

**PRE-SUBMISSION ABBOTSKERSWELL NEIGHBOURHOOD PLAN – TABLE OF COMMENTS AND RESPONSES**

(Note: coloured rows used to delineate responses from single individual or organisation with multiple comments)

<b>Response No</b>	<b>Plan Ref</b>	<b>Name of Contributor</b>	<b>Comments made</b>	<b>Suggested changes to Pre-Submission N P by Contributor</b>	<b>Response by Steering Group</b>
1	Aim 6	Mrs B Gates	Importance of local bus service at the level it is currently		Comment noted
2	Objective 6.5	Mr J Clowes	Paragraph 125 – HGV’s in village	Priory Road should have “no access” signs at both ends	Sign installed at Decoy end already, no sensible place to install sign at village end. However, not relevant to NP process
	Policy TA3		Paragraph 133 strongly supported		Support noted
	Objective 6.2		Paragraph 123 disagree	A 20mph limit without calming measures will not be obeyed	Comment noted
	Objective 6.2		Paragraph 120 agree	Double yellow lines required at key locations.	Comment noted
	Aim 9		No mention of Heavitree land at the end of South View for village recreation	Include this land	Land not currently accessible. Therefore, no amendment to Plan
	Policy CF1		Reference to cricket pitch twice	Should be both amended to cricket ground	Text amended
3	Policy TA3	Mrs D W Hoare	Bitney Lane is not a Right of Way	Delete text from policy	Status changed from proposed policy to an aspiration and map amended. Contributor advised.
4	Policy TA3	Mr C Glyn	Object to proposal to extend Vicarage Road as cycle/footpath	Delete text from policy	Status changed from proposed policy to an aspiration and map amended. Contributor advised.
5	Policy TA3	Mr & Mrs Buckpitt	Paragraph 136 (TA3) strong objection to proposed footpath (Vicarage Road to	Delete text from policy	Status changed from proposed policy to an aspiration and map amended.

			Manor Farm and Great Oak) and cycle path to Langford Bridge		
6	Policy TA3	Mrs E E Buckpitt	Object to proposed cycle route from Vicarage Road to Langford Bridge	Delete proposal	Status changed from proposed policy to an aspiration and map amended.
7	Aim 5	Tetlow King on behalf of Retirement Villages	Wish to develop further modest care accommodation in the existing footprint of The Priory. Additional aspirations are for small, low density and highly sensitive development in the adjoining undeveloped area currently identified as 'Local Green Space' (Biodiversity) (Policy NE3)	Amend plan to include such development.	Plan amended to include support for community health and welfare facilities where normal planning rules apply to avoid building on local green space.  Development application should be dealt with through normal planning process.
8	The Plan's status	Devon County Council	Paragraph 17 Reference should be to the two Mineral Safeguarding Areas as proposed in the emerging Minerals Plan.	Amend text	Text amended and to include most up to date map.
	Objective 4		Paragraph 73 The NA3 allocation is not within the Neighbourhood Plan area and the current Teignbridge Local plan encourages prior extraction of the sand and gravel.	Reference to the NP not supporting extraction should be deleted from Plan	Part of the NA3 allocation is within the Neighbourhood Plan area – not agreed.  This site contains within its boundaries a European Protected Site, a SSSI, a County Wildlife Site, and is a habitat and foraging area for a number of Section 41 species.

					<p>It has been stated that a SUDS drainage system would be required to prevent contamination of the Fen. This at the same time would diminish the water flow into the Fen. A SUDS scheme to cater for somewhere in the order of 750 houses and estate roads will require a system of some complexity and cost, and would be very close proximity to the Fen.</p> <p>The clay layers in the gravel beds prevent the groundwater from percolating down to the lower levels of the Aller Gravel beds. It is highly likely that construction work in the collecting area above the Fen would disturb the clay layers and disrupt the groundwater feeding the Fen.</p> <p>Until a thorough scientific assessment of the Fen's hydrology is assessed the combination of mineral extraction coupled with an extensive SuDS scheme would seriously impact water flow and water balance into the Fen.</p> <p>This is therefore a major risk to the Fen and SSSI.</p>
	Policy NE4		It would be useful to clarify that these "measures" (Local Flooding) can include the use of Sustainable	Amend text	Text amended to SuDS

