

# Teignbridge Proposed Submission Local Plan to 2040

## Consultation Statement

December 2022

Appendix 1 Schedule 3d (Parts 2 & 3)

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Appendix 1 Schedule 3d: Summary of the representations, number made, and changes made between Regulation 18 and Regulation 19 Proposed Submission  
Version

Chapter 11 - Part 3 Solar PV

Draft Solar PV Renewable Energy Policy

Summary of comment	Council Response	Respondents' unique ID
<p>1. Should be temporary. 2. Limited to within settlements or brownfield sites. 3. Limit biodiversity impact.</p>	<p>There is insufficient resource within settlements and on brownfield sites to accommodate the amount of solar PV panels needed to help meet local energy demands and improve energy security for the district. They are permanent structures, but conditions will require them to be removed at the end of their useful life. There are relevant clauses within CC5 to avoid impacts on biodiversity, alongside other policies of the plan.</p>	<p>DLP3.E.028 DLP3.E.033 DLP3.E.040 DLP3.E.041 DLP3.E.048 DLP3.E.053 DLP3.E.076</p>
<p>DWT - 1. Majority of solar provision should be incorporated in-built solar PV. 2. New homes or buildings should usually be expected to incorporate solar PV on roofs as standard. 3. The use of ALC grade 3-5 land only is likely to conflict with the High Nature Value Farmland which is also often supported on these grades of land. It will be important to seek land on all grades of land (including grades 1 and 2) and ensure at least 10% BNG and no loss of species or habitats as a principle. 4. This Solar PV policy fails to discuss or recognise roof-mounted solar PV. 5. DWT objects to a position being promoted that pre-emptively undermines the mitigation hierarchy and the designations and protections afforded wildlife, due to the needs of renewable energy provision and climate change mitigation outweighing the significant harm to these features. 6. NPPF section 174(d) states that "Planning policies and decisions should contribute to and enhance the natural and local environment by: minimising impacts on and providing net gains for biodiversity (our emphasis), including by establishing coherent ecological networks that are more resilient to current and future pressures". In addition, Schedules 14 and 15 of the Environment Act 2021 state that planning permission and nationally significant infrastructure projects must meet a biodiversity (our emphasis) net gain of at least 10%.</p> <p>This section suggests that reductions (net loss) in habitats and species (biodiversity) are acceptable where net environmental gains can be made – it is unclear what environmental net gains may include, but presumably the intention is that this includes carbon reductions through renewable energy generation including solar. This directly contravenes the NPPF and Environment Act which clearly demand a biodiversity net gain not environmental net gain. DWT recommends that this section be removed, and any policy or decision-making assumptions based on such wording be amended to reflect the NPPF and Environment Act.</p>	<p>The policy wording of CC5 has been amended to specifically address any negative direct, indirect and cumulative impacts on landscape character, biodiversity, geodiversity and best and most versatile agricultural land, as well as any significant adverse effect on the integrity of European wildlife sites.</p> <p>The policy now includes reference to "particular support for the provision of low carbon and renewable energy technologies on brownfield sites, buildings and rooftops".</p>	<p>DLP3.E.081 DLP3.E.091 DLP3.E.093 DLP3.E.103 DLP3.E.104 DLP3.E.115 DLP3.E.135 DLP3.E.141 DLP3.E.158 DLP3.E.160 DLP3.E.171 DLP3.E.180 DLP3.E.187 DLP3.E.195 DLP3.E.210</p>

Summary of comment	Council Response	Respondents' unique ID
<p>RSPB - 1. Serious concern of a lack of initial screening process to eliminate designated and other sites of importance.</p> <p>2. Policy should be explicit that sites should not be designated on any area designated for nature conservation value (SSSIs, SPAs and SACs) or on land that it functionally linked.</p> <p>3. Concern of the use of ""on balance"", results in favourable weighting towards solar developments on sites of significant biodiversity value. Should be screened early and directed away.</p> <p>4. Object to any development on its nature reserves and functionally linked areas.</p> <p>5. Further investigation of sites near to watercourses.</p> <p>6. Object to the inclusion of land between Bishopsteignton and Teignmouth.</p> <p>7. Object to the inclusion of the nature reserve at Labrador Bay.</p>	<p>The scale of the potential area is extensive across the district and screening out all potential constraints at this stage is likely to remove a significant amount of potential. The Council has a legal duty to respond to the climate emergency which needs to be balanced against all other considerations and therefore it is considered more appropriate to allow the development management process to assess individual applications on a site-by-site basis. The policy wording of CC5 has been amended to remove the phrase 'on balance' and to strengthen protection for landscape character, biodiversity, geodiversity and best and most versatile agricultural land, as well as assess any significant adverse effect on the integrity of European wildlife sites.</p>	
<p>NE - 1. Policy also appears to support development that causes significant harm to the environment, to heritage assets, and to the amenity and safety of residents where it can be demonstrated that the proposal's contribution to renewable energy provision and climate change mitigation outweighs that harm. Is this the correct interpretation of the policy? If this is the case, how will the balance be judged, and how will the correct application of the mitigation hierarchy be secured? It should also be noted that this approach is not consistent with NPPF para. 180a which states that "if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused".</p>	<p>This wording has been deleted.</p> <p>Policy CC5:Renewable and Low Carbon Energy Generation (which excludes wind turbine development), has been significantly amended following consideration of comments received during the consultation on Part 3 of the draft Plan which seeks to address these concerns.</p> <p>This policy is also read alongside all other policies of the Plan, including:  Policy EN10: Biodiversity and Geodiversity  Policy EN11: Important Habitats and Features  Policy EN12: Legally Protected and Priority Species  EN13: European Wildlife Sites  EN14: Exe Estuary and Dawlish Warren and  EN15: South Hams SAC</p>	
<p>DCC - Comment -</p> <p>1. Given relationship with extensive Mineral Safeguarding Areas and Mineral Consultation Areas, recommended that draft mineral policy add 'safeguarding' to list of constraints within the policy.</p> <p>2. Bovey Basin - needs to also reference MSAs for limestone, sand and gravel. Explicitly recognise relationship of solar PV with minerals.</p> <p>3. May be scope for temporary solar PV development that will be removed in advance of development of the underlying mineral resource (informed by a mineral resource assessment).</p> <p>4. While larger significant heritage assets, such as the scheduled monuments and registered parks and gardens have been avoided, some areas will not be suitable due to the presence and impact of any solar energy development upon significant, un-designated heritage assets. As such, the Historic Environment Team would recommend that the draft policy is rephrased to remove the blanket presumption in favour of solar energy development within the shaded areas shown on the Solar PV map and instead refer to the map as showing areas in which solar energy development could potentially be developed with sites considered on a case by case basis in relation to criteria (a) – (g) of the draft policy. This will ensure compliance with paragraph 200 of the NPPF."</p>	<p>Policy amended to:</p> <p>Remove implicit 'in principle' support and replace with reference to areas that "could potentially be developed subject to criteria 2.a-g".  include reference to "avoidance of negative direct, indirect and cumulative impacts on...mineral deposits..."</p> <p>Solar pv panels are permanent structures but conditions will require them to be removed at the end of their useful life. As such, they will not lead to long term sterilisation of mineral deposits.</p>	

Summary of comment	Council Response	Respondents' unique ID
1. Capitalise on reverting land back to growing after end of use.	Conditions will require them to be removed at the end of their useful life.	
Exeter Airport Comment - 1. Aviation can be affected by large scale solar PV. Approach and departure areas (15km) from aerodrome need to be considered. Assess potential glint and glare to ascertain if there are likely to any safety concerns to aircraft.	Reference to aviation inserted in policy	
Object - 1. Landscape impact. 2. Residential amenity.	Relevant clauses included within CC5 to enable applications to be assessed on the basis of their impact on landscape character and residential amenity (among other considerations).	
NACoC Support - 1. All proposals.	Noted.	
BPCComment - 1. Only support sites on brownfield sites.	There is insufficient resource on brownfield sites to accommodate the amount of solar pv panels needed to help meet local energy demands and improve energy security for the district.	
Comment/object - 1. Oppose solar on sites that are of high value agricultural production. 2. Solar should be on brownfield sites.	Relevant clauses included within CC5 to enable applications to be assessed on the basis of their impact on best and most versatile agricultural land (among other considerations).  There is insufficient resource within settlements and on brownfield sites to accommodate the amount of solar pv panels needed to help meet local energy demands and improve energy security for the district.	
Support - 1. Policy enables flexibility needed to enable this source of renewable energy to be brought forward. 2. Propose an additional area of land (south of Eastdon Wood in Cofton).	Flexibility has been toned down to address other concerns raised. However, assessments of proposal will take into the value of the scheme in improving local energy security and contributing to our district wide renewable energy supply ambitions and therefore balancing this against other constraints, if they can be mitigated.  The area of land indicated on the solar pv map is based on evidence which shows feasible areas for this technology. The policy allows other areas to come forward but applicants will need to demonstrate the suitability of the chosen site for solar resource at the scale proposed in order to be considered.	
BfTC Object - 1. Large area impact.	It is not anticipated that all of the area will be developed for solar pv use but having a large area identified enables us to explore the potential for renewable energy generation in the district on a much larger scale, subject to proposals being assessed against the policy criteria on a site by site basis.	
MDDC Comment - 1. The draft policy indicates ground-mounted solar photovoltaic (PV) energy developments and associated infrastructure will be strongly supported in principle within areas identified as having suitable solar resource as shown on the Solar PV Map 1 (District) (page 70). This includes land adjacent to Mid Devon District to the west of Tedburn St Mary. We query the wording of the draft policy, which as currently written would permit renewable energy provision where there is significant harm, where that significant harm is outweighed by the contribution towards renewable energy provision and climate change mitigation, which cannot be mitigated.	The policy has been amended to remove implicit 'in principle' support and replace with reference to areas that "could potentially be developed subject to criteria 2.a-g".	

Summary of comment	Council Response	Respondents' unique ID
<p>2. We are not convinced that the balance of renewable energy provision versus the significant harm is consistent with the NPPF and statute (particularly in respect of heritage assets).</p> <p>3. Where proposed solar PV renewable energy development may lead to significant harm, which cannot be mitigated, these locations should not be shown as suitable locations on the Map 1.</p>		
<p>EPC Solar -</p> <ol style="list-style-type: none"> <li>1. Alter policy wording. c) include natural water courses. e) land and soil quality.</li> <li>2. Biodiversity impacts.</li> <li>3. Flood risk.</li> <li>4. Conflicting with designated land uses.</li> </ol>	<p>Policy wording has been amended to include reference to: "Avoidance of negative direct, indirect and cumulative impacts on landscape character; biodiversity and geodiversity (including priority habitats); flood risk and water quality; the significance of heritage assets and their settings; mineral deposits; aviation; and permanent loss of best and most versatile agricultural land."</p>	
<p>DCAF Comment -</p> <ol style="list-style-type: none"> <li>1. PRoW should be included in consideration criteria.</li> <li>2. Location of solar should not detract from landscape enjoyed by PRoW (construction and use).</li> </ol>	<p>PRoWs would be taken into consideration under policy GP6.</p>	
<p>ECC Comment -</p> <ol style="list-style-type: none"> <li>1. Landscape and amenity impact on neighbouring authorities needs to be considered.</li> <li>2. Policy wording should include reference to neighbouring authorities.</li> </ol>	<p>Landscape and amenity impact is taken into consideration in the policy. These would inherently take into account impact on neighbouring authorities.</p>	
<p>Comment -</p> <ol style="list-style-type: none"> <li>1. Solar sites should be strictly managed so as to prevent them being seen as brownfield once not in use.</li> <li>2. On the ground assessment is needed.</li> </ol>	<p>This has been considered but the plan has not been amended because it is already addressed in policy CC5: Renewable and Low Carbon Energy Generation. Conditions will require them to be removed at the end of their useful life.</p>	
<p>In our previous consultation response to the draft Local Plan (Part 1), Historic England indicated its support for the Council's intent to transition to a carbon neutral future by 2025. We advised that we recognise the importance of climate change mitigation and adaptation as part of building resilience for the historic environment and believe that energy efficiency, sustainable technology and reducing carbon emissions are compatible with the conservation of our heritage. We also provided links to relevant information and advice on our website to help to ensure that the potential impacts on the historic environment.</p> <p>Given this, we are disappointed to see that the positive contribution that the historic environment can make to understanding and addressing climate change has not be recognised in chapter 11 of the draft Local Plan (Part 2). For example, the Local Plan can play a key role in encouraging the retention of historic buildings and in promoting their repair, retrofitting and reuse. This can make a vital, positive contribution to reducing carbon emissions.</p> <p>Historic England notes the intention to identify suitable areas for the renewable energy and solar PV development based on the Low Carbon Study and further assessment work with consultation to be undertaken in autumn 2021.</p>	<p>Policy EN17: Heritage Assets only permits the loss of heritage assets where the harm is outweighed by public benefits or benefits to the long term viable use of a heritage asset. This helps to retain historic buildings, making a positive contribution to reducing carbon emissions.</p> <p>The Low Carbon Study was based on the potential for the generation of low carbon energy. It was a technical study and whilst it omitted some areas due to constraints, it was not intended to assess potential effects on heritage assets and their settings.</p> <p>Both Policy CC5: Renewable and Low Carbon Energy and CC6: Wind Turbine Development contain criteria to:</p> <p>Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment; and to consider: cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets</p>	



Summary of comment	Council Response	Respondents' unique ID
<p>We would like further information about the methodology used in the Low Carbon Study and that is intended to be used in the further assessment work in relation to impacts on the historic environment, including historic townscapes, landscapes and seascapes. Of direct relevance to this is new advice contained in HEAN 15: Commercial Renewable Energy Development and the Historic Environment (2021). This describes the potential impacts on the historic environment of large-scale commercial renewable energy proposals, covering wind, solar photovoltaics, biomass and energy from waste. Section 2 provides advice on assessing significance and harm in plan-making and we will be looking to see that the methodology follows this advice.</p> <p>Historic England notes that some of the six site options for a new secondary school in Newton Abbot have the potential to impact on the settings and significance of designated heritage assets. For example, the Bradly Barton site could affect the setting of Berry's Wood earthwork (scheduled monument) and the Newton Abbot Leisure Centre site may affect the settings of several listed buildings in the surrounding area. Other site options may have lesser impacts on nearby heritage assets or potentially none at all.</p>		
<p>ACT Comment -</p> <ol style="list-style-type: none"> <li>1. Opposed to large scale solar sites on greenfield sites.</li> <li>2. Supportive of brownfield sites.</li> <li>3. Ecological impact of sites needs to be considered.</li> <li>4. 10% BNG requirement is needed for all sites</li> </ol>	<p>This has been considered but the plan has not been amended because it is already addressed in policy CC6: Wind turbine development, EN10: Biodiversity and Geodiversity, EN11: Important Habitats and Features, EN12: Legally Protected and Priority Species and EN13: European Wildlife Sites.</p>	

## Part 3 Wind

### Draft Renewable Wind Energy Policy

Summary of comment	Council Response	Respondents' unique ID
<p>Another proposed new policy outlined on the TDC website regarding solar/PV panels states it would.....'establish a planning premise that applications for solar/PV development would be granted where the benefits of renewable energy creation outweigh any other potential disadvantages', ie, they're going to give permission for it regardless of opposition for any reason. It's conceivable therefore that a similar such policy could also be adopted for wind turbine proposals in the future such as the one now outlined as Site 23.</p>	<p>The policy approach has been amended so that all factors are given relevant weight in considering applications for wind turbines.</p>	<p>395440832</p>

Summary of comment	Council Response	Respondents' unique ID
<p>We object to this policy (wind and solar) owing to conflicts with national policy for the conservation of the historic environment and the adequacy of the historic environment evidence base as per paragraphs 31, 35, 189, 190, 199-202 of the NPPF 2021.</p> <p>Low Carbon Study for Teignbridge (2021) is not considered suitable to be used as evidence to support proposed sites.</p> <p>Consideration of site specific policies.</p> <p>Impact on heritage assets and conservation areas beyond Teignbridge.</p>	<p>Both Policy CC5: Renewable and Low Carbon Energy and CC6: Wind Turbine Development contain criteria to:</p> <p>Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment;</p> <p>and to consider:</p> <p>cross-boundary impacts beyond the plan area for sensitive receptors, heritage assets.</p> <p>The Low Carbon Study identified 27 technically suitable sites for large wind turbines which have been subject to consultation and, of the sites contained in the draft Teignbridge Local Plan Part 3, only 10 are included within the Proposed Submission Plan. Sites have been discounted due to proximity to Dartmoor National Park, potential significant ecology constraints and potential for harm to the significance of heritage assets and their settings.</p> <p>As well as being subject to Policy CC5 or CC6, all renewable energy development will also be subject to Policy EN17: Heritage Assets.</p>	<p>DLP3.E.013 (HE)</p>
<p>Amend Wind Policy c) to state: flood risk, coastal change and water quality.</p> <p>BNG should be referenced.</p> <p>We note that the draft solar energy policy references future Renewable Energy Development Design Guidance, so it might be beneficial to reference this in wind energy policy as well.</p> <p>Sites that include or are contiguous to a watercourse. Expect a 50m buffer to be established adjacent to watercourse (noise and ground mitigation).</p> <p>Applications should be supported by Water Interest Surveys and/or Private Water Supply Protection Plan. This is to minimise potential ground water deterioration.</p>	<p>Policy CC6: Wind Turbine Development has been amended to refer to conservation or enhancement of landscape character (which would include coastal change and impact on Undeveloped Coast) and water quality.</p> <p>Policy EN10: Biodiversity and Geodiversity would ensure that a minimum of 10% biodiversity net gain was provided as part of development, unless wind turbine development is excluded development when the Regulations accompanying the Act are published.</p> <p>There is no specific design guidance being prepared by TDC for renewable energy installations at this point.</p> <p>Policy CC6 requires development to avoid, minimise and mitigate harm to biodiversity and geodiversity, including Priority habitats. This would include the creation of buffers as required through the planning application process.</p> <p>Policy EN6: Flood Risk and Water Quality would ensure that groundwater quality is maintained.</p>	<p>DLP3.E.022 (EA)</p>

Summary of comment	Council Response	Respondents' unique ID
<p>DWT objects to a (policy) position being promoted that pre-emptively undermines the mitigation hierarchy and the designations and protections afforded wildlife. The current document adopts a position that the needs of renewable energy provision and climate change mitigation outweigh potential significant harm to these features, which cannot be supported.</p> <p>DWT would expect that, wherever possible, land under operational turbines provides significant benefit to wildlife, with nature-rich semi-natural habitats maintained, restored or created during the development phase. Once a turbine is decommissioned DWT would expect that:</p> <ul style="list-style-type: none"> <li>• Any semi-natural habitat that exists or has been restored/created or has naturally regenerated on the land under/around the turbine should be retained and enhanced.</li> <li>• Land should be restored to wildlife-rich habitats rather than previous land use, continuing the site's value to the public.</li> </ul> <p>-We consider the term 'no net loss to biodiversity' is outdated and inappropriate in a local plan. This statement should reflect the NPPF and Environment Act 2021 and be replaced by:  "...which results in minimal impact to existing biodiversity in addition to a biodiversity net gain of at least 10%".</p> <p>-Bat surveys are required for all wind sites.</p>	<p>The policy approach has been amended so that all factors are given relevant weight in considering applications for wind turbines.</p> <p>Impacts on biodiversity and net gain requirements are covered in policy EN10.</p>	DLP3.E.033 (DWT)
<p>Wind policy should state the need to avoid siting wind sites on/adjacent to statutorily designated sites (SSSI/SAC/SPA).</p> <p>10% Biodiversity net gain should be a requirement for any wind site.</p>	<p>A shortlist of 15 sites were assessed as part of the Habitats Regulations Assessment of the Plan.</p> <p>Net gain is addressed in policy EN10.</p>	DLP3.E.040 (RSPB)
<p>Natural England welcomes the consideration of impacts on Habitats Sites, landscape, biodiversity, geodiversity. but has concerns relating to the effectiveness of the policy as written.</p> <p>The policy will support wind energy developments at identified sites, however, the evidence report assumes that the turbines will be restricted to a specified power generation capacity (i.e. 1MW or 2 MW). The policy should specify the expected generation capacity at each site or provide a criteria against which proposals for developments that exceed that capacity will be judged.</p> <p>The Policy includes a clause that allows other sites to come forward for wind energy development 'where wind turbine development has been demonstrated to be suitable', this approach isn't entirely in accordance with NPPF para 158b which requires projects outside of the identified suitable areas to 'demonstrate that the proposed location meets the criteria used in identifying suitable areas.'</p> <p>The policy appears to support development that causes significant harm to the environment, to heritage assets and to the amenity and safety of residents where it can be demonstrated that the proposal's contribution to renewable energy provision and climate change mitigation outweighs the harm. Is this the correct interpretation of the policy? If</p>	<p>The policy approach has been amended so that all factors are given relevant weight in considering applications for wind turbines.</p> <p>Policy CC6 is read alongside all other policies of the Plan, including the suite of environment policies as follows:  Policy EN10: Biodiversity and Geodiversity  Policy EN11: Important Habitats and Features  Policy EN12: Legally Protected and Priority Species  EN13: European Wildlife Sites  EN14: Exe Estuary and Dawlish Warren and  EN15: South Hams SAC</p>	DLP3.E.041 (NE)

Summary of comment	Council Response	Respondents' unique ID
<p>this is the case, how will the balance be judged and how will the correct application of the mitigation hierarchy be secured?</p> <p>It should also be noted that this approach is not consistent with NPPF para 180a which states that 'if significant harm to biodiversity resulting from a development that cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused'.</p>		
<p>Plan sections &amp; paragraphs: Ancient monuments' should be changed to 'scheduled monuments'</p>	Noted.	DLP3.E.048 (DCC)
All sites must include the requirement for Physical and Technical Safeguarding analysis approved by Exeter Airport to ensure there are no Obstacle Limitation Surface penetrations, Instrument Flight Procedure conflicts or Radar and Instrument Landing System impacts.	Reference to avoiding impacts on aviation has been included in the policy.	DLP3.E.076 (Exeter Airport)
Encourage further equine considerations to be given. Particularly around use of land, management and policy considerations.	Current use of the land will be taken into account.	DLP3.E.106
Alter policy wording. c) Include natural water courses. e) Land and soil quality.	<p>Noted. Policy CC6 requires development to avoid, minimise and mitigate harm to biodiversity and geodiversity, including Priority habitats. This would include the creation of buffers as required through the planning application process.</p> <p>Policy EN10: Biodiversity and Geodiversity would ensure that a minimum of 10% biodiversity net gain was provided as part of development, unless wind turbine development is excluded development when the Regulations accompanying the Act are published.</p>	DLP3.E.141 (E PC)

