

# Teignbridge Local Plan Sustainability Appraisal Report



## Appendix C: Additional Alternatives Information

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**Prepared by:**

ClearLead Consulting Limited  
The Barn, Cadhay, Ottery St Mary, Devon, EX11 1QT, UK

## Quality Management

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Prepared by	V Pearson / TDC	V Pearson / TDC
Signature		
Checked by	J Mitchell	J Mitchell
Signature		
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ISO 9001

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## 1 Introduction

This appendix presents additional information about alternatives in support of the alternatives section of the SA Report (Section 6). It presents a table which presents the policies within the Regulation 19 Draft Local Plan (January 2023) alongside commentary on whether there are any reasonable alternatives and the justification for the proposed policies.

Section 3 onwards of this appendix presents information about site allocation options which have not been progressed to allocation within the new Teignbridge Local Plan Regulation 19 version (January 2023) and the reasons why they have not been chosen. It includes options for residential and employment uses and two sites considered for wind turbine development.

## 2 Alternative Policy Approaches

Table C.1: Policy Approach Alternatives		
Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
<b>General Policies</b>		
GP1: Sustainable Development	No Plan. Rely on National Planning Policy Framework (July 2021).	NPPF (para 9) requires that local plans should contain policies which guide development towards sustainable solutions. Without GP1, decision-takers would need to rely directly on wording in the NPPF, which generally carries marginally less weight than development plan policies.
GP2: Development in Teignbridge	No Plan. Eight distribution scenarios have been tested by the SA and presented within the Stage B SA Report Part 2 available on the TDC website <a href="#">here</a> . See sub-section 6.4.	Policy GP2 provides explanation and expectation concerning location of development, bringing together and summarising planning principles stated elsewhere. NPPF (para 11) provides a lead for the policy. Following the assessment of distribution scenarios, a hybrid distribution strategy was selected as it takes the best performing elements of the distribution scenarios and seeks to avoid those which have potential for significant negative effects.

**Table C.1: Policy Approach Alternatives**

Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
GP3: Settlement Limits & the Countryside	No Plan. Alternatives to settlement limits were considered and assessed as part of preparation of the Draft Reg 19 Plan; including removing boundaries, revise & update boundaries to ensure consistency, reflect physical changes and include proposed Local Plan allocations and no change. (business as usual). See sub-section 6.4.	Without GP3 a random and potentially damaging pattern of development may emerge during the plan period. Restraint in the countryside is required by national policies. The Review of Settlement Boundary Options found that maintaining settlement limits and using them to guide the location of development would have the most overall plan benefits.
GP4: Ashburton & Buckfastleigh	No policy. Rely on Dartmoor Local Plan 2018-2036.	Inclusion of GP4 helps clarify cross-boundary issues, such as infrastructure provision concerning Ashburton and Buckfastleigh which are within Dartmoor National Park but close to the local plan boundary. Duty to cooperate is an important requirement of national planning guidance.
GP5: Neighbourhood Plans	No policy. Rely on made Neighbourhood Plans and NPPF.	Policy GP5 provides explanation and expectation concerning role and ambit of neighbourhood plans with Teignbridge Local Plan and summarising planning principles stated elsewhere. Clarification of strategic and non-strategic policies is given in accordance with the Neighbourhood Planning Act (2017).

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
GP6: Loss of Local Facilities & Services	No policy. Rely on NPPF.	Policy GP6 is consistent with national policies, including NPPF (para 93). There is a need for such a policy to address potential loss of facilities through proposed changes of use. Item e) of the policy addresses future viability issues and is also used in cross references from other DM policies.
GP7: Infrastructure & Transport Network	No policy. Rely on other supporting methods, such as Infrastructure Delivery Plan and Regulation 123 list and national guidance.	Policy GP7 provides explanation and expectation, bringing together and summarising planning principles for a range of infrastructure types relevant to the development process in the plan area. Other providers beyond TDC are fully acknowledged in identified requirements for transport, public services and waste amongst others.
GP8: Viability	No policy. Rely on NPPF.	Policy GP8 provides explanation and expectation, bringing together a range of requirements for viability matters to be considered in the development process which reflects Viability planning practice guidance (2019) and the NPPF.
<b>Climate Change</b>		

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
CC1: Resilience	No policy. Rely on NPPF.	Policy CC1 is consistent with national policies, including NPPF (para 153) and Climate Change planning practice guidance (2019). There is a need for such a policy to set out resilience measures that will be relevant to Teignbridge and integration with other policy regimes, such as the Devon Carbon Plan.
CC2: Carbon Statements	No policy. Rely on Building Regulations, Future Homes Standard and NPPF.	Policy CC2 provides explanation and expectation concerning carbon reduction measures, bringing together and summarising planning principles stated elsewhere. NPPF (para 154, b) provides a lead for the policy together with Climate Change planning practice guidance (2019).
CC3: Electric Vehicle Infrastructure	No policy. Rely on Building Regulation standards, Neighbourhood Plan policies and NPPF.	Policy CC3 is consistent with national policies, including NPPF (para 112) and Climate Change planning practice guidance (2019) and emerging Department of Transport guidance (2021). There is a need for such a policy to set out electric vehicle infrastructure requirements relevant to Teignbridge and specify expectations for a range of non-residential development uses.
CC4: Sustainable Transport	No policy. Rely on NPPF.	Policy CC4 provides explanation and expectation concerning sustainable transport, bringing together and summarising planning principles stated elsewhere. NPPF



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		(para 106) provides a lead for the policy and CC4 expands on this by distinguishing the requirements of sustainable development to serve major development and smaller scale development.
CC5: Renewable & Low Carbon Energy Generation	No policy. Rely on NPPF.	Policy CC5 is consistent with national policies, including NPPF (para 155) and Renewable and low carbon planning practice guidance (2015). There is a need for such a policy to set out renewable and low carbon measures that will be relevant to Teignbridge and integration with other policy regimes.
CC6: Wind Turbine Development	<p>Four Wind Strategy Options were considered in Stage B report for Part 3 of the Draft Local Plan available on the TDC website <a href="#">here</a>. These comprised of:</p> <ul style="list-style-type: none"> <li>• Business as Usual, with no specific allocations made for wind turbine sites;</li> <li>• Proposal to allocate sites for 500kw, 1mw &amp; 2mw wind turbines;</li> <li>• Proposal to allocate sites for 1mw &amp; 2mw wind turbines; and</li> </ul>	<p>Policy CC6 is consistent with national policies, including NPPF (para 155) and renewable and low carbon planning practice guidance (2015). There is a need for such a policy to set out requirements for allocated wind energy development sites in Teignbridge and which uses the findings of the Low Carbon Study in a positive strategy for energy in the plan.</p> <p>Based on the Stage B appraisals, it is possible to combine elements of different options/scenarios to provide a hybrid approach which links the option that allocates only the sites suitable for larger 1mw and 2mw turbines (that are most efficient and productive in terms of</p>

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	<ul style="list-style-type: none"> <li>Proposal to allocate sites only in areas of least environmental harm.</li> </ul>	low carbon electricity generation) and where possible avoid sites in locations which might have the greatest impact on ecology.
CC7: Energy Storage	No policy. Rely on NPPF.	Policy CC7 provides explanation and expectation concerning energy storage facilities, bringing together and summarising planning principles stated elsewhere. NPPF (para 155) provides a lead for the policy and CC7 expands on this by distinguishing the different potential forms of energy storage and conditions or mitigation measures acceptable for such development.
<b>Design and Wellbeing</b>		
DW1: Quality Development	No policy. Rely on NPPF and existing Teignbridge design guide. This is an historic guide which has no status – it was approved by the Executive in 2018 for consultation as a Supplementary Planning Document but not progressed since then.	Policy DW1 sets out how development proposals will be assessed for achieving high quality urban design and explains the process that applicants will have to follow in preparing their schemes.
DW2: Development Principles	No policy. Rely on NPPF and existing Teignbridge design guide. This is an	Policy DW2 sets out principles for place-making to create developments that reflect local character, function well,

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	historic guide which has no status – it was approved by the Executive in 2018 for consultation as a Supplementary Planning Document but not progressed since then.	positively contribute to health and wellbeing and help achieve the district’s net zero ambitions. Detail on the principles is contained in the new Teignbridge Design Code which has been prepared in accordance with the National Model Design Code and National Model Design Guide.
DW3: Design Standards	No policy. Rely on NPPF and existing Teignbridge design guide. This is an historic guide which has no status – it was approved by the Executive in 2018 for consultation as a Supplementary Planning Document but not progressed since then.	Policy DW3 sets out a comprehensive approach for design standards across amenity, accessibility and environmental fields. These cover levels of provision for specific elements of development and is supported by the Teignbridge Design Code which has been prepared in accordance with the National Model Design Code and National Model Design Guide.
<b>Economy</b>		
EC1: Business Development	No policy. Rely on NPPF.	Policy EC1 sets out the main policy lead for new business and employment generating development. Encouraging a sustainable and resilient economy is a priority for the Council and is essential in securing a sustainable district. The absence of a policy which supported business development would therefore have potential negative

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		effects on the strategic objectives of the plan for Economic Prosperity identified in Part 1 of the Draft Plan.
EC2: Local Supporting Services for Employment Sites	No policy	Policy EC2 sets out a way to allow for the location of small local services within employment areas to serve the local workforce. Many workers on business parks and industrial estates may drive to service outlets during the working day to access services and facilities such as childcare, shops, gyms etc. Providing these within the business parks themselves helps to reduce the need to travel further afield to access them and would therefore perform less well against SA objectives .
EC3: Loss of Employment Sites	No policy or a policy which has a more permissive approach to the change of use of employment sites.	The purpose Policy EC3 is to safeguard existing employment uses against development for another use, unless criteria set out within the policy regarding the types of use, the benefit of other uses, and the marketing of existing land are met. Existing employment sites can be very difficult to replace and therefore their loss should be considered very carefully. The absence of a policy which controlled their loss, or which resisted their loss, would therefore have a negative effect on sustainability objectives E Climate Change Mitigation and O Connectivity and Transport.