			Drainage Systems on new development sites. Amend SUDS to SuDS.		
	Policy TA3				DCC did not include any comment on this Policy so wrote to DCC to obtain a response as the responsible authority for Public Rights of Way and Highways– see next line
	Policy TA3		Advice to remove the proposals as no agreement with landowners; also no funding available for such proposals from DCC as not strategic routes. Clarification of status of Vicarage Road and Rydon Lane needed.		Vicarage Road to Junction of Rydon Land and Rydon Lane confirmed as pedestrian accessible by DCC.  Status downgraded from a proposed policy to an aspiration and map (Figure 19) amended.  The Traffic Management Plan, led by the Parish Council, should consider how to potentially enhance routes as indicated by the buff shaded annotations on the Figure 19 map.
9	Paragraph 24	WYG for Linden Homes Ltd	Inaccurate reporting of the Inspector’s Appeal Decision.	No change required	Comment reviewed and noted.
	Policy NE4		Supporting text should establish the evidence behind the sources of information that has led the NP to refer to locations a) – h).	Amend text	Paragraph 59 text amended:  “The Parish Council and its Emergency Planning Committee have recorded all significant incidences of flooding over many years and reported these to both the Environment Agency and the Highways Authority. The areas of localised flooding with which we have particular concern are identified on Figure 9 with yellow triangles and evidenced with photographic and video.”

Objective 4.4		Further clarity is required on the meaning of “appropriate location” and “very small estates”	No change required to Objective 4.4	Aim 5 in Population and housing amended: “Support new small scale housing development in sustainable locations”
Policy BHE1		The requirement to use “where feasible, local stone” is not justified by evidence and could impose unreasonable cost and delay on development delivery. “Local” should be defined with reference to active quarries or types of stone.	Amend text	Text amended after Figure 13.  Materials considered to be local are Limestone deposits, with quarries south of Abbotskerswell (Stoneycombe Quarry) and near to Ashburton (Linhay Quarry), shown on the far top left of the map, and Sand and Gravel extraction quarries at Aller, shown on the right of the map.
Aim 5		Further clarity is required of the meaning “small scale” and “appropriate”	Amend text	Aim 5 in Population and housing amended: “Support new small scale housing development in sustainable locations”
Paragraph 75		States the NP “is intended to be in general conformity” with the Local Plan. It must be in conformity with the Local Plan.	No change required	Term “general conformity” is acceptable
Paragraph 80		Considers the presumption in favour of sustainable development applies to Abbotskerswell “in principle”. NPPF (Paragraph 14) requires it	Amend text	Text amended  Removed “in principle”

			to be in favour of sustainable development.		
	Paragraph 81		Linden consider the principal constraint to development is the tightly drawn settlement boundary. The NP is an opportunity to review the boundary.	Review Settlement Boundary.	Not agreed, review of boundary was considered at an early stage but deemed unnecessary. This Plan was not seeking any additional allocations which would require a settlement boundary review.
	Objective 5		Linden considers the Plan should include a coherent, legible structure for meeting housing need and Table 4 should not be the basis for evidence of Plan's policies.	More housing development should be included and recognise the minority views of residents are more important than those supporting the status quo	Not agreed - plan does this as the Housing Needs Survey is up to date.
	Objective 5		Linden considers the NP should recognise the opportunity for development of the Manor Road site.	... on Manor Road site.	Noted:  This plan considers developments which satisfy the policies of TDC's Local Plan and Abbotskerswell's NP.
	Policy PH3		"High quality" should be referenced to specific Local Plan/NPPF requirements reflecting the character of the settlement/ Conservation Area as appropriate.	Amend text	Text amended  Proposals for Custom Build Development within the settlement boundary are strongly encouraged and will be considered favourably where they: a) Are of a high quality design which reflects the local character, as defined in the Local Plan and design SPD...
10	Policy PH2	PCL Planning Ltd	Policy PH2 is unnecessary duplication of the adopted Teignbridge Local Plan	Remove reference to NA3 from Plan	Part of the NA3 allocation is within the Neighbourhood Plan area and specification of