#### WS1: East of Kingscourt Farm, Dunsford

Summary of comment	Council Response	Respondents' unique ID
Harm to ecology	East of Kingscourt Farm is not being taken forward as a site allocation – please see original SA of Wind Sites (published alongside the draft Teignbridge Local Plan Part 3) for further details.	395415018 393447691 390542976 389820148 DLP3.E.034 DLP3.E.043 DLP3.E.113
Concern about habitat loss within Cirl Bunting breeding area and will require compensation. Concern about impacts on bat species.		DLP3.E.040 (RSPB) DLP3.E.228 (TDC Bio)
Harm to landscape/visual impact, including on DNP		390542976 DLP3.E.034 DLP3.E.043 DLP3.E.070

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.113 DLP3.E.193
Harm to heritage assets and their settings, including an Iron Age Hill Fort		395415018 393447691 389820148 DLP3.E.034 DLP3.E.043
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including the grade II* listed Sowton Barton and grade II listed barn and wall to the west (c. 620m); grade II listed Farrants Farmhouse and barn to the north-west (c. 550m); grade II listed Dandylands and Higher Cotley Farmhouse to the north-east (c. 900m) with the Scheduled Cotley Castle further to the north-east (c.1.7km to the edge of the proposed allocation).</p> <p>HIA should be undertaken.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>		DLP3.E.013 (HE)
Harm to local economy from harm to tourism		395415018 390542976 389820148 DLP3.E.113
Roads are inadequate to cope with additional traffic generated		395415018 390542976 389820148 DLP3.E.034 DLP3.E.113
No benefit for local community		395415018
Harm to amenity of local residents, including from noise		395415018 393447691 390542976 389820148 DLP3.E.034 DLP3.E.043
Potential light pollution		395415018 389820148
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
Devaluation of property		393447691 390542976
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.		DLP3.E.022 (EA)

Summary of comment	Council Response	Respondents' unique ID
Biodiversity enhancement (BNG) should be investigated.		DLP3.E.022 (EA)
No long-term employment benefit		DLP3.E.034
Concerns due to proximity to DNP (within 2km), priority habitat and BMV agricultural land.		DLP3.E.041 (Nat Eng) DLP3.E.043 DLP3.E.113 DLP3.E.228 (TDC Bio)
Community support needed to approve.		DLP3.E.070
Land owner support subject to details. Some areas adjoin the site owner's property. Open to extend the provisional allocation further north and east to remain within this landowner's ownership.		DLP3.E.079
Limited benefit beyond land owner and utility.		DLP3.E.043
Ancient Woodland within 150m. May need attention.		DLP3.E.228 (TDC Bio)

#### WS2: North West of Bishopsteignton

Summary of comment	Council Response	Respondents' unique ID
This site contains a known archaeological site of prehistoric or Roman date that will require archaeological mitigation.	NW of Bishopsteignton is not being taken forward as a site allocation – please see original SA of Wind Sites (published alongside the draft Teignbridge Local Plan Part 3) for further details.	395468967 DLP3.E.048
Support for the site		395206998
There is the potential for the setting and significance of the following assets to be adversely affect:- grade II listed Ashwell House to the southeast; grade II listed Wolfs Grove to the south; and the grade II Registered Park and Garden of Lindridge to the north, including the individually grade II listed buildings located within it such as the principal grade II listed Main Gateway.		DLP3.E.013 (HE)
HIA should be undertaken. This should take account of the cumulative impacts of this site option with site options 10 and 14.		
Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		
Harm to biodiversity. This site lies 1.25km from a known Grey Long-Eared Bat maternity roost. The site is also 500m from the Haldon Forest Important Bird Area.		DLP3.E.033 (DWT) DLP3.E.034 DLP3.E.040 DLP3.E.053 DLP3.E.093

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.113 DLP3.E.158 DLP3.E.180
Harm to landscape/visual impact, including on DNP		DLP3.E.034 DLP3.E.113
Harm to heritage assets and their settings		DLP3.E.034
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
Harm to amenity of local residents, including from noise		DLP3.E.034 DLP3.E.053
Roads are inadequate to cope with additional traffic generated		DLP3.E.034 DLP3.E.113
No long-term employment benefit		DLP3.E.034
Site is within mineral safeguarding area. Should be protected unless a resource assessment concludes it has no current or future economic potential. Temporary permission may be suitable if future potential is found.		DLP3.E.048 (DCC minerals)
Few large turbines rather than several small turbines.		DLP3.E.053
Adjacent to Ancient Semi-Natural Woodland.		DLP3.E.064
Harm to farming.		DLP3.E.113
Grey long-eared bat = v rare in GB. Bish Ho is 1 of only 8 known maternity roosts in GB.  GLEB are NOT SAC/ HRA species, but are legally protected like all other bats. GLEBs forage in an area round Bish which incld WS2.  Annex II (ie SAC-able) I species Barbastelle forages near here too.  GCN zone, but no ponds.  Overlaps a cirl bunting territory Could check BCT whether Turbines are a risk to GLEBs/barbies – poss smaller ones are worse than big ones. Could maybe fit turbine size to suit.  Amber or Red due to GLEB/barb		DLP3.E.228 (TDC Bio)

### WS3: North East of Holcombe Burnell

Summary of comment	Council Response	Respondents' unique ID
Harm to ecology	The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.  Policy CC6: Wind turbine development requires consideration of:	384459265 DLP3.E.034 DLP3.E.043 DLP3.E.113



Summary of comment	Council Response	Respondents' unique ID
	<p>Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.</p> <p>Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.</p>	
Site contains medieval field boundaries	Impacts on heritage assets and their settings will be considered in detail through the planning application process, as per the requirements of CC6.	384459265
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including the Holcombe Burnell Conservation Area and the individually designated listed buildings within it, including the grade II* listed Church of St John the Baptist and grade II* listed Holcombe Burnell Manor House. These assets are located c. 630m to the south-west of the edge of the proposed allocation.</p> <p>HIA should be undertaken.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p>Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.</p> <p>All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.</p> <p>In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.</p>	DLP3.E.013 (HE) DLP3.E.034 DLP3.E.043
Harm to landscape/visual impact, including on DNP	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that there are lower landscape constraints for a single 100m turbine but higher landscape constraints for multiple turbines.	DLP3.E.034 DLP3.E.043 DLP3.E.113
Unacceptable noise impacts on amenity and livestock	There are 7 properties within 500m of the site. Amenity would need to be investigated further at planning application stage, as per CC6 policy requirements.	DLP3.E.034
Harm to amenity of local residents, including from noise	See above.	DLP3.E.034 DLP3.E.043
Roads are inadequate to cope with additional traffic generated	Wind turbines generally don't attract much traffic generation, other than for installation and servicing. Access is likely to be from Rixafer Road. Alternative arrangements could be made from Coley Lane.	DLP3.E.034 DLP3.E.113
No long-term employment benefit	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy.	DLP3.E.034
<p>Adjoins priority habitats – deciduous woodland, and is close to good quality semi-improved grassland</p> <p>Ancient woodland – less than 1km from Holcombe Wood and Easter Cotley Woods</p> <p>Adjoins Cutteridge Wood (and accessible Woodland Trust wood)</p> <p>Public right of way crosses through the site</p> <p>High likelihood of BMV predicted</p>	<p>Policy CC6: Wind turbine development requires consideration of:</p> <p>Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.</p> <p>This would protect Priority Habitats and BMV.</p>	DLP3.E.041 (NE) DLP3.E.228 (TDC Bio) DLP3.E.043 DLP3.E.113



Summary of comment	Council Response	Respondents' unique ID
	In addition, Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.	
Within WT Cutteridge wood and adjacent to Emridge Wood (Ancient Semi Natural Wood).	This has been considered but the plan has not been amended because it is already addressed in policy CC6: Wind turbine development, EN11: Important Habitats and Features and EN16: Trees, Hedges and Woodlands.	DLP3.E.064 (Woodland Trust) DLP3.E.228 (TDC Bio)
Bridal way is not included.	The refined site area does not include the bridal way.	DLP3.E.160
Neighbouring authority's amenities considered and included in policy wording.	There are 7 properties within 500m of the site. Amenity would need to be investigated further at planning application stage, as per CC6 policy requirements.	DLP3.E.171 (ECC)
Limited benefit beyond land owner and utility.	The benefit of the wind turbine is primarily for renewable energy production and local energy security.	DLP3.E.043

#### WS4: Land at Colley Lane, Ideford

Summary of comment	Council Response	Respondents' unique ID
Potential harm to ecology	Land at Colley Lane, Ideford is not being taken forward as a site allocation – please see original SA of Wind Sites (published alongside the draft Teignbridge Local Plan Part 3) for further details.	389751511 DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.113 DLP3.E.041 (NE)
Proximity to protected habitats		389751511 DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.041 (NE) DLP3.E.113
Harm to landscape		389751511 389009543 DLP3.E.034 DLP3.E.113
Harm to heritage assets and their settings		389751511 DLP3.E.034
Given the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including the Scheduled Castle Dyke (c.1.3km to the south-east) and to listed buildings mostly located to the south in and around Luton (c.950m) and to the south-west in and around Ideford (c.1.3km). Further away, we note the presence of several Registered Parks and Gardens (grade II* Ugbrooke Park to the		DLP3.E.013 (HE)

Summary of comment	Council Response	Respondents' unique ID
<p>west, grade II Lindridge to the south-west and grade I Luscombe Castle to the south-east) in the area surrounding this site option.</p> <p>HIA should be undertaken. This should take account of the cumulative impacts of this site option along with site options 10 and 14.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p style="font-size: 48px; opacity: 0.1; transform: rotate(-45deg);">DRAFT</p>	
<p>Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.</p>		DLP3.E.022 (EA)
<p>Biodiversity enhancement (BNG) should be investigated.</p>		DLP3.E.022 (EA) DLP3.E.040 (RSPB) DLP3.E.158
<p>Priority Habitats – deciduous woodland Contains areas of soils with peaty pockets Abuts Access Land – Ideford Common Moderate to High likelihood of BMV (predictive) South Hams SAC GHB Flightpaths within boundary.</p>		DLP3.E.033 (NE) DLP3.E.040 (RSPB) DLP3.E.228 (TDC Bio) DLP3.E.040 (RSPB) DLP3.E.228 (TDC Bio) DLP3.E.113
<p>Unacceptable noise impacts on amenity and livestock</p>		DLP3.E.034
<p>Harm to amenity of local residents, including from noise</p>		DLP3.E.034
<p>Roads are inadequate to cope with additional traffic generated</p>		DLP3.E.034 DLP3.E.113
<p>No long-term employment benefit</p>		DLP3.E.034
<p>Support but scaled back.</p>		DLP3.E.093 (Bish PC) DLP3.E.158 DLP3.E.180
<p>Within RSPB's Haldon Important Bird Area (possible Haldon SAC).</p> <p>Overlaps a curlew territory.</p> <p>Within a GCN zone, but no ponds.</p> <p>Object due to SAC, SSSI, cSAC</p>		DLP3.E.228 (TDC Bio)

WS5: East of Dunchideock

Summary of comment	Council Response	Respondents' unique ID
Harm to Site of special scientific interest.	East of Dunchideock is not being taken forward as a site allocation – please see original SA of Wind Sites (published alongside the draft Teignbridge Local Plan Part 3) and Landscape Evidence for further details.	395593499 395381650 395339799 382170783 DLP3.E.033 (DWT)
The proposed site is close to dwellings and the Hyperion horses		395593499
Harm to the landscape, which is open to wide views		395457382 395457375 395452957 395453788 395416831 395381650 395339799 395338366 395293949 395184021 394579073 382170783 DLP3.E.034 DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113 DLP3.E.183
Harm to ecology		395452957 395427178 395416831 395339799 395338366 395293949 39461134 38217078 DLP3.E.033 (DWT) DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113 DLP3.E.183
Harm to heritage assets and their settings, notably Haldon Belvedere and Lord Haldon Hotel and former estate		395593499 395452957 395453788 395437061

Summary of comment	Council Response	Respondents' unique ID
		395427178 395416831 395381650 395339799 395338366 395293949 395184021 39461134 394579073 394376448 382170783 DLP3.E.034 DLP3.E.043 DLP3.E.151 DLP3.E.155 (Devon Historic Buildings Trust) DLP3.E.183
Proximity to residential properties and impacts of noise		395452957 395416831 395338366 395293949 DLP3.E.034 DLP3.E.043 DLP3.E.183
Potential health impacts on local residents		395452957 395416831 395293949 395184021
Harmful effect on local businesses/tourist accommodation/tourism businesses		395452957 395453788 395437061 395427178 395416831 395339799 395338366 395293949 395184021 394579073 382170783 DLP3.E.113
Prejudice use of good quality agricultural land. BMV land.		395381650 DLP3.E.041 (NE)

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.043 DLP3.E.113
Would require new access, causing further damage to environment		395437061 395381650 395184021 DLP3.E.034 DLP3.E.113 DLP3.E.183
Loss of amenity to those who use local footpaths and cyclepaths around Haldon Forest		395427178 395338366 382170783
Major disruption from delivery of component parts on local lanes		395416831 395339799 395338366 394579073 382170783
Harmful effect on property prices		395416831
Interfere with TV signal		
On flight path of commercial airlines, police, air ambulance and military helicopters.		395339799
Would not create local employment opportunities		39461134 DLP3.E.034
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including a grade II listed building (Lord Haldon Hotel Wall and Entrance Arch) is located in close proximity to this site option. The site is c.460m to the south-east of this designated heritage asset.</p> <p>To the east are the grade II listed Hill Farmhouse and Cider House and barn (c.800m). To the south-west are the grade II listed Lyalls and Lyalls Cottage (c.400m) with the grade II* listed Lawrence Castle/Haldon Belvedere located further to the south-west of the site option (c. 1km).</p> <p>HIA should be undertaken.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>		DLP3.E.013 (HE)
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.		DLP3.E.022 (EA)
Biodiversity enhancement (BNG) should be investigated.		DLP3.E.022 (EA)
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
<p>Priority Habitats – abuts an area of deciduous woodland. Proximity to ancient woodland at Tower Wood.</p> <p>Less than 200m from Haldon Forest Park – a forestry commission community forest.</p>		DLP3.E.041 (NE)

Summary of comment	Council Response	Respondents' unique ID
Limited benefit beyond land owner and utility.		DLP3.E.043
Within South Hams SAC LCZ with GHB roost nearby.		DLP3.E.228 (TDC Bio)
May be significant issues associated with the site.		
Adjacent to two small woods one of which is within an Unconfirmed Wildlife Site.		DLP3.E.228 (TDC Bio)

#### WS6: North of Langdon Road, Dawlish

Summary of comment	Council Response	Respondents' unique ID
This site is close to a number of known archaeological sites of prehistoric or Roman data and therefore has the potential to contain archaeology. This needs to be assessed and mitigation put in place.	North of Langdon Road is not being taken forward as a site allocation – please see original SA of Wind Sites (published alongside the draft Teignbridge Local Plan Part 3) for further details.	395468967 386266388 DLP3.E.048 (DCC)
Harm to landscape		381129763 DLP3.E.020 (DTC) DLP3.E.034 DLP3.E.113 DLP3.E.154
Potential harm to ecology		393980031 393915078 388969539 381129763 DLP3.E.020 (DTC) DLP3.E.033 (DWT) DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.113
Must protect Grades 1 and 2 agricultural land		393980031 393915078 381129763 DLP3.E.041 (NE) DLP3.E.113
Agent for landowner (Gatehouse Park Developments) confirms site not available for wind turbine development.		389930836
No benefit to local economy		381129763 DLP3.E.034
Potential harm to occupiers of Langdon Hospital		DLP3.E.020 (D TC)
Proximity to housing		
Would result in unacceptable increase in traffic through Starcross and Dawlish		DLP3.E.034 DLP3.E.113
Support for development		389728100 386266388

Summary of comment	Council Response	Respondents' unique ID
Planned or in progress housing was not indicated.		DLP3.E.020 (D TC)
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.		DLP3.E.022 (EA)
Biodiversity enhancement (BNG) should be investigated.		DLP3.E.022 (EA) DLP3.E.040 (RSPB)
Heritage harm.		DLP3.E.034
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
Proximity to residential properties and impacts of noise		DLP3.E.034 DLP3.E.154
Impact Risk Zone (IRZ) for the Exe Estuary and Dawlish Warren for all wind turbines. Within 2km IRZ for the South West Coast National Trail. (25m).		DLP3.E.041 (NE)
Within South Hams SAC LCZ.		DLP3.E.228 (TDC Bio)
Small part is within a cirl bunting County Wildlife Site.		DLP3.E.228 (TDC Bio)
If Cirl Bunting mitigation provided, then suitable.		

#### WS7: Hamlyns Farm, Chudleigh

Summary of comment	Council Response	Respondents' unique ID
Please refer to the document named 'Landscape and Visual Impact Statement' and 'Ecological Appraisal' in the email from Walker Morris LLP – Subject: Chudleigh – WS7 – Hamlyns Farm - Comments dated 24 January 2022	Hamlyns Farm is not being taken forward as a site allocation – please see original SA of Wind Sites (published alongside the draft Teignbridge Local Plan Part 3) for further details.	395580862
Concern about harm to ecology, especially the impacts on the South Hams SAC Sustainance Zone. Red due to SAC, SSSI, UWS		393312887 DLP3.E.034 DLP3.E.041 (NE) DLP3.E.047 (D&T PC) DLP3.E.113 DLP3.E.228 (TDC Bio)
Would need to monitor impacts		391849059
Harm to landscape/visual impact, including on DNP		DLP3.E.009 DLP3.E.034 DLP3.E.070 DLP3.E.113
There are several designated heritage assets in the area surrounding this site option, including the grade II* listed Whiteway House and other grade II listed buildings to the north-east; grade II listed stable block and cider barn at Hamlyns Farm to the south-east and grade II listed Lower Bramble Farmhouse to the west.		DLP3.E.013 (HE) DLP3.E.027

Summary of comment	Council Response	Respondents' unique ID
<p>There are distances of c.360m, between some of these assets the edge of the proposed allocation and the potential for development to adversely affect their settings and significance, especially in views from north-east towards the site.</p> <p>HIA is needed.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p style="font-size: 48px; opacity: 0.1; transform: rotate(-45deg);">DRAFT</p>	
<p>Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.</p>		DLP3.E.022 (EA)
<p>Biodiversity enhancement (BNG) should be investigated.</p>		DLP3.E.022 (EA)
<p>Site is within the Chudleigh GHB Sustenance Zone.</p>		DLP3.E.033 (DWT)
<p>Immediately adjacent to the Haldon Forest SSSI and Haldon Forest Important Bird Area.</p>		<p>DLP3.E.033 (DWT)</p> <p>DLP3.E.040 (RSPB)</p> <p>DLP3.E.041 (NE)</p> <p>DLP3.E.228 (TDC Bio)</p>
<p>Heritage harm. Would result in substantial harm to nearby and further listed assets. Case law has demonstrated that proposals which result in far less harm have been refused. This allocation would cause far more harm.</p>		<p>DLP3.E.027</p> <p>DLP3.E.034</p>
<p>Unacceptable noise impacts on amenity and livestock</p>		DLP3.E.034
<p>Proximity to residential properties and impacts of noise</p>		DLP3.E.034
<p>Roads are inadequate to cope with additional traffic generated</p>		<p>DLP3.E.034</p> <p>DLP3.E.113</p>
<p>No long-term employment benefit</p>		DLP3.E.034
<p>Site is within Veteran Oak and Notable Oak</p>		DLP3.E.064 (Woodland Trust)
<p>WS7 includes Unconfirmed Wildlife Sites for parkland, traditional orchard and U/SI grassland within.</p> <p>Adj to UWS for Anc Wood.</p>		DLP3.E.228 (TDC Bio)
<p>Within GC Newt zone, ponds adjacent.</p>		DLP3.E.228 (TDC Bio)
<p>Object due to SAC, SSSI, UWS impact.</p>		DLP3.E.228 (TDC Bio)



WS8: Lower Thornton Farm, Kenn

Summary of comment	Council Response	Respondents' unique ID
<p>This site is in an area where there are a number of known archaeological sites of prehistoric and Roman date. The archaeological potential needs to be assessed and mitigation put in place.</p>	<p>Lower Thornton Farm is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.</p>	<p>395468967 DLP3.E.048 (DCC)</p>
<p>Potential harm to ecology</p>		<p>389756548 DLP3.E.034 DLP3.E.043 DLP3.E.113</p>
<p>Proximity to protected habitats</p>		<p>389756548 DLP3.E.034 DLP3.E.113</p>
<p>Harm to landscape</p>		<p>389756548 DLP3.E.034 DLP3.E.043 DLP3.E.113</p>
<p>Harm to heritage assets and their settings</p>		<p>389756548 DLP3.E.034 DLP3.E.043</p>
<p>This site is located on land immediately adjoining the southeast end of the Kenn Conservation Area. The adopted Kenn Conservation Area Character Appraisal (2010) describes the importance of the parkland and farmland landscapes surrounding Trehill and Bickham and notes their positive contribution to the special interest of the Conservation Area. The Appraisal also mentions the Conservation Area’s rural setting and backdrop on the southern side of the village with the Haldon Hills beyond, cautioning that the impacts of development must be considered even if some distance away. There are also listed buildings within the Conservation Area and outside with settings and significance that may be affected by wind turbine development. These include grade II* Bickham House and Trehill House and the grade II listed Higher Thornton Farmhouse and farm buildings c. 400m to the south-east of the site for example. Further to the south-east lies the grade II Oxton House Registered Park and Garden (c.1km to the edge of the proposed allocation) and the listed buildings located within it and associated with it such as the grade II listed Oxton House, Gate Piers and Gate at the entrance to The Drive.</p> <p>Given the heritage sensitivity of this location, we consider it is unlikely to be appropriate for a wind energy allocation owing to the high potential for the proposed allocation to adversely affect the settings and significance of these heritage assets. This may need to take account of the cumulative impacts of this site option along with site options 9 and 12.</p> <p>If the Council is minded to propose this site option as an allocation, however, we consider that HIA should be undertaken. Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy</p>		<p>DLP3.E.013 (HE)</p>

Summary of comment	Council Response	Respondents' unique ID
for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		
Site lies within the South Hams SAC GHB Connectivity Zone and within 700m of the Haldon Forest SSSI, and immediately adjacent to the Haldon Forest Important Bird Area. Omission where impacts are likely.		DLP3.E.033 (DWT)
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
Proximity to residential properties and impacts of noise		DLP3.E.034 DLP3.E.043
Roads are inadequate to cope with additional traffic generated		DLP3.E.034 DLP3.E.113
No long-term employment benefit		DLP3.E.034
Site is within 1km of Haldon Forest SSSI to the west.		DLP3.E.040 (RSPB)
Priority habitat – adjoins an area of deciduous woodland. Less than 250m from an area of ancient woodland (trehill wood).		DLP3.E.041 (NE)
Public right of way passes through the site.		DLP3.E.041 (NE)
High likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.113
Limited benefit beyond land owner and utility.		DLP3.E.043
Within South Hams SAC LCZ and adjacent to Unconfirmed Wildlife Site woodland.		DLP3.E.228 (TDC Bio)
Acceptable.		

