

Ipplepen Neighbourhood Plan

Submission (Reg. 16) Public Consultation

Index of Respondents to the Regulation 16 Submission Consultation of the
Ipplepen Neighbourhood Plan which ran from 31 October - 12 December 2022

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1. Natural England

Comment relates to: **Land and Environment**

Nature of representation: **Not Specified**

Natural England welcomes the emerging Neighbourhood Plan and would like to make the following comments:

Neighbourhood Development Plan Submission Draft (November 2022)

Policy 11

Policy 11 should be strengthened by making it clear that if a development site is within the South Hams SAC Landscape Connectivity Zone, it might have a likely significant effect on the South Hams SAC and should be subject to a project level HRA. The HRA should assess whether the proposal could result in impacts on greater horseshoe bat roosts or foraging and commuting routes, for example by removing lengths of hedgerow or from artificial lighting. Detailed guidance is provided in the South Hams SAC – Greater horseshoe bat Habitats Regulations Assessment Guidance (October 2019).

A link should be provided in The Plan to the 2019 South Hams SAC Guidance (or its successor document). This would provide clarity for the applicant regarding the expectations for the subsequent planning application.

Response: The comment is noted and the following supporting text will be added to reinforce the policy. Comprehensive protection is provided within the Teignbridge Local Plan 2013-2033 and the emerging Teignbridge Local Plan 2020-2040, so duplication is not considered necessary.

To protect and enhance existing areas of biodiversity, including networks of habitats and connections between them, development proposals should be located and designed to take account of the importance of any affected habitats or features.

If a development site lies within the South Hams SAC Landscape Connectivity Zone, it could have an effect on the South Hams SAC and depending on the likely level of impact, be subject to a project level HRA. The HRA should assess whether the proposal could result in impacts on greater horseshoe bat roosts or foraging and commuting routes. Detailed guidance is provided in the [South Hams SAC – HRA Guidance \(October 2019\)](#).

If, following survey work undertaken at planning application stage, a site of local importance is found to contain nationally important habitats or features, the appropriate level of protection should be afforded in light of this new evidence.

Strategic Environmental Assessment (October 2022)

Natural England is inclined to agree with the conclusion that full SEA is not required on the basis that the Neighbourhood area does not contain sensitive natural assets that may be affected by the proposals in The Plan.

However, in light of our comments on the HRA screening report, we advise that the reasoning should be amended. Planning practice guidance outlines that if an appropriate assessment is required for your neighbourhood plan this will also engage the need for a SEA, unless it can be demonstrated that the 'small area' or 'minor modification' exemption applies. One of the basic

conditions that will be tested by the independent examiner is whether the neighbourhood plan is compatible with European obligations, including those under the SEA Directive.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

[Response: Comment noted. See response for Habitats Regulations Assessment below.](#)

Habitats Regulations Assessment (September 2022)

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. This conclusion has been drawn having regard for the measures built into the proposal that seek to avoid all potential impacts.

On the basis of information provided, Natural England's advice is that this proposed development may contain (or require) measures intended to avoid or reduce the likely harmful effects on a European site(s) which cannot be taken into account when determining whether or not a plan or project is likely to have a significant effect on a site and requires an appropriate assessment (following the People Over Wind ruling by the Court of Justice of the European Union).

For this reason, we advise that on the basis of the information supplied that the application may have a likely significant effect on the site(s). These measures therefore need to be formally checked and confirmed by your Authority, as the competent authority, via an appropriate assessment, in accordance with the Conservation of Habitats and Species Regulations 2017 (as amended). These measures, and any additional measures that can avoid or reduce any likely harmful effects, can be considered as part of the appropriate assessment, to determine whether a plan or project will have an adverse effect on the integrity of the European site.

Natural England advises that it is a matter for your Authority to decide whether an appropriate assessment of this proposal is necessary in light of the People Over Wind ruling. In accordance with the Conservation of Habitats and Species Regulations 2017 (as amended), Natural England must be consulted on any appropriate assessment your Authority may decide to make.

Response: The proposed Ipplepen allocations are included in the Proposed Submission Local Plan 2020-2040, which began its Regulation 19 consultation process on 23rd January 2023. The site policies are V13, V14 and V15 on pages 170-172 of Chapter 12 [Villages \(arcgis.com\)](#) of the Local Plan. All the supporting documents including the SA and HRA are also available at [Live consultation: Teignbridge Local Plan - Sustainability Appraisal \(SA\) and Habitats Regulations Assessment \(HRA\) - Teignbridge District Council](#)

The Local Plan HRA [appendix-d-draft-habitats-regulations-assessment.pdf \(teignbridge.gov.uk\)](#) considers the People Over Wind and an Appropriate Assessment has been carried out. As a result, the policy and supporting text wording has been amended accordingly. See paragraphs 2.33 (P23), 2.46 (P29), 4.17 (P48), 13.1 (P109) for notes on People Over Wind. The Appropriate Assessment is covered over pp.49-108 and the HRA Screening Assessment (Ipplepen) is on pp.179-782.