			which provides a sufficient level of control.		“green Infrastructure” within NA3 Wolborough Design SPD/LDF is awaited
11	Policy BHE1	Historic England	Support this policy.		Support noted
12	Policy PH3 Policy TA1 Policy TA3 Policy EE1 Policy CF1	Natural England	Advises that the wording of these policies are amended to include wording that takes into account of any potential impact these policies may potentially have on South Hams SAC.	Amend policies.	Text amended in accordance with TDC SAE/HRA screening – see response 27 (Para 2.4) below.
13	NE3/52	Liz Clowes	What about land behind the village hall?	Include this land as community facility	Land not currently accessible. Therefore, no amendment to Plan
	CF1/150		Not enough emphasis on children’s playing facilities.	Playpark needs to be upgraded (like Ippepen)	Plan already safeguards this community facility.
14	TA3 /133	Mr. A. Farley	Always wanted this circular route (refers to footpath proposal linking Vicarage Road with Great Oak Cross)		Support noted
15	NE1	Mr P Richards	Agree		Support noted
	NE2		Agree – really crucial to allow development as a last resort		Support noted
	NE3		Agree – vital to protect for future generations		Support noted
	NE4		Agree		Support noted
	BHE1		Agree – really important		Support noted
	PH1		Agree – must try to address national housing shortage		Support noted

	PH2		Agree- I use this area regularly for walking and such a green buffer is vital		Support noted
16		Andrew Rose	Support proposals		Support noted
17		Mary Colclough	Support proposals		Support noted
18		Ian Calderbank	Support proposals		Support noted
19		Tim Collins	Support proposals		Support noted
20		Christine Nelson	Support proposals		Support noted
21		Mrs Diana Harvey	Support proposals		Support noted
22		Enid Davis	Support proposals		Support noted
23		Mrs AM Richards	Support proposals		Support noted
24		E Goodman	Support proposals		Support noted
25		A Sanders	Support proposals		Support noted
26		John Brench	Support proposals		Support noted
27		Ray Vyse (Short Mat Bowls)	Support proposals		Support noted
28		Emma Grice (Preschool including baby and toddler)	Support proposals with one exclusion. Requirement for need for 6 affordable houses is too conservative.		Noted. The number of affordable houses needed, ie 6, was independent assessed through a comprehensive survey (2014) conducted by Community Council of Devon (CCD). CCD sent all households in the parish a survey form to complete and return. The neighbourhood plan proposes to review housing needs at least every 5 years.
29		Paul Marino (Village Hall Trust (VHT))	Comments from sports and social representatives on the management committee were requested to be sent to VHT.	None received although two submissions above were sent direct to steering group.	Noted.

30		Pete Wade (AbbPast)	Presented concerns about the conservation area, in particular, the former Wesleyan Chapel, the former Co-operative Shop, the Square, Industrial Area, Public Baths, Barnfield Council Houses, Salem Bungalow, Houses built at the bottom of Wilton Way.		<p>Recommendations noted for future consideration.</p> <p>The plan reaffirmed the settlement envelope defined in 1996 and confirmed in the TDC Local Plan and the conservation area defined in the Abbotskerswell's Character Appraisal (2010).</p> <p>The neighbourhood plan recognises further reviews of the Character Appraisal are expected. The neighbourhood plan proposes support to TDC when it reviews the existing settlement envelope and conservation area.</p>
<b>Strategic Environmental Assessment (SEA) &amp; Habitats Regulations Assessment</b>					
31	SEA / HRA	TDC	<p>Strategic Environmental Assessment (SEA) &amp; Habitats Regulations Assessment</p> <p>2.1 Teignbridge District Council undertook a screening assessment and determination for the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment dated September 2016.</p>	2.1 No Change required	2.1 Noted
	Response para 2.2		2.2 The SEA Screening assessment concluded that there were unlikely to be any significant effects	2.2 No change required	2.2 Noted