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
EC4: Inclusive Employment and Skills	No policy. Rely on NPPF.	Policy EC4 reflects the need to attract and retain a high-quality workforce by helping to promote wider access to jobs and address skills shortages. One way of doing this is through the construction industry, an appropriately skilled workforce of sufficient number is vital to support growth ambitions and deliver associated infrastructure.
EC5: Working from Home	No policy.	The use of home working for starting and running small businesses, as encouraged by Policy EC5, is an increasing trend and provides an efficient use of land and buildings for employment uses. It helps to minimise the need to travel as well as reduce some business costs for those setting up or working for small businesses.
EC6: New Tourist Accommodation and Attractions	No policy.	The tourist economy, whilst a relatively small direct element of local employment, provides additional visitors to the area and increased spend in retail and other services in Teignbridge. It is therefore important that planning policies, such as EC6 support their sustainable expansion rather than inhibit their growth. There are sufficient controls within the policy and other policies of the plan to ensure that this is appropriately managed within the context of the local environment and

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		infrastructure and therefore it is not considered necessary to identify an alternative policy.
EC7: Static and Touring Caravan Sites	No policy. Rely on NPPF.	Policy EC7 sets out criteria for when proposals to extend or intensify existing static and touring caravan sites will be permitted and where new sites will not be permitted. Not having a policy or having a less restrictive policy could have negative effects on landscape context (Sustainability Appraisal objective B).
EC8: High speed digital networks	No policy. Rely on NPPF.	Planning has a key role to play in ensuring new developments are future proofed and therefore the absence of a policy, or a policy which encourages rather than requires new development to have access to digital infrastructure, would limit the effectiveness of the plan in supporting a sustainable and resilient economy in Teignbridge.
EC9: Development in and around Town Centres	No policy. Rely on NPPF.	Policy EC9 identifies the key town centres in the district and the measures the council will take to maintain and enhance the vitality, viability, accessibility and distinctive characteristics of the centres.

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
EC10: Vital and Viable Town Centres	No policy. Rely on NPPF.	EC10 sets out the type of proposals that will be supported in principle in town centres outside of the defined Core and Secondary Activity Areas in order to balance high level activity with the continued importance of heritage and their role as sustainable centres by promoting a mix with active ground floor uses where possible. The retail industry (and particularly the high street) has experienced numerous challenges over the last decade, most notably from a contraction in consumer spending, rising property and operation costs, and a shift in consumer spending towards e-retail. This has changed the way that town centres are being used and planning policy needs to respond appropriately to this.
EC11: Large Scale Retail Development	No policy. Rely on NPPF.	The purpose of EC11 is to control the scale and location of retail development in order to limit the promotion of less sustainable patterns of retail development by new shops outside of town centres and to limit the potential negative impact on town centre investments and the vitality and viability of town centres.
EC12: Local Shops	No policy. Rely on NPPF.	EC12 sets out terms for provision of local shops so that they complement rather than compete with town centres. For those locations outside defined settlement limits,

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		proposals for retail uses will be acceptable where they can be within new or existing community buildings.
<b>Homes</b>		
H1: Land for New Homes	No policy. Rely on NPPF.	<p>Policy H1 sets out the main policy lead for providing sufficient land for new homes in the plan area to match the annual target of 741 over a 16-year period to 2037/38. It contains a trajectory for market and affordable housing over this timescale. The absence of such a policy would mean the local plan not providing a key function set out in national planning policy to deliver a sufficient supply of homes.</p> <p>The target is based on evidence of need as identified in the Local Housing Needs Assessment (2022) and viability assessments. The affordable housing need (not including those able to afford private rented accommodation) for Teignbridge is around 23% of the district’s housing requirement. Viability assessments show that a range between 20-30% in different value areas of the district is viable.</p>



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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
H2: Affordable Housing Targets	A policy with lower or higher affordable housing targets.	H2 requires a percentage of new housing to be delivered as affordable housing, with a tenure split weighted towards the delivery of social rented accommodation. It ensures that affordable homes are sold to registered providers at a price that retains their affordability and, sets out the limited circumstances when it will be acceptable to provide a financial contribution towards affordable housing instead of providing it on-site. A policy which sets out lower or higher affordable housing targets could be identified but SA of such alternatives would perform the same with respect to Sustainability Appraisal objective I Homes.
H3: Affordable Housing Controls	No policy/a policy which allows more flexibility in rent levels, eligibility and management of affordable housing stock.	<p>Given the continued high level of affordable housing need in Teignbridge it is essential that sufficient controls through H3 are in place to ensure that as much affordable housing is retained as possible and that they are restricted to those most in need.</p> <p>No policy or a policy which had looser restrictions would not enable TDC to do this to the same extent and would therefore have potential negative effects on delivery of affordable housing and Sustainability Appraisal objective I Homes.</p>

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
H4: Inclusive Mix, Design and Layout	No policy. Rely on NPPF.	The absence of a policy to ensure inclusive design and layout could result in segregated areas within a development site where the market and affordable housing are clearly distinguishable and mixed communities are more difficult to achieve.
H5: Homes Suitable for All	No policy. Rely on NPPF.	H5 responds to NPPF requirements to ensure that development provides the right types and sizes of homes to meet different housing needs. This includes suitable housing for older and disabled people, housing for families and housing for young people. The current no policy approach provides no hooks with which to ensure that this is achieved.
H6: Custom Build	No policy/a lower or higher % requirement for custom and self-build plots.	H6 is the primary means by which the Council meets its legal duties required under self and custom housebuilding legislation introduced in 2015. No policy would mean that the Council would be unlikely to be able to fulfil its legal obligations. H6 requires 5% of new development plots (on sites of 20 dwellings or more) to be provided for sale to custom and self-builders, and that plots include a range of sizes, are delivered at an early stage in the development and are immediately developable. The identified 5% requirement represents a continuation of the level of plots

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		first approved in the 2013 adopted Local Plan and followed survey evidence to understand demand for custom build in Teignbridge. Given the continued high demand of those coming forward on the self-build and custom build register, it would be possible to adjust the % requirement accordingly. A policy which sets out lower or higher % requirement for custom and self-build plots could be identified but SA of such alternatives would perform the same with respect to Sustainability Appraisal objective I Homes.
H7: Rural Exception Sites	No policy. Rely on NPPF.	H7 includes support for single plot rural exception sites, affordable custom and self-build sites, introduces a cap on the number of homes to be provided on an individual exception site and requires meaningful engagement from the community. The additional clauses help to balance the need for more affordable homes with the provision of infrastructure and impact on townscape and landscape.
H8: Other Exception Sites	No policy.	H8 details homes which may be permitted to meet an exceptional need for housing in the district that may not be met fully through allocations of the plan due to other policy requirements associated with those developments. Plot size thresholds are in place to help improve the

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		affordability of the homes by ensuring that new housing stock is modest in size and does not provide an open door to very large houses in the countryside.
H9: Local Connection Test and Cascade	No policy.	The main objective of H9 is to give priority to relevant housing for people from the local area first, cascading out to a wider geography as necessary. It does allow local workers to live near their place of work, providing they do not work from home. Without the policy it may limit opportunities to provide homes in the communities where people already have a local connection.
H10: Homes for the Travelling Community	No policy. Rely on NPPF.	Policy H10 confirms the supply of pitches for gypsies and travellers up to 2040 and sets out specific criteria for managing applications for unallocated pitches and plots. The absence of a policy to manage these applications could result in a lower quality development, less sustainable locations for pitches and/or lower levels of amenity for gypsies and travellers.
H11: Householder Development	No policy.	Minor alterations to existing homes is important in allowing people to adapt or enlarge their homes to meet their changing needs over time. H11 allows householders to do this but ensures that this is done in a way which