The findings of these studies and the comments made by Natural England to the Local Plan site allocation consultations have informed the policy wording and requirements.

2. Environment Agency

Comment relates to: **Land and Environment**

Nature of representation: **Not Specified**

Thank you for the recent consultation in respect of the Ipplepen Neighbourhood Plan.

Please note that due to resource pressures we have had to limit our bespoke input to Neighbourhood Plan work outside of our local focus areas and/or where the plan proposes allocations/policies within areas at risk of flooding. The Ipplepen parish is not presently within such a focus area and therefore we will not be providing any bespoke advice in respect of this Neighbourhood Plan.

However, it remains important that parish councils and neighbourhood forums are provided with the best available evidence to shape the future of the places in which people live and work. We therefore attach the guide 'Neighbourhood Planning for the environment' which has been prepared jointly by Environment Agency, Natural England, Forestry Commission and Historic England. This environmental toolkit focusses on:

- Opportunities to enhance your local environment through neighbourhood plan-making;
- Where to find information about your local environment;
- Good practice; and
- A checklist to use whilst developing your plan.

Response: Comments and attached guide noted.

3. Historic England

Comment relates to: **Land and Environment**

Nature of representation: **Not Specified**

Many thanks for your consultation on the Regulation 16 Ipplepen Neighbourhood Plan (1 November 2022). We previously made a number of comments at the Regulation 14 stage, concerning the Neighbourhood Plan's obligations with respect to heritage assets. We urged the Neighbourhood Plan steering group to provide a rigorous heritage evidence-base and justifications for each of the proposed sites allocated for development, that would demonstrate that any effected heritage assets were being fully considered and adequately respected.

Having inspected the current suite of documents, we cannot detect how our previous concerns have been addressed. Without a suitable evidence-base and justifications, it is unlikely that the Neighbourhood Plan will be able to demonstrate that it has put in place adequate provisions for the protection of heritage assets. Therefore, it is also unlikely to comply with the provisions of the Local Plan, or the National Planning Policy Framework.

Therefore, we would like to take this opportunity to strongly re-iterate our previous advice:

Your Local Authority Conservation Officer will be best placed to help you understand and negotiate your obligations with respect to local heritage assets. Our role as the National statutory consultee generally focuses 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 specific site allocations for development are being made.

In the case of Ipplepen, we note there are eleven such areas being considered as sites allocated for development. Where a Neighbourhood plan recommends a site to be allocated for development, there is a risk that heritage assets may be harmed as a result of that development. Therefore, when such allocations are proposed, we look to see that they are supported by appropriate evidence to demonstrate conformity with national policy for the protection and enhancement of the historic environment, as set out in the National Planning Policy Framework (NPPF). Such evidence ought to demonstrate that significant environmental effects, in terms of harmful impact on heritage assets, are unlikely.

The Ipplepen Neighbourhood plan recognises the need for a heritage evidence base (page 25). We applaud the section of the Plan on "Safeguarding our Heritage" (page 41). This section identifies the obligations that the Plan has for safeguarding heritage. However, at present, we are unable to find sufficient evidence within the remainder of the draft Plan itself, or on the Planning Group's website, that an appropriate mechanism, or methodology is in place to meet these obligations.

The eleven proposed site allocations lie outside of the historic centre. Furthermore, we note that the plan currently presents little evidence of heritage assets in, or adjacent to these eleven sites. Furthermore, there is currently no assessment of the potential harm to such assets resulting from any of the proposed developments.

Where site allocations are being suggested, it is common for the Planning Group to consider undertaking a Strategic Environmental Assessment (SEA). Such an exercise would systematically provide the evidence-base and justification required for the plan to be compliant with the NPPF's guidance on the protection of heritage assets. Of course, the Planning Group may choose to establish this evidence base and justification for development by other means. We recommend that the Planning Group seek the advice of their Local Authority Conservation Officer, who is best placed to suggest suitable ways forward.

We would strongly recommend the use of our respective guidance on SEAs, Setting of Heritage Assets, Site Allocations, Local Listing, and Neighbourhood Planning, to help ensure that the Plan can demonstrate an appropriate degree of conformity with overarching policy for the protection and enhancement of the historic environment as set out in the Local Plan and NPPF.

Our guidance can be found at :

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment>

<https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/heag180-gpa3-setting-heritage-assets/>

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans/>

<https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/neighbourhood-planning-and-the-historic-environment-historic-england-advice-note-11/>

<https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/heag301-local-heritage-listing/>

We wish you well with the on-going work on your plan.

Response: There appears to be some confusion regarding the number of sites proposed. There are only 2 proposed development sites, not eleven as quoted in the comments. The heritage impact of these sites has been assessed by the District Council Conservation Officer and subsequently via the Neighbourhood Plan SA screening and finally through the SA conducted as part of the Teignbridge Local Plan 2020-2040. This has informed the policy wording and requirements.

