

# BISHOPSTEIGNTON PARISH COUNCIL

## Teignbridge Draft Local Plan 2020-2040 (Part 1) Consultation Questionnaire Response



### 1. Your Details

Please provide your details below:

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2. Please tick YES if you wish to be notified on the progress of the Local Plan Review and included in future consultations	YES	<input checked="" type="checkbox"/>
	NO	<input type="checkbox"/>

Bishopsteignton Parish Council would wish to complement Teignbridge District Council on what it is felt is a comprehensive review of policy that will position Teignbridge District Council well in respect of both the social and environmental challenges that must be met. In its detailed response to the consultation Bishopsteignton Parish Council would like to point to comments regarding ambiguity, lack of clarity and conflict between elements of the text to assist Teignbridge Parish Council in achieving a new set of Policies that are fit for purpose in the current and future environment that we live and work in.

### Chapter 2: Sustainable Communities

Bishopsteignton Parish Council comments on specific policies within the Sustainable Communities Chapter.

SC1: Sustainable Development	All good criteria but it will need to be demonstrated how this will be delivered if the Plan is to have credibility. (d) in particular, is a point to note– most of the document speaks to an individual site’s development and the requirements around that. There is little evidence that the issue of congestion in general is being addressed by Teignbridge – developments are given approval with no change to the roads in the adjacent area – as exemplified by the roads from the A380 down into Kingsteignton and Newton Abbot which are inadequate for the volume of traffic that uses them throughout the day
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SC2: Settlement Limits and the Countryside	It is particularly difficult to comment on the proposed settlement limit until part 2 is published.
SC3: Ashburton and Buckfastleigh	No comment
SC4: Neighbourhood Plans	Bishopsteignton NDP made October 2017.
SC5: Infrastructure	Here the issue is at what point in the surrounding infrastructure is the proposal being linked – notably in recognising the statement of intent around (c)
SC6: Viability	This policy is ambiguous in defining scale/size of the proposed developments.
<p><i>Additional comments on the Sustainable Communities Chapter:</i>          Concerned at the general lack of definition in the wording and would have expected to see more robustly worded policies in order to support and underpin TDCs Climate Emergency declaration.</p>	

### Chapter 3: Climate Change

Bishopsteignton Parish Council comments on specific policies within the Climate Change Chapter.

CC1: Resilience	'Fossil fuel scarcity' should be replaced with 'elimination of fossil fuel use' to make this policy effective.
CC2: Carbon Statements	<p>Given that this is the only concrete policy to address the councils Climate Emergency declaration we would expect the policy would have sufficient supporting legal powers to ensure delivery.</p> <p>"Carbon Neutral" and its use throughout, that its definition within the policy is placed in the list of terms used in the document.</p> <p>The last para defines the meaning of "Carbon Neutral" developments, that is to eliminate or offset all regulated emissions. The second para of this policy states that the policy seeks to "achieve Carbon reductions", this may be misleading as it does not state the level of reduction expected as shown in table 6 on page 37.</p> <ol style="list-style-type: none"> <li>a. Transport - The wording "...depending on its location." should be removed.</li> <li>b. Energy Demand – The wording "... and avoid temperature discomfort" should be removed as unnecessary.</li> <li>c. Renewables – Whilst supporting the principles of these points, emphasis should be placed on the impact of building sufficient affordable homes.</li> </ol>
CC3: Electric Vehicle Infrastructure	<p>It is disappointing that the authors have not carried out a high degree of viability analysis already, before writing the statements. Noting the point about Hydrogen fuel, why not make that mandatory?</p> <p>All the points are valid but really fall short – the requirement should be a full Type 2 charging point for example, not an option for a 13amp socket.</p> <p>On point (e) – This does not clarify the applicable number of dwellings in a development. Unclear what point (f) means. Does Teignbridge propose financial support?</p>