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
		benefits the local landscape, townscape and character of the area, protects amenity and does not result in the loss of existing environmental value. The absence of a policy could therefore have potential negative effects on Sustainability Objectives A natural environment, B landscape and E climate change mitigation.
H12: Residential Amenity	No policy/ less restrictive policy.	H12 prevents development causing unacceptable impacts on the living conditions of nearby residential occupants in relation to loss of privacy, dominance, loss of light, noise, activity and odour. The absence of a policy or one which is less restrictive could therefore have negative effects on people’s health and wellbeing.
H13: Replacement Dwellings	No policy. Rely on NPPF.	One purpose of H13 is to allow the replacement of existing dwellings in the countryside with dwellings of a higher standard of design that are more modern and efficient, not significantly larger and positioned in the most appropriate position. The absence of a policy-may result in landscape impacts and therefore have a negative effect on sustainability appraisal objective B landscape.
H14: Re-use and Conversion of	No policy. Rely on NPPF.	H14 sets out a way to secure the re-use of redundant or disused buildings of historic or architectural merit in the

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
Disused Buildings in the Countryside		countryside that are capable of being converted to dwellings or employment use and whose manner of conversion would maintain and enhance the character and appearance of the building, its setting and the wider rural setting. The absence of a policy or a policy which did not allow the re-use and conversion of existing buildings in the countryside would limit the potential for such buildings to be restored sensitively and provide a source of housing.
H15: Subdivision of Existing Dwellings	No policy. Rely on NPPF.	<p>The subdivision of housing, detailed by H15 results in a greater number of units within one building, thereby helping to boost the supply of housing locally. The policy introduces some local controls to ensure that both visual and amenity impacts can be fully considered at the planning application stage.</p> <p>The absence of a policy, particularly when the NPPF already permits this in the countryside, would therefore limit the ability to influence these considerations, having a potential negative effect on sustainability objectives.</p>
H16: Rural Workers' Dwellings	No policy. Rely on NPPF.	The purpose of H16 is to enable the building of dwellings in the countryside where they are required for the effective operation of businesses that require to be

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		located in the countryside and that contribute to the local economy. The absence of a policy, particularly when the NPPF already permits this in the countryside, would limit the ability to apply local controls on what is expected from applications for rural workers dwellings, having a potential negative effect on sustainability objectives.
H17: Removal of Conditions Imposed on Rural Workers' Dwellings	No policy. Rely on NPPF.	The purpose of H17 is to restrict the removal of agricultural or other rural business occupancy conditions to situations where either there have been significant change in circumstances or the business no longer requires the dwelling and it has been marketed with the restrictive condition for at least 12 months. The absence of a policy to manage such circumstances could result in new homes being built in the countryside for a temporary purpose and then default to a permanent residential dwelling with no occupancy restrictions.
<b>Environment</b>		

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Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
EN1: Setting of Settlements	No policy. Rely on NPPF.	There are certain gaps between settlements and settings which are important to their character or are themselves of high environmental quality. The absence of EN1 which means that open gaps are not identified could result in development being permitted within areas that are particularly vulnerable or sensitive and this could result in potential negative effects against sustainability appraisal objective B Landscape.
EN2: Undeveloped Coast	No policy. Rely on NPPF.	EN2 seeks to protect, maintain, and enhance the distinctive landscape and seascape character and ecological qualities of the undeveloped coast and seeks to restrict development that would have a negative impact on the visual or physical character of the undeveloped coast or estuaries. The absence of a policy or designation to protect this special landscape would reduce the weight given to the consideration of landscape impacts in this area and could lead to an erosion over time of the special qualities of this area.
EN3: Coastal Change Management Areas	No policy. Rely on NPPF.	EN3 sets out to control development and encourage relocation of services within Coastal Change Management Areas or protection of these areas from the impacts of climate change in relation to climate change



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		and the coastal impacts of this, in particular, the impacts of coastal erosion and flooding from coastal sources and promotes future resilience to change. If there is no provision for existing homes and businesses to relocate from affected areas then there would be negative effects on sustainability objectives for these policy areas.
EN4: Landscape Protection and Enhancement	No policy. Rely on NPPF.	EN4 sets out to protect and enhance the landscape and seascape character with special regard given to Dartmoor National Park, the historic designed landscapes around Haldon hills, Mamhead, Oxtot, Powderham and the Haldon Estates, and the Exeter Urban Fringe. The absence of a policy would therefore mean that applications would be determined on the basis of a more generalised policy approach within the NPPF and not benefit from the local detail which is proposed through the policy.
EN5: Equine Development	No policy. Rely on NPPF.	EN5 seeks to control equine development in the countryside in order to promote a vibrant rural economy and sustainable land management whilst minimising impacts upon biodiversity and landscape character. Teignbridge has quite a high level of equine activity and in some cases there can be adverse impacts on the

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		<p>landscape as a result of development associated with it. The absence of a policy which set locally relevant detail and criteria could result in negative effects on sustainability appraisal objective B Landscape and therefore an alternative approach is not sought.</p>
<p>EN6: Flood Risk and Water Quality</p>	<p>No policy. Rely on NPPF.</p>	<p>EN6 introduces a sequential approach to the location of development in order to avoid areas at most risk from flooding. It also sets out criteria for the consideration of development proposals with regard to the water environment and sustainable drainage systems. The absence of a policy would therefore mean that applications would be determined on the basis of a more generalised policy approach within the NPPF and not benefit from the local detail which is proposed through the policy.</p>
<p>EN7: Air Quality</p>	<p>No policy. Rely on NPPF.</p>	<p>Air quality is a high national political priority as it impacts on whole populations, particularly the young, elderly and those with pre-existing health conditions. The absence of a policy would therefore mean that applications would be determined on the basis of a more generalised policy approach within the NPPF and not benefit from the local detail which is proposed through EN7.</p>

**Table C.1: Policy Approach Alternatives**

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EN8: Light Pollution	Rely on Policy GP1: Sustainable Development / NPPF.	EN8 seeks to protect habitats and landscape character from detrimental impacts from external lighting and guidance for lighting where required for security or safety, for example. The policy adds some controls to the provision of lighting where it is considered as part of a planning application so that these issues can be appropriately considered and given due weight in determining applications for development. As such, the absence of a policy or reliance on GP1 could have a less positive effect than EN8 on sustainability objective K Wellbeing.
EN9: Contaminated Land/Land Instability	No policy. Rely on NPPF.	EN9 requires development proposals which are likely to have an effect upon, or be affected by land contamination of stability, to be supported by information regarding the ground conditions and likely impact of the development upon the natural environment and public health. The absence of a policy would mean that applications would be determined on the basis of a more generalised policy approach within the NPPF and not benefit from the local detail which is proposed through EN9.

Table C.1: Policy Approach Alternatives		
Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
EN10: Biodiversity and Geodiversity	No policy. Rely on NPPF.	EN10 sets out how the Council will work with statutory and other partners to protect, enhance and restore the biodiversity of the plan area and how development proposals will be considered with regard to biodiversity. The absence of a policy would therefore mean that applications would be determined on the basis of a more generalised policy approach within the NPPF and not benefit from the local detail which is proposed through EN9.
EN11: Important Habitats and Features	No policy. Rely on NPPF.	EN11 seeks to ensure the protection and enhancement of biodiversity and geodiversity and networks of habitats and connections between them by setting out a hierarchy of sites to which development proposals will be required to take account of and criteria to be considered when assessing proposals for development which may impact upon an important site or feature. The absence of a policy would therefore mean that applications would be determined on the basis of a more generalised policy approach within the NPPF and not benefit from the local detail which is proposed through EN11.

**Table C.1: Policy Approach Alternatives**

Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
EN12: Legally Protected and Priority Species	No policy. Rely on NPPF.	EN12 sets out how the development proposals will be expected to take into account legally protected and priority species in order to avoid harm and, where harm cannot be avoided, the circumstances under which development will be considered acceptable in terms of mitigating and managing impact upon species. The absence of a policy would mean that applications would be determined on the basis of a more generalised policy approach within the NPPF and not benefit from the local detail which is proposed through EN12. This could have a potential negative effect on the sustainability appraisal objective A Natural Environment.
EN13: European Wildlife Sites	No policy. Rely on NPPF.	EN13 sets out how development proposals will be required to respond to impacts upon European Protected Wildlife Sites and how proposals will be refused unless adverse effects can be fully mitigated and/or compensated. Teignbridge contains and is close to a number of internationally important (Natura 2000) wildlife sites. The absence of a policy which manage how applications which affect these sites and sets out the commitment to the protection and delivery of necessary

Table C.1: Policy Approach Alternatives		
Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
		mitigation measures for them could risk TDC not satisfying its legal requirements.
EN14: Exe Estuary and Dawlish Warren	No policy. Rely on NPPF.	EN14 sets out details for providing mitigation concerning development pressure on protected sites of Exe Estuary SPA, Ramsar site and Dawlish Warren SAC. The policy sets out TDC's commitment to the protection and delivery of necessary mitigation measures for these sensitive sites. EN14 describes how applications which affect these sites would be managed. The absence of such a policy could risk TDC not satisfying its legal requirements.
EN15: South Hams SAC	No policy. Rely on Policy EN13: European Wildlife Sites/NPPF	EN15 sets out how development will be managed in terms of potential impacts on the integrity of the South Hams SAC Greater Horseshoe Bat population and how development shall be designed in order to avoid, minimise and mitigate any potential adverse impact upon the integrity of the site. The absence of a policy, or relying on EN13, could limit opportunities to ensure that the integrity of the SAC is maintained to a favourable conservation status, as the specific detail included within EN15 is based on up-to-date research and evidence as to how Greater Horseshoe Bats are using the landscape.