#### WS9: Telegraph Plantation

Summary of comment	Council Response	Respondents' unique ID
This site is in an area where there are a number of known archaeological sites of prehistoric and Roman date. The archaeological potential needs to be assessed and mitigation put in place.	Telegraph Plantation is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395468967
Harm to landscape		395355247 DLP3.E.034 DLP3.E.043 DLP3.E.113
There is the potential for the proposed allocation to adversely affect the settings and significance of heritage assets including the grade II Oxton House Registered Park and Garden to the east and south-east (c. 350m to the edge of the allocation) and the many listed buildings located within it and associated with it such as the grade II listed Oxton House, Gate Piers and Gate at the entrance to The Drive. Further to the south-east is the grade II* Registered Park and Garden of Mamhead Park and the grade I listed Dawlish Cottage and many associated and high graded listed buildings including the grade II* listed Obelisk (c. 1.3km).		DLP3.E.013 (HE)

Summary of comment	Council Response	Respondents' unique ID
The grade II listed Higher Thornton Farmhouse and farm buildings are also located to the north of the site (c. 650m).		
HIA should be undertaken. This may need to take account of the cumulative impacts of this site option with site options 8 and 12.		
Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.		DLP3.E.022 (EA)
Biodiversity enhancement (BNG) should be investigated.		DLP3.E.022 (EA)
Site lies within the South Hams SAC GHB Connectivity Zone and within 700m of the Haldon Forest SSSI, and immediately adjacent to the Haldon Forest Important Bird Area. Omission where impacts are likely.		DLP3.E.033 (DWT) DLP3.E.040 (RSPB) DLP3.E.228 (TDC Bio)
Heritage harm.		DLP3.E.034 DLP3.E.043
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
Proximity to residential properties and impacts of noise		DLP3.E.034 DLP3.E.043
Roads are inadequate to cope with additional traffic generated		DLP3.E.034 DLP3.E.113
No long-term employment benefit		DLP3.E.034
Priority habitat – abuts areas of deciduous woodland Triggers 2km IRZ for Haldon Forest SSSI – for all wind turbines. Abuts a large area of accessible woodland – woodland trust and forestry commission Public right of way – bridleway – passes through the site. High likelihood of BMV (predictive)		DLP3.E.041 (NE) DLP3.E.040 (RSPB) DLP3.E.043 DLP3.E.113
Limited benefit beyond land owner and utility.		DLP3.E.043
Within a GC Newt zone, but no ponds.		DLP3.E.228 (TDC Bio)
Should be suitable.		

#### WS10: Middle Rixdale Farm, Luton

Summary of comment	Council Response	Respondents' unique ID
This site lies in an area where there is known prehistoric archaeology. The potential for the site to contain archaeological deposits needs to be assessed and mitigation put in place.	Middle Rixdale Farm is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395468967 DLP3.E.048 (DCC)

Summary of comment	Council Response	Respondents' unique ID
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including the Scheduled Castle Dyke (c.780m to the west) and listed buildings in Luton including the grade II Chapel of St John The Evangelist (c.550m to the west). Further to the south-west is the grade II Registered Park and Garden of Lindridge Park (c.1km).</p> <p>HIA should be undertaken. This should take account of the cumulative impacts of this site option with site options 2 and 14.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>		DLP3.E.013 (HE)
<p>Site lies immediately adjacent to Little Haldon Heaths SSSI and within the Haldon Forest Important Bird Area.</p>		DLP3.E.033 (DWT) DLP3.E.040 (RSPB) DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
<p>Ecological and biodiversity harm.</p>		DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.041 (NE) DLP3.E.047 (D&T PC) DLP3.E.093 (B PC) DLP3.E.113 DLP3.E.158 DLP3.E.180
<p>Harm to landscape.</p>		DLP3.E.034 DLP3.E.113
<p>Heritage harm.</p>		DLP3.E.034
<p>Unacceptable noise impacts on amenity and livestock</p>		DLP3.E.034
<p>Proximity to residential properties and impacts of noise</p>		DLP3.E.034
<p>Roads are inadequate to cope with additional traffic generated</p>		DLP3.E.034 DLP3.E.113
<p>No long-term employment benefit</p>		DLP3.E.034
<p>Priority Habitats – lowland heathland, and within 50m of a traditional orchard.</p>		DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
<p>Triggers 2km buffer for Great Haldon Heaths – all wind turbines.</p>		DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
<p>Part of the site is Access Land.</p>		DLP3.E.041 (NE)
<p>Part of site has high likelihood of BMV (predictive).</p>		DLP3.E.041 (NE)

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.113
Within a GC Newt zone, pond close by.		DLP3.E.228 (TDC Bio)
Object due to SSSI, CWS, SAC, cSAC		DLP3.E.228 (TDC Bio)

WS11: North of Staddon Road, Dunsford

Summary of comment	Council Response	Respondents' unique ID
Harm to ecology	North of Staddon Road is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395415018 389820148 382174607 DLP3.E.034 DLP3.E.043 DLP3.E.113 DLP3.E.114 DLP3.E.147
Harm to heritage assets and their settings, including an Iron Age Hill Fort		395415018 389820148 DLP3.E.034 DLP3.E.043
Harm to landscape		389820148 382174607 DLP3.E.034 DLP3.E.043 DLP3.E.070 DLP3.E.113 DLP3.E.114 DLP3.E.147 DLP3.E.193
Harm to Dartmoor National Park		389820148 DLP3.E.041 (NE) DLP3.E.043 DLP3.E.070 DLP3.E.113 DLP3.E.114 DLP3.E.147 DLP3.E.193
Harm to local economy from harm to tourism		395415018 389820148 DLP3.E.113
Roads are inadequate to cope with additional traffic generated		395415018

Summary of comment	Council Response	Respondents' unique ID
		389820148 DLP3.E.034 DLP3.E.113
No benefit for local community		395415018
Harm to amenity of local residents, including from noise		395415018 389820148 DLP3.E.034 DLP3.E.043
Potential light pollution		395415018 389820148 382174607 DLP3.E.043
Potential harm to livestock and animals		389820148
Cross boundary landscape and visual impact – South Hams		DLP3.E.010 (JLP – P,SH & WD)
There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including the grade II Higher Brook Farmhouse and Lower Brook to the north (c.375m); grade II* listed Windout Farmhouse and associated farm buildings and structures to the north-west (c.550m); grade II listed Scottishill Farmhouse and Corridge Farmhouse to the south-west (c.750m); and grade II Tower Lodge to the west (c.900m).  HIA should be undertaken. This should take account of the cumulative impacts of this site option with site options 20 and 26.  Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		DLP3.E.013 (HE)
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.		DLP3.E.022 (EA)
Biodiversity enhancement (BNG) should be investigated.		DLP3.E.022 (EA)
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
No long-term employment benefit		DLP3.E.034
Cirl Bunting territories immediately north of Dunsford.		DLP3.E.040 (RSPB)
Priority Habitat – deciduous woodland, and good quality semi-improved grassland.		DLP3.E.041 (NE)
High likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113
Limited benefit beyond land owner and utility.		DLP3.E.043
Site includes 2.6 ha of grassland County Wildlife Site, a woodland Unconfirmed Wildlife Site, a stream and parts of two Other Sites of Wildlife Interest.		DLP3.E.228 (TDC Bio)

Summary of comment	Council Response	Respondents' unique ID
Object due to CWS. If CWS, streams and woodland were omitted from boundary, could be acceptable.		

#### WS12: West of Willsworthy Farm, Kenn

Summary of comment	Council Response	Respondents' unique ID
This site is in an area where there is known prehistoric activity. The potential needs to be assessed and mitigation put in place.	West of Willsworthy Farm is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395468967 DLP3.E.048 (DCC)
Given the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including Pennycombe Farmhouse and the Former mill house, kennels and adjoining cottage to the north-west (c.400m); Whitcombe Farmhouse and Haydon Cottage to the south-west (c.400m); and Sampsons Cottage to the east (c.850m). Further to the south lies the grade II Oxton House Registered Park and Garden (c.950m to the edge of the proposed allocation) and the listed buildings located within it and associated with it such as the grade II listed Oxton House, Gate Piers and Gate at the entrance to The Drive. Further to the east is the grade II* Registered Park and Garden of Powderham Castle (c.1.8km) and there are many individually listed buildings associated with this heritage asset. The potential for views of wind turbine development from within these Registered Park and Gardens as well as from within their settings is unknown.  HIA should be undertaken. This should take account of the cumulative impacts of this site option with site options 8 and 9.  Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		DLP3.E.013 (HE)
Biodiversity and ecological harm		DLP3.E.034 DLP3.E.043 DLP3.E.113
Harm to landscape.		DLP3.E.034 DLP3.E.043 DLP3.E.113
Heritage harm.		DLP3.E.034 DLP3.E.043
Unacceptable noise impacts on amenity and livestock		DLP3.E.034
Proximity to residential properties and impacts of noise		DLP3.E.034 DLP3.E.043
Roads are inadequate to cope with additional traffic generated		DLP3.E.034 DLP3.E.113



Summary of comment	Council Response	Respondents' unique ID
No long-term employment benefit		DLP3.E.034
Cirl Bunting breeding territory is noted 1km to the east.		DLP3.E.040 (RSPB)
Site is within the Impact Risk Zone (IRZ) for the Exe Estuary		DLP3.E.041 (NE)
Priority habitat – abuts area of deciduous woodland.		DLP3.E.041 (NE)
Exe Estuary 3km IRZ.		DLP3.E.041 (NE)
Triggers 3km IRZ for Haldon Forest SSSI.		DLP3.E.041 (NE)
High likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113
Site is adjacent to Cole Park/Short's Copse ASNW/PAWS.		DLP3.E.064 (WT)
Limited benefit beyond land owner and utility.		DLP3.E.043
Within South Hams SAC LCZ.		DLP3.E.228 (TDC Bio)
Adjacent to Ancient Woodland (& Unconfirmed Wildlife Site). Most of the site is within 250m of the Ancient Woodland.		DLP3.E.228 (TDC Bio)
Significant issues due to proximity of Ancient Woodland.		

#### WS13: East of Fordland Farm, Longdown

Summary of comment	Council Response	Respondents' unique ID
This site contains a known archaeological settlement site of prehistoric or Roman date. This and wider potential needs to be assessed and appropriate mitigation put in place.	<p>Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.</p> <p>All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.</p> <p>In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.</p>	395468967 DLP3.E.048 (DCC)
Concern that once developed the site would be regarded as brownfield land and further development permitted.	Policy CC6 requires that the site is restored to its former condition once the turbine is no longer in economic use.	391074654
There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including the Scheduled Roman signal station located c.1km to the south; the Scheduled Cotley Castle located c.1.95km to the west; the grade II listed Fordland Farm located c.475m to the north-west; and the Ide Conservation Areas with the individually listed buildings located within it to the east c.1.1km away with the Alphin Brook Conservation Area beyond.	<p>Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.</p> <p>The site is largely screened in views from the west by Cotley Wood and undulating landform partially obscures views from the south and south west.</p>	DLP3.E.013 (HE)



Summary of comment	Council Response	Respondents' unique ID
<p>HIA should be undertaken.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p>All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.</p> <p>In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.</p>	
Heritage harm.	See above.	DLP3.E.034 DLP3.E.043
Biodiversity and ecological harm.	<p>The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.</p> <p>Policy CC6: Wind turbine development requires consideration of:</p> <p>Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.</p> <p>Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.</p>	DLP3.E.034 DLP3.E.043 DLP3.E.113
Harm to landscape.	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower landscape constraints for a single smaller size turbine (100m) on the top of the ridge although higher constrains for multiple turbines.	DLP3.E.034 DLP3.E.043 DLP3.E.113
Unacceptable noise impacts on amenity and livestock.	<p>The evidence shows that the proximity of 24 properties within 500m of the site could represent a constraint, although extensive woodland at Cotley Wood screens views from properties to the west. Properties to the south and south west are partially obscured by the undulating landform. However, properties along Longtown Road at Bakers Hill to the north, which are elevated above the site, have full views over the site. The visibility of turbines from these properties would need to be investigated further.</p> <p>CC6 requires consideration of impacts on amenity.</p>	DLP3.E.034
Proximity to residential properties and impacts of noise.		DLP3.E.034 DLP3.E.043
Landscape and amenity impact on neighbouring authorities needs to be considered.		DLP3.E.171 (ECC)
Roads are inadequate to cope with additional traffic generated.	Wind turbines generally don't attract much traffic generation, other than for installation and servicing. Access is likely to be from Weston Road via a farm track, utilising the existing track to avoid introduction of new access tracks and resulting changes in landscape character.	DLP3.E.034 DLP3.E.113
No long-term employment benefit.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy.	DLP3.E.034

Summary of comment	Council Response	Respondents' unique ID
<p>Priority Habitat – near to an area of deciduous woodland, and about 100m from a traditional orchard</p> <p>Low likelihood of BMV (predictive)</p>	<p>Policy CC6: Wind turbine development requires consideration of: Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.</p> <p>This would protect Priority Habitat and BMV.</p> <p>In addition, Priority Habitats are protected under Policy EN11: Important Habitats and Features.</p>	<p>DLP3.E.041 (NE)</p> <p>DLP3.E.228 (TDC Bio)</p> <p>DLP3.E.043</p> <p>DLP3.E.113</p>
<p>Site is adjacent to Pollards Hill Brake PAWS.</p>	<p>See above</p>	<p>DLP3.E.064 (WT)</p>
<p>Limited benefit beyond land owner and utility.</p>	<p>The benefit of the wind turbine is primarily for renewable energy production and local energy security.</p>	<p>DLP3.E.043</p>
<p>Adjacent to potential RIGS (old railway line).</p> <p>Significant issues due to proximity of Ancient Woodland.</p>	<p>This has been noted as a sensitive receptor but overall the evidence has not noted this as a constraint to a single turbine.</p> <p>Further assessment will be undertaken in accordance with policy CC6: Wind turbine development, EN10: Biodiversity and Geodiversity, EN11: Important Habitats and Features, EN12: Legally Protected and Priority Species and EN13: European Wildlife Sites.</p>	<p>DLP3.E.228 (TDC Bio)</p>

#### WS14: North of Bishopsteignton

Summary of comment	Council Response	Respondents' unique ID
<p>This site contains a number of known prehistoric sites that should be protected from development. The wider potential for more sites needs to be assessed and appropriate mitigation put in place. Should be excluded.</p>	<p>North of Bishopsteignton is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.</p>	<p>395468967</p> <p>DLP3.E.048 (DCC)</p>
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of heritage assets notably the grade II Registered Park and Garden of Lindridge to the immediate south-west (c.400m) and the individually listed buildings associated with it. The Scheduled Castle Dyke is also located c.1km to the north-east and several listed buildings in Luton c. 430 to the north-west.</p> <p>HIA should be undertaken.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>		<p>DLP3.E.013 (HE)</p>
<p>Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.</p>		<p>DLP3.E.022 (EA)</p>
<p>Biodiversity enhancement (BNG) should be investigated.</p>		<p>DLP3.E.022 (EA)</p>
<p>Prominent hillside location. Near to Coombe Cellars and Shaldon/Ringmore tourism hotspots.</p>		<p>DLP3.E.025 (Teignmouth NP)</p>

Summary of comment	Council Response	Respondents' unique ID
		Steering/action group) DLP3.E.113
This site lies 2km from a known Grey Long-Eared Bat maternity roost.		DLP3.E.033 (DWT) DLP3.E.047 (D&T PC) DLP3.E.228 (TDC Bio)
This site lies immediately adjacent to Little Haldon Heaths SSSI and within the Haldon Forest Important Bird Area.		DLP3.E.033 (DWT) DLP3.E.040 (RSPB) DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
Biodiversity and ecological harm.		DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.041 (NE) DLP3.E.047 (D&T PC) DLP3.E.093 (B PC) DLP3.E.113 DLP3.E.158 DLP3.E.180
Harm to landscape.		DLP3.E.034 DLP3.E.113 DLP3.E.158
Heritage harm.		DLP3.E.034
Unacceptable noise impacts on amenity and livestock.		DLP3.E.034
Proximity to residential properties and impacts of noise.		DLP3.E.034
Roads are inadequate to cope with additional traffic generated.		DLP3.E.034 DLP3.E.093 (B PC) DLP3.E.113 DLP3.E.158 DLP3.E.180
No long-term employment benefit.		DLP3.E.034
Priority habitats – good quality semi-improved grassland, and lowland heathland, and abuts an area of deciduous woodland.		DLP3.E.041 (NE)
Triggers 2km IRZ for Great Haldon Heaths		DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
Site partly within an area of soils with peaty pockets		DLP3.E.041 (NE)
Adjoins an area of open greenspace – Teignmouth golf course.		DLP3.E.041 (NE)
Part of the site is Access Land.		DLP3.E.041 (NE)

Summary of comment	Council Response	Respondents' unique ID
Part of site has high likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.113
Landscape and amenity impact on neighbouring authorities needs to be considered.		DLP3.E.171 (ECC)
County Wildlife Site for heath habitats and is functionally linked land for the adjacent SSSI.		DLP3.E.228 (TDC Bio)
Within RSPB's Haldon Important Bird Area (possible Haldon cSAC)		DLP3.E.228 (TDC Bio)
Overlaps a curlew territory.		
Within a GC Newt zone with a pond on site.		
Red due to SAC, GLEB/barb, SSSI CWS, cSAC.		

#### WS15: West of Tedburn St Mary

Summary of comment	Council Response	Respondents' unique ID
This site contains a known prehistoric or Roman settlement site. This should be protected from development or assessed and appropriate mitigation put in place. The wider potential of the area should also be assessed.	Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.	395468967 DLP3.E.048 (DCC)
There is the potential for the proposed allocation to adversely affect the settings and significance of heritage assets including the grade II* listed Church of St Mary to the east and other grade II listed buildings nearby (c.400m); grade II listed Higher Rubhay Farmhouse and barn to the north-east (c.300m); and the grade II listed Withycombe Farmhouse and Melhuish Down Cottage to the south west (c.350-400m).	All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.	DLP3.E.013 (HE)
HIA should be undertaken.	In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.	DLP3.E.034 DLP3.E.043 DLP3.E.113
Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		
Heritage harm		
Cross boundary landscape and visual impact – South Hams	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that it is considered that the site has lower landscape constraints for multiple (up to 3) smaller size turbines (100m) on the hilltop.	DLP3.E.010 (JLP – P,SH & WD)
Harm to landscape.		DLP3.E.034 DLP3.E.043 DLP3.E.070

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.109 (Tedburn PC) DLP3.E.113 DLP3.E.226 (Dartmoor NPA)
Turbines on these sites may be visible from the National Park, but the distance of the sites from the National Park boundary will reduce their visual impact. Whilst it may be possible to introduce small scale turbines into this landscape without them causing significant harm, the level of harm will depend on siting, size and numbers of turbines introduced onto the land.		DLP3.E.226 (Dartmoor NPA)
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed. Biodiversity enhancement (BNG) should be investigated.	Noted. Policy CC6 requires development to avoid, minimise and mitigate harm to biodiversity and geodiversity, including Priority habitats. This would include the creation of buffers as required through the planning application process.  Policy EN10: Biodiversity and Geodiversity would ensure that a minimum of 10% biodiversity net gain was provided as part of development, unless wind turbine development is excluded development when the Regulations accompanying the Act are published.	DLP3.E.022 (EA)
Unacceptable noise impacts on amenity and livestock.	The proximity of 31 properties within 500m of the site could also represent a constraint. The visibility of turbines from these properties would need to be investigated further at planning application stage.	DLP3.E.034
Proximity to residential properties and impacts of noise.		DLP3.E.034 DLP3.E.043
Roads are inadequate to cope with additional traffic generated.	Wind turbines generally don't attract much traffic generation, other than for installation and servicing. There are no existing access routes into the site. A new access will need to be created, to be determined at planning application stage.	DLP3.E.034 DLP3.E.113
No long-term employment benefit.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy.	DLP3.E.034
Limited benefit beyond land owner and utility.		DLP3.E.043
Ecological importance of the Withycombe Farm to the east, Unconfirmed Wildlife Site is safeguarded.	Policy CC6: Wind turbine development requires consideration of:  Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.	DLP3.E.040 (RSPB) DLP3.E.228 (TDC Bio)
Within 5km of Dartmoor NP Priority Habitats – site abuts areas of Deciduous Woodland Moderate likelihood of BMV (predictive)	This would protect Priority Habitats and BMV.  In addition, Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.  The setting of Dartmoor National Park is protected under Policy EN4: Landscape Protection and Enhancement, which gives great weight to the protection of the setting of the National Park. The setting of the DNP has been taken into consideration in the landscape and visual assessment of the site.	DLP3.E.041 (NE) DLP3.E.043 DLP3.E.070 DLP3.E.109 (Tedburn PC) DLP3.E.113 DLP3.E.034 DLP3.E.043 DLP3.E.113