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CC4: Sustainable Transport	<p>This set of principles is fine but there is too much wriggle room in delivery.</p> <p>The key issue is the question of the crunch point between the development site and the existing infrastructure. There is ample evidence in the Newton Abbot area to show that the existing infrastructure is already overloaded and there is very limited evidence of an appetite on the part of bus operators to expand services.</p>
CC5: Renewable and Low Carbon Energy	<p>This policy needs to be more strongly worded to be an effective requirement to TDCs climate emergency declaration.</p> <p>Some of the paragraphs supporting this policy seem vague and the reasoning is ambiguous and lacks consistency.</p>
CC6: Energy Storage	<p>This whole section has good intentions, but it is essential that in Part 2 at least there are quantifiable targets set for the period to the end of the Plan in 2040.</p> <p>These targets should also be achievable rather than aspirational.</p>
<p><i>Additional comments on the Climate Change Chapter:</i></p> <p>The principles embodied in these policies are excellent however the phrasing of some policies would benefit from more emphatic language to give them greater effect.</p>	

### Chapter 4: Design and Wellbeing

Bishopsteignton Parish Council comments on specific policies within the Design and Wellbeing Chapter.

DW1: Quality Development	<p>This policy is unclear in its intention particularly for development companies of under 10 homes as to what 'will be required'.</p> <p>The sentence 'Development should accord...' should begin with 'All' to cover development producing any number of dwellings.</p> <p>Point (l) is already covered by (h).</p>
DW2: Easy to Navigate Places	<p>The first sentence of DW2 should be replaced with the first sentence of paragraph 4.7; we would suggest the policy should be worded as follows</p> <p>'New development will create places which have an easy to navigate layout by paying attention to the structure, composition, layout and combination of features, both built and natural. This will be achieved by:' Subclauses (a) to (f) to follow.</p>
DW3: Street Character and Form	<p>The critical factor, we believe, in making new developments work well is often how they connect with existing infrastructure and this needs to be encompassed within policy DW3.</p>
DW4: Good Building Design	<p>Sub clause (i) should be expanded to include and encourage any other ecologically efficient opportunities to come forward from the design stage, rather than only solar gain.</p>
DW5: Design of Employment, Retail and Civic Buildings	<p>No comment.</p>
DW6: Shop Fronts and Advertisements	<p>Here could be an opportunity to control unnecessary lighting and the wording of 1(e) could be "...where absolutely or proven to be necessary."</p> <p>5. Outdoor advertisements - there is no stipulation regarding lighting.</p>

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DW7: Creating Neighbourhoods	No comment.
DW8: Healthy Active Places	No comment
DW9: Natural Infrastructure	No comment.
DW10: Design of Natural Infrastructure	No comment.
DW11: Natural Green Space	This policy needs to qualify the type of management body in subclause (e) to be responsible for maintaining in perpetuity the green space created.
DW12: Natural Corridors	This policy needs to qualify the type of management body in subclause (c) to be responsible for maintaining in perpetuity the natural corridor created.
DW13: Parks and Recreation	No comment.
DW14: Allotments	Principles of this policy are satisfactory however the council ask is the ratio in (a) sufficient? This policy, under Subclause (f) does not state who will manage the allotments provided by the developer? For smaller developments BPC would expect a contribution towards the provision of allotments.
DW15: Sustainable Drainage Systems	Difficult to comment on this policy as no scale is provided.
DW16: Urban Greening	Throughout this policy the terms 'Major/Minor development' requires definition as to scale and size.
DW17: Long-Term Stewardship	What is meant by 'major residential development'? This requires definition. The Long-term stewardship should be carried out by appropriately qualified bodies.
DW18: Parking	The importance of climate change needs to be reflected in a policy dealing with parking eg. adequate provision of equipped charging spaces should be included. BPC feel this policy should include a clause which covers change of use applications which result in more dwellings per building.
DW19: Residential Density	The word dwelling requires definition. Wording should be changed to 'Some variation <i>may</i> be permitted <i>if</i> it can be demonstrated...'
DW20: Waste and Recycling Storage Provision	For clarity, the first sentence requires an additional word ' <i>...must</i> continue to be achieved...' and should end ' <i>...must</i> meet the following criteria.' Point (a) not easily understood and need rewording. Does point (b) indicate a change in policy so that waste is now collected from private property?
DW21: Services and Utilities	No comment.
DW22: Loss of Local Facilities and Services	Rewording to include ' <i>...at least one of the following</i> '.
DW23: Protection of Recreational Land and Buildings	In the opening sentence should continue ' <i>...unless</i> robust evidence demonstrates:' Under subclause (a) removed the option of equivalent provision. In point (c) does European Protection continue to apply?

