Mules Park it needs maintaining, the trees are all overgrown. The Railway site looks a mess. The benches facing the sea have long since disappeared and need replacing, and the Picnic area has just had its benches + tables removed, presumably by the Council, to avoid Mtce, yet totally against the policy of encouraging health, walking, fresh air and tourism.

Response: Sports, Leisure and Recreation, Local Green Space, Pages 49-52 – Sprey Point has not been identified as a local green space. Comments considered and noted. There are limits to how far maintenance work is within scope of a Neighbourhood Plan. No modification proposed.

It would be good to see a policy for the Council to increase Affordable Council houses, and not expect developers to do it free of charge, and stopping selling off existing Council Houses unless they really are surplus to requirements, would be a good place to start. How can selling off houses that are in short supply increase the number of council houses in the longer term. This seems nonsense to me. I would like to see the plan amended accordingly.

Response: Housing, Omission, Pages 42-47 – Policy context for affordable social housing is already addressed by the adopted Teignbridge Local Plan (policy WE2 refers) and emerging draft local plan 2020-2040. The points raised are not within the scope of a Neighbourhood Plan. No modification proposed.

## 12. Dorothy Dawson

Comment relates to: **Whole Plan**

Nature of representation: **Objection**

I feel called to make the general observation that the Neighbourhood Plan seems to deal with all the outstanding planning issues but it is alarmingly reactive in nature.

As a planet we are now experiencing a rapid acceleration of climate change and for a town so vulnerable to storms we need to take a proactive stance. The issues inherent in our coastal and estuarine situation should be first on the Executive Summary.

I know that a lot of work is being done on these but given that the last revision was in 2022 when the potential for storm damage was not so obvious, I am concerned that the increasing rate of climate change has not been factored in.

It is essential for the town to raise the authorities' awareness of this issue (without causing alarm and despondency) and ensure that we do not sleepwalk into a messy situation.

[Response: Section 3: Cross-Cutting Themes does contain a comprehensive explanation of how Climate Change is covered by the plan, including coastal issues with regard to rising sea levels and flood risk. Comments considered and noted. No modification proposed.](#)

## 13. Mr & Mrs Richardson

Comment relates to: **Sports, Leisure and Recreation**

Nature of representation: **Objection**

We are surprised there is no mention within the Sport Recreation Leisure item of Jet Skis whose excessive noise levels cause so much concern and disturbance to all those hoping to enjoy restful few hours either within the immediate vicinity or further afield particularly during the summer months.

Most people don't go to the beach to have their peace regularly shattered by the roar of engines hurtling round the bay performing loop the loop or such a few meters offshore and wondering, if they should venture down there, will it be such a day. Indeed, one wonders how the sound of a single attention seeking skier thundering around the main area disturbing not only a packed beach but hundreds more further inland can be justified?

It's not just people sitting on the beach affected; sound travels, particularly if wind directional, carrying a considerable distance throughout Woodland Avenue, New Road and beyond; so much so that many a holiday maker, who has spent a not inconsiderable sum lured by the prospect of a peaceful family break in a quiet seaside town, must be extremely disappointed to experience the reality as are locals for whom it is ongoing. It's hard to think of any positives! One can only begin to imagine the damage to marine life and habitat!



It can't be good for the environment, energy or safety and it certainly isn't good for those stressed out by the whole scenario. Water sports certainly but not a minority sport whose questionable 'high' becomes the majority's 'low'.

Response: Sports, Leisure and Recreation, Marine-related Activities, Pages 56-58. The misuse of Jet-Skis and related noise impacts are more relevant to law enforcement and environmental health regimes than for development plans. No modification proposed.

## 14. Judith Sharples

Comment relates to: **Sports, Leisure and Recreation, Tourism, Accessibility and Parking**  
Nature of representation: **Support**

I support the aims and objectives of the plan. In particular I am pleased that the plan recognises the importance of the Teign Estuary Trail and the need for a dedicated multi-purpose route through the town centre (policy TAP6).

My concern is that the Community Actions and Projects do not set out in sufficient detail how the Town Council, working with the local community, will support the delivery of this policy. In addition, there is no reference to the contribution this route could make to other aims in the plan such as the improvement of air quality in Bitton Park Road.

