

# Teignbridge Proposed Submission Local Plan to 2040

## Consultation Statement

December 2022

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# 1. Introduction

## 1.1 Purpose

This Consultation Statement sets out how the Council has involved residents and key stakeholders in preparing the Teignbridge Local Plan 2040 in accordance with Regulations 18 the Town and Country Planning (Local Planning) (England) Regulations 2012.

This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI) (May 2018).

The SCI document sets out how the Council will consult and involve the public and statutory consultees in planning matters. Full details of the current adopted SCI can be viewed here:

- [Draft Statement of Community Involvement \(May 2018\)](#)
- [Covid-19 Addendum: Temporary Consultation Arrangements](#)
- [Statement of Community Involvement \(May 2019\)](#)

Due to the number of comments received, particularly on proposed sites within Parts 2 and 3 of the draft Plan, comments have been grouped where they raised similar issues. Therefore, it may not be possible to search a specific comment, however, the reference numbers are listed to show the number of times a particular issue was raised.

If a comment, response, or change noted is required to be viewed in an accessible format then the respondent should contact the Council directly via [localplanreview@teignbridge.gov.uk](mailto:localplanreview@teignbridge.gov.uk).

## 1.2 Background

This Consultation Statement describes how the Council has undertaken community participation and stakeholder involvement in the production of the Local Plan, setting out how such efforts have shaped the Plan and the main issues raised by consultation / representations.

The Council began preparing a new Local Plan for the District in 2017. The new Local Plan will set out the strategic vision, objectives and spatial strategy for the District, as well as the planning policies which will guide future development. The Plan will look ahead to 2040 and identify the main areas for sustainable development growth. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework (NPPF).

The Local Plan will replace the adopted Teignbridge Local Plan 2013 – 2033 (adopted May 2014) that is currently part of the development framework for the District.

The Consultation Statements accompanying the draft Local Plan Part 1 (Reg 18 Part 1) set out:

- the early engagement undertaken prior to the publication of the Local Plan Issues Paper in Summer 2018;
- how the comments received during the Issues Paper consultation influenced the draft Local Plan Part 1; and
- engagement following initial Issues Paper Consultation, including Planning Cafes, Officer Workshops and Local Plan Working Group meetings.

Therefore, this Consultation Statement does not include further responses to the matters already addressed and included in the Reg 18 Plans.

### 1.3 Structure of Statement

This statement of consultation comprises three sections:

- Section 1 – Introduction.
- Section 2 – Timeline.
  - Sets out the timeline which has been followed in preparing the Local Plan which is accordance with the up to date [Local Development Scheme](#).
- Section 3 – Main issues
  - Summarises the main issues raised during the course of the consultations carried out under Regulation 18 and how the comments received have been considered by the Council in the preparation of the Proposed Submission Local Plan (Regulation 19).
  - Section 3 is supported by the two appendices detailing how consultation was undertaken, the responses received at Regulation 18 and how the comments have been taken into account by the Council.
  - Appendix 1 explains:
    - who was invited to make representations and how as part of the Regulation 18 Local Plan consultation (Regulation 22 (1)(c)(i) and (ii));
    - a summary of the main issues raised by those persons (Regulation 22 (1)(c)(iii)) in Plan order (Parts 1,2 and 3); and
    - how those issues have been addressed in the preparation of the Local Plan (Regulation 22 (1)(c)(iv)).
  - Appendix 2 will be completed following the public consultation on the Proposed Submission Local Plan (Reg 19).

## 2. Plan Production Timeline

The creation of a new Local Plan requires a number of thorough and robust stages of consultation. This is to enable early and ongoing engagement with the local community, businesses and organisations to develop a comprehensive document, tailored to the needs of the district in terms of strategy and the policies required. It has involved a comprehensive review of the 2013-2033 Local Plan and takes account of revisions to the NPPF and NPPGs.

The Regulation 18 Plan has been published over 4 separate consultations: Issues Paper 2018; Part 1 (Development Management Policies); Part 2 (Residential, Employment and Education Sites); and Part 3 (Wind Sites and Small Residential Sites).

The below timetable outlines main consultation stages of the emerging Local Plan up until the anticipated Submission date in July 2023.