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### *Additional comments on the Design and Wellbeing Chapter:*

On the whole BPC found this chapter well thought through and rooted in common sense and should encourage plans to come forward for designs which promote wellbeing for all, however, it has been particularly difficult to comment on these policies as no scale of development is provided.

### **Chapter 5: Economy**

Bishopsteignton Parish Council comments on specific policies within the Economy Chapter.

EC1: Business Development	Must not be too remote from towns and larger villages. Access to local facilities important to reduce vehicle movements.
EC2: Local Supporting Services for Employment Sites	Must not be too remote from towns and larger villages. Access to local facilities important to reduce travel.
EC3: Loss of Employment Sites	Important to give priority to maintain and develop existing employment sites and to facilitate agreements to deliver related infrastructure.
EC4: Inclusive Employment and Skills	Important to give priority to maintain and develop existing employment sites and to facilitate agreements to deliver related infrastructure. We understand and agree with the principle of this policy however feel it is impracticable to enforce.
EC5: Working from Home	Facilitating home working vital although it is unclear what is meant by "support". Percentage will increase significantly over time, particularly for part of working week, with an office base being used less frequently.
EC6: New Tourist Accommodation and Attractions	Strategy to increase and expand existing tourism opportunities increasingly important but in a focused way and provided there are linking plans to improve the associated access roads.
EC7: Static and Touring Caravan Sites	A sensible policy.
EC8: High Speed Digital Networks	In the first sentence "... to have access to..." should be reworded as "will have installed the best available...". High Speed Digital Networks vital. Need to facilitate ongoing upgrading of facilities, being mindful of any health issues. Key element to increased working from home.
EC9: Development in and Around Town Centres	Essential to redevelop Town Centres. Key to facilitate change of use from retail to residential, entertainment and other new opportunities. Increased footfall is needed to make Town Centres viable.
EC10: Vital and Viable Town Centres	Essential to redevelop Town Centres. Key to facilitate change of use from retail to residential, entertainment and other new opportunities.
EC11: Large Scale Retail Development	Strong support to limiting size of new retail parks/sites rather than only individual shops outside of town centres.

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EC12: Local Shops	Support & develop local shops needs to include retention of existing shops - vital to local communities, evidenced by the need to reduce vehicular travel in difficult times.
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<b>Chapter 6: Homes</b> Bishopsteignton Parish Council comments on specific policies within the Homes Chapter.	
H1: Affordable Housing Targets	It is noted that the affordable housing target for Newton Abbot & Kingsteignton is 17%. BPC feel this percentage is insufficient to meet increasing demand. In subclause (c) what is criterion c) of this policy?
H2: Affordable Housing Controls	No comment.
H3: Inclusive Design and layout	No comment.
H4: Homes Suitable for All	A welcome inclusive policy but there is a lack of clarity how this is applied across the district, in other parishes.
H5: Custom and Self Build	BPC question the demand for self-build. 5% on sites over 20 dwellings is bound to have a significant impact on the overall cost of housing as a developer has to recover their costs and profits on a smaller number of dwellings.  Rural exception sites have plot values capped at £10k but it would seem more sensible in our unpredictable economic times to fix plot prices at a percentage of open market value rather than a specific monetary figure., and we would suggest that alteration to this should be considered.  Maybe better to allow local authorities to build homes to rent.
H6: Rural Exception Sites	As our comment for H5. It is not clear what this policy is seeking to achieve. Much more clarity is required and it is proposed that, in the context as presented, Clause (a) should be extended to require that the provision be met by any existing or future management agency for the affordable housing units in perpetuity.
H7: Entry Level Exception Sites	No comment
H8: Local Needs Housing in Rural Areas	There is no mention of permitted development rights being removed which we consider essential where dwellings are to be built outside of a defined settlement limit. Also, in the case of live/work units the employment and residential elements cannot be separated to be sold off or let individually. It is essential that Change of Use should be discouraged. Additionally, it needs to be clearly stated which land use categories would be permitted for the work use part so that nuisance is not created for neighbouring properties.  In subclause (k) what is 'significant' additional traffic movement?
H9: Homes for the Travelling Community	This policy should make it clear where these Travelling Community sites are or are planned to be.