Table C.1: Policy Approach Alternatives		
Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
		This could have potential negative effects on Sustainable Appraisal objective A Natural Environment.
EN16: Trees, Hedges and Woodlands	No policy.	EN16 seeks to ensure that existing trees, hedges and woodland are retained and incorporated into the overall design of a scheme and how retained trees will have a satisfactory long-term relationship with development (including buildings, infrastructure, highways, utilities and services, amenity, safety etc.). The absence of a specific policy could limit opportunities for such natural assets to be effectively integrated within new developments as well as limit their potential to remain part of the new development in the long term.
EN17: Heritage Assets	No policy. Rely on NPPF.	EN17 sets out how the area's heritage will be protected and enhanced and how the significance, character, setting, and local distinctiveness of any affected heritage asset/conservation area will be considered through the development management process. The absence of a specific policy could limit opportunities for the potential impacts of development on heritage assets/conservation areas to be properly assessed and respond to the key issues outlined within the clauses of the policy.

**Table C.1: Policy Approach Alternatives**

Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
<b>Garden Community</b>		
GC1: Travel and Movement	No policy. Rely on Policy GP7: Infrastructure & Transport Networks / NPPF.	The Garden Community policies (GC1-GC5) represent a complementary policy framework for helping deliver a set of development improvements for local travel, green infrastructure and public realm, education facilities, town centre regeneration in Newton Abbot and flood defence and management in Newton Abbot and Kingsteignton; following recognition as a Garden Community by the government. The absence of the Garden Community policies could limit opportunities for development of infrastructure for local communities and regeneration of Newton Abbot town centre which would be based on mostly previously developed land. Funding and viability aspects may be more problematic without such policies. This could have potential negative effects on sustainable appraisal objectives A) natural environment, F) climate change adaptation, N) town centres and O) connectivity & transport.
GC2: Connecting to Nature - Green	No policy. Rely on Policy GP7: Infrastructure & Transport Networks / NPPF.	As above



**Table C.1: Policy Approach Alternatives**

Policy number and name	Reasonable alternatives to the policy	Justification (why there is no reasonable alternative or why the preferred policy been selected)
Infrastructure and Public Realm		
GC3: Education	No policy. Rely on Policy GP7: Infrastructure & Transport Networks / NPPF.	As above
GC4: Town Centre Regeneration Area	No policy. Rely on Policy EC9: Development in and around Town Centres / NPPF.	As above
GC5: Flood Risk Management and Resilience	No policy. Rely on Policy EN6: Flood Risk and Water Quality / NPPF.	As above



### **3 Residential and Employment Site Rejected Site Options**

### 3.1 Newton Abbot and Kingsteignton Garden Community

**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
<p>Land south of Priory</p> <p>REF: Hv13be8 uj137p9</p>	<p>Site extends a long way out of Newton Abbot and without the NA3 development being implemented feels very disjointed from the existing built up area. It is accessible from Abbotskerswell via a small track (Vicarage Road) although this would only be suitable for pedestrian/cycle access. Vehicle access would be achieved from Kingskerswell Road. Proposed numbers are too small to achieve any on site facilities, such as a school or shop, but there are limited opportunities to connect to existing services, particularly without NA3 being implemented.</p> <p>Concerns over coalescence with Abbotskerswell and proximity to The Priory (listed building). There are mature trees across the site and mainly low hedgerow boundaries. Slopes across the site and open in long views to the south and from Abbotskerswell and Aller/Buckland. Concept plan proposes to avoid ridgeline development and provide a very green (c.60%) development. Potential as a longer term development option but further thought required about how sustainable travel links and local services would be accessed. Potential for harm to the setting and significance of the grade II* St Augustine's Priory, given the proximity of the proposed allocation and the cumulative impact of this allocation in combination other proposed allocations and the existing allocation NA3.</p>
<p>South of NA3</p> <p>REF: UFS_NA_10</p>	<p>Site is separated from the rest of NA3 from a large strip of green infrastructure serving as a bat flyway. This creates a definite break in the development line between Newton Abbot and Abbotskerswell and development within the southern field would see development creep above the ridgeline again after an obvious break. On higher parts of the site there are views to Dartmoor and the Grade 1 St Andrew's church in Highweek. Site is surrounded by mature treelines. Access would need to be provided via the northern fields of NA3, requiring a road to</p>

**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
	<p>be made through the area of green infrastructure and severing the bat flyway. The field to the east of Firestone Lane is only accessible from the field south of NA3 and would involve significant removal of a deep bank with mature trees. This eastern field is elevated high above Abbotskerswell to the south and would be imposing in views from the village.</p>
<p>Conitor Copse  REF: vx13u2g</p>	<p>Very difficult to see how an access would be achieved. Access indicated on the concept plan shows this coming from the A381 but there is a significant level change which would involve substantial engineering and loss of roadside wall and mature trees. The access road would then have to traverse a significant portion of the site around it's eastern and southern boundaries before feeding into the proposed development area. This is unlikely to be viable and also dissects an area of abundant wildlife and bat flyway travelling to the roost within the site. The proposed development area is high up, on ridgelines and a plateau, becoming very visible in the surrounding landscape. Safe pedestrian access cannot be achieved into Newton Abbot either via the A381 or Denbury Road.</p>
<p>Ogwell Central  REF: UFS_NA_08</p>	<p>Site rises east to west with the fields at the north becoming flatter and more visible in the surrounding landscape. Vehicular access can be achieved opposite East Hill (property) but would need to be widened with some removal of hedgerow. Mature trees in places surrounding the site. Non-strategic power line crosses the site east to west along the north of the site. Potential opportunity to provide a safe pedestrian link within the site between East Ogwell and Canada Hill. Concerns that the development would result in the coalescence of the two built up areas whose settings are currently characterised by the large area of green space between them. Limited local facilities in the area. Only partial availability of the site.</p>

**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
Berry Knowles/A382 Corridor  REF: 3515y9f sv13b46	Minerals Safeguarding Area. Land not available for residential development. Potential for playing pitch and allotment hub, and possibly a small employment site. Does contain fairly extensive farm buildings complex with existing residential use subdivided, direct highway access from improved A382 and also rear access from minor road.
Howton Road, north of Mile End  REF: UFS_NA_02	Close proximity to the planning permission boundary for the operational Ringslade Quarry and therefore potential for residential development in this location to constrain mineral operations whilst the quarry is still being worked. Access along Howton Road restricts site size, so suitable as small site only. Likely that creation of new passing bays would be beneficial on road to help car traffic pass. Field slopes down towards the claypit, so development should be kept in the south of the site close to the road.
Milber  REF: zat312x	Poor access up narrow road. Fairly distant and up steep hill for active travel. Site includes private sports pitch. Mature hedge boundary around site, sloping towards eastern side. Edge of highway parking along Long Lane to north of site for workers from nearby industrial units is extensive.
South of Aller  REF: 3313hxx ug15yoz	Site has poor accessibility with regards to its overall proximity to local services and facilities, with limited opportunities for active and sustainable travel. Part of site is physically developable providing all the on-site green infrastructure is kept, including the trees in the upper third of the site. Southern eastern edge of site is steeply sloping towards quarry and includes potential access point. Adjacent to SSSI.
Chercombe Bridge Road	Site is access via a junction off the A383 opposite Mile End Garage. Additional traffic likely to require upgrades to junction

**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
<p>REF: UFS_NA_05 ao15yqp</p>	<p>to avoid queueing on Chercombe Bridge Road. There is a narrowing between the recent housing estate and Chercombe Bridge Road which would need to be widened in order to accommodate a new road into the development. It is difficult to see how this can be achieved at present given current land ownerships on either side of the highway. If this can be achieved, the access road would need to be taken through the westernmost field before crossing in the south of the site to the eastern side as the existing lane would not be suitable for increased volumes of traffic.</p> <p>The land rises steeply to the rear of Chercombe Valley Road, reaching an elongated ridgeline parallel to the residential development to the north of the site. This area of land would be unsuitable for development but could provide complementary green infrastructure for any development on the wider site. Development would be possible on the lower slopes to the south of the ridgeline and in the westernmost field, but with the ridgeline undeveloped there would be quite a significant breach in the building line of the town, taking the development over the top of a natural boundary. However, this is less of an obvious break as the site moves eastwards towards the town where it links nicely into Bradley Barton and provides close sustainable links into the town centre. There may be potential for development in future plans but the currently unresolved access issues and physical break due to the extensive ridgeline make it a less suitable development site than others at this time.</p>
<p>Caravan storage at Linden Lea</p>	<p>Site has secured planning permission for small development.</p>

**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
REF: UCS_TDC_NA_ 39	
Cricketfield  REF: UCS_TDC_NA_ 22  URS - Cricketfield Area	Flood risk makes majority of site undevelopable. Remaining small areas close to Kingsteignton Road are in existing active use but could be redeveloped as within the settlement limit. Flood study will emphasize importance of safeguarding uses and improvements for river Lemon channel and therefore mainly re-orientation of uses, rather than new residential development.
Jettymarsh and Wharf Road  REF: UCS_TDC_NA_ 49  URS – Jetty Marsh	Flood risk makes majority of site undevelopable. Potential for policy requiring safeguarding area for flood defence works. Only developable part on marginal area, comprising sloped land to south west of Jetty Marsh Road.
Osbourne Street  REF: UCS_TDC_NA_ 21  URS – Osbourne Street  UCS_TDC_NA_ 46	No potential due to flood risk. The site is wholly within flood zone 3, including access.