### 21. Key Local Plan Stages:

#### 1. Identify issues and collect evidence (Regulation 18): 2017/18

- a. The resolution to produce a new plan was taken by Full Council on 17<sup>th</sup> June 2017;
- b. The Council subsequently reviewed existing policies and identified any current gaps in policies or evidence bases. This took the form of meetings between various members of the Spatial Planning team and other services of the council. In addition, informal consultation also included Neighbourhood Plan Groups, Town and Parish Councils, the Gypsy and Traveller Forum, all Council Services and Elected Members. Began undertaking further research to inform the Local Plan;
- c. The Local Plan Review 2020-2040 Issues Papers were published for consultation. These included a Settlement Boundary Review, Settlement Hierarchy Review, SA/SEA Scoping, HRA Screening and the Statement of Community Involvement; and
- d. The **Local Plan Review 2020-2040 Issues Papers Consultation** was open for an 8-week period (**21 May and 16 July 2018**).

#### 2. Draft Local Plan consultation (Regulation 18): March 2020 – November 2021

- a. The Council undertook a 3-stage consultation on the draft Local Plan which were based on the updated evidence base, technical assessments, previous consultation responses and internal comments;
- b. **Part 1 (Development Management Policies)** was published for consultation for an 8-week period between **23 March and 13 July 2020**;
- c. **Part 2 (Site Options)** was published for a 6-week period between **28 June 2021 and 9 August 2021**; and
- d. **Part 3 (Renewable Energy, Gypsy and Traveller and Small Residential Sites)** was published for a 10-week period (extended due to Christmas) between **15 November 2021 until 24 January 2022**.

#### 3. Plan amendments: 2020 - 2022

- a. The Council took on board comments received during the draft Local Plan consultations and further evidence base documents were updated (eg SA/SEA) or commissioned (Viability Assessment, Landscape Character Assessment), Landscape Sensitivity Assessment, Heritage Impact Assessment). Comments and evidence have informed the Proposed Submission Local Plan, which combines the 3 draft Plans into a single document.

***Local Development Scheme timetable ahead:***

**4. Publish the Proposed Submission Local Plan for Consultation (Regulation 19): January 2023**

- A submission ready version of the plan will be made available for stakeholders and the public to comment on for 8 weeks. In accordance with the Local Plan Regulations, this will be a formal consultation seeking specifically comments on the Plan's soundness for Examination in Public.

**5. Submission to the Secretary of State (Regulation 23): July 2023**

- The Council will consider the comments received during the regulation 19 formal consultation and decide whether the Local Plan is sound and can be submitted for Examination in Public (EiP).

**6. Examination (Regulation 23 – 25): November 2023**

- The Plan will be examined by an independent Planning Inspector.

**7. Adopt (Regulation): May 2024**

### 3. Summary of Main Issues Identified from consultation on Reg. 18 Local Plan

This section contains a summary of the main issues and points identified through the regulation 18 consultation process. For further details please refer to Appendix 1 Schedules 3a-d which contain summaries of all representations made, the number of representations, and responses to comments and changes made to the Local Plan between Regulation 18 and Regulation 19 versions, resulting from the consultations.

#### 3.1 General Policies

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Too many homes being built is unsustainable, including with regard to access to public services, traffic congestion and environmental impact.</li> </ul>	<p>The Council must use the Government’s Standard Method for calculating the number of homes to be built.</p> <p>The Council does work with partners to identify and mitigate impacts on services and infrastructure and address these wherever possible.</p> <p>The Local Plan has identified the least environmentally damaging sites, for example, concentrating development away from the most sensitive environments and locating housing around existing settlement to minimise travel and maximise opportunities for active travel.</p>
<ul style="list-style-type: none"> <li>Infrastructure, services, public transport and employment should be provided / in place prior to homes being built</li> </ul>	<p>Policy requirements seek to deliver infrastructure and service mitigations or improvements alongside development, accepting the role of cash flow in development viability. In some circumstances it may be possible to forward fund infrastructure where alternative sources of funding can be secured.</p>
<ul style="list-style-type: none"> <li>Homes should primarily be built on brownfield sites, including in view of COVID impact on town centres.</li> </ul>	<p>Brownfield sites have been prioritised and proposed in the plan, where they are considered available or deliverable.</p> <p>The town centres remain in good health and development management policies allow conversion of space to residential uses in appropriate locations.</p>
<ul style="list-style-type: none"> <li>Development should be zero carbon and include solar panels, and address biodiversity loss.</li> </ul>	<p>The policies in the plan address both issues based on a balance of the available evidence, national policy and legislation, and the ability to implement and deliver the proposals.</p>

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Views in favour and against changes to settlement limits, and changes in specific settlements.</li> </ul>	New reviewed settlement limits will be published following the consultation in 2018/19 and a further review in 2021 during the draft plan preparation.