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H10: Householder Development	<p>For clarity it is assumed that H10 applies where an existing property is developed and not an attempt to demolish and rebuild.</p> <p>BPC strongly believe it is essential to retain established garden space for biodiversity however this is not referred to in this policy.</p> <p>For clarity we would like to see the same stipulation as contained in clauses 4.64 &amp; 4.65 to be applied to clause (i) of policy H10.</p> <p>In clause (j) reword to ‘Substantially reduce energy demand...’ instead of ‘Minimises.’</p>
H11: Residential Amenity	A subjective policy which has not been applied robustly enough in the past. People’s lives have been blighted by planners’ bad decision making. Despite the definitions within table 29, how do Teignbridge intend to enforce this policy?
H12: Replacement Dwellings	No comment.
H13: Re-use and Conversion of Existing Buildings in the Countryside	There would seem to be no time specified before an existing building can be claimed to be redundant or disused and unless this is specified in a saved policy, we would suggest that the building should have been in existence prior to the application for conversion for a minimum period of years and this should be added in as a proviso to Policy H13.
H14: Subdivision of Existing Dwellings	No comment
H15: Rural Workers’ Dwellings	Not sure that sub-clause C is understood. What does “...within sight and sound...” mean? Would it be better to say “... which could meet the need within a stipulated distance (eg. Half a mile) of the holding”?
H16: Removal of Conditions Imposed on Rural Workers’ Dwellings	Does this policy reduce the term from before removal of conditions from 7 to 3 years?

### Chapter 7: Environment

Bishopsteignton Parish Council comments on specific policies within the Environment Chapter.

EN1: Strategic Open Breaks	<p>Pleased to see and strongly support the proposal to maintain the physical separation between Teignmouth and Bishopsteignton however it is vital that a strategic break between Bishopsteignton – Kingsteignton must be included in this policy. The land from the A380 slip road along the bends is the gateway to the Teign Estuary and Teignmouth and the rural character must be maintained.</p> <p>Policy wording must be strengthened as follows: “Development within these open breaks <b>will not be</b> permitted. Add another point (c) The integrity of European Protected Sites or SSSI’s must not be compromised.</p>
EN2: Undeveloped Coast	No comment.
EN3: Coastal Change Management Areas	<p>An increasingly important policy in the coming years due to increased flooding predictions along the Teign.</p> <p>Under *Essential Infrastructure could other possible sources of renewable energy be included.</p>