**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
UCS_TDC_NA_20	
Kingsteignton Retail Park  REF: URS - Kingsteignton Retail Area	No potential due to flood risk. The site is wholly within flood zone 3, including access.
Greenhill Industrial site  REF: UCS_TDC_KT_04	Site has potential for redevelopment but very small and below a realistic threshold for allocation. Within settlement limit so could come forward for redevelopment. Some of the buildings in poor state of repair, no real landscaping on a flat site. Fairly limited access point from Greenhill Road.
Land at Strap Lane  REF: UCS_TDC_KT_02  er14y0x	Fenced off playing pitch close to housing which should be brought into wider community use as a public park and recreation area. Site should not be developed. Open aspect from site, no landscaping around the boundary. Quality of playing field and facilities is ordinary and requires upgrade but does link well to public swimming pool immediately to west.
Land east of Rydon  REF: pk14x8s	Well located brownfield site with good opportunities for active travel links and extensive green infrastructure. However, the developability of the site is uncertain and it is in current use as a highway depot. Occupies a raised position with outward views to southwest towards Dartmoor. Access road wide from Avery Hill. Ground condition issues would require appropriate



**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
	survey, recent history of rock fall from one section of the old quarry.
<p>Greenhill Way/Hackney Lane</p> <p>REF: UCS_TDC_KT_05</p>	<p>Small area of planted public amenity land. Current condition poor, requires more care/management.</p>
<p>North west of Orchid Vale</p> <p>REF: UCS_TDC_KT_13</p>	<p>Overgrown small town centre site with mature trees. More suitable as a pocket park or other community recreation use.</p>
<p>Sandygate</p> <p>REF: zn15yva</p>	<p>Small site with Gas Main, which restricts developable area and puts capacity below any realistic threshold for allocation. Flat topography, power installation located in mid-east section would require protective boundary or removal. Mostly delineated by fence boundaries rather than hedges or other landscaping. Only very limited footpath along adjoining road to east.</p>
<p>Land off Hackney Lane</p> <p>REF: lr1379w</p>	<p>Well located site with good opportunities for active travel links and extensive green infrastructure. Sloping topography across site, including near access point would require significant groundworks. Most developable part of site on raised plateau, landscape impacts but scope for screening and existing area of trees in central area should be retained. Tight existing access</p>

**Table C.2: Newton Abbot and Kingsteignton Garden Community**

Site	Reason for not allocating
	<p>point from Hackney Lane, which is narrow and would need significant improvement. The northern and western boundaries of the site are within flood zones 2, 3 and 3b, including the vehicle access point. The only safe pedestrian emergency access leads to the dead end at the Passage House Inn.</p>

### 3.2 Dawlish

Table C.3: Dawlish	
Site	Reason for not allocating
Dawlish North  REF: re13hvk  5h15yx9  Zat072x  Mn15y8x  Wu13b2g  0015y6y  2u13u8h  pw15yj4	<p>Site comprises a number of HELAA sites, lying to east and west of the A379, with different landowners, making for a rather disjointed larger site. Some of the sites lie adjacent to the Dawlish Countryside Park, which provides SANGS for existing/allocated development. There is strong concern that development around the SANGS could dramatically alter the experience and enjoyment of the countryside park, which could prejudice its success and ultimately the protection of the Exe Estuary SPA and Dawlish Warren SAC. However, proximity of part of the larger site to the SANGS also provides opportunity for enlargement of the countryside park, depending on where development in the wider site is situated. The lack of useable footways along the busy A379 presents a problem to all sites, as links cannot be dependent on the unlit paths through Dawlish Countryside Park. The majority of the site is within the Critical Drainage Area (CDA) (with the exception of the part at Sparrow's Nest) and requires sequential assessment before allocation. There is currently no flood strategy in preparation for the Dawlish CDA and therefore no identified solutions to drainage issues in this area.</p> <p>LAND NORTH OF SHUTTERTON LANE: Field lies between A379 and Dawlish Countryside Park (DCP). Land rises from north to south, where it would adjoin Shutterton Lane, beyond which is recent development. Enclosed by hedges, with narrow tree line along boundary with DCP. Access could be taken from DCP if this was widened, or from A379, as shown on draft concept plan for a standalone development. Concern about lack of links towards supermarket and town centre and lack of footway/poor narrow footway/ speed of traffic. Particular concern about impacts on DCP.</p> <p>LAND OPPOSITE ST MARY'S COTTAGES, AMITY FARM AND LAND NORTH OF ORCHARD LANE: The sites would be</p>

	<p>accessed off Orchard Lane, which has a pinch point close to junction with A379 and we have been advised that this floods in wet weather. Land to south of the road rises from west to east and is divided by a central hedgebank. Enclosed by hedges and trees. Narrow footway only along A379. Site adjacent to DCP and concern that development around the SANGS could dramatically alter the experience and enjoyment of the countryside park, which could prejudice its succes and ultimately the protection of the Exe Estuary SPA and Dawlish Warren SAC. However, proximity of part of the larger site to the SANGS also provides opportunity for enlargement of the countryside park, depending on where development in the wider site is situated. Concern about outlying position, beyond the DCP, distance from the town centre and lack of links to town centre.</p> <p>SPARROWS NEST: Fairly level grassed site, slopes gently down from east to west, enclosed by hedges/trees. Existing vehicular access from road - would not include existing roadside cottages. Lies to north of Port Road and lacks footway until junction with Port Road/Orchard Lane, beyond which is poor/no footway. Most remote part of the wider site. Only low density development along Port Road.</p> <p>HIGH WINDS: Site rises from south towards north to a ridge line (where farm buildings are and running nw/se), beyond which it falls away to north. Poor existing vehicular access. Whilst there is a bridlepath along sw boundary of the site, this connects poorly and dangerously with the A379 and would not provide pedestrian link. Set beyond open grounds of Langdon Hospital.</p>
<p>Langdon Hospital/ Hensford Park</p> <p>REF: i8141i9 li13b5t</p>	<p>Site comprises 3 HELAA sites, one of which overlaps with existing mixed use and green infrastructure allocations of adopted Local Plan. All access would be reliant on adjacent development and all site within Critical Drainage Area (CDA). There is currently no flood strategy in preparation for the Dawlish CDA and therefore no identified solutions to drainage issues in this area. Site is reasonably well contained within the</p>

<p>pt13bwt</p>	<p>landscape, forming a part bowl like shape. LANGDON HOSPITAL: lies adjacent to allocated development at Shutterton and would be reliant on this development to provide access to the site. The land rises from south to north and wraps around SW and W of the hospital buildings. Variety of fields, including flower nursery use (hospital residents), enclosed by trees/hedges. Brook to south. Higher and more remote part of site (northern part) provides opportunity for open space and BNG, whilst lower parts for development. Even if vehicular link over Shutterton Brook was not provided, it would be reasonable to expect a pedestrian link/s. LANGDON FARM: Adjoins southern part of Langdon Hospital. However, access appears to be reliant on development of land to SE, due to constraint of Shutterton Brook to north east. Masterplan shows land outside draft Plan site. Fields with boundary hedges, and farm track to north. Whilst OS plan appears to show an existing track crossing the brook to join the land to the north, this does not exist. LANGDON ROAD: Site overlaps with mixed use and GI parts of Gatehouse development. Is reliant on adjacent development for access. Field enclosed by hedges, sloping down to the watercourse to the north.</p>
<p>Warren Farm/South of Mount Pleasant Road</p> <p>REF: I915y8m</p>	<p>The draft Plan site comprises 2 HELAA sites.</p> <p>LAND AT WARREN FARM: Southern boundary of westernmost field is an arbitrary line, divorced from the existing good quality vehicular access from Warren Road. Fairly level site, divided by hedges. Divorced from the town of Dawlish and more relates to the holiday development on the edge of Dawlish Warren. Part of site has prominent coastal location - views from sea not land. Considered more appropriate for land to be included within undeveloped coast designation to retain the separate identities of Dawlish and Dawlish Warren.</p> <p>LAND SOUTH OF MOUNT PLEASANT ROAD: Small grassed site on edge of Dawlish Warren. Fairly flat with existing vehicular access from road to north and from west, where a new access has been created to serve an unauthorised (?) camp site. The same comments as above apply to this site -</p>