### 3.2 Climate Change

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Consider specific measures for climate resilience by setting out these and how development can help existing areas adapt to impacts.</li> </ul>	The plan allows for a range of measures to come forward in the resilience policy, such as renewable energy and green infrastructure, site specific measures will be identified in development allocation policies.
<ul style="list-style-type: none"> <li>For carbon statements, policy could be stronger, energy saving, and generation should be standard in all new buildings.</li> </ul>	The policy places a primary emphasis on Energy Hierarchy strategic principles to guide new development schemes which includes detailed information on minimising the demand for energy and ensuring in-use performance of buildings. Approach will be standardised following adoption of the plan.
<ul style="list-style-type: none"> <li>Concerns over financial / viability impacts of proposed policies and preference for higher standards to be required through Building Regulations.</li> </ul>	The plan has been viability tested to determine that the proposals are viable and deliverable. The plan positively responds to Government objectives and targets contained in national policy and legislation.
<ul style="list-style-type: none"> <li>Broad support for EV Charging with some concern about implications of more EVs and technological alternatives.</li> </ul>	Grid infrastructure capacity and related future needs over the plan period will be addressed by strategic utility providers, mainly outside the development plan ambit.
<ul style="list-style-type: none"> <li>Main scope of sustainable transport policy is favourable, some concern remains over quality of public transport services, take up of active travel and traffic congestion.</li> </ul>	The plan will require development proposals to address transport including ensuring appropriate public transport and active travel links, with the aim of minimising increases in private car use. The plan and District Council will work alongside the County Transport Authority, Although it is acknowledged that public bodies have a finite ability to directly improve privately run public transport provision.
<ul style="list-style-type: none"> <li>General agreement with renewable and low carbon energy development and storage, although some views encouraging policy</li> </ul>	The plan responds positively to the Government objective regarding addressing climate change. The Council has subsequently commissioned

Summary of Main Comments	Council Response
to be more ambitious, and others urging caution regarding the local environment impacts of such development.	further evidence to understand the extent or risk of potential impacts from any allocated development.

### 3.3 Design and Wellbeing

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Where possible brownfield sites should be developed before greenfield sites</li> </ul>	The Local Plan's strategy for distributing development prioritises town centre brownfield sites. However, because of the high Government housing target some housing will have to go on greenfield sites. This is being located close to key centres where jobs and services are available, as well as a modest proportion to provide for the rural villages.
<ul style="list-style-type: none"> <li>Whilst healthy active places are essential, they require maintenance and the cost of upkeep, based upon existing information must be factored into Council budgets that seem to be ever under threat.</li> </ul>	This has been considered and the issue of stewardship, maintenance and upkeep is addressed in Policy DW3 and the Teignbridge District Design Code (Appendix 4).
<ul style="list-style-type: none"> <li>Maximise Natural green space to give net gain in biodiversity</li> </ul>	Local Plan Policy EN10 requires that all development, excluding any development exempted by the Environment Act, will demonstrate a 10% or greater net gain in biodiversity compared with pre-development system.
<ul style="list-style-type: none"> <li>Suggest that the management, maintenance, conservation and enhancement of heritage assets is identified within heritage policy.</li> </ul>	All but 3 of the previous 23 design policies have been removed from the Local Plan following the Government's introduction of the requirement for Design Codes. They have been integrated into the Teignbridge District Wide Design Code. Detailed requirements for Heritage Assets are also contained in Policy EN17.