Summary of comment	Council Response	Respondents' unique ID
Close proximity to Mid Devon District. While they have been identified as being technically suitable for renewable wind energy development we would welcome continued close working.	Noted. Engagement with statutory consultees such as Mid Devon District Council will continue.	DLP3.E.135 (Mid Devon DC)
There is a risk of creating a band of wind turbines surrounding the boundary of the Park and consideration has to be given to cumulative impact.	Cumulative impact is addressed in policy CC6: Wind turbine development and EN4: Landscape Protection and Enhancement.	DLP3.E.226 (Dartmoor NPA)
Includes streams.  Significant issues, but if UWS, woodland and streams avoided, the more suitable.	Policy CC6: Wind turbine development requires consideration of:  Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.	DLP3.E.228 (TDC Bio)

#### WS16: South West of Ide

Summary of comment	Council Response	Respondents' unique ID
<p>This site should not be included in the plan. It would adversely impact the setting of the Ide Roman Fortlet or Signal Station, which is a Scheduled Ancient Monument. There is also potential for the area to contain other sites of prehistoric and Roman date.</p> <p>Given the heritage sensitivity of this location, we consider it is unlikely to be appropriate for a wind energy allocation owing to the high potential for the proposed allocation to adversely affect the setting and significance of this designated heritage asset.</p> <p>This site option is immediately adjacent to the Scheduled Roman signal station 450m north of Marshall Farm (c.50m away). Further to the south/south-west is the grade II listed Marshall Farmhouse and adjoining barn (c.500m).</p> <p>If the Council is minded to propose this site option as an allocation, however, we consider that a HIA should be undertaken. This should take account of the cumulative impacts of this site option with site option 13.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p>Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.</p> <p>All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.</p> <p>In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.</p>	<p>395468967 DLP3.E.048 (DCC) DLP3.E.013 (HE)</p>
Heritage harm		<p>DLP3.E.034 DLP3.E.043 DLP3.E.151 DLP3.E.155</p>



Summary of comment	Council Response	Respondents' unique ID
Concern that once developed the site would be regarded as brownfield land and further development permitted	Planning conditions will be applied to require turbines to be dismantled and removed from the site, and the site restored to its former (or an improved) condition, once the turbine is no longer in economic use.	391074654
Harm to landscape.	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower constraints for multiple (up to 3) medium size turbines (125m) on the upland plateau.	DLP3.E.034 DLP3.E.043 DLP3.E.048 (DCC) DLP3.E.113 DLP3.E.151 DLP3.E.155
Landscape and amenity impact on neighbouring authorities needs to be considered.		DLP3.E.171 (ECC)
Unacceptable noise impacts on amenity and livestock.	The proximity of 8 properties within 500m of the site could also represent a constraint; however, plantation woodland to the west obscures visibility, and views from properties to the south (Idestone Barton and Marshall Farm) which are located at a lower elevation, are obscured by the undulating topography. Whiddon Farm, which is located 350m north east of the site boundary, has full views into the site. The visibility of turbines from these properties would need to be investigated further at planning applications stage.	DLP3.E.034
Proximity to residential properties and impacts of noise.		DLP3.E.034 DLP3.E.043
Roads are inadequate to cope with additional traffic generated.	Wind turbines generally don't attract much traffic generation, other than for installation and servicing. Access to the site is likely to be via farm tracks extending from Whiddon Lane, utilising the existing track to avoid introduction of new access tracks and resulting changes in landscape character.	DLP3.E.034 DLP3.E.113
No long-term employment benefit.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy. Businesses are also dependent on affordable energy.	DLP3.E.034
Site is close to conifer plantation to the west where there may be potential for nightjars.	Policy CC6: Wind turbine development requires consideration of:  Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.  This would protect Priority Habitats and BMV.  In addition, Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.	DLP3.E.040 (RSPB)
Within 5km of Dartmoor NP Permissive bridleway passes through the site High likelihood of BMV (predictive)		DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113
Biodiversity and ecological harm.		DLP3.E.034 DLP3.E.043 DLP3.E.113
Limited benefit beyond land owner and utility.	The benefit of the wind turbine is primarily for renewable energy production and local energy security.	DLP3.E.043
Close to a Regionally Important Geological Site.  Should be suitable.	Noted	DLP3.E.228 (TDC Bio)

WS17: West of Downhouse Farm, Longdown

Summary of comment	Council Response	Respondents' unique ID
Concern about harm to ecology	<p>The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.</p> <p>Policy CC6: Wind turbine development requires consideration of:</p> <p>Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.</p>	<p>395461459 391469877 DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.043 DLP3.E.113</p>
<p>Within 5km of Dartmoor NP Priority Habitats – site abuts deciduous woodland, and good quality semi-improved grassland Proximity to ancient woodland (within 200m) Low likelihood of BMV (predictive)</p>	<p>Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.</p>	<p>DLP3.E.041 (NE) DLP3.E.228 (TDC Bio) DLP3.E.043 DLP3.E.113</p>
<p>Adjacent to four woodland Unconfirmed Wildlife Sites. Significant issues due to UWS, but if grassland UWS was omitted from boundary, may be acceptable. This has been considered but the plan has not been amended because it is already addressed in policy CC6: Wind turbine development, EN10: Biodiversity and Geodiversity, EN11: Important Habitats and Features, EN12: Legally Protected and Priority Species and EN13: European Wildlife Sites.</p>		<p>DLP3.E.228 (TDC Bio)</p>
<p>Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed. Biodiversity enhancement (BNG) should be investigated. Potential impact on Grade 3 Agricultural Land.</p>		<p>DLP3.E.022 (EA) DLP3.E.028 (W PC) DLP3.E.113</p>
<p>Harm to Dartmoor National Park</p>	<p>The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower constraints for a single turbine (up to 125m) on the hilltop in the east.</p>	<p>391469877 DLP3.E.043 DLP3.E.113</p>
<p>Harm to the landscape</p>	<p>Cumulative impact is addressed in policy CC6: Wind turbine development and EN4: Landscape Protection and Enhancement.</p>	<p>391469877 DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.070 DLP3.E.113</p>
<p>Turbines on these sites may be visible from the National Park, but the distance of the sites from the National Park boundary will reduce their visual impact. Whilst it may be possible to introduce small scale turbines into this landscape without them causing significant harm, the level of harm will depend on siting, size and numbers of turbines introduced onto the land. There is a risk of creating a band of wind turbines surrounding the boundary of the Park and consideration has to be given to cumulative impact.</p>		<p>DLP3.E.226 (Dartmoor NPA)</p>
<p>Harm to heritage assets</p>	<p>Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.</p>	<p>391469877 DLP3.E.034 DLP3.E.043</p>



Summary of comment	Council Response	Respondents' unique ID
<p>There is the potential for the proposed allocation to adversely affect the setting and significance of this heritage asset. The grade II* listed Kingsford Farmhouse is located c. 650m to the south of this site option.</p> <p>HIA should be undertaken. This should take account of the cumulative impacts of this site option with site option 21.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p>All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.</p> <p>In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.</p>	DLP3.E.013 (HE)
Access inadequate - concern about damage to hedgerows from delivery of large component parts	<p>Access is likely to be via the farm track from Dowhouse Farm, utilising the existing track to avoid introduction of new access tracks and resulting changes in landscape character. However, access works are likely to be required to existing narrow lanes/ track, resulting in the loss of hedgebanks and trees.</p> <p>Proposals will require a Construction and Environment Management Plan to manage potential impacts.</p>	395461459 DLP3.E.028 (W PC) DLP3.E.113
The local lane network is unsuitable for delivery of large component parts		391469877 DLP3.E.034 DLP3.E.113
Adverse effect on local tourism	It is recognised that landscape and visual amenity are important considerations in where tourists choose to go. However, the long-term impacts of climate change, if not minimised, could in themselves cause detrimental changes to existing landscape character. Such impacts may include tree loss through more frequent and powerful storms and increases in pests and diseases, or the loss of traditional field patterns due to potential future changes in agricultural practices. Therefore, whilst the Council recognises that the introduction of wind turbines will impact existing landscape character, these landscapes will be adversely altered if nothing is done to combat climate change.	391469877
Would cause light pollution	The introduction of aviation lighting would add light sources to the dark skies within the site and adjoining landscape.	391469877 DLP3.E.043
Would cause undue noise	The proximity of 15 properties within 500m of the site could also represent a constraint, although most are located on an unnamed lane to the north and south east of the site, where visibility is often oblique. The visibility and noise impacts of turbines from these properties would need to be investigated further.	391469877 DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043
Livestock and farming harm.	Wind turbines only use a fraction of the land. Whilst there are considerations to take into account, farming practices can continue around turbines.	DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.113
No long term employment benefit.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy. Businesses are also dependent on affordable energy.	DLP3.E.034
Limited benefit beyond land owner and utility.		DLP3.E.043

Summary of comment	Council Response	Respondents' unique ID

#### WS18: Exwick Woods

Summary of comment	Council Response	Respondents' unique ID
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of heritage assets such as the Scheduled Monument known as the Earthwork enclosure 300m SW of the Three Horse Shoes Inn that is located c.1.1km to the northeast of this site option. There are also a number of listed buildings located mostly to the north-east, south-east, south and south-west of the proposed allocation at distances ranging from c.0.77-1.3km as well as the Exwick Conservation Area located c.1.25km to the south-east.</p> <p>We are also concerned to understand the potential impact of wind turbine development on Exeter's skyline and its distinctive, rural, landscaped setting to the west. Potential impacts on the settings and special interest of some of Exeter's conservation areas may also need to be considered.</p> <p>HIA should be undertaken. This may need to take into account the cumulative impacts of this site option with site option 27.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p>Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.</p> <p>All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.</p> <p>In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.</p>	DLP3.E.013 (HE)
Heritage harm		DLP3.E.034 DLP3.E.043
<p>Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.</p> <p>Biodiversity enhancement (BNG) should be investigated.</p>	<p>The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.</p>	DLP3.E.022 (EA)
Biodiversity and ecological harm.	Policy CC6: Wind turbine development requires consideration of:	DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.113
Recommend assessment of the site for bat usage due to close proximity to woodlands.	Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.	DLP3.E.040 (RSPB) DLP3.E.228 (TDC Bio)
Part within Great Crested Newt zone and pond present.		DLP3.E.228 (TDC Bio)
Significant issues due to proximity of Ancient Woodland and GCNs.		
Priority habitats – deciduous woodland High likelihood of BMV (predictive)	Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.	DLP3.E.041 (NE) DLP3.E.064 (WT) DLP3.E.228 (TDC Bio) DLP3.E.043 DLP3.E.113

Summary of comment	Council Response	Respondents' unique ID
	Policy EN10: Biodiversity and Geodiversity would ensure that a minimum of 10% biodiversity net gain was provided as part of development, unless wind turbine development is excluded development when the Regulations accompanying the Act are published.	
Landscape harm.	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower constraints for multiple (up to two) smaller size turbines (100m) on the higher slopes, one to the north and one to the south.	DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.113
Landscape and amenity impact on neighbouring authorities needs to be considered.		DLP3.E.171 (ECC)
Close proximity to an existing Gypsy and Traveller site.	The visibility and noise impacts of turbines from the gypsy and traveller site would need to be investigated further at planning application stage.	DLP3.E.028 (W PC)
Accessibility to the site is poor and narrow road network.	Access is likely to be from Rowhorne Road although a new access track off it will be required which may result in changes to the landscape character. Access works are also likely to be required to the existing narrow road, resulting in the loss of hedgebanks and trees.  Proposals will require a Construction and Environment Management Plan to manage potential impacts.	DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.113
Residential amenity harm from noise.	The proximity of 10 properties within 500m of the site could also represent a constraint, as these are mostly located to the west of the site along Rowhorne Road with direct and open views of the site. The visibility and noise impacts of turbines from these properties would need to be investigated further at planning application stage.	DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043
Livestock and farming harm.	Wind turbines only use a fraction of the land. Whilst there are considerations to take into account, farming practices can continue around turbines.	DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.113
No long term employment benefit.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy. Businesses are also dependent on affordable energy.	DLP3.E.034
Limited benefit beyond land owner and utility.		DLP3.E.043

#### WS19: West of Cockwood

Summary of comment	Council Response	Respondents' unique ID
This site is near to known archaeological sites of prehistoric date. The potential needs to be assessed and appropriate mitigation put in place.	West of Cockwood is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395468967 DLP3.E.048 (DCC)
Support		386266388 DLP3.E.020 (D TC)

Summary of comment	Council Response	Respondents' unique ID
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including to the north is the grade II listed Vennbridge Farmhouse (c.400m); to the east is the Cockwood Sod Conservation Area (c.550m) and several grade II listed buildings located within it; to the south is the grade II Coffard Farmhouse (c.380m); and to the west is the grade II* listed Mowlish Manor (c.540m).</p> <p>The adopted Cockwood Conservation Area Character Appraisal (2010) identifies the largely agricultural nature of the Conservation Area's setting on the landward side as a positive feature. The Appraisal also notes that panoramic views from parts of the Conservation Area are a positive feature and that care needs to be taken with the impacts of developments on views west towards the Haldon Ridge and grade I listed Mamhead House/Dawlish College (set within the grade II* Mamhead Registered Park and Garden, even at distance).</p> <p>We are also concerned about the potential impact of wind turbine development on views across the River Exe Estuary and the intervisibility to and from heritage assets on its eastern side. These include the grade II Registered Park and Garden of Al La Ronde and The Point-in-View, the grade II listed Lympstone Manor/Courtlands House and the Conservation Areas of Lympstone and Exmouth for example.</p> <p>HIA should be undertaken.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>		<p>DLP3.E.013 (HE) DLP3.E.034</p>
<p>Planned or in progress housing was not indicated.</p>		<p>DLP3.E.020 (D TC)</p>
<p>Site lies within the South Hams SAC GHB Landscape Connectivity Zone and within 1km of the Exe Estuary SPA, which is internationally important for migratory birds, DWT is concerned about the potential impact of this site.</p>		<p>DLP3.E.020 (D TC) DLP3.E.033 (DWT) DLP3.E.034 DLP3.E.040 (RSPB) DLP3.E.041 (NE) DLP3.E.113 DLP3.E.228 (TDC Bio)</p>
<p>Landscape harm.</p>		<p>DLP3.E.034 DLP3.E.113</p>
<p>Accessibility to the site is poor and narrow road network.</p>		<p>DLP3.E.034 DLP3.E.113</p>
<p>Residential amenity harm from noise.</p>		<p>DLP3.E.034</p>
<p>Livestock and farming harm.</p>		<p>DLP3.E.034 DLP3.E.113</p>
<p>No long term employment benefit.</p>		<p>DLP3.E.034</p>

Summary of comment	Council Response	Respondents' unique ID
Site falls partly within habitat used by two breeding territory for Cirl buntings. Compensatory habitat provision would be needed.		DLP3.E.040 (RSPB)
Within 5km of East Devon AONB.		DLP3.E.041 (NE)
Within 2km IRZ for the South West Coast National Trail.		DLP3.E.041 (NE)
Priority Habitats – abuts a small area of deciduous woodland		DLP3.E.041 (NE)
Dawlish Warren 1km IRZ		DLP3.E.041 (NE)
High likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.113
Site sensitivities include a requirement for further investigation as to whether the site is a migration route for SPA birds. The further investigation should also determine if the site is functionally linked to the SPA or SSSI.		DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
Nearest part is 770m from Exe Estuary SPA and 530m from the nearest known functionally linked land, it is not within the 400m SPA buffer. Given raised location in landscape it is unlikely that the site itself would be used by many SPA birds.		DLP3.E.228 (TDC Bio)
CHECK whether NE or RSPB know if it is on an important migration route, if so, not suitable.		
Western half within South Hams SAC LCZ.		
Significant issues if NE/RSPB are unconcerned.		

#### WS20: Duck's Brook, Tedburn St Mary

Summary of comment	Council Response	Respondents' unique ID
There is the potential for the proposed allocation to adversely affect the settings and significance of heritage assets including the grade II listed South Halstow Farmhouse and barn to the southeast (c.380m) and grade II* listed Windout Farmhouse and associated grade II listed buildings to the south-west (c.380m). HIA should be undertaken. This may need to take into account the cumulative impacts of this site option with site option 21.  Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.	Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.  All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.  In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.	DLP3.E.013 (HE)
This site contains a known prehistoric or Roman settlement site. This should be protected from development or assessed and appropriate mitigation put in place. The wider potential of the area should also be assessed.		395468967

Summary of comment	Council Response	Respondents' unique ID
Harm to heritage assets and their settings, including an Iron Age Hill Fort		395415018 389820148 380080967 DLP3.E.034 DLP3.E.043 DLP3.E.109 (TSM PC) DLP3.E.113
Harm to landscape/Dartmoor National Park	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower landscape and visual amenity constraints for multiple (up to three) smaller size turbines (100m) on higher slopes (with one or two to the north west, one to the north east and one to the south west).  Cumulative impact is addressed in policy CC6: Wind turbine development and EN4: Landscape Protection and Enhancement.	391300465 389820148 382174607 380080967 DLP3.E.034 DLP3.E.041 (NE) DLP3.E.043 DLP3.E.070 DLP3.E.109 (TSM PC) DLP3.E.113 DLP3.E.226 (Dartmoor NPA)
Cross boundary landscape and visual impact – South Hams		DLP3.E.010 (JLP –P,SH & WD)
Turbines on these sites may be visible from the National Park, but the distance of the sites from the National Park boundary will reduce their visual impact. Whilst it may be possible to introduce small scale turbines into this landscape without them causing significant harm, the level of harm will depend on siting, size and numbers of turbines introduced onto the land. There is a risk of creating a band of wind turbines surrounding the boundary of the Park and consideration has to be given to cumulative impact.		DLP3.E.226 (Dartmoor NPA)
Harm to local economy from harm to tourism	It is recognised that landscape and visual amenity are important considerations in where tourists choose to go. However, the long-term impacts of climate change, if not minimised, could in themselves cause detrimental changes to existing landscape character. Such impacts may include tree loss through more frequent and powerful storms and increases in pests and diseases, or the loss of traditional field patterns due to potential future changes in agricultural practices. Therefore, whilst the Council recognises that the introduction of wind turbines will impact existing landscape character, these landscapes will be adversely altered if nothing is done to combat climate change.	395415018 389820148 380080967 DLP3.E.113
Roads are inadequate to cope with additional traffic generated	Access is likely to be from a farm track in the east (via an unnamed road that runs around the northern and eastern boundaries of the site), utilising the existing track to avoid introduction of new access tracks and resulting changes in landscape character. However, access works are likely to be required to existing narrow lanes/ track, resulting in the loss of hedgebanks and trees.  Proposals should include a Construction and Environment Management Plan to manage potential impacts.	395415018 389820148 DLP3.E.034 DLP3.E.113



Summary of comment	Council Response	Respondents' unique ID
Harm to amenity of local residents, including from noise	The proximity of 12 properties (located in all directions) within 500m of the site could also represent a constraint, as most of these properties will have direct views of the turbines breaching the skyline (although properties along Pike Hill are afforded with some screening from woodland at Hackworthy Brakes). The visibility and noise impacts of turbines from these properties would need to be investigated further at planning application stage.	395415018 389820148 382174607 380080967 DLP3.E.034 DLP3.E.043
Potential light pollution	Introduction of aviation lighting would add light sources to the dark skies within the site and adjoining landscape.	395415018 389820148 DLP3.E.043
Harm to Ecology	The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.  Policy CC6: Wind turbine development requires consideration of:	395415018 389820148 382174607 380080967 DLP3.E.034 DLP3.E.043 DLP3.E.113
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed. Biodiversity enhancement (BNG) should be investigated.	Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.	DLP3.E.022 (EA)
Site is within 2km of curlew breeding territories.	Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.	DLP3.E.040 (RSPB)
Within 5km of Dartmoor NP Priority habitat – good quality semi-improved grassland, lowland meadows, and traditional orchard High likelihood of BMV (predictive).	Policy EN10: Biodiversity and Geodiversity would ensure that a minimum of 10% biodiversity net gain was provided as part of development, unless wind turbine development is excluded development when the Regulations accompanying the Act are published.	DLP3.E.041 (NE) DLP3.E.228 (TDC Bio) DLP3.E.043 DLP3.E.109 (TSM PC) DLP3.E.113
It also includes traditional orchard (a priority habitat) and a woodland OSWI. Adjacent to other woodland, including a UWS. Not suitable for damage to CWS, but CWS, Wood and orchard were omitted from boundary, may be acceptable.		DLP3.E.228 (TDC Bio)
Livestock and farming impact due to noise.	Wind turbines only use a fraction of the land. Whilst there are considerations to take into account, farming practices can continue around turbines.	DLP3.E.034 DLP3.E.043
No long term employment benefit.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy. Businesses are also dependent on affordable energy.	DLP3.E.034
Limited benefit beyond land owner and utility.		DLP3.E.043



Summary of comment	Council Response	Respondents' unique ID
No benefit for local community	Applications will consider the direct benefits from the development on the local community.	395415018

#### WS21: Land north of West View Farm

Summary of comment	Council Response	Respondents' unique ID
Resulting light pollution	Introduction of aviation lighting would add light sources to the dark skies within the site and adjoining landscape.	389820148 DLP3.E.043
Harm to tourism from harm to landscape	It is recognised that landscape and visual amenity are important considerations in where tourists choose to go. However, the long-term impacts of climate change, if not minimised, could in themselves cause detrimental changes to existing landscape character. Such impacts may include tree loss through more frequent and powerful storms and increases in pests and diseases, or the loss of traditional field patterns due to potential future changes in agricultural practices. Therefore, whilst the Council recognises that the introduction of wind turbines will impact existing landscape character, these landscapes will be adversely altered if nothing is done to combat climate change.	389820148 DLP3.E.113
Undue noise creation	The visibility and noise impacts of turbines from these properties would need to be investigated further at planning application stage.	389820148 DLP3.E.034 DLP3.E.043
Local roads are inadequate for delivery of large component parts	Access is likely via the private roads to Ford Farm or Bilsdon, utilising existing tracks to avoid the introduction of new access tracks and resulting changes in landscape character. However, access works are likely to be required to existing narrow lanes/ track, resulting in the loss of hedgebanks and trees.  Proposals should include a Construction and Environment Management Plan to manage potential impacts.	389820148 DLP3.E.034 DLP3.E.113
Harm to heritage assets	Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.  All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.  In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful	389820148 DLP3.E.034 DLP3.E.043 DLP3.E.013 (HE)
There is the potential for the proposed allocation to adversely affect the setting and significance of heritage assets including, the grade II listed Ford Farm is located c. 380m to the south of this site option. Further away to the north-west is the grade II listed South Halstow Farmhouse and barn (c.370m) and the grade II* Kingsford Farmhouse to the east (c.780m).  HIA should be undertaken. This should potentially take account of the cumulative impact of this site in conjunction with site options 17 and 20.		