			<p>arising from the Abbotskerswell Neighbourhood Development Plan that were not covered in the SEA and HRA of the Teignbridge District Local Plan (2013-2033). It asserted that in the opinion of Teignbridge District Planning Authority that the Pre-submission Abbotskerswell Neighbourhood Development Plan does not require a full SEA to be undertaken.</p>		
	<b>Response para 2.3</b>		<p>2.3 The Habitats Regulations Assessment concluded the following: "Provided the required caveats (in the final column of the screening matrix) and explanatory paragraph (above) are added, this assessment can conclude that there will be no likely significant effect on a European wildlife site from the policies listed in the Pre-submission</p>	<p>2.3 Amend text with required caveats.</p>	<p>2.3 Text amended as suggested in SEA/HRA screen.</p>

			Abbotskerswell Neighbourhood Development Plan, when implemented in conjunction with the Teignbridge Local Plan 2013 -2033 and the latest edition of the South Hams SAC Planning Guidance. However, any future changes to the emerging Abbotskerswell NDP will require their own Habitat Regulations Assessment.”		
	<b>Response para 2.4</b>		2.4 This screening determination and HRA conclusion has been forwarded to Historic England, Natural England and The Environment Agency to seek their opinion on this determination. These consultees were sent the documentation via email and hard copies sent in the post on 21st September 2016.	Responses received from Historic England and Natural England.	2.4 Text amended as suggested in SEA/HRA screen.  In response number 12 from Natural England, Natural England advises that the wording of policies recommended by TDC as the competent authority are amended to include wording that takes into account of any potential impact these policies may potentially have on South Hams SAC.
	<b>Response para 2.5</b>		2.5 Comments were requested to be received	2.5 Natural England requested extension of time.	2.5 Comments received and text amended.

			by Friday 4th November 2016.		
	<b>Natural Environment</b>	TDC	<p>Aim 1 and Aim 2 present 'where feasible' in slightly different formats and these should be consistent.</p> <p>NE2: Devon Banks/Hedgerows Need to present the evidence with its full title in the boxes at the end of the pages and include publishing dates. Care should also be taken on ensuring the titles are accurate such as Highway Management in Devon's Protected Landscapes: The Protocol, Devon County Council (June 2011).</p> <p>NE3: Local Green Space (biodiversity) The identified local green spaces should include a reference which relates to the local green space map on page 21 i.e. LGS A: Grange Copse (SX86/174)</p>	<p>Amend text</p> <p>Amend Evidence Base Text</p> <p>NE3 Amend maps</p> <p>Amend text</p>	<p>Text amended</p> <p>Text amended</p> <p>Map amended and inserted.</p> <p>Text amended as a footnote in Plan.</p>

			<p>Criteria ii includes “which is also currently being surveyed for dormouse activity”. This doesn’t add anything to the policy and should instead appear within the supporting text of the policy.</p> <p>The final paragraph of the policy doesn’t read well and is confusing as to how it should be applied. Whilst not ideal the following wording would be considered an improvement on existing:  <i>“Proposed development should consider and where relevant mitigate in-combination biodiversity effects, particularly referencing...”</i></p> <p>The flooding maps on page 23 and 24 should include a key which illustrates the flood zones applicable.</p> <p>NE4: Local Flooding  The title of the policy is presented in the plan as “Policy NE4- Local</p>	<p>Amend text</p> <p>Amend maps</p> <p>Amend text</p>	<p>Proposed words included</p> <p>“Proposed development should consider and where relevant mitigate in-combination biodiversity effects, particularly referencing...”</p> <p>Keys added to maps.</p> <p>Text amended.</p>
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			<p>Flooding". This is the only example where the word 'policy' precedes the title. It is advised to remove the word 'policy' from the title to ensure consistency throughout the plan.</p>		
	<p><b>Built and Historic Environment</b></p>		<p>The second paragraph on page 28 makes reference to Wilton Way respected as starter homes for first time buyers. Care should be taken that statements such as these are accurate.</p>	<p>Amend text</p>	<p>Text amended:  Wilton Way, together with other cul-de-sacs, contain and offer several different styles of architectural design which are now an integral part of our settlement's post war organic development. Some of these developments are recognised as potential starter homes for those who maybe putting the first foot on the housing or rental ladder. to reflect house values in Parish.</p>
		<p>The first paragraph on page 28 references 'figure 10 below' however figure 10 is presented on the preceding page.</p>	<p>Amend text</p>	<p>Text amended: Figure reference corrected.</p>	
		<p>Figure 12 on page 30 requires a key. Paragraph 63 refers to the solid yellow line but this is barely visible on the diagram. The diagram could be trimmed to exclude the area or the</p>	<p>No change required</p>	<p>Map detail is explained in accompanying text adjacent to map.</p>	