4. Devon County Council

Comment relates to: **Land and Environment**

Nature of representation: **Not Specified**

Page 23 – reference to a strength being low levels of flooding. There are records of internal property flooding from surface water and groundwater within Ipplepen itself, including areas not shown within Figures 18 or 19. It is recommended that this reference is removed.

Page 40 – The LLFA are pleased to see that watercourses are recognised as positive features of the Conservation Area's character.

You may wish to consider opportunities through the Neighbourhood Plan where development could deliver benefits to water quality and reduce flood risk through installation of natural flood management measures see <https://www.gov.uk/flood-and-coastal-erosion-risk-management-research-reports/working-with-natural-processes-to-reduce-flood-risk>

The Neighbourhood Plan may also wish to consider reference to DCC's SuDs Guidance - <https://www.devon.gov.uk/floodriskmanagement/planning-and-development/suds-guidance/> and

Devon's recently published Carbon Plan - <https://devonclimateemergency.org.uk/view-devon-carbon-plan/>

Tom Aldridge, Flood and Coastal Risk Officer

Flood and Coastal Risk Management Team, Devon County Council

Response: Page 23 - reference to a strength being low levels of flooding removed. Other comments considered and noted.

5. Network Rail

Comment relates to: **Traffic and Transport**

Nature of representation: **Support**

Thank you for consulting Network Rail on the Ipplepen Neighbourhood Plan. This email forms the basis of our response.

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 Parish. There are no level crossings in the area.

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. We trust these comments will be considered in your preparation of the forthcoming Neighbourhood Plan documents.

Response: Page 23 - Comments considered and noted.

6. Alison Milne

Comment relates to: **Land and Environment / Traffic and Transport**

Nature of representation: **Support**

- All new buildings to include integrated solar panels, grey water systems, have integrated swift and bat boxes built into the fabric of the building (eg bird or bat bricks).

Response: The requirement for the inclusion of renewable energy technologies is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan. Bird and bat boxes can be proposed to developers if feasible and appropriate for the location.

- Support and develop community energy schemes, and increase local energy security.
Response: The requirement for the inclusion of renewable energy technologies is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan.
- Not building on flood prone areas.
Response: No development is proposed in functional flood zones.
- Support better public transport, improve cycling routes and safer cycling around the Parish and to neighbouring settlements.
*Response: Improved accessibility is a key aim (1) of the Neighbourhood Plan. Suggest amendment of Objective 1e to *Improve pedestrian footways and access to cycle path provision.**
- Create more public green space and enhance existing ones for wildlife and well-being.
Response: Maintenance and improvement of green spaces throughout the parish is a stated objective in the Neighbourhood Plan (1e).
- Support local electric car share schemes and setting up charge points.
Response: This is addressed through Policy IPP1 and also through the Teignbridge Local Plan.
- Plant more trees, to create or enhance woodland and hedgerows, in suitable areas, to reduce atmospheric carbon and improve health and wellbeing. Create wildflower meadows to improve biodiversity, health and wellbeing.
Response: Maintenance and improvement of green spaces throughout the parish is a stated objective in the Neighbourhood Plan (1e).
- Increasing car traffic is a major problem as identified in the local plan. The number of cars and traffic is a hazard to walkers, horse riders and pedestrians. It is of strategic importance to enable children and families to walk or cycle to schools, shops, friends and make use of the countryside. Increasing the number of footpaths or using permissive paths would help this important issue.
*Response: This is addressed via Objectives 1a-1e. Suggest amendment of Objective 1e to *Improve pedestrian footways and access to cycle path provision.**

7. Gavin Milne

Comment relates to: **Land and Environment / Traffic and Transport / Community Services and Facilities / Business and Employment / Matching Key Issues with Policies / Project Related to the Neighbourhood Plan.**

Nature of representation: **Object**

Whilst I have labelled these object, elements may also support plans at this stage. Most of the below focusses on local resilience; essentially the capacity of the village to endure energy, food and other supply shocks, whilst developing more capacity to address these locally. Given the size and nature of the village, it is well placed to do this.

Housing:

1. As an outlying village, we are vulnerable to energy supply issues, and need to enhance local energy security. So to commit to so far as possible best practice efficiency, water use (eg. rain water catchers) and renewable energy for all new houses, including solar panels, heat pumps etc.

Response: The requirement for the inclusion of renewable energy technologies is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan.

2. To support older housing in the village to be retrofitted appropriately, in terms of insulation and renewable energy - either via accessing funding or assistance. Government schemes are sporadic, and harder for the older / most vulnerable population to navigate.

Response: This is not within the scope of a Neighbourhood Plan.

3. Any new housing plan to include a self build / similar eco house quota. This also has the effect of showcasing what is possible in terms of sustainable housing.

Response: The requirement for self-build homes on new development is addressed in Policies IPP7 and IPP8. The Blackberry Hill development allocation (IPP8) is proposed entirely for custom and self build homes. Requirements for zero carbon homes is addressed in the emerging Teignbridge Local Plan 2020-2040.