	<p>that it is divorced from the town of Dawlish and more relates to the holiday development on the edge of Dawlish Warren.</p>
<p>1-50 Lanherne  REF: UCS_TDC_DA_ 10</p>	<p>Small site within the town centre of Dawlish, easily accessed via the existing vehicular access serving the Teign Housing apartments. Site is overgrown and enclosed by historic walling that would need to be retained. Small scale development only appears possible, likely to be apartment form. Developable area puts capacity below any realistic threshold for allocation. Site is within settlement limit so could come forward for development without allocation.</p>
<p>Meadow Park  REF: 7w13bvj</p>	<p>Site encompasses 2 parts. The eastern part of the site, which is accessed on the level from Meadow Park, is brownfield land, but lies outside the settlement boundary. The yard area of the site is level but it drops away steeply to the south and rises steeply to the north. This area has potential for development and would improve the unsightly yard. A settlement limit extension to include this area is recommended. A settlement limit extension to include this area is recommended.</p> <p>The land to the north of Meadow park is at a much higher level than the road and continues to rise to the northern boundary, where TPO trees are present. There is an informal footpath through the site, used to link to the right of way through the field to the north of the site. This indicates a desire line. Strong concern about the amount of excavation and earth removal required to develop this part of the site, even for small numbers. It is considered less sustainable and is highly likely to result in undue disturbance to neighbours/nearby residents, not only in the immediate locality, but further from the site, resulting from the use of steep, residential roads, with on street parking and poor narrow lanes closer to and within the town centre to access the A379.</p>

### 3.3 Teignmouth

Table C.4: Teignmouth	
Site	Reason for not allocating
Buddleford Farm  REF: wm135ir	<p>Only part of site considered suitable for development. This is for reasons of landscape character and also vehicular access. The southern field only appears possible for development with access taken through Moor View Drive. Agent confirms that landowner in process of buying access strip from Crown Estate. This would lead to the same traffic issues as identified for the site at Land at Shepherd's Lane, as it would direct traffic towards the town centre through Bitton Park AQMA. In addition, Highway Authority advice would be needed as to the scale of development that could be supported by the residential estate roads, namely Moor View Road etc, particularly if site at Shepherd's Lane was developed. Consider pedestrian link to green infrastructure of allocated development site to east and also to green infrastructure for land at Shepherd's Lane if developed. Land rises from east to west and highest areas may need to be avoided. The southern parcel of land which is most developable is also sloping, though enclosed by existing hedgerows.</p>
Higher Holcombe Farm  REF: nw13baw	<p>Site comprises different parcels of land. Land to the south of the farm access track is situated on the ridge of the landscape and would result in skyline development. Therefore, appears unsuitable due to landscape harm. Access is also a major constraint as the private farm access already serves 5 dwellings in the farm area. Land to the north west of the access track comprises part of a field, through which a farm track runs. This is on the landscape ridge and would be unsuitable for development due to landscape harm. There is only post and fence boundary without hedge or bank along north perimeter providing open aspect. The adjacent field slopes down to the existing development of Higher Holcombe Road. In the interests of landscape, development should be located on the lower part of this site if allowed - although access is a major constraint and</p>

**Table C.4: Teignmouth**

Site	Reason for not allocating
	<p>would be reliant on access from adjacent land at Higher Woodway Road. However, siting properties on the lower part of the field would result in significant loss of amenity to the properties it adjoins, whose rear elevations face directly onto the site and lie in close proximity to it. Therefore, it would not be possible to retain landscape character and retain existing residential amenity - even if access was possible. The field slopes from north east down to the south west quite steeply and is enclosed by hedges. Two mature trees in the place where access could be gained from land to west.</p>
<p>Land at Shepherd's Lane  REF: 9r140zl</p>	<p>Site on NW of Teignmouth. Access is possible through road widening of Mill Lane to south of junction with Coombe Lane/Headway Cross Road and then to east of Shepherd's Lane, through the site. Footway exists along Mill Lane up to school entrance but not beyond to the site. However, this would result in additional traffic using Mill Lane and onto Bitton Park Road (AQMA), so advice from Highway Authority needed as to level of development supported. Lower fields not prominent in landscape. Prominence increases over fields as land rises to north. Difficulty of providing sustainable travel links, due to lack of footway on Headway Cross Road - which finishes at Headway Rise and would require land outside site to connect. Agent confirms that access through 10 Combe View would also be possible, for either pedestrians or vehicles and pedestrians. Large site submitted included land to west of Shepherd's Lane and Mill Lane and attracted strong ecology objection due to adjacent Cirl Bunting reserve. If the northern fields of the land to the east of Shepherd's Lane were used to provide for GI/SANGS for the development of field/s lower down to the south, opportunity should be taken to link into development of Buddleford Farm to the NE, through the north east corner of site. Site, and those to north of it, are grassed fields enclosed by hedges, sloping down from west to east and north to south. Some history of drainage/flooding from channel that runs along</p>



**Table C.4: Teignmouth**

Site	Reason for not allocating
	<p>east edge of site which has impacted cul-de-sacs off Moorview Drive would require further assessment. Cumulative issues will need to be considered if both this site and Buddleford Farm site developed.</p>
<p>North of Higher Woodway Road</p> <p>REF: CFS-R-17 nw13baw</p>	<p>This site provides an additional field, immediately west of land at Higher Holcombe Farm and would be required to gain access to the land at that site. There is an existing access, but a new one further up the lane would be required to serve the site. The lane could be widened and the sharp bend reduced as part of this. Small field (forming part of larger site) in elevated position, sloping up from sw to ne is relatively self contained. Enclosed by hedges with two mature trees in position where access to adjacent site would be needed.</p> <p>The eastern part of the field is close to the ridgeline and visible across a wide area. The sloping topography of the middle and western fields, risks overlooking existing residential properties along Higher Holcombe Road to south. The westernmost field has best potential with ability to gain direct access from Higher Woodway Road and more self- contained than rest of site.</p>
<p>East and West of Holcombe Road</p> <p>REF: zs14xnz and j414xwv</p>	<p>Both sites lie in an area with a much less developed character. Whilst all sites in Teignmouth lie on the edge of development, these sites lie adjacent to low density, rather than residential estate style development. This changes the character, which is notably rural edge. In addition, relatively close views of the sea add to the coastal plateaux character. Both sites are defined by mature hedge boundaries. Potential visual sensitivity of development on east field in relation to existing residential properties along Teignmouth Road, immediately to south to avoid overlooking would require further consideration. There is poor access along Holcombe Road, which could not be improved until the site is reached, approx 140m from the A379. Even if access could be achieved, the landscape sensitivity of the site is considered the highest constraint. Development would</p>

**Table C.4: Teignmouth**

<b>Site</b>	<b>Reason for not allocating</b>
	result in a reduction of the physical separation between Holcombe and Teignmouth to approx 150m at its closest.

### 3.4 Ashburton

Table C.5: Ashburton	
Sites	Reason for not allocating
Dolbeare Road  REF: gb12vrt 9c13boy j315yx1 st15yep bs135di	<p>Site covers a wide area with land generally sloping upwards to the south of the site and becoming more visible in views from Ashburton and Dartmoor further up the hills. Fields closest to the A38 are low lying with limited visual impact from Dartmoor. Draft concept plans show development avoiding the ridgelines and most sensitive areas. The front of the site runs parallel with the A38 but is in a cutting and screened by mature trees. Additional noise buffering/noise bunds may be required. GHB corridor runs along the route of the A38 and will require a buffer. Utilities already on this side of the road. Concept plan shows how approximately 300 homes can be accommodated on the site. Because of its detached nature from the rest of the town, any development would need some 'identity' to avoid the risk of it becoming an isolated suburb. This could be achieved with a community green, through good design and good active travel links into town. It is not large enough for new facilities to be viable. The section of Dolbeare Road through the site could become closed to vehicular traffic and be used as a green lane for walking and cycling, diverting traffic from Dolbeare Road through the site. The Paddock is within the development area. There is a consortium landowner agreement. There is additional land within their ownership outside of this boundary which could be used for BNG. Pedestrian access into Ashburton would be required. Some work has been carried out and demonstrates that a crossing over to the western side of the bridge could be achieved and a footpath running along the western side of the bridge. This will link to existing footpaths to the town centre and school. Vehicular access can be achieved via the existing entrance onto Dolbeare Road but will require removal of some Devon bank. Overall, the site is considered to be developable but there are significant landscape concerns due to a) an objection from Dartmoor National Park which borders the site and b) the physical</p>

**Table C.5: Ashburton**

<b>Sites</b>	<b>Reason for not allocating</b>
	breaching of the A38 for a substantial development which would affect the character of the town being 'contained' between the moor and A38.