			map could be reoriented and/or resized to make this area more visible.		
			Paragraph 72 includes 'local' within inverted commas which suggests the APC are not local? This paragraph also references a planning advice note and then provides a link to the emerging Design Guide. The Residential Development Design Planning Advice Note has been replaced by the Teignbridge Design Guide (partially complete and on the website). Whilst not fully completed it is likely to be fully adopted by the time the Neighbourhood Plan is Made. This design guide is a Supplementary Planning Document and not an advice note. This paragraph also refers to developers contacting APC for its local scoping opinion which is slightly confusing as to what is meant as a scoping opinion, in	Amend text	Text amended:  78. Applicants for planning permission are encouraged to engage early with Abbotskerswell Parish Council (APC) to discuss their proposals. APC will reference TDC guidance on good design principles for residential developments, in particular, TDC has produced a Design Guide Supplementary Planning Document (SPD): Teignbridge Design Guide - Contents and Teignbridge Design Guide - Layout Strategies. It is aimed at improving the design standards of residential development and sets out key aspects of design that will help to shape the successful layout of the places where residents live.

		<p>planning terms, usually refers to SEA's. It would probably be better phrased as <i>"Applicants for planning permission are encouraged to engage early with APC to discuss their proposals"</i>.</p> <p>BHE1: High Quality Design in Abbotskerswell The policy as written instructs proposals which require a planning statement or design and access statement to demonstrate the scheme would deliver high quality design. Whilst this is a plausible approach, the policy as written is read as only requiring developments which fall within the requirement to provide one of these statements to achieve high quality design.</p>	Amend text	<p>Amended with proposed words:</p> <p><i>"Applicants for planning permission are encouraged to engage early with APC to discuss their proposals"</i>.</p>
		<p>It may be more appropriate to state: <i>Development in the Parish should always seek to deliver high quality design.</i></p>	Amend text	<p>Amended with proposed text</p> <p><i>"Development in the Parish should always seek to deliver high quality design."</i></p>

	<b>BHE1</b>		<p><i>Where a Design and Access Statement or Planning Statement is submitted this should demonstrate how the scheme will achieve high quality design, enhance visual amenity and minimise adverse impacts on the built environment.</i></p> <p><i>Development should have regard to relevant planning guidance issued by Teignbridge District Council with attention paid to:</i></p>		<p>Where a Design and Access Statement or Planning Statement is submitted this should demonstrate how the scheme will achieve high quality design, enhance visual amenity and minimise adverse impacts on the built environment.</p> <p>Development should have regard to relevant planning guidance issued by Teignbridge District Council with attention paid to:"</p>
			<p>Criteria ii requires attention to be paid to using local stone where feasible however it is entirely possible it would be feasible to use local stone and but not appropriate. To ensure flexibility and to avoid adverse impacts from the inappropriate use of stone the word appropriate should be included i.e.</p>	Amend text	<p>Amended with proposed text:</p> <p>"where feasible and appropriate".</p>

			<p><i>“where feasible and appropriate”</i>. In addition it is not clear as to why local stone has been particularly singled out over and above other suitable materials such as slate. I would suggest that instead of referring to local stone it may be more appropriate to say <i>“have regard to local vernacular and materials used”</i>.</p>	Amend text	Amended with proposed text:  <i>“have regard to local vernacular and materials used”</i>
			<p>Local Plan Policy WE8: Domestic Extensions, Ancillary Domestic Curtilage Buildings and Boundary Treatments should be included in the list of related national and district policies at the end of policy BHE1.</p>	Ament text	Text added: WE8: Domestic Extensions, Ancillary Domestic Curtilage Buildings and Boundary Treatments
			<p>Under key supporting evidence two Abbotskerswell character appraisals are referenced but only the 2010 appraisal is extant. This adds an element of confusion as there is an</p>	Amend text	Text amended (paragraph 61 and 67) to reflect the 2010 character appraisal.