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Concern that there are an insufficient number of parking spaces provided in new development. Also, that garages should be of a size able to hold a large car as they are currently too small resulting in them not being utilised for anything other than storage.</li> </ul>	<p>This has been considered and parking standards and requirements and a specified minimum garage size is required by Policy DW3 and the District Design Code (Appendix 4).</p>

### 3.4 Economy

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>It is important to be able to attract major employers into the district through business development policy.</li> </ul>	<p>The policy provides a basis for supporting planning applications for business development of different sizes in suitable locations with emphasis on existing and edge of defined settlements.</p>
<ul style="list-style-type: none"> <li>Value of promoting sustainable jobs related to energy efficiency, heritage sector and other skill shortage areas.</li> </ul>	<p>Providing support for sustainable jobs, as indicated, is recognised in the plan through the inclusive employment and skills policy which links to joint programme for greater Exeter area which partners with the local construction industry.</p>
<ul style="list-style-type: none"> <li>Working from home requires more flexibility of housing design to allow appropriate space for such use.</li> </ul>	<p>It is acknowledged that increased home working during the coming years will need to embrace design outcomes which provide flexibility of internal space, in accordance with new design policy for quality development and other guidance.</p>
<ul style="list-style-type: none"> <li>High speed digital network's important objective in rural areas in reducing travel and supporting businesses.</li> </ul>	<p>The policy along with other economic initiatives being co-ordinated by public bodies will help to deliver more efficient connectivity for businesses at new development sites and buildings.</p>
<ul style="list-style-type: none"> <li>Support for pedestrianisation in town centres, alternative uses being allowed and measures to prevent vacant units.</li> </ul>	<p>The plan approach towards vital and viable town centres will allow for the type of flexibility towards uses being sought. Pedestrianisation and other specific enhancement projects forms part of allocation policies, including Garden Community section.</p>

### 3.5 Homes

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Strong support for affordable housing provision, with opposition from those concerned with development viability.</li> </ul>	<p>The policy requires differing proportions of affordable housing by location based on the viability evidence.</p>
<ul style="list-style-type: none"> <li>Support for a greater proportion of affordable housing, and more affordable tenures including social rented housing provision.</li> </ul>	<p>Affordable housing is one of the Council's 3 priorities, alongside Employment and Climate Change. The Plan seeks to positively address and balance these issues.</p>
<ul style="list-style-type: none"> <li>Concerns over viability impacts of proposals for capping of social housing rents and issues relating to recycling of receipts.</li> </ul>	<p>Proposal for capping of rents removed from plan. Policy for recycling of affordable housing sales receipts made consistent with national policy.</p>
<ul style="list-style-type: none"> <li>Mix of support for and opposition to minimum residential space standards and accessibility requirements.</li> </ul>	<p>Evidence in the Local Housing Needs Assessment demonstrates a high level of need for accessible housing, which the plan seeks to address. The plan safeguards against the risk of very small speculative housing.</p>
<ul style="list-style-type: none"> <li>Support for Custom Build policy, but specific concerns such as level of demand and length of marketing period.</li> </ul>	<p>The policy is in place to ensure the Council can satisfy its legislative duties and ensure provision for specialist groups.</p>

### 3.6 Environment

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>General support for the protection of the natural environment with some desire for greater protection and greater weight to be given to the environment in planning decisions.</li> </ul>	<p>The suite of environment policies in the Plan contains proportionate protection for the environment, which must be considered along with social and economic factors. However, minor amendments have been made which would ensure greater benefits for the environment and wildlife. In addition, the Proposed Submission Plan includes 2 new site policies relating to the Exe Estuary SPA/Dawlish Warren SAC and to the South Hams SAC.</p>
<ul style="list-style-type: none"> <li>Both the Environment Agency and Natural England highlighted the need for the plan to include Coastal Change Management Areas (CCMAs).</li> </ul>	<p>The Proposed Submission Plan designates CCMA's in areas where the most up-to-date Shoreline Management Plan is not taking the coastal defence approach of "hold the line".</p>
<ul style="list-style-type: none"> <li>Support for the provision of strategic open breaks between additional settlements and the need for better protection of the setting of Exeter City and Dartmoor National Park.</li> </ul>	<p>Draft Policy EN1: Strategic Open Breaks has been amended to new policy EN1: Setting of Settlements. This amended policy expands protection from particular areas to also include the setting of all settlements.</p>

Summary of Main Comments	Council Response
	Supporting text clarifies that this includes settlements outside the Plan area within Exeter City, Torbay and Dartmoor National Park.
<ul style="list-style-type: none"> <li>Concern about flood risk resulting from new development and the need to locate development away from areas at risk of flooding, as well as concern about the lack of protection for water quality and coastal waters.</li> </ul>	Draft Policy EN6: Flood Risk has been re-drafted and expanded to include protection for the water environment, including coastal waters and the ecological status of waterbodies, within Policy EN6: Flood Risk and Water Quality.
<ul style="list-style-type: none"> <li>Historic England offered comprehensive comments on the structure and content of draft heritage policies</li> </ul>	Heritage Assets policy has been significantly amended to ensure it is consistent with the NPPF and in line with the approach/structure/wording suggested by Historic England.