4. How would the 100 houses lead to biodiversity net gain?

Response: An explanation and the requirements for biodiversity net gain arising from new development is addressed in Policy EN10 of the Teignbridge Local Plan 2020-2040, so is not duplicated in the Neighbourhood Plan.

5. Object to housing development to west of Totnes Road, on grounds of carrying capacity of the village - Dainton seems like best place, to reduce pressure on village services - especially bottleneck traffic on the high street.

Response: The suitability for development of the Blackstone Cross allocation (Policy IPP7), including has been thoroughly assessed both by the Neighbourhood Plan Steering Group and through various studies and assessments contributing to the Teignbridge Local Plan 2020-2040. Both assessments concluded that the site was suitable for development.

Land and Environment:

1. To find land for a community garden and orchard. Places that younger and older generations can tend to and enjoy. Again, this could also support the need of future local food security, getting the village used to sharing and growing food together.

2. More areas devoted to rewilding - can look very nice, alongside more kept / mowed land.

Response: Maintenance and improvement of green spaces throughout the parish is a stated objective in the Neighbourhood Plan (1e).

Traffic and transport:

1. Communal electric car charging points / infrastructure - village hall car park, or the hub? Could be linked to solar panel generation on the roof. Also encourage people in to access food etc. at the hub.

Response: This is addressed through Policy IPP1 and also through the Teignbridge Local Plan.

2. Electric car share provision - lets buy a community car or 2, could be covered largely by membership fee.

Response: An ambition of this nature is not within the scope of a Neighbourhood Plan.

3. Improved and safe cycle routes

Response: Improved accessibility is addressed via Objectives 1a-1e. Suggest amendment of Objective 1e to *Improve pedestrian footways and access to cycle path provision.*

4. Better bus service - with loyalty discounts, to try to encourage a culture of public transport use. Again, improving energy resilience.

Response: An ambition of this nature is not within the scope of a Neighbourhood Plan.

Community services and provision:

1. Community hot pot meals - perhaps at the hub or village hall
2. Find a way to offer a community post office again - albeit downsized and more sustainable. Again, reduces travel footprints.

Response: Ambitions of this nature are not within the scope of a Neighbourhood Plan.

Matching key issues with policy:

1. Declare a climate emergency

Response: An ambition of this nature is not within the scope of a Neighbourhood Plan and should be raised with the Parish Council.

2. Seek to embed all decisions within this context - especially mitigation and adaptation.

Response: Comment noted.

Project related to the neighbourhood plan:

1. Local energy generation project - to explore ways of establishing local energy resilience. ie. community energy generation schemes.

Response: The requirement for the inclusion of renewable energy technologies is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan. However, a project this specific should be raised with the Parish Council.

Local employment opportunities:

A bit vague, but is there scope to specifically support businesses or help expand places such as the 'Hub' - already offering impressive village services, to support localisation of things to do with food and energy use. eg. Wholesale food, of bulk products. Low cost community cooked meal provision. eg. Hot pot meals at the hub / village hall? Gathering and selling local veg produce.

Response: The plan does not identify specific employment uses, it seeks to develop and encourage new employment and support the growth and expansion of existing businesses.

8. Elizabeth Allen

Comment relates to: **Traffic and Transport**

Nature of representation: **Object**

Building an additional 120 houses in the village will add at least 200-300 new residents and 200+ cars/vans. Parking in the village is already a major problem, especially around the centre. Recently we temporarily lost our bus service due to people's selfish parking choices and losing it permanently has been threatened. Adding a large number of new cars to the area is only going to exacerbate the problems. We have already had a large number of park homes foisted on the village, with no planning consultation whatsoever and now we are told we are getting another 120.

Response: Local concerns about parking has been a key area of focus for the play throughout its development. These concerns are addressed in chapter 4 and Policy IPP1 of the Neighbourhood Plan.

Many village residents, especially the elderly and secondary age schoolchildren rely on the buses coming into the village and would struggle without the service. The distance of the Blackstone Road proposed development from the Co-op is likely to require car use, particularly as the proposal mentions smaller properties suitable for downsizing by older people. Clampitt Road and the beginning of Blackstone Road has recently begun to be used as a carpark by car/van/lorry owners from elsewhere in the village. Will the proposed properties have multiple parking spaces or will even more vehicles be dumped in the area around the development?

Response: Yes, the Neighbourhood Plan Policy IPP1 and The Teignbridge Local Plan requires car parking spaces to be provided with new homes proportionate to the number of bedrooms.

As a resident of Blackstone Road, whose property has suffered from flooding by runoff from the field in the past, I am very concerned that replacing the grass with concrete is going to cause the problem to recur even more seriously, as the land is considerably higher than the road and our homes/gardens. Presumably if 100 houses are packed onto the site, there will be little land left for gardens, which will make the situation worse.