			inference that both documents should be referenced, even the one replaced.		
	<b>Population and Housing</b>		<p>It is not clear what the purpose of the table on page 40 is? It should be noted that the fourth row, third column reference to scoping opinion will be dated shortly.</p> <p><u>PH1: Local Needs Housing/ Affordable Housing in Abbotskerswell</u></p> <p>The second bullet point of the local connection criteria refers to off-site affordable housing contributions being applied to adjoining parishes if there is no identified need. However if there is identified need but no available site under this policy the funds could be returned to the developer. Slightly amended policy text is proposed below:  <i>“Secondly be applied to adjoining parishes, where there is no identified affordable housing need or</i></p>	<p>No change required.</p> <p>Amend text</p>	<p>Records sites which landowners have expressed affordable housing considerations.</p> <p>Also, NA3 LDF &amp; Scoping opinion due to be published in early 2017 may and offer affordable housing opportunities within the parish.</p> <p>Text amended:  <i>“Secondly be applied to adjoining parishes, where there is no identified affordable housing need or available site in the parish of Abbotskerswell.”</i></p>

		<p><i>available site in the parish of Abbotskerswell.”</i></p> <p>The local connection criteria reference the stages within the text i.e. firstly, secondly, thirdly, therefore the numbered bullet points are not necessary.</p> <p>Consideration should be given to suitability and sustainability of the local connection criteria as presented. It currently favours the rural area over the urban in regards to the provision of off-site affordable housing contributions.</p> <p>Abbotskerswell stands adjacent the Newton Abbot urban area and the provision of Abbotskerswell’s off-site contributions to the adjacent urban area may well be the more sustainable approach than a location in the rural area which is further to travel from the parish. Would it be considered more suitable</p>	<p>No change required</p> <p>No change required.</p>	<p>Noted</p> <p>TDC Local Plan allocates the highest level of housing growth, both open market and affordable, to adjacent urban areas, less so to adjacent and wider rural parishes. Part of the urban expansion is in Abbotskerswell Parish.</p> <p>However, due to the imbalance of between urban and rural development, this plan favours affordable housing contributions being allocated to rural parishes first and foremost...</p>
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			<p>and sustainable for a person who wishes to live in Abbotskerswell, but can't find a suitable affordable house to be resident in the adjacent urban area closer to the place of preference than a less sustainable rural location?</p> <p>Paragraph 102 on page 42 references residents concern however the first quote refers to green belt. The District has no green belt. Whilst I appreciate that this is a direct quote, placing it within the plan reinforces this inaccuracy.</p> <p>Paragraph 104 references the scoping area risking the narrow buffer between NA3 and Abbotskerswell. This is not accurate as the scoping area includes the green infrastructure in its assessment to ensure that development mitigation areas are considered and a holistic assessment of the developments impacts and mitigations are addressed.</p>	<p>Amend Text</p> <p>Amend text by changing references to buffer.</p>	<p>Text amendment to change "Green belt" to Green [space] to indicate editorial correction of consultee's intent...</p> <p>Text amended to replace "buffer" with "green infrastructure".</p>
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			<p><i>Development.</i> If it is to be retained, further explanation and definition of terms should be provided.</p> <p>Paragraph 107 states the Neighbourhood plan policy PH1 will meet the parish's immediate affordable housing need. Policy PH1 doesn't allocate any development sites to meet the affordable housing need in the parish. As written this paragraph is inaccurate and amended policy wording should be considered along the lines of:</p> <p><i>"Teignbridge District Council's Local Plan Policy WE1 establishes the Districts strategic need for affordable housing and Neighbourhood Plan policy PH1 seeks affordable housing provision tailored to the local need of Abbotskerswell Parish."</i></p> <p>Whilst the NDP cannot require custom build</p>	<p>Amend text</p>	<p>affordable housing provision tailored to the local need of Abbotskerswell Parish."</p> <p>Text amended:</p> <p><i>"Teignbridge District Council's Local Plan Policy WE1 establishes the Districts strategic need for affordable housing and Neighbourhood Plan policy PH1 seeks affordable housing provision tailored to the local need of Abbotskerswell Parish."</i></p>
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			<p> dwellings would not appear to fit well with this aim because such developments are rarely affordable for the young and the single.</p>		<p>downsize, providing such developments conform to other Policies set out in this Plan.”</p>
	<p><b>Transport and Accessibility</b></p>		<p>It should be noted that objectives 6.3 (parking restrictions), 6.4 and 6.5 are not related to land-use planning. A Neighbourhood plan must address the development and use of land or clearly highlight an aspirational requirement.</p> <p>Paragraph 117 states that because over 50% of households have more than one car that there should be little doubt about the validity of the community’s opinions expressed in the road and travel matters survey 2015. It is not clear how these two relate?</p>	<p>Amend text</p> <p>No change</p>	<p>This was covered generically in NP paragraph 109 to indicate Parish Council action is required. This has been made more specific by adding “namely 6.3, 6.4 and 6.5”</p> <p><i>[Note, the Parish Council has successfully introduced through Devon County Council an “Unsuitable for HGVs” sign at the Priory Road-Decoy Road junction. ]</i></p> <p>This is a statement of fact and for noting only.</p>