### 3.7 Housing Sites

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Strong concerns about the lack of capacity in existing health infrastructure, including schools, GPs, dentists and hospitals, which will be made worse by additional development, have been made in relation to the majority of sites.</li> </ul>	Policy GP7: Infrastructure and Transport Networks includes a requirement which seeks a per dwelling financial contribution for primary and acute health care infrastructure costs. In addition, reference has been made in site specific policies where any additional infrastructure is required as a result of the development.
<ul style="list-style-type: none"> <li>Concerns about the lack of capacity within the existing road network, and how existing traffic problems of congestion or lack of parking in town centres will be worsened by additional development, have been made in relation to the majority of sites.</li> </ul>	All sites were assessed through the Housing and Land Availability Assessment (HELAA) in consultation with Devon County Council Highway Authority and further site specific comments received during the consultation on the draft Plans have been taken into account. The Development Strategy of the Plan focuses new development in areas close to services and facilities and seeks to reduce the need to travel and to enable travel by sustainable modes. Many development sites include specific transport related requirements, including those to increase travel by sustainable modes, to help reduce the volume of car based travel.
<ul style="list-style-type: none"> <li>Objections to the principle of developing greenfield sites rather than brownfield land have been repeatedly raised.</li> </ul>	The Development Strategy of the Plan has prioritised the redevelopment of brownfield sites. However, there is insufficient brownfield land that is

	available and developable to enable the development needs of Teignbridge to be met through re-use of brownfield land alone.
<ul style="list-style-type: none"> <li>The need for such a high number of new homes is repeatedly questioned, with strong concerns that new homes are not occupied by local people or as primary residences</li> </ul>	The Local Plan seeks to meet the Objectively Assessed Needs of the District, following the Standards Method for Calculation. However, Policy H1: Land for New Homes has been amended to require new residential development to be occupied as primary residences.
<ul style="list-style-type: none"> <li>Concerns that the new homes will harm the landscape or wildlife.</li> </ul>	All sites were assessed through the Housing and Land Availability Assessment (HELAA) in consultation with Teignbridge’s Landscape and Biodiversity Officers and further site specific comments received during the consultation on the draft Plans have been taken into account. Policies EN1: Setting of Settlements and Policy EN4: Landscape Protection and Enhancement provide protection for the landscape and Policies EN10-15 protect wildlife and their habitats. In addition, site specific criteria have been included within allocation policies where required in response to specific landscape or ecology constraints or concerns.
<ul style="list-style-type: none"> <li>Concerns about loss of open space to development, especially from sites with public access, including footpaths.</li> </ul>	The majority of development will bring forward new and improved green infrastructure, as required by Policy DW3: Design Standards, with public access to areas of open space and play.
<ul style="list-style-type: none"> <li>Concern that new development result in increased flood risk, or about lack of capacity in existing sewerage infrastructure to accommodate new development.</li> </ul>	New development would be subject to Policy EN6: Flood Risk and Water Quality, which would prevent new development increasing flood risk either on site or elsewhere and requires adequate drainage provision for new development.

### 3.8 Employment Sites

The character and residential amenity of villages with high levels of commercial vehicles bisecting their centre are impacted negatively over time.	Such matters as character and appearance are covered by Policy GP1: Sustainable Development and in particular residential amenity and environmental effects are key aspects to consider when assessing development schemes.