Response: The site is only allocated for 100 homes, which is considered low density, so each home will have adequate space for gardens and shared green spaces. The developer of the site is required to take full account of flood risk on the site and the impact on the surrounding area and drainage infrastructure.

The fact that you are proposing 2 storey houses not bungalows is going to cause loss of light to existing homes below them and they will be a very prominent feature from all over the village. I feel that 100 is far too high a density level for the size and position of the site.

Response: The site is well located on the edge of the village with access directly to the A381, which will reduce traffic flow through the village. The density of the site is considered low and appropriate for its location on the edge of the settlement.

Our doctors surgery is already under enormous pressure. This week all patients received a message saying they are at present running an emergency only service. How are they going to cope with an extra 200-300 new residents?

Response: The Devon Clinical Commissioning Group (CCG) have been consulted on the proposed growth of the village and its impact on services. The CCG is currently liaising with Teignbridge District Council regarding funding required from new development for improvements to existing provision.

This is too large a development for Ipplepen and its facilities. We are a rural village and do not want to become a town!

Response: Comment noted.

9. Geoff King

Comment relates to: **Land and Environment / Community Services and Facilities**

Nature of representation: **Object**

Firstly I would like to thank all those involved in the production of this Plan for their hard work and their contribution to the future well-being of our community. I have a number of comments:

1. The demographic statistics all relate to the 2011 census - is it possible to now utilise 2021 census data?

Response: Unfortunately, it is too late in the process to review the content of the Neighbourhood Plan to incorporate the 2021 census figures.

2. The foreword includes reference to supporting a “sustainable community”. “Sustainability” should include promoting and supporting sustainability energy use, particularly domestic and transport energy use and thus lead to identifying potential action that could be taken within the village to reduce use of fossil fuel derived energy.

Response: The requirement for the inclusion of renewable energy technologies is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan.

3. In 2.42 references are made to County Wildlife Sites and the Parish Biodiversity Audit - I think it would be helpful to clarify their significance, particularly in relation to identifying future action to safeguard our local wildlife and natural environment.

Response: The significance and purpose of the designated areas is set out in the Natural Environment section of the document and glossary. It is also addressed in Objective 3 and Policy IPP2.

4. In 4.19 the Telephone Exchange site is referenced as not being available for community use or purchase. I think it would be helpful to explain the ownership situation and why it’s not available. Also, in terms of a potential parking site, could the land around the building be utilised for parking even if the building itself remains in its current use.

Response: This level of detail is not required for the Neighbourhood Plan, but the plan does support for the site should it become available in the future.

5. Reference to “Community Resources” should also include the range of community and voluntary organisations in the village, the role they play in securing a “sustainable community” and the support that could be provided to maximise their future contribution to the well-being of our community.

Response: The plan considers and identifies a wide range of community facilities and services that contribute to a sustainable community.

6. There needs to be an update on The Post Office closure and the PC’s unsuccessful attempt to take it over.

Response: This is not within the scope of a Neighbourhood Plan and should be raised with the Parish Council.

10. Steve Rattlidge

Comment relates to: **Land and Environment / Traffic and Transport / Community Services and Facilities / Business and Employment / Matching Key Issues with Policies / Project Related to the Neighbourhood Plan**

Nature of representation: **Support**

Having been heavily involved in the process of preparing the NP for Ipplepen I feel that such a great deal of background work has resulted in a very fair representation of parishioners views / needs / requirements. We were very concerned that Ipplepen does not become a 'dormitory village' but remains as active as at present.

Response: [Comments noted](#)

11. Dennis Smith

Comment relates to: **Community Services and Facilities / Business and Employment**

Nature of representation: **Support**

I fully support the need for additional social/affordable housing within the plan area. It is therefore essential that Community Services and Facilities are supported. It is also essential that local businesses are supported and encouraged thereby providing employment without the need for excessive travel. I fully support the plan in its entirety.

Response: [Comments noted](#)

12. Sabrina Thomas

Comment relates to: **Not Specified**

Nature of representation: **Object**

I do not object to the housing being put forward here, but how is the need for Gypsy/Travellers being presented in your neighbourhood plan? There is no mention of Gypsy/Travellers in your neighbourhood plans and no pitches being included in your allocation of affordable housing. Gypsies and Travellers need suitable pitches just as the settled community need suitable housing.

Response: [Gypsy and Traveller provision is addressed through the Teignbridge Local Plan.](#)

13. June Rattlidge

Comment relates to: **Land and Environment / Traffic and Transport**

Nature of representation: **Support**

Support for much needed new housing particularly affordable for first time buyers and offering downsizing potential. New road junction to ease traffic flow around village. New development to be 'in keeping' with existing housing.