	<b>TA1</b>		<p><u>TA1: Off-road Parking</u></p> <p>The aim of the policy is to increase the provision of off-road parking to reduce the impact of on-street parking issues.</p> <p>However criteria i and ii are seeking to add unnecessary restrictions to this provision which seems to counter the aim of the policy. In relation to criteria i, this policy is being written because you've already identified a need (as expressed through preceding supporting text) why then does this need have to be again demonstrated by a developer? Criteria ii could result in unforeseen consequences in requiring off-street parking as close to the travel destination as possible. There may be circumstances when the closest option is not the most visually appropriate or suitable for highway</p>	<p>Amend text</p> <p>Amend text</p>	<p>Text amended</p> <p>Text amended</p> <p>Remove criteria 1. Criteria 2 is new criteria 1 reads:</p> <p>i) That the proposed parking is as close to the travel origin and/or destination as possible; and</p>
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		<p>safety. In addition the term travel destination is confusing, do you mean the origin instead?</p> <p>Criteria v requires no adverse impacts but then in the same line states “<i>or adverse impacts can be satisfactorily mitigated</i>”. A change in wording would add clarity to this criteria. A suggestion might be “<i>There are no unacceptable impacts on landscape character after mitigation measures are considered</i>”.</p> <p>The policy currently supports additional provision of off-road parking but doesn’t make any provision for safeguarding existing off-road parking provision.</p> <p>The final paragraph of the policy requires development proposals for new housing and employment to</p>	<p>Amend text</p> <p>Amend text to include safeguarding</p> <p>Amend text</p>	<p>Amended with v) “<i>There are no unacceptable impacts on landscape character after mitigation measures are considered</i>”.</p> <p>New final paragraph added to TA1 “Safeguarding Existing Off-road Parking To ensure existing off-road parking is protected, or possibly enhanced, by development.”</p> <p>Text amended to be all inclusive by removal of qualification “new housing and employment” .</p>
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			demonstrate sufficient off-road parking provision which omits any requirements for other types of potential development such as leisure and retail development.		
	<b>Economy and Employment</b>		<p><u>EE1: Supporting Micro and Small Enterprises</u></p> <p>The policy supports new or expanded employment provision in the rural area which presumably refers to the areas outside the settlement boundary. The reference to the rural area excludes policy support for such development within the settlement boundary. If the words 'rural area' were removed the policy would read as supporting new or expanded employment provision where they comply with the criteria.</p>	Amend Text to be all inclusive for locations.	Text "in the rural area" changed to "in the Parish"