<ul style="list-style-type: none"> <li>There are concerns related to SWW infrastructure and a contribution may be required to address this.</li> </ul>	All development pays financial contributions towards SWW infrastructure, and it is for SWW to then implement improvement works in accordance with their strategies.
<ul style="list-style-type: none"> <li>The proposed allocation would risk the permanent sterilisation of nationally and internationally important ball clay resources. The site is located within the Minerals Safeguarding Area for ball clay resources as defined by Policy M2 of the DMP.</li> </ul>	Development proposals would be subject to matching future longer term extraction plans in the final quarter of the century for ball clay which is recognised in the new allocation policy for the site. Employment based development has greater latitude in this regard than residential use which is not being promoted by the plan.
<ul style="list-style-type: none"> <li>It's a green field site can't you find existing brown field sites and adjacent areas to develop first?</li> </ul>	The draft plan does contain a range of urban renewal sites in order to maximise development on previously developed land. However, the physical nature of Teignbridge means that most development allocations will be located on greenfield sites.
<ul style="list-style-type: none"> <li>Object due to poor road access, with on road parking causing restriction to construction lorries visiting the existing site.</li> </ul>	Traffic movement and management will be addressed at planning application stage to ensure that any impact on the village and immediate area is mitigated as far as possible.
<ul style="list-style-type: none"> <li>Development would more than double the area of land proposed for industrial development. It will completely change its character, from open fields and hedgerows.</li> </ul>	The new policy requires that development proposals will provide landscaping measures to retain and reinforce the setting of the town, as informed by a Landscape Visual Impact Assessment and observe the needs of Policy EN4: Landscape Protection and Enhancement.

### 3.9 Wind policy and sites

Summary of Main Comments	Council Response
<ul style="list-style-type: none"> <li>Harm to ecology - particularly protected sites, including European Sites, SSSIs and Ancient Woodland.</li> </ul>	All shortlisted wind turbine sites have been screened in the Habitats Regulation Assessment. The HRA has concluded that there are no Likely Significant Effect on the allocated sites due to distance and lack of impact pathways for all European sites. Policy CC6: Wind turbine development requires consideration of: Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land. Priority Habitats are protected under

	Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.
<ul style="list-style-type: none"> <li>Flood risk, coastal change, and water quality should be considered. Additionally, Biodiversity Net Gain should be included.</li> </ul>	Policy CC6 and EN6 addresses concerns related to water. Policy EN10 ensures that a minimum of 10% BNG is provided as part of any development.
<ul style="list-style-type: none"> <li>Wind policy should specify generation capacity and criteria for assessment should proposals exceed this capacity.</li> </ul>	Policy CC6 has been amended significantly since its original format. Generation capacity is not specified per site.
<ul style="list-style-type: none"> <li>Wind policy appears to support development that causes significant harm to the environment, heritage assets, amenity and safety. This approach is inconsistent with National Policy.</li> </ul>	
<ul style="list-style-type: none"> <li>Harm to heritage assets and the need for further Heritage Impact Assessment.</li> </ul>	Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan. All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets. In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.
<ul style="list-style-type: none"> <li>Concern that wind sites would be considered brownfield once decommissioned.</li> </ul>	Policy CC6 includes provisions that require turbines to be dismantled and removed from the site, and the site restored to its former (or improved condition), once the turbine is no longer in economic use. This will prevent sites being considered brownfield at the end of their lifetime.
<ul style="list-style-type: none"> <li>Harm to landscape/visual impact, including Dartmoor National Park, and cumulative impact of turbines on landscape.</li> </ul>	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. Sites with lower landscape sensitivity have been taken forward to allocation. Cumulative impact is addressed in policy CC6: Wind turbine development and EN4: Landscape Protection and Enhancement.

<ul style="list-style-type: none"> <li>• Unacceptable noise and visual impact on amenity</li> </ul>	<p>Potential impact on amenity has been considered as part of the landscape evidence base. This notes all potential receptors and properties within different proximities to the turbines. There are different impacts noted for each of the different sites, ranging from minimal impact to more significant impact. As required by CC6, the visibility and noise impacts of turbines from these properties would need to be investigated further at planning application stage.</p>
<ul style="list-style-type: none"> <li>• Roads are inadequate to cope with additional traffic generated</li> </ul>	<p>Wind turbines generally don't attract much traffic generation, other than for installation and servicing. Some sites have greater access potential than others, and some will require works to facilitate access. The impact of new access routes, and proposed mitigations, will be considered at planning application stage, as per CC6. Proposals should include a Construction and Environment Management Plan to manage potential impacts.</p>
<ul style="list-style-type: none"> <li>• No long-term employment or community benefit</li> </ul>	<p>The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy. Applications will consider the direct benefits from the development on the local community.</p>
<ul style="list-style-type: none"> <li>• Impact on farming practices</li> </ul>	<p>Wind turbines only use a fraction of the land. Whilst there are considerations to take into account, farming practices can continue around turbines.</p>
<ul style="list-style-type: none"> <li>• Increase in light pollution</li> </ul>	<p>Introduction of aviation lighting would add light sources to the dark skies within the site and adjoining landscape.</p>
<ul style="list-style-type: none"> <li>• Impact on tourism</li> </ul>	<p>It is recognised that landscape and visual amenity are important considerations in where tourists choose to go. However, the long-term impacts of climate change, if not minimised, could in themselves cause detrimental changes to existing landscape character. Such impacts may include tree loss through more frequent and powerful storms and increases in pests and diseases, or the loss of traditional field patterns due to potential future changes in agricultural practices. Therefore, whilst</p>