### 3.5 Bovey Tracey

Table C.6: Bovey Tracey	
Sites	Reason for not allocating
<p>Land off Moretonhampstead Road</p> <p>REF: y314119</p>	<p>Slightly sloping downwards to the road. Hill continues to rise on fields to the south and east of the site. No pedestrian links into the town unless they can be achieved via the allocated BT1 site. Stone wall along frontage which provides gateway character to this entrance into the town. Lizards reported in wall. Existing access would need widening involving removal of some of the stone wall. Low hedge boundaries east and south. Mature tree boundary on northern side. Views to Dartmoor.</p>
<p>Bovey Tracey Golf Centre</p> <p>REF: 0m152pb</p>	<p>Good vehicle access to the site via the existing entrance but existing active travel links are poor and site is more detached/less well related to facilities in the town than other options. Southern boundary of the site is on the Dartmoor National Park and National Trust (Parke) boundary and the whole of the site is visible in views out to Dartmoor. Development would result in the loss of the golfing facility which would need to be replaced in some form with another recreational facility. Numerous tree lines and tree clusters within the site and heavily wooded on all boundaries. Currently the land is intensively managed for the golf course and therefore development with Biodiversity Net Gain and Public Open Space could result in an ecological improvement for the area. No existing pedestrian link into town other than a recreational path via Southbrook Farm. This would need to be created, linking the site preferably to allocated development at BT1. Manmade lakes on site fed by springs along the watercourse. Boggy along parts of the watercourse. Deer on site. Ownership extends to include the copse in the centre of the site and further north. Non-strategic power lines across the site.</p>

**Table C.6: Bovey Tracey**

<b>Sites</b>	<b>Reason for not allocating</b>
Old employment sites, Cannon Road, Heathfield  REF: UCS_TDC_BT_HF_2	Site is in active business use.

### 3.6 Villages

Table C.7: Villages	
Sites	Reason for not allocating
Orchard Lane, Abbotskerswell  REF: 3e141fa	No vehicular access into the site. Could not enter the site. Understand that the site is no longer available.
Manor Road, Abbotskerswell  REF: we15yrp	Site is overgrown with brambles, hedgerows, grass, semi-mature trees etc. Strong tree boundary along the north east and north west boundaries to provide a natural edge. Large site with opportunity for POS/net gain on site. Higher slopes to the north of the site, lower towards the south and along the route of the watercourse - site is effectively basin shaped around the watercourse. Long views in from the south and due to the elevated nature of the site will have an impact on the landscape setting of the village. Site does not appear to be in any active use. Opportunity for footpath through the site. Development likely to be most feasible on the eastern part of the site/east of the watercourse. Non-strategic power lines and phone lines across the site. Substation on north eastern boundary just outside the site. Most feasible access option is along Firestone Lane where there is a bend in the road and good visibility in both directions. This section of Firestone Lane is relatively wide and leads into the village but the wider road network around the village and in the other direction is constrained.
Plum Tree Cottage, Abbotskerswell  REF: by13u46	Site is part of residential curtilage of Plum Tree Cottage. There is a reasonable level change between the existing drive and potential developable area as well as a wall which might make direct access into the rear of the site difficult to achieve. Yield will be constrained by the access. Orchard trees on site. Possible settlement boundary considered but only if adjacent site at Butcher's Arms is included otherwise there is a break in

**Table C.7: Villages**

Sites	Reason for not allocating
	the boundary. Potential for 2 homes and therefore below the threshold for allocation.
Bickington sites  REF: N/A	Bickington is currently included within the 2013 Adopted Local Plan as a 'defined settlement'. A 'defined settlement' is a settlement within Teignbridge which has at least a basic level of services including either a school or shop. All defined settlements have a settlement limit. Because of their basic level of service provision, residents within these settlements are able to access at least some daily services without having to use the private car. This helps to reduce the impact of any new development on climate change, as well as promote a more sustainable way of living for residents. All of the settlements with proposed allocations satisfy the criteria of having at least a school or shop. However, Bickington does not meet the same criteria. Whilst the shops at Trago Mills and Blackpool School in Liverton could be reached within a 25-30 minute walk (c. 2.8km), there are no safe, dedicated, level routes and the likelihood is that most people would therefore use their car to access these basic services. It is therefore proposed to remove Bickington from the list of defined settlements and to not allocate any new development here.
Bishops Combe, Bishopsteignton  REF: 0r13rql	There is an existing gateway into the field but this is unsuitable for access as it is narrow and it would not be possible to turn into it from the south. Cannot see how an alternative access would be achieved. Site slopes to the north. Visible in views from the south but is screened in parts from trees/hedgerows.
High Elms, Bishopsteignton  REF: zbt076x	Small site in the very north of the village. Could not access the site. The site appears to be a small area of residential curtilage. Steep and too small for allocation purposes.



**Table C.7: Villages**

Sites	Reason for not allocating
<p>Field south of Broadhempston</p> <p>REF: CFS-R-37</p>	<p>Site is slightly undulating. Access is available at the southernmost point of the site but this is some distance from the rest of the village. Unsure whether an alternative access could be achieved into the north of the site. Fairly contained in views from the east but visible in long views from the south. Power cables crossing the centre of the site east to west. Pedestrian access to village services would be via existing lanes and are some distance away.</p>
<p>Land north of Ashwick Court, Broadhempston</p> <p>REF: I514yy5</p>	<p>Access into the site available via existing gateway but the section would need to be widened to provide sufficient turning space and visibility. Well contained in wider views. Pedestrian track runs along the south west boundary of the site to enable access into Headlands and onwards to village centre. Mature tree boundaries enclosing the site. Reported flooding and drainage issues in the southern part of the site. Site is largely developable but an alternative site in the village is preferred by the community.</p>
<p>Lomans Farm, Broadhempston</p> <p>REF: pp137b1</p>	<p>Site can be split into two main sections: north (orchard) and south. The northern parcel is a historic orchard and within the conservation area and not suitable for development. It is also an Unconfirmed Wildlife Site. The whole of the site is within a Scheduled Monument (Local Provisional) area. A footpath link through the entire site could enable pedestrian access to the village centre. There is an old stone wall separating the two parts of the site. The southern parcel is more developable with access achieved from an existing gateway on the lane to the south, although this is further away from village services than other site options. Vehicle access would have to be achieved from the south of the site. Whilst the lane is relatively wide at the access point, it narrows and becomes steep and bendy towards the village centre, and further down the lane becomes even more constrained due to parked vehicles. This area is above the</p>

**Table C.7: Villages**

Sites	Reason for not allocating
	level of the centre of the village but not overly visible in views when looking up from the northern part of the site.
Land west of Ashwick Court  REF: I514yy5	Site is very open in views to the west. It appears to form a key part of the setting of the village with the potential to affect the overall character of Broadhempston. Clear sight lines to the listed Church and close to conservation area. Very close to adjoining properties on its south side which have virtually no screening onto the field. Access achievable via the Ashwick Court driveway. Pedestrian access to Small Park Lane from the western end of the site. Relatively flat.
South West of Stoop Cross, Broadhempston  REF: ms15y50	Site is difficult to access due to levels and wall/property on opposite side of existing gateway. An alternative access further down the site is unlikely to be achievable due to the tall and deep Devon bank running along the length of the eastern boundary. Hedgerows and semi-mature trees on other boundaries. It is quite exposed in views, with long views in from Dartmoor. The conservation area is immediately north of the site and because the site is elevated above the village would be visible in views from the conservation area. Power cables on the northern part of the site including a pole with transformer. Site slopes down towards the village.
Land South of Strode Road, Buckfastleigh  REF: 3a13bhe	No access available. Site is undulating and levels are quite far above those of Strode Road. Very strong and linear mature tree boundaries surrounding the site. Very short distance to a large Greater Horseshoe Bat maternity roost.
Land east of Cheriton Cross, Cheriton Bishop  REF: jo14yq7	Good access to the site via an existing gateway. Slightly sloping towards the east. Low hedgerow boundaries. Likely to be visible in views from Dartmoor, especially on high ground. Old telephone exchange next to the site. Non-strategic power lines across the site. Most of Cheriton St Bishop is within Mid Devon

**Table C.7: Villages**

Sites	Reason for not allocating
	District Council and site has recently been allocated in the village in their Local Plan.
Land to rear of Apple Tree Close, Chudleigh Knighton  REF: 4r15yvy	Relatively level site. Large site, likely to only need southern section. Intermittent tree boundary on eastern boundary of site and strong tree boundary on west. Very open in the landscape with views in and out of Dartmoor. Access achievable via Apple Tree Close. Site is within Minerals Safeguarding Area with potential for future working.
Denbury Glebe, Denbury  REF: z813bfu	Site is largely flat and lies at the foot of Denbury Down, a registered hill fort. Devon bank along road frontage. Large mature oak trees on western boundary. Temporary stable structure to rear of site. Reported surface water flooding on site. Low wire fence separating the site from the adjoining properties. Short, level walk to the school. Good access via the existing gateway. Not suitable due to proximity to Hill Fort and importance within it's setting.
Land south of the Union Inn, Denbury  REF: 2h15yf1	Site slopes from both the north and south into the centre of the site. Mature trees on eastern boundary. Access available via existing gateway towards the south of the site. High stone wall along the frontage of the site. Next to listed building and conservation area which includes the cottages opposite the northern section of the site. Used as sledging hill for village. Less developable, with more constraints than other site options in the village.
Land at Denbury Down, Denbury  REF: zat166x	Site is largely flat but falls away towards the west making it very visible in long views in from Dartmoor. Haytor visible. Well screened from adjoining properties via Beech/bramble hedge. Mature trees on some boundaries of the site. Access achievable via Denbury Down Lane or Heathfield Road. Close to Denbury Down/within the immediate setting of Denbury Down, a