	<p><b>Community Facilities and Assets</b></p>		<p><u>CF1: Community Facilities, Spaces and Assets</u></p> <p>The table at the beginning of the policy lists three areas of land owned by the parish council. It is not clear what these spaces are (verge, car parks or areas of recreational land?) Just because they are owned by the parish council does not infer their community or recreational use. If these areas are to be safeguarded effectively they must be mapped otherwise the application of the policy is unlikely to be consistent.</p> <p>The fourth paragraph to the policy mentions Assets of Community Value, this is a very specific designation covered under non-planning related legislation. Abbotskerswell currently has no Assets of Community Value on the successful Assets of Community Value nomination list.</p>	<p>Amend text to recognise land open to the public.</p> <p>References to assets of Community Value removed.</p>	<p>Community Facilities and Assets section has been amended and represented as follows:</p> <p>A new proposals map inserted (Figure 20).</p> <p><b>The Retention and Enhancement of Community Facilities</b></p> <p>The provision of new community facilities is strongly encouraged where they are open and accessible to the local community.</p> <p>The redevelopment or loss of community facilities as identified on Figure 20 will be supported where:</p> <ol style="list-style-type: none"> <li>I. An equivalent `replacement facility would be provided in a location accessible to the local community, or`</li> <li>II. It is demonstrated the facility is no longer needed by or is no longer suitable for use by the community of Abbotskerswell, or</li> <li>III. It is demonstrated the facility can no longer operate viably for a use which would benefit the local community, and</li> <li>IV. It is demonstrated there would be no adverse impact on the South Hams SAC.</li> </ol> <p><b>Safeguarding Open Space and Recreational Facilities</b></p> <p>Open space and recreational land and facilities as identified Figure 20 should be safeguarded from inappropriate development</p>
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			designations onto a proposals map.		
			Criteria i of policy CF1 supports applications where they meet the requirements of local plan policy WE11. Local Plan policy WE11 relates to the promotion of green infrastructure as part of development and doesn't relate to the loss of community facilities. This reference should be removed from the policy as	Remove text.	Text removed

			it lacks relevance to policy CF1.		
			<p>Teignbridge District Council Formal Comment on the Abbotskerswell Pre-submission Neighbourhood Development Plan (September 2016)</p> <p>Policy CF1 relates to community facilities but also to sports and recreational facilities. The policy cross-references local plan policy WE13: Protection of Recreational Land and Buildings however this conflicts with the requirements which follow. Policy WE13 enables the loss of recreation land and buildings where the loss would be replaced or the development is for alternative sports and recreational provision. Policy CF1 enables the loss of open space for an alternative community use. This alternative community use could cover a range of uses and built development which has no relationship to</p>	Reappraise and represent CF1	See above for new policies and content.

			<p>recreational land and buildings such as a retail unit or pub. This provision stands contrary to the requirements of local plan policy WE13.</p> <p>Overall the policy is confused by the introduction of four different types of designations i.e. Community Facilities, recreational open space, Local Green Space and Assets of Community Value. A policy already exists for local green spaces and any reference should be contained within that policy. Recreational open space and community facilities would be better served and the policy would read more logically if these two designation types were separated.</p>	Amend and/or remove text	See above for revised policies and content.
	<b>Generic</b>		Key supporting evidence boxes at the end of each policy should include the full and proper titles where	Amend evidence boxes	Boxes amended

		<p>possible (as in the previous version of the plan).</p> <p>There is a lot of text and data within this document which is going to date very quickly and regard should be had for future flexibility of the plan.</p> <p>Acronyms should be included with an explanation in the glossary</p> <p>The response form which accompanies the pre-submission plan includes the following reference:</p> <p><i>“Any forms that do not have the personal details section fully completed will be logged but not considered”</i></p> <p>There is nothing within the regulations or legislation which stipulates under what circumstance a Neighbourhood Plan group can discount a consultee’s comments. All comments should be considered regardless of whether they have completed all their</p>	<p>No change required</p> <p>Add Glossary</p> <p>Amend forms</p> <p>All comments to be considered</p>	<p>Noted</p> <p>Glossary introduced.</p> <p>Forms amended</p> <p>Consultation documents amended</p>
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			<p>personal details on the response form or not.</p> <p>Para 24 refers to Abbotskerswell as a 'Strategic settlement' however the village of Abbotskerswell is not identified as strategic by Teignbridge District Council.</p> <p>There should be consistency in the general supporting text, aims and objective and policy in relation to the terms settlement boundary, settlement limit and village envelope. One should be chosen and repeated throughout.</p> <p>All maps included within the plan should be accompanied by the Parishes OS Copyright License.</p>	<p>Amend text</p> <p>Amend text</p> <p>Introduce licence numbers throughout</p>	<p>Text amended</p> <p>Text amended</p> <p>Licence number boxes added to maps.</p>
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