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EN4: Landscape Protection and Enhancement	<p>A welcome protection. The District Landscape Character Assessment does not appear to cover the whole of Teignbridge and only gives definition to a few areas. Does the same apply to other Landscape Value Areas e.g. around Bishopsteignton?</p> <p>Please add a 2<sup>nd</sup> sentence – “We also welcome the special regard which will be given to the <b>setting</b> of Dartmoor National Park, Haldon Hills and Exeter Urban Fringe. This special regard should also be given to the Teign Estuary, from Teignmouth up to Hackney Marshes”</p>
EN5: Equine Development	No comment.
EN6: Flood Risk	<p>Important to be mindful of the potential impact of additional caravan/chalet parks (Point 2) moved from lower ground due to risk of flooding onto available higher ground.</p> <p>However, surface water flooding is not mentioned e.g. if a green area is converted to hardstanding it could make surface run off worse and contribute to local surface water flooding during rainfall events. However, Bishopsteignton neighbourhood development plan does cover this. <i>BSA6 New development within the Parish should ensure that it does not exacerbate existing storm drainage problems and where appropriate contribute to its solution.</i></p> <p>7.21 – BPC question why building would be considered in location of flood risk.</p>
EN7: Air Quality	<p>Point 2 – Harmful impact on air quality should be avoided not just mitigated. It is essential that any financial contributions are committed to improving air quality initiatives.</p>
EN8: Light Pollution	<p>Policy EN8 is acceptable in principle, however, supporting paragraphs lead to ambiguity and a lack of clarity results in misinterpretation.</p>
EN9: Contaminated Land/Land Instability	<p>An important policy for villages such as Bishopsteignton given landslips in recent times the land stability point should be emphasised in request for relevant information.</p> <p>For example, prior to development a comprehensive geological survey is conducted to assess land stability and establish varying water tables to see the impact of excavation both on-site and downstream(hill).</p> <p>Any runoff from the higher ground above such developments could also be an issue if the land is not properly managed in perpetuity.</p>
EN10: Biodiversity	<p>Gardens are an important characteristic of the village and add to the biodiversity, forming an extensive network of habitats and wildlife corridors. Gardens provide good sources of food, shelter and breeding sites for insects, amphibians, birds and small mammals. In the longer term gardens will be essential to help society adapt to the effects of climate change and allow for the growing of local food. A protective policy is required to secure this resource now and for the future, to protect the landscape, character and biodiversity of an area from inappropriate development on residential gardens.</p> <p>Point 1 – What is the definition of ecosystem services?</p> <p>Point 2 - The two strategies quoted are not easily located on the website. All developments result in fragmentation of habitat therefore ‘minimise loss and fragmentation of habitat etc’ is unachievable.</p> <p>Point 3 - According to the local plan, net gain excludes any development exempted by the Environment Act - it would be useful for the plan to clarify what developments are exempt, a link or list would be useful. It would also be useful to know what scale of development is exempt, such as domestic properties, if any.</p>



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	<p>Pleased to see development will demonstrate a 10% or greater net gain in biodiversity compared with the predevelopment. This is in line with national policy.</p> <p>Point 4 – Off-site compensation is never a good option. Local communities will be deprived of native habitat.</p> <p>Point 5 – remove the words ‘...in principle.’</p> <p>Point 6 – suggest reducing this to read ‘... Development that involves the loss of irreplaceable habitats will not be supported.’</p>
EN11: Important Habitats and Features	<p>f) reword to strengthen ‘the public interest benefits of the development demonstrably outweigh the harm’</p> <p>g) Worrying and open to developers’ interpretation. Will the decision maker be independent of the developer or landowner?</p> <p>h) reword – any harm or losses are fully mitigated.</p>
EN12: Legally Protected and Priority Species	<p>A welcome policy, however</p> <p>2b) Reword ‘Appropriate mitigation must be scientifically proven, and the possibility of alternative financial contribution is not acceptable.</p> <p>2c) strengthen – The public benefit must demonstrably outweigh the harm.</p> <p>3. What is meant by ‘Where appropriate...’? Remove this and change to ‘Proposal must include...’.</p> <p>After hedgehog holes add’ ... in fences and hedging.’</p>
EN13: European Protected Wildlife Sites	No comment.
EN14: South Hams Special Area of Conservation	No comment.
EN15: Trees, Hedges and Woodlands	<p>Any planting must show net gain in the area and properly managed until fully established and maintained in perpetuity.</p> <p>We suggest para 7.66 be reflected within the policy as an additional point which strengthens hedge translocation.</p>
EN16: Heritage Assets	Suggest including an additional point which encourages changes to be permitted to include the energy efficiency of existing buildings.
EN17: Conservation Areas	No comment.

Bishopsteignton Parish Council has undertaken a comprehensive review drawing on both Council and specialist expertise to enable a detailed commentary to be submitted. It should be noted that, whilst Bishopsteignton Parish Council supports the intentions of the policies being proposed, it is felt that in a number of points in both the Policy Statements and the supporting text there are both issues of ambiguity and a lack of clarity in the statements. There are also instances where the intention of the policy is in fact degraded either by a lack of definitive statement of requirement or indeed a conflict with other parts of the text which could lead to the setting aside of what Bishopsteignton Parish Council believes are important statements of requirements.