	the Council recognises that the introduction of wind turbines will impact existing landscape character, these landscapes will be adversely altered if nothing is done to combat climate change.
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## Appendix 1

The appendix addresses the requirements of Regulation 22(1)(c)(i) to (iv).

The appendix sets out:

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,*
- (ii) how those bodies and persons were invited to make representations under regulation 18,*
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,*
- (iv) how any representations made pursuant to regulation 18 have been taken into account;*

### Introduction

The Council published the draft Local Plan for consultation under Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2019 in four parts:

- Consultations for the Local Plan Review Issues Paper 2018 was open for an 8-week period (Monday 21 May to Monday 16 July 2018).
- Consultations for Part 1 was open for an 8-week period (Monday 23 March to Monday 13 July 2020).
- Consultations for Part 2 was open for a 6-week period (Monday 28 June 2021 to Monday 9 August 2021).
- Consultations for Part 3 was open for a 10-week period (15 November 2021 to 24 January 2022).

The Plan was subject to a total of **24 weeks** of consultation.

A total of **7,308** responses were received and logged. This is made up of responses received via both online form submission as well as email, letter, post and in person:

- Issues Paper - 267
- Part 1 - 476
- Part 2 - 5,030
- Part 3 - 1,535.

## List of Schedules attached to Appendix 1

- Schedule 1 of this appendix “Details of the consultation databases” sets out which bodies and persons were invited to make representations and how that was undertaken. *(Regulation 22(1)(c)(i) which bodies and persons the local planning authority invited to make representations under regulation 18)*
- Schedule 2 of this appendix “Details of consultation methods” sets out the methods of consultation used. *(Regulation 22(1)(c)(ii) how those bodies and persons were invited to make representations under regulation 18)*
- Schedules 3, 3a, 3b, 3c and 3d of this appendix include summaries of the representations made, number, and resulting changes made to the Plan between Regulation 18 and Regulation 19 Proposed Submission. This includes the response of the Council indicating how such comments were taken into account in the next stage of Plan preparation. The Schedule is organised by Local Plan chapter for both policies and site allocations and includes comments on key evidence where relevant (e.g., SA/SEA/HRA). *(Regulation 22(1)(c)(iii) a summary of the main issues raised by the representations made pursuant to regulation 18 and Regulation 22(1)(c)(iv) how any representations made pursuant to regulation 18 have been taken into account).*
  - Schedule 3: draft Local Plan Part 1 (Development management policies)
  - Schedule 3a: draft Local Plan Parts 2 & 3 - Urban Renewal Sites and Heart of Teignbridge
  - Schedule 3b: draft Local Plan Parts 2 & 3 - Coastal Towns, Rural Towns and Edge of Exeter
  - Schedule 3c: draft Local Plan Parts 2 & 3 - Villages
  - Schedule 3d: draft Local Plan Part 3 - solar and renewable energy policies and wind sites

## Conclusion

The Council considers that it has met the requirements of Regulation 22(1)(c) (i) to (iv) by: including a comprehensive list of bodies and persons invited to make presentations; detailing the methodology of how those bodies and persons were invited to make representations; providing a summary of the main issues raised by the representations gathered; and detailing how these representations have been taken into account in the Plan.

It is also considered to demonstrate conformity with the Council’s Statement of Community Involvement.

## Appendix 1 Schedule 1: Details of the consultation database

The Council maintains a database of all individual persons and organisations who have expressed an interest to be kept informed of consultations by the Council on planning policy documents. These persons and organisations were all notified of each of the consultations by letter or email. All statutory consultees (including town and parish councils), district councillors and adjacent councils were also notified. In addition, those submitting comments via the online form or by email were given the option of being added to the database, and those choosing to do so, were also notified of following consultations.