Response: [Comments noted.](#)

14. Mabel Harris

Comment relates to: **Land and Environment / Traffic and Transport / Community Services and Facilities / Business and Employment / Matching Key Issues with Policies / Project Related to the Neighbourhood Plan**

Nature of representation: **Not Specified**

Page 28 Aims and Objectives of the plan could be more ambitious to address climate change issues, the climate emergency (adopted by Devon County Council and Teignbridge and many other Parish Councils) and enhancing biodiversity to address the ecological emergency. A report in 2021 found that the UK is the least effective G7 member at protecting nature (<https://www.rspb.org.uk/about-the-rspb/about-us/media-centre/press-releases/new-report-shows-the-uk-is-the-least-effective-g7-member-at-protecting-nature/>). Our Plan would help to address these important issues. By seeking more holistic systems where local people are encouraged to drive less, use better public transport or cycle, these can contribute to better health and well-being.

Response: The requirement for the inclusion of renewable energy technologies is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan. The Plan does acknowledge its contribution to addressing the climate change emergency by improving the walkability of the village, promoting and developing local employment opportunities and requiring electric vehicle charging points on new development.

It is important to maintain and increase the community resources (work and leisure needs) in the parish/village to reduce commuting and reliance on services from neighbouring large towns, it was very sad to lose the Post Office/newsagent/shop from the centre of the village.

Response: This is not within the scope of a Neighbourhood Plan and should be raised with the Parish Council.

We should aim for a plan where the green spaces can be greatly enhanced for wildlife and the well-being of local people, studies have shown that wilder locations with higher biodiversity are more valuable for mental health and wellbeing <https://www.mentalhealth.org.uk/our-work/research/nature-how-connecting-nature-benefits-our-mental-health> . Biodiversity can also be enhanced in the existing green spaces and the built environment. For example, football fields have very low wildlife value if any, but the boundary hedges and wildflower verges are vital wildlife corridors for many species. New buildings can help the loss of biodiversity through the including of built-in wildlife boxes such as swift boxes and bat boxes built into walls; the creation of new woodlands or wildflower meadows should be encouraged (where appropriate) and wildlife gardening supported.

Response: Comment noted. Provision of green spaces and biodiversity net gain requirements are required by the Teignbridge Local Plan 2020-2040. The Neighbourhood Plan seeks to protect certain areas by designating them as Local Green Spaces (Policy IPP6)

Not everyone has a garden or time to manage to manage an allotment to grow their own food, but the creation of community garden and/or orchard could address this to give people the same opportunity to try to grow their own, and the associated health and social benefits of getting outdoors and gardening. As the village has a higher-than-average proportion of people of retirement age and older, many gardens appear to be gravelled or paved over to reduce maintenance, this is a terrible loss for wildlife - more should be done to encourage gardening or set up a garden sharing scheme where garden-owners pair with keen gardeners to grow for food or wildlife, this may also reduce flood risk due to the reduction of hard standing. Energy and food security are issues that the Plan should seriously consider, global issues that have arisen since the first draft of the Plan, since covid and the Russian war in Ukraine.

Response: The requirement for provision of allotments is addressed in the Teignbridge Local Plan. Further opportunities for local food growing opportunities should be raised with the Parish Council.

IPP Policy 1: Parking

a) Agree.

c) if the parking provision for new housing was reduced and better public transport was put in place, this may discourage car use/ownership. Reducing car use will reduce carbon emissions to reduce the climate change impacts. By lowering parking provision, this should place greater importance on the need to provide a good quality reliable, frequent public transport service, such as buses. Better public transport is particularly important as the Parish has a higher-than-average retirement age population – where older residents may prefer to get a free bus service than drive, especially if driving insurance costs increase or people feel less confident driving.

Response: The level of parking provision is proportionate to the number of bedrooms in each new home and to ensure that local roads do not become dominated with parked cars. The larger Blackstone Cross allocation is close to existing bus routes to encourage the use of this sustainable travel option.

d) The plan should seek to improve public transport, and safer cycle routes, to/from the village in order to reduce individual car use and ownership whether or not there is new housing.

Response: Improved accessibility is a key aim (1) of the Neighbourhood Plan. Suggest amendment of Objective 1e to Improve pedestrian footways and access to cycle path provision.

e) Agree, but the plan should aim to create at least one or two electric car parking charge points, irrespective of whether there is new housing. (Agree with 4.34 Facilities for the charging of electric vehicles for private off-street parking and new public parking is also required.) I would support local electric car share schemes and setting up charge points. All parking provision should use porous materials to reduce runoff and flash-flood events. I would support better public transport, improve cycling routes and safer cycling (preferably off-road where possible) around the Parish and to neighbouring settlements.

Response: Comment noted.

The War Memorial area is listed as a green space, but it is not very green as it is mostly covered with concrete and used as a parking area. Any attempt to improve the War Memorial area and make a truly 'green space', with seating and green planting (eg shrubs) would be welcome to enhance biodiversity and well-being of local residents, as a place where people can meet and rest. This would make the village centre a far more attractive focal point. If the war memorial area was made into a small park/garden, could replacement parking be located to the grassy verges on Bridge Street (to east) or expanding the existing car park in Caunters Close?