Response: Sports, Leisure and Recreation, Teign Estuary Cycle and Multi-use Trail, Page 111. There is no particular requirement to make reference to Teign Estuary Trail in the Community Actions and Projects section as the initiative is covered sufficiently in the justification text of policy TAP6. In addition, other partner authorities such as Devon County Council are taking leading roles with the support of Teignmouth Town Council and other local interest groups. No modification proposed.

## 15. Mr Wetten

Comment relates to: **Whole Plan**  
Nature of representation: **Support**

The plan is well written, and Teignmouth needs some clear direction that the plan gives. Hopefully this will be part of the much-needed regeneration of this town.

Response: Comments considered and noted. No modification proposed.

## 16. Alistair Whybrow

Comment relates to: **Built Environment, Natural Environment**  
Nature of representation: **Objection**

It's not really an objection but a comment to try and help the small bird species of Teignmouth. It would be great for the future of Teignmouth swift population and other small birds that are known to use swift (universal) nest boxes if specific action could be incorporated into the Neighbourhood plan to reverse the decline of the local swift population in Teignmouth.

This would be easy to do by having the requirement for all new developments to have swift nest boxes incorporated into the building as set out in BS42041:2022 Integral nest boxes - selection, published in March 2022 that sets out the requirements for the selection and installation of integral nest boxes in new developments, including residential, commercial, industrial and public buildings. For new developments it recommends an average of one integral bird box per residential unit.

Section 8.4.2 refers to Larger Buildings, Larger buildings occur in many types and sizes and serve a number of purposes and uses. These include: commercial buildings and offices, residential apartments, libraries, educational buildings, nursing/care homes and hotels and student accommodation, etc. The type and purpose of building could determine how many integral nest boxes are either appropriate or can be installed. The number of installed integral nest boxes in larger buildings depends upon the building construction. Glass-clad buildings might have no opportunities because of the material and the danger it presents to the birds. Some modern cladding could restrict opportunities.

The number of integral nest boxes to be installed shall be proportionate to the size and design of the building. Note 1 There is not an upper necessarily an upper limit to the number of boxes that can be installed. Note 2 Although it is unlikely that all boxes on a site will be occupied at the same time it very likely that all boxes will be used at some point in the lifespan of the development.

It further recommends creating: 1. A 'site plan at an appropriate scale intended to show the location specific buildings on the development into which swift boxes are to be installed'. they will also need to show: a. the position on each building on site where the boxes are to be installed i.e. marked on the working drawings. b. details of the materials, method and workmanship necessary to install each box, taking into account relevant building regulations. c. confirmation that the dimension and shape of the entrance holes shall be minimum of 30mm x 65mm to accommodate all the species expected to use Universal Boxes.

The Construction Industries own publication [www.nhbc.co.uk/foundation/biodiversity-in-new-housing-developments](http://www.nhbc.co.uk/foundation/biodiversity-in-new-housing-developments) summarises "Best Practice" for major developments and it would be wonderful if this was used as a benchmark for new developments in the Teignmouth Neighbourhood Plan. I have attached links below on why swift boxes are considered a universal nest box and offer other species nesting opportunities which boxes such as sparrow terraces fail to provide. Links to the universal nest brick [www.swift-conservation.org/universal\\_swift\\_nest\\_brick02.pdf](http://www.swift-conservation.org/universal_swift_nest_brick02.pdf) [markavery.info/2020/12/30/guest-blog-swift-bricks-by-dick-newell/#comments](http://markavery.info/2020/12/30/guest-blog-swift-bricks-by-dick-newell/#comments)

Response: Built Environment, swift nest boxes, pages 20-41 omission – The value of incorporation of swift nest boxes into new development schemes is acknowledged along with the related guidance BS42041:2022 which is referenced. Although there is no specific policy recognition in the Neighbourhood Plan, the matter is largely addressed within the Proposed Submission Teignbridge Local Plan 2020-2040, through part 3 of policy EN12: Legally Protected and Priority Species which sets out a minimum guide for provision of one bird box, one bat box and one bee brick per dwelling or 100 sqm of non-residential floorspace. Therefore, further detail in the Neighbourhood Plan would be superfluous. No modification proposed.