- **Local Plan Review Issues Paper 2018:** please see [Statement of Consultation](#) March 2020, published alongside the draft Local Plan Part 1, for full details.
- **Draft Local Plan 2020-2040 Part 1:** please see [Consultation Statement](#) May 2021, published alongside the draft Local Plan Part 2, for full details.
- **Draft Local Plan 2020-2040 Parts 2 and 3:** all statutory consultees, district councillors, town and parish councils, and adjacent councils were notified as well as all those on the council's database, including the following:
  - Active Devon
  - Agricultural consultant
  - Public Art
  - Civil Aviation Authority
  - Community Council for Devon
  - Dartmoor National Park
  - Devon & Cornwall Polie
  - Devon & Somerset Fire and Rescue
  - DCC Archaeology, Childcare Services, Social Services, Education, Flood Risk, Highways, Gypsy & Traveller Liaison Officer, and Minerals.
  - DEFRA
  - Devon Garden's Trust
  - Devon Stone Foundation
  - Devon Wildlife Trust
  - Environment Agency
  - Historic England
  - East Devon District Council
  - Exeter Airport

- Exeter City Council
- Forestry Commission
- The Gardens Trust
- Kaolin And Ball Clay Association
- Listed Building Societies And Theatre Trust
- Mid Devon District Council
- Natural England
- NHS
- Network Rail
- OFCOM
- Plymouth & Devon Racial Equality Council
- RSPB
- South Hams District Council
- South West Water
- Sport England
- Sustrans
- Teignbridge Community & Voluntary Services
- Torbay Council
- Wales & West Utilities
- Woodland Trust

Consultation responses were received in several formats including online form completions, email, post, and in person. As a result of the submission types, two separate consultation response databases were created for each part of the Regulation 18 consultation. The first type consisted of extracted submissions from the online form platform (Survey Monkey and Firmstep). The second type consisted of email, post and in person submissions, which were each summarised and manually logged into the respective database. As a result, there are a total of six consultation response databases.

Schedule 3 a-d consists of a combination of both consultation response databases logged per topic.

Each logged representation was assigned a unique reference number either automatically (via online form platform) or manually (manually logged). The respondent was provided with their respective reference number if their submission was done so via the online form platform. A reference was not made available to the respondents who submitted responses via email, post, or in person.

## Appendix 1 Schedule 2: Details of the consultation methods undertaken

- **Local Plan Review Issues Paper 2018:** please see [Statement of Consultation](#) March 2020, published alongside the draft Local Plan Part 1, for full details.
- **Draft Local Plan 2020-2040 Part 1:** please see [Consultation Statement](#) May 2021, published alongside the draft Local Plan Part 2, for full details.
- **Draft Local Plan Parts 2 & 3**

The consultation periods for the draft Local Plan Parts 1, 2 and 3 have occurred following temporary changes to the Council's Statement of Community Involvement made subsequent to the outbreak of Covid in 2020. Therefore, consultation did not involve any face-to-face methods. However, the volume of responses received, especially in comparison to those received following 11 face-to-face roadshow events held during the Issues Paper consultation, is evidence that an online presence is far more important.

As well as informing those on the Council's database, the following methods were used to publicise the consultations for the draft Local Plan Parts 2 & 3:

- Dedicated pages on the Council website
- Email – those on consultation database including members of the public, interest groups, statutory consultees, Town and Parish Councils, and Elected Members.
- Media releases in the local press and news releases to local media
- Posts in Residents' newsletter which involves regular email updates to Teignbridge residents and businesses registered on the circulation list
- Social media posts throughout consultation periods (Facebook and Twitter)
- Hard copies made available in public places, including Council Offices and local libraries
- Hard copies sent to Town and Parish Councils to enable those offline to view the Plan
- Attendance at "virtual" meetings, workshops or Town or Parish Council meetings

## Appendix 1 Schedules 3, 3a, 3b, 3c and 3d: Summary of the representations, number made, and changes made between Regulation 18 and Regulation 19 Proposed Submission Version

Please refer to separate documents attached.

## Appendix 2

Regulation 19/20 submission. To be completed at a later date for Regulation 22.

DRAFT