Response: Comment noted. The proposal to improve this space should be raised with the Parish Council.

Any new parking should be constructed with porous materials to prevent runoff and flash-flooding. The sad loss of the Post Office may mean that there is now less demand for parking in this area. See IPP Policy 6 Local Green Spaces LGS5.

Response: Comment noted. The choice of materials and nature of the surface will be based on the level of flood risk associated with the development and location.

IPP Policy 2: Development in the Countryside Development in the countryside is supported where it enhances the distinctive landscape character of the parish, complies with the strategic policies of the Local Plan and where it meets the following:

a) Conserves and enhances hedgerows with any required openings limited to the minimum required for safe access. Where loss is unavoidable, equivalent replacements should be provided in close proximity to the loss. Agree, and see comments below.

[Response: Comment noted.](#)

b) Minimises the loss of traditional field boundaries and historic orchards. Agree. However, there should be a commitment to create new orchards and hedgerows for biodiversity and community well-being gains. As a volunteer for the Ipplepen Community greening group 'IpplePlanet, we are discussing where there is scope to plant a Community Orchard in the Recreation Ground. We have since identified a 'main site' in the long field to the west of the skatepark and along the strip between the tennis courts and the allotments. An area of the allotment was also considered. The Parish Council's highlighted areas around the recreation ground/allotment that may be suitable for planting of native trees, such as filling gaps in the boundaries and corners to enhance biodiversity and increase carbon sequestration.

[Response: This was not identified during the creation on the Neighbourhood Plan and should be raised with the Parish Council.](#)

c) Buildings and associated enclosures contribute to the enhancement of, and do not detract from, the rural landscape character of the parish either as a standalone scheme or cumulatively. Yes, particularly in the Conservation Areas, however where there are more modern homes, eg bungalows, and where it is not affecting the Conservation area, renewable energy schemes such as solar panels on roofs should be encouraged in the interests of promoting non-fossil fuels and improving energy security. Also, green roofs, bird and bat bricks should be encouraged to enhance biodiversity either as retrofit or for new builds.

[Response: The requirement for the inclusion of renewable energy technologies on new homes is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan. Features such as bird and bat bricks can be raised at planning application stage through the Parish Council.](#)

d) Light pollution is limited through the design, siting and technological solutions to prevent sky glow, including through the limitation of luminosity and hours of operation of outdoor lights. Agree.

[Response: Comment noted.](#)

e) Any reduction in level of tranquillity is minimised through siting, layout and landscaping of the scheme. Agree.

[Response: Comment noted.](#)

f) Special regard is given to enhancing westerly views to the hills of Dartmoor, particularly on hilltops and open areas with clear views/wide aspect.

IPP Policy 4: Development Design. This policy does lacks any attempt to ensure housing design is sustainable and address climate change issues and Teignbridge District Council's Climate Emergency. There should be a policy to include the need for all new buildings to be achieve the highest levels of energy efficiency, to include integrated solar panels/roof wind turbines (where appropriate), recycled (grey) water systems. New buildings should also have integrated swift and bat boxes built into the fabric of the building (eg bird or bat bricks in walls or eaves) to address the ecological emergency, bird and bat populations are in serious decline and such simple measures are relatively low cost and effective if executed correctly. Green roofs should also be promoted to enhance the local areas wildlife.

Support and develop community energy schemes, and increase local energy security, especially in light of the Russian war in Ukraine. There was a solar farm built in the past 12 years near Fermoy. Other renewable energy schemes, such as solar panels or wind turbines, must be given serious consideration to prevent energy shortages.

Response: The requirement for the inclusion of renewable energy technologies on new homes is included in the Teignbridge Local Plan, so is not duplicated in the Neighbourhood Plan. Features such as bird and bat bricks can be raised at planning application stage through the Parish Council.

Not building on flood prone areas, such not building on areas identified in the Plan as being prone to flooding.

Response: No new development will take place in the functional flood zones. Neither of the development sites allocated in the Neighbourhood Plan lie in these areas.

IPP Policy 5: Community Facilities. It was disappointing to lose the Post Office as this was in walking distance from my home. I am pleased there is a replacement Post Office on the busy main road but this is a longer walk that I'm sure will encourage people to drive to. The road is very busy so perhaps new infrastructure such as traffic lights or a zebra crossing could be installed to aid pedestrian access to the new Post Office.

Response: This is not within the scope of a Neighbourhood Plan and should be discussed with the Parish Council who can raise the issue with the Highways Authority.

IPP Policy 6: Local Green Spaces See my comment above about the War Memorial and suggestions to transform into a truly green space. Also confused why the long field to the west of the skatepark is not included as part of the Recreation ground. This has been discussed as a site for a possible community orchard. I have seen people allowing their dogs in this long field and in the main recreation ground, so suggest stronger enforcement of byelaws and clearer signage is required to prevent dog walking and fouling. I prefer for my children to play in a safe recreation ground without dogs and dog fouling and know other parents feel the same.