Summary of comment	Council Response	Respondents' unique ID
Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.	impacts on the significance of heritage assets and their settings in line with the NPPF.	
Livestock and farming impact due to noise.	Wind turbines only use a fraction of the land. Whilst there are considerations to take into account, farming practices can continue around turbines.	DLP3.E.034 DLP3.E.043 DLP3.E.113
Harm to ecology	The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.	389820148 DLP3.E.034 DLP3.E.043 DLP3.E.113
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed. Biodiversity enhancement (BNG) should be investigated.	Policy CC6: Wind turbine development requires consideration of:	DLP3.E.022 (EA)
Site is 1km from nearest curlew territory.	Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.	DLP3.E.040 (RSPB)
Within 5km of Dartmoor NP Priority Habitat – good quality semi-improved grassland, lowland meadows and traditional orchard High likelihood of BMV (predictive)	Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.	DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113
Adjacent to three Unconfirmed Wildlife Site woodlands.  Contains a copse, streams and ponds.  If on-site habitats avoided, could be acceptable.		DLP3.E.228 (TDC Bio)
Harm to landscape	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower constraints for a single smaller size turbine (100m) on the higher slope to the north.	389820148 DLP3.E.034 DLP3.E.043 DLP3.E.113 DLP3.E.226 (Dartmoor NPA)
There are no significant vertical features in this landscape and the introduction of wind turbines will have a detrimental visual impact. The significance of this impact will depend on the position of the turbine, its size and whether multiple turbines are introduced into this landscape.  There are very few modern vertical structures in this landscape and the introduction of wind turbines will have an impact on the character of the local landscape and the setting of the National Park. This is a tranquil landscape and turbines are dynamic features that will impact on the perception of tranquillity. Wind turbines would not be supported on these sites.  Turbines on these sites may be visible from the National Park, but the distance of the sites from the National Park boundary will reduce their visual impact.	Cumulative impact is addressed in policy CC6: Wind turbine development and EN4: Landscape Protection and Enhancement.	DLP3.E.226 (Dartmoor NPA)

Summary of comment	Council Response	Respondents' unique ID
There is a risk of creating a band of wind turbines surrounding the boundary of the Park and consideration has to be given to cumulative impact. Whilst it may be possible to introduce small scale turbines into this landscape without them causing significant harm, the level of harm will depend on siting, size and numbers of turbines introduced onto the land.		
Limited benefit beyond land owner and utility.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy.	DLP3.E.043
No long term employment benefit.		DLP3.E.034

## WS22: Powderham New Plantation

Summary of comment	Council Response	Respondents' unique ID
This site is in an area where there is known prehistoric activity. The potential needs to be assessed and mitigation put in place.	Powderham New Plantation is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395468967
Harm to landscape		395456971 DLP3.E.034 DLP3.E.043 DLP3.E.113 DLP3.E.141 (E PC)
Harm to heritage assets and their settings		395456971 DLP3.E.034 DLP3.E.043 DLP3.E.141 (E PC)
Harm to those enjoying local footpaths and cycle paths		395456971
There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets (grade II listed buildings) including Crablake Farm and farm buildings to the north (c.400m); Blackheath Cottage and Red Lodge to the east (c.375 675m); and Mellands to the south (c.720m). There is also the potential for views of wind turbine development from the grade II* Registered Park and Garden of Powderham Castle to the south-east and individually listed buildings associated with it (c.950m between the edges of the Registered Park and Garden and the proposed allocation).  HIA should be undertaken.  Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		DLP3.E.013 (HE)
Site lies within 1.2km of the Exe Estuary SPA, which is internationally important for migratory birds.		DLP3.E.033 (DWT) DLP3.E.040 (RSPB)

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.041 (NE)
Biodiversity and ecological harm.		DLP3.E.034 DLP3.E.043 DLP3.E.113 DLP3.E.141 (E PC)
Unacceptable noise impacts on amenity and livestock.		DLP3.E.034
Proximity to residential properties and impacts of noise.		DLP3.E.034 DLP3.E.043 DLP3.E.141 (E PC)
Roads are inadequate to cope with additional traffic generated.		DLP3.E.034 DLP3.E.113 DLP3.E.141 (E PC)
No long-term employment benefit.		DLP3.E.034
Unlikely to be used by roosting/foraging birds. But recommend assessment to determine if a significant number are present.		DLP3.E.040 (RSPB)
Site is within 1km of cirl bunting breeding territories record to the north and south.		DLP3.E.040 (RSPB)
Priority Habitats – good quality semi-improved grassland.		DLP3.E.041 (NE)
Abuts a large area of accessible woodland – woodland trust.		DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
High likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.113
Water resource impact.		DLP3.E.141 (E PC)
Flood risk and surface water management impact.		DLP3.E.141 (E PC)
Limited benefit beyond land owner and utility.		DLP3.E.043

#### WS23: South of Broadhempston

Summary of comment	Council Response	Respondents' unique ID
Harm to landscape	South of Broadhempston is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395601519 395546814 395524995 395594860 395511480 395496767 395480162 395472623 395470522 395466407 395469334 395466704 395468085

Summary of comment	Council Response	Respondents' unique ID
		395464698
		395459146
		395458435
		395455611
		395447677
		395440832
		395439729
		395440599
		395426503
		395427782
		395406619
		395391984
		395381316
		395373682
		395372080
		395306337
		395302504
		395300395
		395299075
		395270258
		395159087
		395172201
		395171190
		395143899
		395133886
		395120311
		395096279
		395073273
		395049054
		395036253
		394935130
		394926187
		394923359
		394903050
		394901796
		394891112
		394896299
		394891014
		394889909
		394882889
		394854336
		394805436
		394584677
		394563582

Summary of comment	Council Response	Respondents' unique ID
		394202482 394051060 393998081 393893448 393799017 393813793 393789482 393737446 393649197 393648396 393623323 393618196 393587230 393518902 393494763 393500207 393465441 392661486 391441050 389699935 387838500 DLP3.E.034 DLP3.E.113 DLP3.E.178 DLP3.E.179 DLP3.E.182 DLP3.E.188 DLP3.E.190 DLP3.E.191 DLP3.E.205
Harm to ecology		395601519 395511480 395496767 395480162 395469937 395468085 395464698 395459146 395458435 395447677 395440832 395439729 395441191 395426503

Summary of comment	Council Response	Respondents' unique ID
		395427782 395381316 395372080 395302504 395300395 395298758 395299075 395265374 395159087 395171190 395143899 395120311 395096279 395073273 395036253 394935130 394926187 394923359 394901796 394891112 394896299 394889909 394882889 394854336 394805436 394584677 394563582 394209248 393998081 393893448 393737446 393648439 393644626 393623323 393618196 393518902 393494763 393500207 393465441 393312887 392661486 391441050 391316351 391187313



Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.034 DLP3.E.113 DLP3.E.178 DLP3.E.179 DLP3.E.182 DLP3.E.188 DLP3.E.190 DLP3.E.205
Prejudice active agricultural use of land		395601519 395600841 395515042 395469937 395466407 395450069 395439729 395291675 395159087 395036253 394584677 393789482 393648439 387753615 DLP3.E.034 DLP3.E.113
Harm to setting of heritage assets within village and surroundings		395546814 395515042 395511480 395496767 395480162 395469937 395466407 395469237 395469334 395466704 395468085 395465595 395459146 395458435 395440832 395439729 395440599 395426503 395427782 395406619

Summary of comment	Council Response	Respondents' unique ID
		395381316
		395382803
		395373682
		395372080
		395306337
		395302504
		395300393
		395299075
		395265374
		395270258
		395159087
		395172201
		395171190
		395143899
		395133886
		395120311
		395096279
		395073273
		395049054
		395036253
		394935130
		394926187
		394923359
		394903050
		394891112
		394896299
		394891014
		394889909
		394882889
		394854336
		394805436
		394584677
		394209248
		393998081
		393893448
		393799017
		393789482
		393737446
		393648439
		393644626
		393623323
		393618196
		393465441
		393312887

Summary of comment	Council Response	Respondents' unique ID
		392661486 392522226 391441050 391316351 387838500 DLP3.E.034 DLP3.E.149 DLP3.E.177 DLP3.E.178 DLP3.E.179 DLP3.E.188 DLP3.E.205
Proximity to housing		395601519 395469937 395469237 395466704 395465595 395464698 395455611 395441191 395440599 395406619 395391984 395386332 395384329 395373682 395372080 395298758 395267144 395191054 395159087 395172201 395171190 395049054 395036253 394935130 394891112 394854336 394563582 393789482 393644626 393623323 393312887 392522226

Summary of comment	Council Response	Respondents' unique ID
		391316351 391187313 389699935 387753615 DLP3.E.034 DLP3.E.047 (D&T PC) DLP3.E.178 DLP3.E.179 DLP3.E.190
Concern about access constraints in terms of delivery of component parts and servicing		395601519 395600841 395546814 395511480 395496767 395480162 395472623 395470522 395469937 395466407 395469237 395469334 395466704 395468085 395464698 395459146 395458435 395450069 395447677 395439729 395440599 395426503 395427782 395406619 395391984 395381316 395373682 395372080 395306337 395302504 395298758 395299075 395265374 395270258

Summary of comment	Council Response	Respondents' unique ID
		395191054 395159087 395172201 395171190 395167530 395143899 395133886 395073273 395049054 395036253 394935130 394926187 394923359 394903050 394901796 394891112 394896299 394891014 394889909 394881890 394882889 394854336 394846343 394584677 394051060 393998081 393893448 393799017 393813793 393737446 393649197 393648396 393648439 393644626 393618196 393500207 392661486 392522226 391441050 391316351 389699935 DLP3.E.034 DLP3.E.113 DLP3.E.178

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.179 DLP3.E.188 DLP3.E.190 DLP3.E.191 DLP3.E.199 DLP3.E.205
Harmful visual impact		395600841 395469937 395466407 395466704 395464698 395447677 395440832 395381316 394563582 391187313 DLP3.E.034 DLP3.E.113
Harmful noise impact on residents of village		395600841 395546814 395524995 395515042 395511480 395496767 395480162 395470522 395466407 395469334 395465595 395459146 395458435 395447677 395440832 395439729 395426503 395427782 395373682 395306337 395302504 395300395 395299075 395265374 395191054 395159087

Summary of comment	Council Response	Respondents' unique ID
		395172201 395171190 395143899 395133886 395120311 395073273 395025216 394926187 394923359 394917504 394903050 394901796 394891112 394896299 394891014 394889909 394882889 394854336 394846343 394563582 394202482 393998081 393893448 393799017 393737446 393649197 393648396 393648439 393618196 393494763 393500207 392522226 391441050 391316351 391187313 389699935 387838500 DLP3.E.034 DLP3.E.047 (D&T PC) DLP3.E.144 DLP3.E.178 DLP3.E.179 DLP3.E.188



Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.191 DLP3.E.199 DLP3.E.205
Concern about proximity to public footpaths in woodland and surrounding fields		395601519 395546814 395496767 395470522 395469937 395469237 395469334 395459146 395458435 395426503 395427782 395406619 395391984 395372080 395306337 395302504 395300395 395298758 395299075 395265374 395191054 395159087 395167530 395143899 395133886 395120311 394935130 394926187 394923359 394903050 394901796 394891112 394896299 394891014 394889909 394882889 394854336 394209248 393998081 393893448 393799017

Summary of comment	Council Response	Respondents' unique ID
		393737446 393648396 393648439 393644626 393623323 393618196 393312887 391316351 391187313 387753615 DLP3.E.041 (NE) DLP3.E.182 DLP3.E.191
Harmful effect on local businesses and holiday accommodation in village and general tourism to the area		395546814 395496767 395469937 395466407 395469334 395459146 395458435 395426503 395427782 395306337 395302504 395300395 395299075 395265374 395270258 395159087 395133886 395120311 395049054 394926187 394923359 394901796 394896299 394891014 394889909 394584677 394051060 393998081 393893448 393737446 393618196

Summary of comment	Council Response	Respondents' unique ID
		393465441 391441050 387838500 DLP3.E.113
Service road required would cause destruction of hedgerows and wildlife habitat.		395515042
Will not create local employment and not benefit local economy		395600841 395515042 395511480 395372080 394891112 393813793 393649197 393648396 DLP3.E.034
Will provide employment		395594860
The proposed development is out of scale for the area		395600841
Medium landscape impact		395594860
Low heritage impact		395594860
a very good site for a wind farm and creating locally produced sustainable energy		395594860
Unspecified harmful effect		395515042
Potential for long term health impacts		395511480
Better sited on higher ground of Dartmoor		395511480 395426503 395025216 393494763
No direct benefit to village from electricity that would feed into the national grid		395511480 95469937
No community benefits		395440599 395381316 395171190 394584677
Concern about light pollution		395496767 395265374 393813793 DLP3.E.144
Distraction to motorists		395496767 95469937
Could interfere with TV signals/mobile phone reception		95469937 395469334 395426503 395406619 395381316 395300395

Summary of comment	Council Response	Respondents' unique ID
		395265374 395171190 395120311 394926187 394923359 394891112 394891014 394889909 394882889 393998081 393737446 392522226 DLP3.E.188
This site has the potential to contain sites of prehistoric and Roman date. This needs to be assessed and appropriate mitigation put in place.		395468967 DLP3.E.048 (DCC)
Undue pressure on local amenities from employees associated with the turbine		395466407 395426503 394584677
Negative impact on property/land prices in village		395459146 395447677 395439729 395373682 395265374 394881890 393649197 393648396
Potential harm to village residents from light flicker		395458435 395381316 395172201 394202482 DLP3.E.144
Construction of 3 wind turbines would be out of proportion with the site		395450069
General support for wind turbines but not for this site		395465851 DLP3.E.016
Concern that local residents are unaware of the proposal		395440832
On green belt land		395440599
Concern for safety of animals		394881890
Potential danger to nearby properties and farm animals		395426503 DLP3.E.034
Cost of connection may undermine viability		395381316
A full ecological survey should be provided		395306337
Noise could affect the school		395172201
Support for site		394795609

Summary of comment	Council Response	Respondents' unique ID
		395306250 395287969 395212346 395194611 394935304 394619100 394613628 394216962 DLP3.E.049
Some residents of Broadhempston intend to work out how Broadhempston can locally generate and use adequate power from climate responsible sources to the economic benefit of all residents and the climate response		395303020
Impact on cross-boundary heritage assets such as potential impact of the wind turbine near Broadhempston on listed buildings in the nearby South Hams parishes of Staverton and Littlehempston.		DLP3.E.010 (JLP – P, SH & WD)
<p>There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets. Such as to the north west is the Broadhempston Conservation Area (c.470m) with listed buildings within and nearby including grade II listed Well House. We further note that the adopted Broadhempston Conservation Area Character Appraisal (2010) identifies the predominantly pastoral setting of the Conservation Area as a positive feature but does not appear to identify views to the east or south-east as being of particular importance to overall special interest.</p> <p>To the east of the site option are a few listed buildings including the grade II* listed Ambrook Farmhouse, grade II listed Great Ambrook and the grade II Registered Park and Garden of the Italian Garden at Great Ambrook (c.450-550m away from the edge of the allocation).</p> <p>HIA should be undertaken.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>		DLP3.E.013 (HE)
Legality of the site.		DLP3.E.016
Site is within 250m of Cirl bunting breeding territories to the west, south and east.		DLP3.E.040 (RSPB) DLP3.E.047 (D&T PC) DLP3.E.228 (TDC Bio)
Priority habitats – contains areas of deciduous woodland.		DLP3.E.041 (NE)
High likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.113

Summary of comment	Council Response	Respondents' unique ID
Do not give permission for the site to be used. Request its removal from allocations. Request a 50m buffer between this site and any other proposed development.		DLP3.E.064 (WT) DLP3.E.144
Efficiency of turbines in this location.		DLP3.E.178 DLP3.E.179
Aviation impact.		DLP3.E.188 DLP3.E.205
Site does not meet the requirements set out in the plan.		DLP3.E.188
Within South Hams SAC LCZ.		DLP3.E.228 (TDC Bio)
Within a GCN zone and contains ponds.		
Surrounds a wood.		
Overlaps part of a cirl territory.		
Includes an area of wetland and grassland habitats.		
Significant issues due to GCNs.		

#### WS24: North West of Tedburn St Mary

Summary of comment	Council Response	Respondents' unique ID
This site should be excluded from the plan. It would adversely affect the setting of Higher Bury Camp, which is a Scheduled Ancient Monument.	Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.	395468967 DLP3.E.048 (DCC)
There is the potential for the proposed allocation to adversely affect the settings and significance of heritage assets notably the Scheduled Higher Bury Camp to the west (c. 350m) and the grade II listed Rubhay Farmhouse and Higher Rubhay Farmhouse to the southeast (c.700m). HIA should be undertaken. This may need to take account of the cumulative impacts of this site option with site option 15. Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation. , ,	All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.  In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.	DLP3.E.034 DLP3.E.043 DLP3.E.109 (TSM PC) DLP3.E.013 (HE) DLP3.E.048 (DCC)
Interest from land owner.	The support for this development allocation is acknowledged.	DLP3.E.004
Cross boundary landscape and visual impact – South Hams	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor	DLP3.E.010 (JLP –P,SH & WD)
Proposals should also have regard to the landscape character in locations elsewhere where these adjoin the Teignbridge Local Plan area. Both sites are in close proximity to Mid Devon District.		DLP3.E.135 (Mid Devon DC)

Summary of comment	Council Response	Respondents' unique ID
Harm to landscape and Dartmoor National Park.	National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower landscape and visual amenity constraints for a single smaller size turbine (100m) positioned along the central ridge (minimising impact on the intimate river valley running along the River Ted).	DLP3.E.034 DLP3.E.043 DLP3.E.070 DLP3.E.109 (TSM PC) DLP3.E.113
Within 5km of Dartmoor NP Priority habitats – adjacent to good quality semi-improved grassland, and deciduous woodland High likelihood of BMV (predictive) Site contains streams. If woods and streams avoided then suitable.	The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.  Policy CC6: Wind turbine development requires consideration of:	DLP3.E.041 (NE) DLP3.E.113 DLP3.E.228 (TDC Bio)
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed. Biodiversity enhancement (BNG) should be investigated.	Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.	DLP3.E.022 (EA)
Biodiversity and ecological harm.	Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.	DLP3.E.034 DLP3.E.043 DLP3.E.113
Unacceptable noise impacts on amenity and livestock.	The proximity of 10 properties within 500m of the site could also represent a constraint. Intervening vegetation screens views from Great Cummins in the south and Little Leigh in the north-west; however, other properties to the south and east have relatively open views of the site. The visibility and noise impacts of turbines from these properties would need to be investigated further at planning application stage.	DLP3.E.034
Proximity to residential properties and impacts of noise.		DLP3.E.034 DLP3.E.043
Roads are inadequate to cope with additional traffic generated.	Access is likely to be via the farm tracks to the east, utilising the existing tracks to avoid introduction of new access tracks and resulting changes in landscape character. However, access works are likely to be required to existing narrow lanes/ track, resulting in the loss of hedgebanks and trees. Proposals will be required to include a Construction and Environment Management Plan to manage potential impacts.	DLP3.E.034 DLP3.E.113
No long-term employment benefit.	The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy. Businesses are also dependent on affordable energy.	DLP3.E.034
Limited benefit beyond land owner and utility.		DLP3.E.043
Preserve site for agricultural use.	Wind turbines only use a fraction of the land. Whilst there are considerations to take into account, farming practices can continue around turbines.	DLP3.E.043 DLP3.E.109 (TSM PC) DLP3.E.113

#### WS25: Summercombe Woods

Summary of comment	Council Response	Respondents' unique ID
Ecology must be protected	Summercombe Woods is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	393980031 DLP3.E.020 (D TC)



Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.034 DLP3.E.113
Grades 1 and 2 agricultural land should be protected		393980031 DLP3.E.034 DLP3.E.113
Should not be developed as would harm ecology in woodland		393915078
Harm to landscape		380230389 DLP3.E.034 DLP3.E.113
Harm to setting of heritage assets, including Luscombe Castle		380230389 DLP3.E.020 (D TC) DLP3.E.034
<p>Given the heritage sensitivity of this location, we consider it is unlikely to be appropriate for a wind energy allocation owing to the high potential for the proposed allocation to adversely affect the settings and significance of these heritage assets.</p> <p>This site option is immediately adjoining the grade I Luscombe Castle Registered Park and Garden. There are several individually listed buildings located within the Registered Park and Garden, notably the grade I listed Chapel of St Alban.</p> <p>There also several listed buildings in the surrounding area including the grade II listed Ashcombe Tower and associated grade II listed buildings to the west (c. 600m); grade II* listed High Rixdale and grade II listed Lower Rixdale and barn at Lower Rixdale Farm to the east (c.400m), as well as the group of grade II listed buildings to their south (c.450m); and grade II listed Bere Cottages to the south-east (c.685m) and Oak Cottage to the south (c.445m).</p> <p>HIA should be undertaken. This should include the potential impacts on views of development from within the Registered Park and Garden.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>		DLP3.E.013 (HE)
Planned or in progress housing was not indicated.		DLP3.E.020 (D TC)
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.		DLP3.E.022 (EA)
Biodiversity enhancement (BNG) should be investigated.		DLP3.E.022 (EA)
Site lies within the South Hams SAC GHB Connectivity Zone and within 600m of the Little Haldon Heaths SSSI and Haldon Forest Important Bird Area, which supports breeding nightjar which are of international importance, DWT is concerned about the potential impact of this site.		DLP3.E.033 (DWT) DLP3.E.041 (NE) DLP3.E.228 (TDC Bio)
Proximity to residential properties and impacts of noise.		DLP3.E.034
Roads are inadequate to cope with additional traffic generated.		DLP3.E.034

Summary of comment	Council Response	Respondents' unique ID
		DLP3.E.113
No long-term employment benefit.		DLP3.E.034
Site is within 500m of two Cirl bunting breeding territories.		DLP3.E.040 (RSPB)
Small area of Soils with peaty pockets within the site.		DLP3.E.041 (NE)
High likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.113
Site is adjacent to Luscombe Woods ASNW/PAWS		DLP3.E.064 (WT) DLP3.E.228 (TDC Bio)
Within a GC Newt zone, but no ponds.		DLP3.E.228 (TDC Bio)
Not acceptable due to proximity of Ancient Wood.		

