



Thank you for taking the time to provide us with your comments on the Local Plan 2020-2040 Proposed Submission document.

**Your Submission:**

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**Agents Name (if used):** Hilary Winter

**Examination Hearings:** I do not wish to participate

**Participation comments (if you do wish to participate):**

**Local Plan Hearing:**

**CIL Hearing:**

**Staying in Touch:** Yes

**Your Comments:**

Document	Part	Legal/Sound/Duty to co-operate	Comments	Modification Comments
Additional Evidence		//		

Document	Part	Legal/Sound/Duty to co-operate	Comments	Modification Comments
Local Plan 2020-2040 Proposed Submission - Whole Plan Comment	Whole Plan Comment	yes / no / no	<p>In its response to the Local Plan Review – Issues Consultation in 2018, the Devon Countryside Access Forum raised the question of the impact of visitors and the tourism economy, highlighting that this should be a factor in assessing the need for green infrastructure provision. This issue extends beyond the population growth anticipated from any development and is particularly the case in coastal communities in Teignbridge. It would be helpful for the Local Plan to recognise that additional green infrastructure may be required.</p> <p>Teignbridge District Council should assess the data on visitor numbers to the district and the pressure on existing green space, identifying where additional green infrastructure should be provided. This would help to alleviate the impact on Dawlish Warren Special Area of Conservation and the Exe Estuary Special Protection Area in particular. Where new SANGS has already been provided, or is identified in the Plan, this relates solely to the scale of housing development.</p> <p>There is a reference to the negative impact of tourism developments (paragraph 4.21) on protected sites but no policy related to green infrastructure that addresses the number and impact of tourists.</p>	
Additional Evidence		//		

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Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)		yes / no / no	<p>The draft Plan makes many references to the quality of green space. The Devon Countryside Access Forum regards the Plan as unsound as it makes no specific recommendations as to how the quality will be measured, monitored and assessed, other than for SANGS sites. (Paragraph 9.30 states that SANGS quality will be subject to scrutiny by Natural England to ensure that sufficient and high quality mitigation is put in place to prevent harm to European Wildlife sites). In its response to the Local Plan Review: Issues Consultation in 2018, the Devon Countryside Access Forum asked specifically how quality will be determined, assessed and monitored.</p> <p>Nationally, the quality of green space is referred to in the National Planning Policy Framework in paragraph 98. "Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change." Similarly, the Environmental Improvement Plan, just published, states that "good quality green infrastructure is important for health and wellbeing, air quality, nature recovery and for delivering net zero targets, as well as for adapting to climate change by providing urban cooling and reducing flood risk. It can help to address issues of social disparities and environmental decline, whilst also making better places to live."</p> <p>The Plan should include a methodology to define, assess and monitor the quality of green space and green infrastructure to ensure it meets the national aspirations above. This should also be incorporated in the Sustainability Appraisal.</p>	Table 10.1 SA Monitoring Indicators should include condition and quality of green infrastructure/green space in A. Natural Environment, a role for the LPA. Outcomes should be included in the Annual Monitoring Report.

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General Policies (GP1-GP8)	GP7: Infrastructure & Transport Networks	yes / no / no	<p>In its response to the Teignbridge Local Plan consultation in 2020, the Devon Countryside Access Forum advised that the phrase "Connections to existing footpaths and cycleways should be delivered prior to occupation;" should be amended and include connections to other public rights of way and recreational trails. The Forum is disappointed that this has not been changed in the Proposed Submission Local Plan and regards the current policy as unsound. It should be incumbent on developers to link to public rights of way and recreational trails as well as to any urban cycleways to ensure the benefits of sustainable transport. It would also be a more inclusive statement as it would include bridleways and byways. The policy GP7: Infrastructure &amp; Transport Networks point 7 should be amended to "Whilst recognising potential for development viability considerations, ensure that new development is provided with appropriate infrastructure as early in the development as possible. Connections to existing public rights of way, recreational trails, footways and cycleways will be delivered prior to or alongside the first occupation. Active travel links to potential long-term future development sites will be safeguarded." CC4 Sustainable Transport does refer to "b. Retain existing public rights of way and provide link to strengthened, improved and extended public transport, cycling and walking networks and green infrastructure networks.". However, to link this point more directly to infrastructure associated with development at the earliest opportunity would make the Plan more compliant in terms of sustainable transport. The Rights of Way Circular (01/09) states that "Rights of way provide for various forms of sustainable transport and can play a significant part in reducing traffic congestion and harmful emissions."</p>	<p>GP7: Infrastructure &amp; Transport Networks</p> <p>7. Whilst recognising potential for development viability considerations, ensure that new development is provided with appropriate infrastructure as early in the development as possible. Connections to existing public rights of way, recreational trails, footways and cycleways will be delivered prior to or alongside the first occupation. Active travel links to potential long-term future development sites will be safeguarded.</p>

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Design and Wellbeing Policies (DW1-DW3)	DW3: Design Standards	yes / no / no	<p>The Proposed Submission Local Plan would be more sound if it sought to include a statement along the lines that allocations of space and type of informal outdoor space might need to recognise the requirements for different groups, for example the percentage of children compared to the number of children's informal play areas and the number of areas that are accessible to disabled people. Research shows men and women use outdoor space differently, for example there are more male cyclists and more horse riders are women. Use of informal outdoor space should consider provision for a range of access users such as walkers, dog walkers, disabled users, cyclists and horse riders. This aspect should be considered as part of policy GC2 Connecting to Nature - Green Infrastructure and Public Realm and/or DW3: Design Standards and include a statement along the lines of "The design of green space will take into account the number and mix of users, giving consideration to walkers, dog walkers, disabled users, cyclists, horse riders and the needs of specific groups such as children." The National Model Design Code sets a baseline standard of quality and practice which local planning authorities are expected to take into account when developing local design codes and guides and when determining planning applications, including "How the design of new development should enhance the health and wellbeing of local communities and create safe, inclusive, accessible and active environments."</p> <p>The Devon Countryside Access Forum previously submitted its position statements on Greenspace and Disability Access to Teignbridge District Council as part of its response to the consultation on the draft Local Plan in July 2020.</p>	<p>GC2 Connecting to Nature - Green Infrastructure and Public Realm and/or DW3: Design Standards should include a statement along the lines of:</p> <p>"The design of green space will take into account the number and mix of users, giving consideration to walkers, dog walkers, disabled users, cyclists, horse riders and the needs of specific groups such as children.</p>

## Community Infrastructure Levy (CIL) Draft Charging Schedule

I wish to comment: No

Status of Representation:

CIL Comments:

### Comments on the Proposed CIL rates

Do you agree with the proposed charges?:

If no, Your comments:

Charging Zone	Charges	Your recommended charge	Comments