Response: Comment noted.

IPP Policy 7: Blackstone Cross Site Residential development on the Blackstone Cross site identified as site 1 on the Policies Map is supported for a comprehensive development of 100 homes where:

c) Site boundary hedgerows are maintained with required access openings kept to the minimum required to ensure safe access. Agree.

Response: Comment noted.

d) Footpaths are created in around the site to connect to the existing footpath network to provide safe pedestrian access to the village recreation ground and services. Agree. I suggest including cycle paths through the site and onwards to neighbouring settlements. Improved cycleways Preferably off-road, from the new site, and Ipplepen and to Newton Abbot and Totnes to reduce car commuting reliance and encourage recreational cycling.

Response: Suggest rewording of IPP7 (d) Footpaths and cycle paths are created in around the site to connect to the surrounding existing footpath and cycle path network to provide safe pedestrian access to the village recreation ground and services.

e) Special regard is had in the design and landscaping to provide a safe movement corridor for wildlife between the village and the countryside. Support.

Response: Comment noted.

f) High quality landscaping which includes native species is implemented to soften the visual impact of the development both from the village of Ipplepen and looking toward Ipplepen from the southern approach.

g) The layout of the development and landscaping should incorporate opportunities to maximise views towards Dartmoor.

h) The development includes a carbon reduction plan which stipulates how the proposal seeks to minimise its carbon footprint with regard to viability, materials, construction methods, design (including orientation to maximise solar gain), energy, water, waste management, travel planning and carbon offsetting. A thorough ecological assessment, historic environment and flood risk assessment should also be completed before this plan is approved. The new buildings should seek to attain the highest levels of insulation, energy efficiency, renewable energy generations (eg solar panels) and wastewater recycling. For example, refer to BREEAM | BRE Group standards for sustainable built environments. The plan should also consider and include provision for green transport for the future residents (eg good public transport, cycle and pedestrian access). There should also be provision of a green recreational space within the footprint of the new development, eg playpark, gardens with seating. Each building should also include integrated bat and bird boxes built into the walls, especially swift boxes, in the appropriate locations. Green roofs should also be encouraged to enhance biodiversity.

Response: Ecological assessment, historic environment and flood risk assessment are all required elements of the planning process. The standards and quality of new homes is identified in the Teignbridge Local Plan. Inclusion of features such as bird and bat bricks can be raised at planning application stage through the Parish Council.

i) The housing mix provides for a greater number of smaller homes (2 or fewer bedrooms) than larger homes (3 or more bedrooms). Agree.

Response: Comment noted.

j) Buildings are no more than 2 storeys in height to ameliorate landscape impacts from the sites elevated position. Agree.

Response: Comment noted.

l) Open access ducting (open to all fibre providers) suitable for and including full-fibre broadband connections is provided to each dwelling. Agree.

Response: Comment noted.

m) Planning applications must be informed and supported by the results of a programme of archaeological work, including geophysical survey followed by a programme of intrusive archaeological field evaluation. And ecological assessments.

Response: Planning applications and decisions are also informed by ecological assessments. As the impact on local heritage is a key consideration in the planning of this site, it is specifically identified in policy.

n) Development minimises its impact on soils, through the use of appropriate construction techniques that would not result in the over-compaction, pollution or reduction in the quality of the soil. Agree.

Response: Comment noted.

IPP Policy 8: Blackberry Hill Custom & Self Build Site A thorough ecological assessment, historic environment and flood risk assessment should also be completed before this plan is approved. The new buildings should seek to attain the highest levels of insulation, energy efficiency, renewable energy generations (eg solar panels) and wastewater recycling. For example, refer to BREEAM | BRE Group standards for sustainable built environments. The plan should also consider and include provision for green transport for the residents (eg good public transport, cycle and pedestrian access). There should also be provision of a green recreational space within the footprint of the new development, eg playpark, gardens with seating. Each building should also include integrated bat and bird boxes built into the walls, especially swift boxes, in the appropriate locations. Green roofs should also be encouraged to enhance biodiversity.

Response: Ecological assessment, historic environment and flood risk assessment are all required elements of the planning process. The standards and quality of new homes is identified in the Teignbridge Local Plan. Inclusion of features such as bird and bat bricks can be raised at planning application stage through the Parish Council.

IPP Policy 10: New Employment Provision Support a-e. Also consider supporting new green industries that address climate change issues for energy and food security.

Response: Comment noted. The type and nature of specific businesses has not been specified to avoid being prescriptive and allow the flexibility to encourage different types of business.

IPP Policy 11: PROTECTION OF THE SOUTH HAMS SAC – support. Note any hedgerow loss or increased lighting for new developments may negatively affect the bat routes of the South Hams SAC.

Response: This factor is fully considered for development falling within the South Hams SAC.

I welcome the opportunity to contribute my thoughts and comments on the latest version of the Ipplepen Neighbourhood Plan.