#### WS26: Land South of Staddon Road, Dunsford

Summary of comment	Council Response	Respondents' unique ID
Harm to ecology	Land south of Staddon Road is not being taken forward as a site allocation – please see Sustainability Appraisal (SA) for further details.	395415018 389991345 389820148 383541361 382174607 DLP3.E.034 DLP3.E.043 DLP3.E.113 DLP3.E.114 DLP3.E.147
Harm to heritage assets and their settings, including Iron Age Hill Fort		395415018 389991345 389820148 383541361 DLP3.E.034 DLP3.E.043
Harm to landscape		389991345 389820148 383541361 382174607 DLP3.E.034 DLP3.E.043 DLP3.E.113 DLP3.E.114 DLP3.E.147 DLP3.E.193

Summary of comment	Council Response	Respondents' unique ID
Harm to Dartmoor National Park		389820148 383541361 DLP3.E.041 (NE) DLP3.E.043 DLP3.E.193
Harm to local economy from harm to tourism		395415018 389991345 383541361 DLP3.E.113
Roads are inadequate to cope with additional traffic generated and delivery of large component parts		395415018 389991345 389820148 DLP3.E.034 DLP3.E.113
No benefit for local community		395415018 DLP3.E.147
Harm to amenity of local residents, including from noise		395415018 389991345 383541361 DLP3.E.034 DLP3.E.043 DLP3.E.147
Potential light pollution		395415018 389991345 389820148 382174607 DLP3.E.043
Undue noise creation		389820148
Potential harm to livestock and animals		389820148 DLP3.E.034 DLP3.E.113
Result in harmful shadow flicker		389820148
Cross boundary landscape and visual impact – South Hams		DLP3.E.010 (JLP – P,SH & WD)
There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets. Site option is in proximity to the grade II listed Corridge Farmhouse, located c.400m to the east. There are two other grade II listed buildings c.450-550m to the east of this site option (Scottishill Farmhouse and Brook Farmhouse).  HIA should be undertaken. This may need to take account of the cumulative impacts of this site option with site option 11.		DLP3.E.013 (HE)

Summary of comment	Council Response	Respondents' unique ID
Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.		
Development will need buffer adjacent to watercourses/wetland habitat. Any road crossings should be carefully designed.		DLP3.E.022 (EA)
Biodiversity enhancement (BNG) should be investigated.		DLP3.E.022 (EA)
No long term employment benefit.		DLP3.E.034
Site is within 2km of several Cirl bunting breeding territories to the south.		DLP3.E.040 (RSPB)
Priority Habitat – deciduous woodland, traditional orchard		DLP3.E.041 (NE)
Proximity to ancient woodland – 500m to the east of the site (Horridge Copse)		DLP3.E.041 (NE)
Low likelihood of BMV (predictive).		DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113
No employment benefit.		DLP3.E.147
There are no significant vertical features in this landscape and the introduction of wind turbines will have a detrimental visual impact.		DLP3.E.226 (Dartmoor NPA)
There are very few modern vertical structures in this landscape and the introduction of wind turbines will have an impact on the character of the local landscape and the setting of the National Park. This is a tranquil landscape and turbines are dynamic features that will impact on the perception of tranquillity. Wind turbines would not be supported on these sites.		DLP3.E.226 (Dartmoor NPA)
Limited benefit beyond land owner and utility.		DLP3.E.043
Site includes a 7ha grassland County Wildlife Site, a small traditional orchard, streams and appears to overlap small areas of woodland.  Adjacent to larger woods.  Object due to CWS, but if CWS, streams woodland and orchard were omitted from boundary it could be acceptable.		DLP3.E.228 (TDC Bio)

#### WS27: Upper Old Wheatley, Exeter

Summary of comment	Council Response	Respondents' unique ID
This area may contain unexploded bombs from the Second World War.	Ground conditions of the site will be investigated for planning application stage	395468967 DLP3.E.048 (DCC)
There is the potential for the proposed allocation to adversely affect the settings and significance of these heritage assets including the grade II listed Cummery Cottage located c.450-500m to the west, the grade II Oaklands located c. 465m to the north and the grade II listed Lugg's Farmhouse located c.480m to the east.	Further Heritage Impact Assessment of this site will be undertaken prior to submission of the plan.  All wind turbine development would be subject to CC6: Wind Turbine Development, which contains the following criteria to: "Avoid, minimise and mitigate impacts on the significance of heritage assets and their settings, as informed by a heritage	DLP3.E.013 (HE) DLP3.E.034

Summary of comment	Council Response	Respondents' unique ID
<p>However, we are also concerned to understand the potential impact of wind turbine development on Exeter's skyline and its distinctive, rural, landscaped setting to the west. Potential impacts on the settings and special interest of some of Exeter's conservation areas may also need to be considered.</p> <p>HIA should be undertaken. This may need to take account of the cumulative impacts of this site option with other site options near to Exeter including site option 18.</p> <p>Without an up-to-date and proportionate historic environment evidence base for this proposed allocation and a positive strategy for the conservation and enjoyment of the historic environment Historic England objects to the inclusion of this proposed allocation.</p>	<p>impact assessment". This will include an assessment of cross-boundary impacts beyond the plan area for sensitive receptors, including heritage assets.</p> <p>In addition, wind turbine development would be subject to Policy EN17: Heritage Assets, which sets out the approach to avoiding harmful impacts on the significance of heritage assets and their settings in line with the NPPF.</p>	
Site access may be difficult.	<p>The site is located 150m to the north-east of Tedburn Road (a two way road which runs parallel to the A30), with a farm track extending from it and leading up to the site. The road is lined with hedgerow trees.</p> <p>Proposals should include a Construction and Environment Management Plan to manage potential impacts.</p>	<p>DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.113</p>
Landscape harm.	<p>The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. The evidence concludes that the site has lower constraints for a single smaller size turbine (100m) on the highest slope to the south of the site.</p>	<p>DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.113</p>
Landscape and amenity impact on neighbouring authorities needs to be considered.		<p>DLP3.E.171 (ECC)</p>
Noise impact on residential amenity.	<p>The proximity of 83 properties within 500m of the site (most of which are located along the western edge of Exeter to the east and in Nadderwater to the north-east) could also represent a constraint. However, visibility from both of these areas is partially obscured by intervening woodland vegetation along the Nadder Brook and the rising topography. The visibility and noise impacts of turbines from these properties would need to be investigated further at planning application stage.</p>	<p>DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043</p>
Livestock and farming harm.	<p>Wind turbines only use a fraction of the land. Whilst there are considerations to take into account, farming practices can continue around turbines.</p>	<p>DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.113</p>
No long term employment benefit.	<p>The benefit of the wind turbine is primarily for renewable energy production and local energy security. Businesses are also dependent on affordable energy. Businesses are also dependent on affordable energy.</p>	<p>DLP3.E.034</p>
Limited benefit beyond land owner and utility.		<p>DLP3.E.043</p>
Biodiversity and ecological harm.	<p>The site has been screened in the Habitats Regulation Assessment. There is no Likely Significant Effect due to distance and lack of impact pathways for all European sites.</p>	<p>DLP3.E.028 (W PC) DLP3.E.034 DLP3.E.043 DLP3.E.113</p>
Site is within 5km of nearest cirl bunting breeding territory.		<p>DLP3.E.040 (RSPB)</p>

Summary of comment	Council Response	Respondents' unique ID
Less than 500m from Barley Valley LNR Priority Habitats – abuts deciduous woodland , and contains some good quality semi-improved grassland Low likelihood of BMV (predictive)	Policy CC6: Wind turbine development requires consideration of:  Avoidance of negative direct, indirect and cumulative impacts on biodiversity and geodiversity (including priority habitats); flood risk and water quality; and permanent loss of best and most versatile agricultural land.	DLP3.E.041 (NE) DLP3.E.043 DLP3.E.113
Overlaps c. 3.5ha of grassland CWS. Adjacent to another grassland CWS and to woodland. Within Great Crested Newt zone with pond adjacent. Not acceptable for impact on CWS. If CWS was omitted from boundary it could have significant issues (due to GCNs).	Priority Habitats are protected under Policy EN11: Important Habitats and Features, and trees, hedges and woodlands, including ancient woodland, under Policy EN16.	DLP3.E.228 (TDC Bio)

### General comments

Summary of comment	Council Response	Respondents' unique ID
In favour of land based wind turbines, but very difficult to comment without knowing size of turbine[s], actual siting. Landowners should have been notified that their land is under consideration.	Noted. Evidence on feasibility, landscape impact and heritage impact is being produced to support the plan. Development specific details such as siting, height, number, etc. will be considered during planning application stage. Land owners were notified of their land being under consideration for designation as a potential wind turbine site.	395601519
I am in favour of renewable energy schemes but the plans in the consultation document are too vague at this stage for me to make any meaningful comment.	This has been considered but the plan has not been amended.	395496767
Could smaller turbines be considered?	Noted. Development specific details such as siting, height, number, etc. will be considered during planning application stage. Land owners were notified of their land being under consideration for designation as a potential wind turbine site.	395470522
Our previous comments highlighted the sensitivity of the Dart Valley in terms of landscape and visual impact, including the higher parts being prominent in views from Dartmoor National Park, and is often steep-sloping and wooded. Importantly, the Dart Valley system is a key part of the South Devon Greater Horseshoe Bat SAC. We also requested that cross boundary landscape and visual impact were considered in the identification of specific sites and that communities within South Hams that may be effected be properly consulted. This applies particularly to the wind turbine allocations close to the boundary with South Hams (site 23) and a cluster of sites close to the West Devon boundary (Sites 11, 15, 20, 24 and 26). However, the sites now proposed do not appear to have taken into account landscape and visual impacts and does not yet provide the detailed justification for the identification of sites. The evidence and methodology used to justify the wind and solar locations excludes designated sites and natural features, but it does not include	The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. This considers all sensitive receptors.	395096279 Plymouth and South West Devon DLP3.E.010 (JLP P,SH & WD)



Summary of comment	Council Response	Respondents' unique ID
<p>any buffers around them. It is not clear how the assessment methodology follows the best practice guidance contained in Natural England's 'An approach to landscape sensitivity assessment – to inform spatial planning and land management' (June 2019). We are concerned that there is no justification for the identification of sites, specifically in relation to the landscape and visual impacts on the national park and adjacent landscape character areas, ancient woodland, biodiversity sites and corridors as well as Historic Parks and Gardens, both in Teignbridge but also South Hams.</p> <p>It is also unclear what height of turbines are proposed in the different locations identified and how these have been influenced by the landscape. This was very clearly set out in the LUC work on sensitivity for wind energy development which identified that most of the area has a moderate to high sensitivity to turbines over 76m. Given this evidence presumably any proposed wind turbines will be lower than this. In addition it does not appear that the methodology has considered cross boundary landscape and visual impacts. This is particularly important to ensure the highest level of protection for the South Hams Special Area of Conservation (SAC).</p>		
<p>As such it is essential prior to inclusion of sites and submission of the local plan, that landscape and visual impact assessments are undertaken to consider the potential cross-boundary impacts of deploying wind turbines at the scale proposed. It is also important to ensure that, where appropriate, the communities affected by wind turbine and solar proposals are not limited to those within Teignbridge, and that appropriate consultation takes place with communities across the boundary where the zone of influence demands it. The JLP councils will be pleased to support this work by sharing relevant baseline landscape character assessments and GIS shape files where relevant.</p> <p>While we welcome recognition in the Draft Renewable Wind and Solar policies of the impact on landscape character and the supporting text's requirement that the layout and design of any proposals be informed by a Landscape and Visual Impact Assessment, the cross boundary landscape and visual impact and any cross boundary heritage impact should be understood prior to allocation.</p>	See above	395096279 Plymouth and South West Devon DLP3.E.010 (JLP P,SH & WD)
<p>Inclusion of the Interim Devon Carbon Plan and recommendations report considered as evidence to the Local Plan. Onshore wind sites within Devon was included in the recommendations report.</p>	Noted	DLP3.E.005 (Devon Climate Emergency Partnership)
<p>Grid connectivity and capacity issues.</p> <p>Landscape impact needs to be considered.</p> <p>Tourism impact caused by wind turbines needs to be considered</p>	<p>This is a wider issue that once resolved can enable more commercial renewable energy developments.</p> <p>The Council has commissioned an assessment of the site to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast.</p> <p>It is recognised that landscape and visual amenity are important considerations in where tourists choose to go. However, the long-term impacts of climate change, if not minimised,</p>	<p>DLP3.E.025 (Teignmouth Neighbourhood Plan Steering/Action group)</p> <p>DLP3.E.048 (DCC)</p>



Summary of comment	Council Response	Respondents' unique ID
	could in themselves cause detrimental changes to existing landscape character. Such impacts may include tree loss through more frequent and powerful storms and increases in pests and diseases, or the loss of traditional field patterns due to potential future changes in agricultural practices. Therefore, whilst the Council recognises that the introduction of wind turbines will impact existing landscape character, these landscapes will be adversely altered if nothing is done to combat climate change.	
<p>Supports renewable energy policies.</p> <p>Concern around the placement of sites near to or on mineral sites and within safeguarding areas. Goes against mapping done by the Exeter University.</p>	<p>The support for this policy / development allocation is acknowledged.</p> <p>Reference to minerals included in CC6.</p>	DLP3.E.026 (Sibelco)
<p>Limit wind sites to one per parish.</p> <p>EIAs should be done for all wind and solar sites.</p>	<p>Wind sites have been identified on the basis of their feasibility for this type of energy generation. This means that certain areas of the district are more suitable than others due to landform and may result in clusters within particular areas. Cumulative impact will be considered as part of CC6.</p> <p>Developments would be assessed at application stage to determine if Environmental Impact Assessment Regulations apply.</p>	<p>DLP3.E.028 (W PC)</p> <p>DLP3.E.073</p>
<p>Important to ensure BNG is followed through on sites.</p> <p>No reference is made to Nature Recovery Network (NRN). Essential that sites are reviewed against and informed by the NRN. This is to ensure: Species and habitats are identified and protected – as a whole network rather than looking at individual areas, sites or features. Opportunities for strategic habitat restoration and creation along ecological networks are understood and taken. Future opportunity areas for habitat restoration, especially those which secure a network, are protected from development or activities that remove the future opportunity.</p> <p>Concern that wind turbines can be installed at any cost. Not acceptable and some species cannot be mitigated or compensated for.</p>	<p>This has been considered but the plan has not been amended because it is already addressed in policy CC6: Wind turbine development, EN10: Biodiversity and Geodiversity, EN11: Important Habitats and Features, EN12: Legally Protected and Priority Species and EN13: European Wildlife Sites.</p>	DLP3.E.033 (DWT)

Summary of comment	Council Response	Respondents' unique ID
<p>Addition of applications requiring a sustainable soil handling and management strategy.</p> <p>Embed nature recovery networks and principles of the Local Nature Recovery Strategy within the Plan.</p> <p>Nature conservation sites, protected species, and priority habitats:</p> <p>Where a site allocation is progressed and is likely to affect a wildlife site, habitat or species the policy/proposal should set out the required mitigation measures or, as a last resort, compensatory measures to be secured to address those adverse impacts.</p> <p>Where sites are identified as being within the South Hams SAC Landscape Connectivity Zone or Sustainance Zone then the accompanying policy/proposal wording, if a site is progressed, needs to take account of the HRA requirements set out in the 2019 South Hams Bat SAC HRA guidance.</p> <p>Where relevant, for clarity and effectiveness, the Plan policies/proposals should highlight the need for project-level HRA.</p> <p>Where a site triggers a SSSI Impact Risk Zone (IRZ), then it will be necessary to assess (through the SA/SEA) whether there is a potential impact pathway between the development and the site, and if there is, identify the likelihood of being able to mitigate those impacts and recommend the measures necessary.</p> <p>Ancient woodlands, and ancient &amp; veteran trees are irreplaceable habitats. Where a site allocation would have an adverse effect on these habitats that cannot be overcome, we would advise the deletion of the allocation and encourage allocation of an alternative site.</p> <p>Where a site allocation is likely to affect priority species and habitats, the policy should specify appropriate mitigation measures.</p>	<p>All sites have been screened for LSE and only those identified as having no LSE have been allocated in the plan.</p> <p>Protection of wildlife designations, Ancient Woodlands, Biodiversity (including priority species) are all addressed through other environmental policies of the plan.</p> <p>Detail relating to mitigations will be addressed at planning application stage.</p>	<p>DLP3.E.041 (NE)</p> <p>DLP3.E.064 (WT)</p>

Summary of comment	Council Response	Respondents' unique ID
<p>Highways: Consideration be given to the ability of the highway network to accommodate the delivery of equipment.</p> <p>Health and Wellbeing: Wind sites should minimise impacts on residents (screened, low reflective surfaces, etc.).</p> <p>Landscape: Devon Landscape Policy Group Advice Notice 2 should be drawn upon where necessary. It is recommended that the wording of paragraph 3.10 is amended to: “potential impact on landscape characteristics, special qualities and features, and potential impact on key views, with great weight given to conserving and enhancing the natural beauty of nationally protected landscapes”. Helpful for the wind site allocations to be more specific about the maximum scale of development likely to be acceptable. Whilst the details currently distinguish between suitability for 1 or 2MW turbines, it would be helpful to understand how that translates into the scale of development. DLPG Advice Note 2 includes size categories in relation this type of development that may be helpful in helping to identify the size and number of turbines that a site may be able to accommodate. Other potential landscape sensitivities that should be considered: Effects of construction of large scale turbines on narrow rural lanes, hedgerows and irreplaceable habitats. Effects on the setting of protected landscapes (including quality of views, tranquillity, and dark skies). Effects on the setting of heritage assets (particularly in relation to views over landscapes to and from heritage assets). Effects of permanent turbine lighting on inherently dark landscapes.</p> <p>General renewable energy: Helpful to understand if the strategy clarified whether the aim is to concentrate such development in key areas that offer the optimum and most cost-effective development potential, or allow a scattering in various locations. Inclusion of an assessment for the options considered would be useful. The allocation of renewable energy sites should be balanced with other competing asks on Devon’s land – particularly in relation to the Climate Emergency.</p>	<p>Noted. A Construction and Environment Management Plan (CEMP) to ensure construction traffic is managed will be required for any allocated sites.</p> <p>The LUC evidence has looked at the impact on residential amenity. Wind sites allocated will require a noise report and will be assessed against Local Plan Policy H11: Residential Amenity.</p> <p>Wind sites have been identified on the basis of their feasibility for this type of energy generation. This means that certain areas of the district are more suitable than others due to landform and may result in clusters within particular areas. Cumulative impact will be considered as part of CC6.</p>	<p>DLP3.E.048 (DCC)</p>
<p>Object to all wind and solar sites. Encourage alternatives to this (offshore and tidal sources).</p>	<p>Proposals are based on feasibility evidence produced by the University of Exeter (see website for details).</p>	<p>DLP3.E.066 DLP3.E.174 DLP3.E.073</p>

Summary of comment	Council Response	Respondents' unique ID
Support all proposals.	The support for this policy / development allocation is acknowledged.	DLP3.E.091 (Newton Abbot Chamber of Commerce) DLP3.E.187
Greater explanation is needed of both positive and negative factors impacts.	Noted. Further detail provided in the SA/SEA and landscape and visual impact assessment of wind turbines.	DLP3.E.093 (B PC)
Object to all sites.  Wind sites, if done, should be part of neighbourhood plans.	Noted. Wind turbines can be included as part of either the Local Plan or Neighbourhood Plans but there is no legal obligation for neighbourhood plans to be prepared, or for them to address energy issues. Therefore, the preferred route is the Local Plan.	DLP3.E.139 (Campaign to Protect Rural England) DLP3.E.174

## SA/SEA

### Part 2 (Stage A)

Summary of comment	Council Response	Respondents' unique ID
Due to the urgent need to reduce emissions (IPPC 2021) and to safeguard biodiversity, planning for homes and businesses needs to prioritise sustainability over profit. Vital that top priority is given to environmental concerns The commitment to carbon neutrality and environmental sustainability needs to be hugely more ambitious. For example, all housing developments should have 50% of the area as sustainable woodland. Ensure all new building is carbon neutral or even carbon negative by insisting on the highest standards of insulation, installing heat pumps, pv roofs; Replace fossil fuel domestic heating with heat pumps or carbon neutral district heating schemes; Ensure district-wide provision of electric charging points; Maximise renewable energy generation (wind/pv) across the district; Promote cycling and walking by provision of district-wide safe travel routes;	The Local Plan contains a package of policies and measures which address climate change and the majority of the issues raised including improved building fabric standards, specific allocation requirements for renewable energy, requirements for EV and promotion of active travel.	12877476781 12824608715
Natural building materials, such as straw bale and lime render. Sympathetic and traditional look. Build with natural organic materials and keep hold of natural open green spaces needed to exist. Tree's, natural wildlife planting are vital to our planet and can't be ignored. Build a better future for generations to come and enjoy it's beauty.	The local plan includes a design code which encourages use of traditional build materials, as well as requirements for provision of green space and trees.	12875620551
The need for smaller housing is essential, in part due to low wages and competition from 2nd and holiday homes. The needs of older people need to be addressed.	The plan addresses custom build housing and housing for older people, including through the allocation of custom build housing sites and extra care facilities.	12875606178
Southdown road area is an unsuitable site for a large number of houses. There are no schools or shops nearby and all residents would be using cars to get anywhere.	See Annex relating to Dawlish.	12875203091
Can you please explain why the "Climate Change Mitigation" and "Connectivity and Transport" SA Objectives uses the term "peak hours" bus service when the scoring	This issue will be considered in the next iteration of the Sustainability Appraisal for the 'proposed submission' draft Local Plan.	12875190880

Summary of comment	Council Response	Respondents' unique ID
assumptions state that a "frequent" bus service should be used for this objective (and why the minor positive effect is allocated when the Broadhempston bus service does not meet the "frequent" definition)?		
T.D.C. may have little influence over the total number of dwellings to be built in the area, but it has declared a climate emergency, and will be expected to do everything in its power to minimise the impact of the development on the environment, through ensuring the minimum use of embodied carbon in construction, the minimum emission of greenhouse gases resulting from the continuing energy requirements of the new homes, and the minimum damage to amenity and to wildlife. While climate change is frequently mentioned in the Local Plan documents, the absence of quantitative targets, for example with regard to an overall carbon budget, must raise doubts as to the willingness and/or ability of T.D.C. to address the issue.	The Plan positively addresses the issue, with a number of proposed policies to address Climate Change, within the national legislative and policy framework set by Government.	12875176252
Affordable housing has received considerable attention, but there will be concern over whether builders can be held to any agreements made regarding the number of such homes to be provided. Similar concerns exist regarding houses and flats for small families and single people, which may not provide builders with much profit.	Affordable housing is a policy requirement and is viability tested to ensure deliverability.	12875176252
The policy of concentrating new developments in or close to existing urban areas has much to commend it, for example in the possible reduction in transport use compared to more scattered development, and the opportunity for district heating schemes. However some of the areas considered have flood risks, and this raises questions: who will pay for and maintain flood defences, and what assumptions have been made about worst-case changes in sea-level and in rainfall?	Development in flood zones (predominantly within newton abbot town centre) has been assessed through a strategic flood risk assessment and exception test, with appropriate mitigation requirements within the policy.	12875176252
It is important to state that TDC does have control over the quality and the size of housing units to be built and where they are best located to minimise associated carbon emissions.	The plan includes policies including on climate change, design and wellbeing, housing, and a design code which all address the issue of quality and size. The allocation policies implement a distribution strategy which has had strong regard to location as a sustainability factor.	12870736773
Many local people live in one or two-person households, this trend requires appropriately-sized dwellings, not predominantly the 3–5-bedroom houses that are being built and will be built on designated sites. Smaller units lower the GHG emissions whilst still delivering the housing numbers required. Appropriately sized dwellings in line with an aging population and increasingly lower occupancy could result in 30% lower embodied emissions based on local analysis.	The Plan does include a policy which seeks an appropriate mix of housing types, as well as policies that require statements on GHG emissions from new development. However, regard should also be had to the desire of many people to have sufficient space in the home, such as to allow home working or a spare bedroom.	12870736773
I would like to comment on the plans to build over 2000 houses in Dawlish. The land proposed for development is mostly agricultural and sustains a variety of wildlife. Dawlish is a small town which cannot the sustain this level of development. Already the roads are congested and the infrastructure to support such development does not exist. We are in the middle of a climate emergency and yet are prepared to pave over our countryside with untold damage to fragile ecosystems and biodiversity.	Please see the section relating to site proposals in Dawlish.	12870365271
Site on Picket Hill is not appropriate for housing as it is on a steep gradient and any housing will be seen from Teignmouth. It is also a site under coastal preservation.	No sites are allocated in Shaldon.	12870412839
Delivering a pre-set number of housing units to maintain, or even stimulate, economic growth should NOT be the driver. There are much easier ways of maintaining sustainable economic activity without causing environmental damage at the scale proposed.	The housing target is seeking to meet the housing need identified in the area, as determined by the Government Standard method.	12867617435

Summary of comment	Council Response	Respondents' unique ID
<p>We are concerned that the SA (Sustainability Appraisal) Framework for Climate Change Mitigation is limited or inappropriate.</p> <ul style="list-style-type: none"> <li>• It includes “Air”, which we interpret as air quality. This is not a Climate Change related criterion.</li> <li>• While the topic of transport and Energy efficient buildings are mentioned, the latter is restricted to renewable generation. It ignores the higher priority of energy reduction as suggested by widely accepted Energy Hierarchy models.</li> <li>• Without defining “low-carbon” generation in terms of Carbon Intensity, the criterion is open to interpretation.</li> <li>• Apart from transport related criteria, there appears to be no assessment of the correlation between renewables (as defined in chapter 11) and the assessments for the individual sites. In other words, the criteria of Low Carbon development is meaningless without numeric targets of greenhouse gas emissions set out in policy. This should not be limited to ongoing emissions, but include embodied emission targets associated with the building.</li> </ul>	<p>These points will be considered in the preparation of the next iteration of the Sustainability Appraisal.</p>	<p>12867617435</p>
<p>Having looked at the criteria for sustainable villages, it appears that the number of proposed houses only take one factor into consideration i.e shop/no shop. Although accessibility is a category, this doesn't appear to be taken as a factor in determining the number of proposed houses. For example, Kennford with 1 shop has a proposal of 20 houses. However accessibility is poor. Traffic management is vitally important. Housing developments in small villages can exacerbate traffic problems. The one road in Kennford due to the shop is at times impassable. Further buildings will only adversely impact on this. Matrix in determining number of houses overly simplistic &amp; does not consider other important issues.</p>	<p>Consideration which influences the ability of day-to-day trips to be short and local, such as the presence of a shop and school, are considered a useful proxy for assessing the relative sustainability of locations.</p>	<p>12861974837</p>
<p>Please do not destroy our beautiful village and disrupt the safety of the people who live here and visitors, all our beautiful scenery, and our wonderful wild life. We care so very much about our beautiful village so leave well alone.</p>	<p>Some development in the larger rural settlements is considered sustainable and necessary, as set out in the distribution strategy.</p>	<p>12859137494</p>
<p>Western part of Denbury has Anguis Fragilis (Slow Worms). Which are now protected Under the Wildlife and Countryside Act 1981 (as amended). It is inappropriate to build further properties which will affect these wildlife, which are now all endangered.</p>	<p>Policies in the plan provide safeguards relating to protected wildlife and habitats.</p>	<p>12856180778</p>
<p>Kingskerswell is a village not a town and should not be classed as such as per the draft local plan. This needs to be corrected. The definition of having less than 3000 residents is not the definition of a village and should not have been used. This needs rewriting. Kingskerswell has been lumped together as the heart of Teignbridge with Kingsteignton and Newton Abbot when we are a village and should have been separate to this. I can only guess that this was done so that more housing allocation could be placed in our village by allocating us as such. If this is not rectified then our village will amalgamate with Newton Abbot in the not too distant future.</p>	<p>Kingskerswell is considered as a village in the draft plan.</p>	<p>12856177148</p>
<p>This document has omitted the Aller Valley Country Park and Trail planned for Kingskerswell. Therefore the documentation regarding KK4 needs to be moved into the new draft local plan. My supporting points for the Aller Valley Country Park as below: This was stated as a high priority in the Teignbridge green infrastructure plan 2014 and was planned in the Teignbridge Local Plan 2014. This was stated as one of</p>	<p>The objective of a green space with a public route as originally envisages in the KK4 Policy from the 2014 Local Plan, has been added to the plan via policy GC2 Connecting to Nature.</p>	<p>12850899200</p>



Summary of comment	Council Response	Respondents' unique ID
<p>two strategic priorities in the Kingskerswell Village plan 2012 with 91.7 % support from responders (50% of the village population responded). Given land has already been taken from KK4 for an industrial estate on the Old Newton Road and proposals have been submitted for housing on Greenhill Road and a further Industrial estate on the Old Newton Road, both areas being currently KK4 land, we need commitment of Teignbridge to retain the Country Park and Trail plans in their entirety not scaled down. This project will improve air quality in the village as more people will cycle locally as well as use this trail to cycle into Torbay and Newton Abbot (for leisure or employment) as it will create a continuous cycle route, mostly off road connecting Kingskerswell to the main local town hubs. The creation of the Aller Valley Country Park will also improve road safety from a pedestrian point of view as there are no footpaths along the many single track roads in large areas of the village, especially the West side of Kingskerwell. This may also encourage people to walk their children to school if they can avoid these busy roads on this side of the village.</p>		
<p>Having read this document I am astounded that there is no mention of sewerage waste capacity which is already heavily overloaded. 'Storm overflows' are used as standard for a significant amount of the time to dispose of untreated sewerage into local bathing waters. The majority of these releases are outside 'storm events'. I believe there is need for housing but this needs to be done properly. Considering building more homes without increasing sewerage treatment capacity is directly saying that pumping raw sewerage into bathing water is acceptable. This cannot be knowingly brushed under the carpet.</p>	<p>All development pays financial contributions towards SWW infrastructure, and it is for SWW to then implement improvement works in accordance with their strategies.</p>	<p>12849724385</p>
<p>Ideford Parish Council would ask developers to consider the impact any future development will have on the environment and address the need to tackle the climate change issue. They also note that the plan does not include any innovative solutions to deal with traffic and transport management, in particular the need to provide better public transport.</p>	<p>No housing or employment sites are proposed in Ideford.</p>	<p>12841952128</p>
<p>Am horrified by the constant building on greenfield sites, it almost seems immoral as the builders hold sway and do not use the brownfield sites and more and more habitats are ruined. Lip service only is paid to environmental concerns. We are wrecking the countryside for future generations.</p>	<p>The Local Plan's strategy for distributing development prioritises town centre brownfield sites. However, because of the high Government housing target some housing will have to go on greenfield sites. This is being located close to key centres where jobs and services are available, as well as a modest proportion to provide for the rural villages.</p>	<p>12798081187</p>
<p>Starcross - proposals for 60 new homes, with the increase in population, cars and associated flood risk is excessive for the size of the village and amenities</p>	<p>Starcross is one of the more sustainable villages, with a train station and good bus services, as well as a range of other existing shops and services. See site allocation proposals for Starcross.</p>	<p>12793327169</p>
<p>Land west of Houghton Barton is not suitable for development in its entirety due to destruction of hedgerows, flood risk, overhead electric cables, destruction of farm land, steep inclines.</p>	<p>The Local Plan has allocated this area for development. See policy GC13 and the Sustainability Appraisal.</p>	<p>12793257861</p>
<p>Hill crest Exminster potential site. The current documents states that the site is an important area for ecology and a strategic break in terms of planning to prevent the over development of the country side. In terms of ecology "Almost the entire site is part of 'The Farm (Exminster)' County Wildlife Site, identified for Cirl Buntings. Three or more Cirl breeding zones overlap the site. This Cirl Bunting CWS is particularly important as it hosts the most northerly population of Cirl Bunting in Britain.</p>	<p>Site is not allocated.</p>	<p>12778502291</p>

Summary of comment	Council Response	Respondents' unique ID
The proposal to build any more houses in Holcombe would be detrimental to the local environment against all current thinking on climate control this would not be affordable housing so has no merit on a social level and would detract from the beauty of the area on which the local tourist industry.	Site not allocated.	12776093708
The HELAA is inconsistently applied within Denbury Village. Very narrow lanes and restricted parking is common throughout the village yet has been scored differently in different potential development sites. Of particular concern is Glebe Field and Denbury Down Lane Site and Land South of the Union Inn site. The East Street site has a 'negative landscaping issue' yet this is less of an issue than for other sites to the east and west of the village.	The only site in Denbury to be allocated in the plan is East of East Street.	12765632557
As you will be aware, under the provisions of Article 5(1) of The SEA Directive there is a requirement to assess the likely significant effects that the Policies and proposals of a Plan might have upon 'cultural heritage including architectural and archaeological heritage'. In terms of the historic environment, whilst we would endorse some aspects of the Stage A Scoping Report, there are a number of areas where we have particular concerns and where we consider further thought is required, including: Sustainability Objectives in Table 2 - we consider that there should be a separate and specific objective for the historic environment (Task A1); Baseline information for landscape, coast, historic environment and town centres (Task A2) - we are concerned about the adequacy of the information base for the historic environment in respect of its coverage of designated and non-designated heritage assets, settings, historic streetscapes, townscapes and seascapes, and heritage assets at risk; The lack of sustainability issues related to the historic environment (Task A3); and The adequacy of the proposed monitoring indicators, noting that the only one proposed for the historic environment is the Number of Listed Buildings at Risk.	These comments are acknowledged and have been shared with the consultants undertaking the SA/SEA of the Proposed Submission Plan.  A response on how these concerns have been addressed in the SA/SEA of the Proposed Submission Local Plan will be provided.	DLP2:E:650

## Part 2 (Stage B)

Summary of comment	Council Response	Respondents' unique ID
NE - In accordance with the paragraph 175 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA), to justify the site selection process and to ensure sites of least environmental value are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. Baseline environmental data (Appendices A-C and Part 1 Scoping Report) Priority habitats: The presence of Open Mosaic Habitats should be identified, and addressed accordingly, for each site allocation option, where relevant.	Comment notes and referred to Consultants for consideration for next iteration of SA/SEA. Initial landscape screening for sensitivity was undertaken at HELAA assessment stage, prior to the publication of draft Parts 2 and 3 of the Plan (Reg 18). LCA being reviewed and updated. Landscape sensitivity analysis will be undertaken for all large sites. The Teignbridge Green Infrastructure strategy is being updated.	DLP2:E:462 (NE)



Summary of comment	Council Response	Respondents' unique ID
<p>Protected landscapes: The Dartmoor National Park Management Plan should be referenced as baseline environmental information in the SEA and the assessment should take account of any relevant objectives from the Management Plan.</p> <p>Landscape sensitivity and capacity: We note that the evidence base includes landscape sensitivity and capacity studies for South West Exeter, Newton Abbot, Teignmouth, Dawlish and Ashburton (that are informed by the Teignbridge Landscape Character Areas (LCA)), however they aren't referenced as a source of data in the SA site assessment summaries (or scoring assumptions). How has landscape sensitivity been taken into consideration in the site assessment process? It is also understood that the Teignbridge LCAs are due for review. Are the landscape sensitivity and capacity studies likely to be reviewed in light of the updated LCAs?</p> <p>Green Infrastructure: The evidence base would benefit from the inclusion of an assessment of the availability and need for open space, green infrastructure, and access to natural greenspace (NPPF para. 98). It is noted that Teignbridge had previously prepared a Teign Green Network (Green Infrastructure strategy) but this appears to have now been archived. Is the Strategy likely to be superseded?</p> <p>Air quality: The scoring assumptions for the effects of air quality on the natural environment rely on the Air Quality Management Area (AQMA) data. Whilst this data is useful for understanding the effects of air quality on human health, it isn't the preferred source of data for understanding the effects of air quality on the natural environment. The UK Air Pollution Information System (APIS) provides data and information on pollutants and their impacts on habitats and species. The SEA should also be informed by/cross-reference to any assessment of the impacts of air quality on European sites undertaken for the HRA.</p> <p>Water quality: It is unclear if an assessment of sewage treatment capacity has been undertaken, and if it has, whether it has been drawn on in assessing the potential for impact pathways between site allocations and water sensitive habitats.</p> <p>Key environmental issues (Chapter 5 of the main report)</p> <p>The SA Scoping Report identified vulnerability issues for Protected and Priority species, and the local presence of protected species is noted in the scoping report but it is unclear whether the species distribution data and/or the presence of their required/preferred habitats have been considered at the site appraisal stage. It appears as though the presence of priority habitats and habitats that would support protected species are noted in the Ecological Sensitivities sections of the Site Option story maps but it is unclear how the Sustainability Appraisal has informed the site allocations or made recommendations to either remove or modify site allocations (and site requirements) on the basis of the SA findings.</p> <p>For European Protected Sites and Species, the SEA/SA should include a cross-reference to the findings of the Habitats regulations Assessment work.</p> <p>Chapter 5 does not include landscape sensitivity as an environmental issue, is this an intentional omission?</p> <p>Sustainability objectives (Chapter 3 of the main report)</p>		

Summary of comment	Council Response	Respondents' unique ID
<p>Natural England welcomes the natural environment objectives that seek to protect and enhance biodiversity and landscape. The protection and enhancement of geodiversity should also be included within a sustainability objective.</p> <p>The SA/SEA should contain an objective to address potential impacts on air quality arising from ammonia which can be harmful both to the natural environment and human health. The UK has adopted legally binding international targets to reduce emissions of ammonia by 2020 and 2030. The Clean Air Strategy was published in 2019 by DEFRA and states that a combination of regulations, permitting and support will be introduced to reduce emissions from livestock accommodation, spreading of manures and application of fertilizers</p> <p><a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/770715/clean-air-strategy-2019.pdf</a>.</p> <p>Appraisal of options and scoring assumptions (Chapters 6 and 7 of the main report and Appendices A-G)</p> <p>Natural Environment: The SA/SEA should identify the European sites, the SSSIs and the local wildlife sites likely to be adversely affected by site allocations in the plan. The commentary in Appendices D-G do identify the various sites although they are grouped together by settlement rather than for each site allocation and they are named rather than identified by their type of designation which might cause some confusion. Where applicable, the SA/SEA should make recommendations for mitigation measures to be secured in the relevant site allocation policies.</p> <p>Landscape: The SA assessment of the significance of impacts of site allocations on the National Park is based on proximity (e.g. sites within 250m of the NP are given a (- -?) score). Whilst proximity is one indicator for impact on landscape features, I would also expect the relevant site assessments to be based on the landscape sensitivity and capacity work which looks at the other relevant factors when considering the significance of landscape and visual impacts.</p> <p>Land resources: we note, and welcome, that the site allocation process has taken account of soil impacts and the presence of Best &amp; Most Versatile Land. The allocation of, and therefore loss of, BMV land will need to be justified.</p> <p>Cumulative impacts: the SA needs to consider the cumulative nature of the effects of the development allocated in the Plan on the natural environment; including on landscape, habitats, protected species, and soil.</p> <p>Policy recommendations: The Planning Practice Guidance describes Sustainability Appraisal as an iterative process that should inform the preparation of the Plan by considering how the plan performs against sustainability objectives, by identifying (and proposing mitigation measures to address) any potential adverse effects that the Plan might have, and by testing the evidence underpinning the Plan to demonstrate that the tests of Soundness have been met. The SEA should recommend the removal of proposals that adversely affect European sites and SSSIs, where satisfactory mitigation measures cannot be identified.</p> <p>Landscape: The SA assessment of the significance of impacts of site allocations on the National Park is based on proximity (e.g. sites within 250m of the NP are given a (- -?) score). Whilst proximity is one indicator for impact on landscape features, I would also expect the relevant site assessments to be based on</p>		

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<p>the landscape sensitivity and capacity work which looks at the other relevant factors when considering the significance of landscape and visual impacts.</p> <p>Land resources: we note, and welcome, that the site allocation process has taken account of soil impacts and the presence of Best &amp; Most Versatile Land. The allocation of, and therefore loss of, BMV land will need to be justified.</p> <p>Cumulative impacts: the SA needs to consider the cumulative nature of the effects of the development allocated in the Plan on the natural environment; including on landscape, habitats, protected species, and soil.</p> <p>Policy recommendations: The Planning Practice Guidance describes Sustainability Appraisal as an iterative process that should inform the preparation of the Plan by considering how the plan performs against sustainability objectives, by identifying (and proposing mitigation measures to address) any potential adverse effects that the Plan might have, and by testing the evidence underpinning the Plan to demonstrate that the tests of Soundness have been met. The SEA should recommend the removal of proposals that adversely affect European sites and SSSIs, where satisfactory mitigation measures cannot be identified."</p>		
<p>Concern about scoring in relation to town centres</p>	<p>Comment unclear.</p>	<p>DLP2:E:695</p>
<p>Sibelco - the methodology used within the SA fails to appropriately consider the unique context of the Bovey Basin with reference to the occurrence of internationally important ball clays. Whilst mineral resources are recognised within the SA methodology, they are assessed in the Land Resources category together with agricultural land. This effectively means that the impacts on the two assets are balanced against each other when assessing the significance of the environmental impact of each option (i.e. a positive agricultural land effect balances out a negative mineral resource effect creating a neutral result). This undermines the high value of these assets especially as heritage assets, of which the NPPF attaches equal importance to their conservation, are provided their own category on the assessment methodology. Combining, mineral resources and agricultural land undervalues their weighting in the SA methodology in conflict with the importance placed upon these assets in the NPPF.</p>	<p>Mineral resources are considered very important. However it is necessary for the assessments to summarise issues into broad categories to ensure evidence and assessment is proportionate.</p>	<p>DLP2:E:712 (Sibelco)</p>
<p>We are concerned with aspects of the SA/SEA methodology for the Historic and Built Environment and would welcome clarification as to whether the evaluation has drawn upon the heritage and archaeology comments in the HELAA and hence involved heritage specialists. We have observed that there is not always alignment between the heritage and archaeology comments in the HELAA and the SA/SEA site option assessments.</p> <p>We also have several concerns about the scoring assumptions used for the historic and built environment sustainability objective as follows:</p> <ul style="list-style-type: none"> <li>• Although these are stated to be based on no development on nationally or internationally designated sites, several site options contain scheduled monuments, listed buildings and registered parks and gardens. These are nationally designated heritage assets.</li> </ul>	<p>These comments are acknowledged and have been shared with the consultants undertaking the SA/SEA of the Proposed Submission Plan.</p> <p>A response on how these concerns have been addressed in the SA/SEA of the Proposed Submission Local Plan will be provided.</p>	<p>DLP2:E:650</p>

Summary of comment	Council Response	Respondents' unique ID
<ul style="list-style-type: none"> <li>• It cannot reasonably be assumed that there will be minor negative effects on grade II listed buildings as development could still have significant negative effects on their special interest (heritage significance) despite their grade.</li> <li>• It is not always appropriate to leave consideration of the impacts on the settings of heritage assets to the application stage. The potential degree of harm to the significance of heritage assets can vary depending on the contribution of setting to significance and the nature of the proposed development (amongst other matters – see GPA 3: Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)). As can be seen from our detailed comments in Appendix 1, there are some sites where the presence and/or proximity of proposed allocations to heritage assets, the scale and nature of likely development and the resulting potential of harm to their significance mean that we consider a setting assessment is required to inform the decision about their suitability and capacity for development. This is sometimes in combination with a masterplan. Assuming a site is suitable for allocation, this historic environment evidence can also then be used to inform site boundaries and criteria in an associated allocation policy.</li> <li>• No consideration seems to have been given to the potential for positive effects on the historic environment, e.g. an allocation that will help to find a long-term solution for heritage at risk.</li> </ul> <p>In relation to the findings of the SA/SEA, the development distribution scenarios in identified minor negative but uncertain effects for all scenarios. The site options range from significant negative effect to minor negative, but are often uncertain. This reinforces our view that there is the need for further historic environment evidence for many of the proposed allocation sites to inform the SA/SEA so that it in turn can help the Council make more informed choices between site options in the new Local Plan (as per paragraph 32 of the NPPF 2021). This may be intended for the next stages of the SA/SEA and we would welcome clarification on this point while noting that it is also not appropriate to rely on SA/SEA as the sole historic environment evidence for a local plan.</p>		

**Part 3**

Summary of comment	Council Response	Respondents' unique ID
<p>HE Comment -</p> <ol style="list-style-type: none"> <li>1. All wind sites are likely to give rise to significant negative but uncertain effects in respect of the Historic and HBE SA Objective.</li> <li>2. Solar would have a minor negative but uncertain effect against the HBE SA objective.</li> <li>3. G&amp;T and Small Residential site options will result in minor but uncertain effects in relation to HBE SA objectives bar one site (significant negative but uncertain).</li> </ol>	<p>These comments are acknowledged and have been shared with the consultants undertaking the SA/SEA of the Proposed Submission Plan.</p> <p>A response on how these concerns have been addressed in the SA/SEA of the Proposed Submission Local Plan will be provided.</p>	<p>DLP3.E.013 (HE)</p>

Summary of comment	Council Response	Respondents' unique ID
<p>EA - While the list of environmental issues in section 5 Key Sustainability Issues is comprehensive, we recommend that you add Coastal Change/Erosion to the 'flood risk' section.</p> <p>This will become as much of a problem as increases in flooding in future. In addition, we recommend that the word 'defending' should be changed to 'will require adaptation over the longer term'. This is because we are unlikely to be able to defend everywhere indefinitely.</p>	<p>These comments are acknowledged and have been shared with the consultants undertaking the SA/SEA of the Proposed Submission Plan.</p>	DLP3.E.022 (EA)
<p>NE</p> <ol style="list-style-type: none"> <li>1. Any policies or proposals that do not adequately protect European habitats sites; or SSSIs; or that do not afford great weight to conserving landscape, and scenic beauty within protected landscapes; or fully consider the impacts of development on or close to them, are removed from the plan or modified. For sites that are progressed, the SA/SEA should make recommendations for mitigation measures to be secured in the relevant site allocation policies.</li> <li>2. Consider the cumulative nature of the effects of the development allocated in the Plan on the natural environment; including on landscape, habitats, protected species, and soil.</li> <li>3. Main implications of the plan for Protected Species and Priority Species should be identified in the SA Report.</li> <li>4. Cross-reference to the findings identified through the Habitats Regulations Assessment work.</li> <li>5. Include an objective to protect and improve access to the natural environment.</li> <li>6. Considers impacts on soil quality.</li> <li>7. Protection and enhancement of geodiversity should also be included within a sustainability objective.</li> <li>8. Dartmoor National Park Management Plan should be referenced as baseline environmental information in the SEA.</li> </ol> <p>Appraisal of options:</p> <ol style="list-style-type: none"> <li>1. Use of arbitrary buffers. Report should explain why the specific distances were selected.</li> <li>2. Proximity is not the only measure for potential impacts, and consideration of functional links and habitat type should also be included, particularly where the nature conservation site has bird or bat interest features.</li> </ol>	<p>These comments are acknowledged and have been shared with the consultants undertaking the SA/SEA of the Proposed Submission Plan.</p> <p>A response on how these concerns have been addressed in the SA/SEA of the Proposed Submission Local Plan will be provided.</p>	DLP3.E.041 (NE)

### HRA Parts 2 & 3

Summary of comment	Council Response	Respondents' unique ID
<p>The proposed local plan is not in accord with the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019. The LP contains several proposed development sites within known Special Areas of Conservation. The habitat directives place an obligation on the local authority to consider the habitat implications of</p>	<p>These comments will be considered and shared with the consultants undertaking the HRA of the Proposed Submission Plan.</p>	12877720432

<p>proposed site allocation before inclusion within a local plan. The plan refers to 'Draft Habitats Regulations Assessment of the Draft Teignbridge Local Plan 2020- 2040 Part 2, Initial site option screening – May 2021'. This document identifies EVERY site as requiring further 'Appropriate Assessment to identify whether with mitigation it is possible to avoid adverse effects and meet HRA requirements'. Suggesting every site requires an appropriate assessment is not an assessment. The High Court previously advised TDC (in the NA3 development judgement) that they should have carried out environmental impact assessments before including sites within the proposed local plan. There is a risk that this initial screening exercise highlights to site owners the risks to proposed development prior to assessment so that matters may be put in hand prior to proper assessment. It is a matter of record that previously the owners of the Conitor site have attempted to disrupt a greater horseshoe bat roost through the clearance of a bat foraging zone. The National Planning Policy Framework (para 180) advises local planning authorities. if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; As harm to biodiversity could be avoided though consideration of other sites (ie. expansion of 'Town Centre Masterplan Delivery Strategy' to deliver more homes to avoid developing the countryside, the local authority should be obliged to consider them first before considering sites where development risks greater harm to biodiversity. The 'Draft Habitats Regulations Assessment of the Draft Teignbridge Local Plan 2020-2040 Part 2, Initial site option screening – May 2021' clearly states that many of the sites have habitats and species that risk being lost if development were to be considered.</p>		
<p>Protect and enhance with an ethical and eco friendly way. Don't let greed dictate. Our planet will only survive if we take care of it and the huge developments are going to have a negative impact and need careful consideration, as to not destroy our wildlife and planet. Greedy developers should not be at the forefront of our future plan of Devon. Swift's for example don't get the opportunity to house themselves due to new developments and this needs to be seriously considered. Eco friendly natural materials for anymore future builds should be a priority. Keep hold of our historical buildings and think outside the tick box.</p> <p>It is important wildlife must be fully respected. No development should take place which degrades the natural environment. Open and unspoilt countryside is a hall mark of Devon and must be preserved. The South West thrives on tourism. Excess development would pose a negative impact on the tourist industry.</p>	<p>The Plan policies do seek to protect the environment and wildlife, as set out in the Environment section.</p>	<p>12877658656 12875194107</p>
<p>I would like to raise objections on the proposition at Connitor Copse in Ogwell. There is a very diverse habitat there. There are horse shoe bats. We live in Buttercombe Close which is in front of the proposed site. In our garden we have many newts in there including the greater crested newts. There are also horseshoe bats living in the caves by the old quarry.</p>	<p>This site is not allocated.</p>	<p>12877552206 12877542128</p>
<p>The Ogwell Central / Canada Hill sites need assessing for bats, deer and other protected species such as newts. Slow worms, deer and field mice are also in the area</p>	<p>The Plan policies do seek to protect the environment and wildlife, as set out in the Environment section.</p>	<p>12877476781</p>



as are wild rabbits, sparrow hawks and various species of owl and other birds. Removal of hedgerows and trees will impact on the space these species have to thrive, breed and migrate through the village.		
My main concerns are the strain more houses will put on amenities and roads in Exminster and around. The doctors surgery is busy, the school is over subscribed, bridge road and Matford road are often at a stand still. Days Pottles Lane is often used as a rat run. The shops and parking are also at capacity.	This has been considered and the plan seeks to maximise active travel and secure appropriate contributions to infrastructure and services. The GP surgery in Exminster is proposed to be expanded.	12875216621
Depending on the sights for building, scrub land, vacant buildings ideal for building on spare land. Not Green Space.	The Local Plan's strategy for distributing development prioritises town centre brownfield sites. However, because of the high Government housing target some housing will have to go on greenfield sites. This is being located close to key centres where jobs and services are available, as well as a modest proportion to provide for the rural villages.	12870595464
Due to the urgent need to reduce emissions (IPPC 2021) and to safeguard biodiversity planning for homes and businesses needs to prioritise sustainability over profit. Natural building materials, such as straw bale and lime render. Sympathetic and traditional look. Trees, natural wildlife planting are vital to our planet and can't be ignored. Vital that top priority is given to environmental concerns by ensuring all new building is carbon neutral by insisting on the highest standards of insulation, installing heat pumps, PV roofs, replacing fossil fuel domestic heating with heat pumps or carbon neutral district heating schemes, ensuring district-wide provision of electric charging points, maximising renewable energy generation (wind/PV) across the district, promoting cycling and walking by provision of district-wide safe travel routes.	The Habitat Regulation Assessment is a key step in the plan making process to safeguard protected species and habitats.	12862380263 12859137494 12850899200 12848742221
I would like to comment on the plans to build over 2000 houses in Dawlish. The land proposed for development is mostly agricultural and sustains a variety of wildlife. Southdown road area is an unsuitable site for a large number of houses. There are no schools or shops nearby and all residents would be using cars to get anywhere.	Sites in Dawlish not allocated.	12844571732 12793257861
Please do not destroy our beautiful village and disrupt the safety of the people who live here and visitors, all our beautiful scenery, and our wonderful wild life. We care so very much about our beautiful village so leave well alone.	The Local Plan's strategy for distributing development prioritises town centre brownfield sites. However, because of the high Government housing target some housing will have to go on greenfield sites. This is being located close to key centres where jobs and services are available, as well as a modest proportion to provide for the rural villages.	12759388698
Western part of Denbury has Anguis Fragilis (Slow Worms). Which are now protected Under the Wildlife and Countryside Act 1981 (as amended). It is inappropriate to build further properties which will affect these wildlife, which are now all endangered.	The Habitat Regulation Assessment is a key step in the plan making process to safeguard internationally protected species and habitats. This does not include slow worms. However, slow worms would be covered by other policies in the Environment section.	12756293284
Aller Valley Country Park and Trail planned for Kingskerswell in 2014 contains many protected habitats, including the Greater Horseshoe bat, Cirl Buntings, Greater Crested Newts and Slow worms as well as rich hedgerows and mature oak, Beech, Ash and Maple Trees.	This area is identified in policy GC2 Connecting to Nature as a nature reserve with opportunity to provide active travel links.	12756229103 12756216904
Having read this document I am astounded that there is no mention of sewerage waste capacity which is already heavily overloaded. 'Storm overflows' are used as standard for a significant amount of the time to dispose of untreated sewerage into local bathing waters. The majority of these releases are outside 'storm events'. I believe there is need for housing but this needs to be done properly. Considering building more homes without increasing sewerage treatment capacity is directly saying that pumping raw sewerage into bathing water is acceptable. This cannot be knowingly brushed under the carpet.	All development pays financial contributions towards SWW infrastructure, and it is for SWW to then implement improvement works in accordance with their strategies. The issue of water quality may be a consideration in the HRA report.	12754924653

The commitment to carbon neutrality and environmental sustainability needs to be hugely more ambitious. For example, all housing developments should have 50% of the area as sustainable woodland.	This may be desirable but is unlikely to be deliverable or viable.	12744044281
Am horrified by the constant building on greenfield sites, it almost seems immoral as the builders hold sway and do not use the brownfield sites and more and more habitats are ruined. Lip service only is paid to environmental concerns. We are wrecking the countryside for future generations.	The Local Plan's strategy for distributing development prioritises town centre brownfield sites. However, because of the high Government housing target some housing will have to go on greenfield sites. This is being located close to key centres where jobs and services are available, as well as a modest proportion to provide for the rural villages.	12741225498
Starcross - proposals for 60 new homes, with the increase in population, cars and associated flood risk is excessive for the size of the village and amenities	Starcross is one of the more sustainable villages, with a train station and good bus services, as well as a range of other existing shops and services. However, it is adjacent to the Exe Estuary SPA and this will be assessed through the HRA. See site allocation proposals for Starcross.	12877857219
Land west of Houghton Barton is not suitable for development in its entirety due to destruction of hedgerows, flood risk, overhead electric cables, destruction of farm land, steep inclines.	The Local Plan has allocated this area for development, subject to HRA recommendations. See policy GC13 and the Sustainability Appraisal.	12877852501
Hill crest Exminster potential site important for landscape and biodiversity including Cirl Buntings.	Site not allocated.	12877835154
The proposal to build any more houses in Holcombe would be detrimental to the local environment, climate control, would not be affordable housing and would detract from the beauty of the area on which the local tourist industry.	Site not allocated.	12877846878
Concern over assessment of sites within Denbury Village.	1 site east of East Street is allocated. See the specific policy and Environment Chapter which includes a number of policies regarding the protection, mitigation and compensation requirements relating to wildlife and habitats.	12877831294
NE - In accordance with the paragraph 175 of NPPF, the plan should allocate land with the least environmental or amenity value. Natural England expects sufficient evidence to be provided, through the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA), to justify the site selection process and to ensure sites of least environmental value Table 4 of the HRA notes that further work is needed to identify whether recreational impacts resulting from increased housing could, in-combination, have a Likely Significant Effect on Dartmoor are selected, e.g. land allocations should avoid designated sites and landscapes and significant areas of best and most versatile agricultural land and should consider the direct and indirect effects of development, including on land outside designated boundaries and within the setting of protected landscapes. Natural England notes that the Habitats Regulations Assessment (HRA) screening report only covers Part 2 of the Plan. For the Regulation 19 draft of the Plan it will be expected that a HRA will be prepared to accompany the combined Parts 1 and 2 of the emerging plan. Where the HRA demonstrates likely significant effects on particular European sites, the plan should set out the plan-level mitigation measures to be adopted (cross-referencing to the HRA) and need for project level HRA for relevant site allocations. For individual site allocations, the site allocation policies should set out the mitigation measures needed as well as the need for detailed project level HRA. The LPA will need to have reasonable confidence that the mitigation measures will be capable (feasible and adequate) of addressing the impacts.	These comments will be considered and shared with the consultants undertaking the HRA of the Proposed Submission Plan.	DLP2:E:462 (NE)



Recreational impacts (Dartmoor SAC and South Dartmoor Woods SAC)  
 At present we are unable to support the conclusions that there could be potential impact pathways arising from increased recreation and associated air quality degradation, because of housing growth, on Dartmoor SAC and South Dartmoor Woods SAC. We advise that recreational impacts are not identified as a known pressure or threat for either SAC in their Site Improvement Plans (SIP054 and SIP222). SAC and South Dartmoor Woods SAC. Natural England's position on this statement is that, given the information set out in the SIPs, there is insufficient evidence to suggest that known air quality issues are attributable to increased recreation as a result of increased housing numbers set out in the Local Plan, and therefore, the evidence is not needed in order to screen out recreational impacts for these two sites but should be taken in to consideration if it emerges.

Recreational impacts (East Devon Pebblebed Heaths SAC and East Devon Heaths SPA)  
 Natural England agree that it cannot be confirmed that recreational impacts can be screened out for the East Devon Pebblebed Heaths SAC and the East Devon Heaths SPA until the review of the SE Devon European Mitigation Strategy is complete. The Strategy prepared in 2014 recognised that 'the estuary creates a physical barrier and affects travel distances' (para 14.16), and so housing developments within the Teignbridge District were deemed unlikely to result in a significant impact on the East Devon Pebblebed Heaths SAC/SPA and, as a result, were excluded from the charging zone. The review of the Strategy will confirm whether this assumption continues to be applicable.

Recreational impacts (Exe Estuary SPA and Dawlish Warren SAC)  
 Natural England agrees that recreational impacts should be screened in for these sites. However, the concern here, which also applies to several potential impacts identified in Table 3, is that the final column in the table appears to introduce pre-established mitigation measures. Whilst it doesn't appear that potential impacts are being screened out on the basis of the mitigation measures, which would be incorrect procedurally, it should be noted that the mitigation measures should be considered at the Appropriate Assessment stage rather than the Screening stage. The purpose of the Screening stage is to decide whether the plan may have a significant effect on a European site, either alone or in combination with other aspects of the same plan or with other plans, taking no account of any measures intended to avoid or reduce harmful effects.

Natural England notes, and welcomes, the local authority's recognition that the review and update of the South-East Devon European Site Mitigation Strategy needs to be finalised to inform this HRA. The update will need to be based on the overall quantum of development expected within the European Sites zones of influence, as identified through the review of each local authority's Local Plan.

Recreational impacts (Lyme Bay and Torbay SAC)  
 Table 4 of the HRA notes that further work is needed to identify whether recreational impacts resulting from increased housing could, in-combination, have a Likely Significant Effect on Lyme Bay & Torbay SAC.

As public access and disturbance through recreational activities is identified as a pressure/threat on the sea cave features of the SAC, it would be considered reasonable to 'screen in' the site. However, deciding on whether there is a need for

additional evidence in order to be able to conclude 'no adverse effect on integrity' at the Appropriate Assessment/Integrity Test stages is a matter for the Competent Authority to decide at that stage.

Recreational impacts (South Hams SAC)  
 Table 3 should include the reasons for screening in recreational impacts as a pressure/threat, by explaining why (and which) aspects of the Plan are expected to result in likely significant effects on the SAC.

Air Quality (Dartmoor SAC, South Dartmoor Woods SAC, East Devon Pebblebed Heaths SAC, East Devon Heaths SPA)  
 Natural England has published guidance which provides advice on the assessment of the potential impacts from road traffic emissions, arising from plans and projects, on the qualifying features of European sites. Chapter 4 of the guidance provides step-by-step advice on screening for Likely Significant Effects.

Air Quality (Exe Estuary SPA)  
 We note that the LPA has queried whether air quality should be screened in as an issue for the Exe Estuary SPA in terms of nitrogen levels, even though the issue isn't listed on the SIP.  
 At present we are unable to support the conclusion that there could be potential impact pathways arising from increased housing growth as a result of the Local Plan, on the Exe Estuary SPA/Ramsar. We advise that air quality is not identified as a known pressure or threat for the SPA in the Site Improvement Plans (SIP079) and the objectives for air quality in the Supplementary Advice are 'maintain' rather than 'restore' and therefore the risks are low.

Water quality (Dartmoor SAC, East Devon Heaths SPA, East Devon Pebblebed Heaths SAC)  
 The water quality issues identified in the Site Improvement Plans relate to past management practices (Dartmoor SAC) and nutrient enrichment from agricultural fields (East Devon Heaths SPA/SAC), rather than being attributable to Local Plan growth. However, where an impact pathway can be demonstrated then the sites should be screened in for water quality.  
 With regards to the 'screening out' of the River Teign we would recommend consulting with the Environment Agency before reaching this conclusion. We are aware of a historic presence of Salmon in the North Teign within the SAC boundary. The Environment Agency may have/be aware of more recent data.

Water quality (Exe Estuary SPA/Ramsar)  
 At present we are unable to support the conclusion that there could be potential impact pathways arising from increased housing growth as a result of the Local Plan, on the Exe Estuary SPA/Ramsar. We advise that water quality is not identified as a known pressure or threat for the SPA in the Site Improvement Plans (SIP079) and the objectives for water quality (nutrients) in the Supplementary Advice are 'maintain' rather than 'restore' and therefore the risks are low.

Urbanisation (Dawlish Warren SAC, Exe Estuary SPA/Ramsar and South Hams SAC)  
 The term 'urbanisation' is, I assume, used here to describe a number of effects identified in the Site Improvement Plans that are a result of increased development within the Plan area, if this is the case then it would seem reasonable to screen in the potential impact pathways. This should be explained clearly.

<p>Water quality (Dartmoor SAC, East Devon Heaths SPA, East Devon Pebblebed Heaths SAC)</p> <p>The water quality issues identified in the Site Improvement Plans relate to past management practices (Dartmoor SAC) and nutrient enrichment from agricultural fields (East Devon Heaths SPA/SAC), rather than being attributable to Local Plan growth. However, where an impact pathway can be demonstrated then the sites should be screened in for water quality.</p> <p>With regards to the 'screening out' of the River Teign we would recommend consulting with the Environment Agency before reaching this conclusion. We are aware of a historic presence of Salmon in the North Teign within the SAC boundary. The Environment Agency may have/be aware of more recent data.</p> <p>Water quality (Exe Estuary SPA/Ramsar)</p> <p>At present we are unable to support the conclusion that there could be potential impact pathways arising from increased housing growth as a result of the Local Plan, on the Exe Estuary SPA/Ramsar. We advise that water quality is not identified as a known pressure or threat for the SPA in the Site Improvement Plans (SIP079) and the objectives for water quality (nutrients) in the Supplementary Advice are 'maintain' rather than 'restore' and therefore the risks are low.</p> <p>Urbanisation (Dawlish Warren SAC, Exe Estuary SPA/Ramsar and South Hams SAC)</p> <p>The term 'urbanisation' is, I assume, used here to describe a number of effects identified in the Site Improvement Plans that are a result of increased development within the Plan area, if this is the case then it would seem reasonable to screen in the potential impact pathways. This should be explained clearly.</p> <p>Direct loss of interest feature and fragmentation/isolation (South Hams SAC)</p> <p>Table 4 identifies a need for AA for every site within the South Hams SAC Landscape Connectivity Zone. Whilst most of the sites include commentary to explain why LSE is triggered, which appears to be in accordance with the criteria set out in the South Hams Bat SAC HRA Guidance, this needs to be set out for all sites to ensure the AA focusses on the likely significant effects. Sites could reasonably be screened out where the criteria are not met.</p> <p>In-combination</p> <p>The HRA needs to consider possible in-combination effects arising at the screening stage and at the appropriate assessment/integrity test stage."</p>		
<p>NE -</p> <ol style="list-style-type: none"> <li>1. The HRA needs to consider possible in-combination effects arising at the screening stage and at the appropriate assessment/integrity test stage.</li> <li>2. HRA screening report should be for all three parts of the LP.</li> <li>3. Where the HRA demonstrates likely significant effects on particular European sites, the plan should set out the plan-level mitigation measures to be adopted (cross-referencing to the HRA) and need for project level HRA for relevant site allocations.</li> <li>4. For individual site allocations, the site allocation policies should set out the mitigation measures needed as well as the need for detailed project level HRA.</li> </ol> <p>SAC - Chapter 7:</p> <ol style="list-style-type: none"> <li>1. Cannot confirm that recreational impacts can be screened out for East Devon Pebblebed Heaths SAC, the East Devon Heaths SPA, the Exe Estuary SPA, and Dawlish</li> </ol>	<p>These comments will be considered and shared with the consultants undertaking the HRA of the Proposed Submission Plan.</p>	<p>DLP3.E.041 (NE)</p>

<p>Warren SAC until the review of the SE Devon European Mitigation Strategy is complete.</p> <p>2. The report states that 'sites have largely been surveyed', with respect to the loss of functionally linked land. Further information about how the findings of the survey have informed the HRA is needed, as well as details of the planned survey work.</p>		
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