**Table C.7: Villages**

Sites	Reason for not allocating
	registered hill fort. Some potential for a sensitive development but an alternative site in the village has fewer constraints and is preferred by the community.
Mill Lane, East Ogwell  REF: 9p14y42	Site is elevated above the level of the access road and properties opposite, and separated by a Devon bank along its entire western frontage. Access would have to be achieved via the single track lane which runs parallel to the western frontage and wraps around the northern tip of the site. This is unlikely to be suitable for anything more than a few dwellings and widening the track would be difficult to achieve due to the Devon bank on one side and properties on the other. It would also be difficult to achieve an access on the south western tip of the site due to the level change, Devon bank and cost of creating the access, particularly as yield is likely to be low. There is a listed building directly opposite the site which would be in the setting of the development. There is a hedgerow within the site running parallel to the eastern boundary.
Exminster West  REF: Pp141zv Pr15y7r zat102x	This site comprises three fields: one to the north of Deepway lane and two to the south. The fields south of Deepway Lane slope away southwards from the existing settlement, breaching a natural boundary to contain the settlement. These fields are also very visible in views from Haldon and Haldon Belvedere. The field to the north of Deepway Lane is largely flat and faces the existing settlement. The existing tree boundary along the southern boundary of this field could be reinforced to help screen development from views in from Haldon. If developed, there is the potential to bollard the northern end of Deepway Lane to create a green link to Ridgetop Park (SANGS for SE Exeter). The easternmost part of the northern field is more sensitive to development than the west. It has a young community orchard/garden which is managed and used by residents of the on site hospital facility. It is also very visible in long views out across the Exe Estuary. Any development is

**Table C.7: Villages**

Sites	Reason for not allocating
	therefore likely to only be acceptable above the hedgeline on the east of the site and otherwise to the west of the hospital and orchard (c. 7.3ha). There is still uncertainty as to whether the current NHS facility will remain on site and if that is the case there is likely to be a conflict between the proximity of new development and activity on the site and the wellbeing of the patients using the hospital facility.
Land to the north and south of Day Pottles Lane, Exminster  REF: 581357e 4915yma ry15y6g	This is comprised of three sites: one field to the north and two fields to the south of Days Pottles Lane. All three sites are constrained by the access into Days Pottles Lane. The south eastern site has direct access and slopes quite steeply to the south towards the watercourse. A small portion in the north of the site may be developable subject to overall access constraints on Days Pottles lane being acceptable. The south western site is quite narrow and steep and also slopes towards the watercourse. The northern site is very difficult to access, is elevated above the level of the road and is densely vegetated and steep in parts. There are listed buildings next to the site. The collective constraints and poor access make this site unsuitable.
Land to SSE of Exminster House, Exminster  REF: pz13cyh	Site appears to form a prominent gateway into the village. It is detached from existing development and is elevated above the level of the road. Access may be difficult to achieve given potential yield. There are various mature trees on site which would reduce the developable area. Reddaway Drive is a busy road. A30 traffic noise is very audible.
Sentry's Farm, Exminster	Site is accessible via the existing development but requires a level change. Rises steeply to the south with the central area having a 1 in 6 slope. It appears that all the site is used as green infrastructure for the adjoining development, providing an

**Table C.7: Villages**

Sites	Reason for not allocating
REF: 98135f3	important amenity and wildlife space for adjoining residents. There is the potential for this site to be functionally linked land associated with the Exe Estuary SPA. Very visible in views from the north and east. Well related to other development.
Field off Dornafield Road, Ipplepen  REF: h0137ht	Potential access point to the north of the site off Dornafield Road but lane is narrow and any widening would require breaching of Devon Bank. The stretch of lane between existing properties and potential access is narrow and may also require widening to create an appropriate access route. Junction of Dornafield Road onto East Street/Bridge Street (Lane End Cross) very constrained with poor visibility to East. Site slopes north to south. Mature tree boundary on western boundaries is protected by TPOs. Visible in long views from other side of the village and to the east. Strong tree line on ridge would contain the development and provide mirror image of development on opposite side of the village (Clampitt Road) but development would need to stay on lower slopes to avoid breaking the ridgeline. Pedestrian access only via existing lane. Power lines across the site. Currently in arable use.
Field off Moor Road, Ipplepen  REF: kf137vz	Vehicular access point along Moor Road to north of site but lane not suitable for increased traffic movements. Access via Dornafield Road would be very difficult to achieve and would involve level change and substantial demolition of Devon Bank/stone wall to create sufficient widening of lane. Junction of Dornafield Road onto East Street/Bridge Street (Lane End Cross) very constrained with poor visibility to the east. Site slopes east to west towards Dornafield Road. Visible in long views from other side of the village and to the east. Strong tree line on ridge would contain the development and provide mirror image of development on opposite side of the village (Clampitt Road) but development would need to stay on lower slopes to avoid breaking the ridgeline. Pedestrian access to village centre via existing footpath. Power lines across the site. Mature tree in

**Table C.7: Villages**

Sites	Reason for not allocating
	centre of site. Small holding on northern triangle (off site). Currently pasture land.
Park Hill Lodge, Ipplepen  REF: zat041x	Site is very detached from the settlement and accessed via Moor Road - single track lane not suitable for significant increases in traffic movements. Plot size unlikely to generate significant traffic levels though. Tree boundary on western side. Site slopes north to south. Stable block next to access on southern side. Wide access onto Moor Road but narrow direct entrance into the site, creating a very tight u-turn if entering the site from the western approach.
East High Street, Kennford  REF: i31375j	Large site to the rear of various properties. Very limited screening between properties and site. Narrow access only available and would likely require the demolition of an adjoining dwelling to access the site for any significant development. Given numbers proposed this is not likely to be feasible. Site is very open with long views in from the south. Hedge/tree boundaries surrounding the site.
Kennford South/Land adjacent Frank Aller  REF: kg1374c 3u137qv	Site extends a long way out of the village and requires both vehicle and pedestrian crossing of the bridge over the A38. Vehicle access into the site would need to be created as only existing access is via a very small lane and junction onto the A30 slip. Relatively flat site but very open and visible in long views to the south, north and east.
Land at Gissons Hotel, Kennford  REF: 4s13umk	Site is partially brownfield with part vacant premises of the hotel. Remainder of site is greenfield with several mature trees. Hedgerow/Devon bank boundaries. Good vehicular access into the site and potential for pedestrian link onto Gissons Lane but further away from the village centre than other site options. Site could benefit from some redevelopment of vacant brownfield

**Table C.7: Villages**

Sites	Reason for not allocating
	area. Development would need to be sensitive to adjoining hotel uses.
St Andrew's Close, Kenn  REF: zat052x	No settlement limit in Kenn therefore no potential for allocation.
South Town, Kenton  REF: r015yf4	Fields in arable use and have public footpaths crossing the site. Extends a long way out from the village centre with narrow stretch of pavement along the A379. Limited views from the west but majority of the site is very visible from Exmouth and the Exe Estuary. Largely flat but sloping slightly to the east. Non-strategic power lines crossing the site. Access would need to be achieved via the A379 but achieving good visibility may be difficult.
Witcombe Lane, Kenton  REF: ib15ys1	Site is elevated above the surrounding properties on Witcombe Road and above Warborough Hill. It is currently used as arable land. Access would need to be achieved via Witcombe Lane but would involve bank removal and a level change. Western parcel of the site is much more sensitive in the landscape than the eastern field and is visible in long views from Haldon and across the village from the north. Public footpath from the northernmost point of the site connects the site to the A379 and the shop at Powderham Castle can be accessed via a narrow stretch of pavement along this busy road. Pedestrian access to school and village centre would be achieved via Witcombe Lane. Eastern area of site only considered to have potential. Potential for 30 - 50 homes.
Fluder Farm, Kingskerswell	Site slopes upwards from west to east reaching the ridgeline at Kingskerswell Road. The other side of the lane drops down to the adjoining Willows development within the Torbay boundary. The site is very prominent in the surrounding landscape and is



**Table C.7: Villages**

Sites	Reason for not allocating
REF: 2v13r1b	clearly visible in key approach routes into Torquay from the A380 (Hamelin Way). Large strategic power cables in the northern area of the site. Concerns that development here would breach the natural ridgeline between Torquay and Kingskerswell and result in eventual coalescence of the settlements.
Edginswell Lane, Kingskerswell  REF: l315yfs	Existing access into the site but this would need widening and may be difficult to achieve because of mature trees and the boundary with highway land. Land slopes up from the access to an elevated position above the A380. Would be visible in views from the A380. Current development along Edginswell Road is set lower down and screened by mature tree boundaries. Site slopes slightly down to the north east and then shelves steeply on land outside of the site area down to the A380. Mature tree boundary on the east of the site. A380 traffic noise audible. Additional screening/noise bunds would be necessary and would affect yield. Site currently not in use and largely overgrown. Pedestrian access via pavements back into Kingskerswell. Edginswell Lane gets much narrower and windy turning south out of the site and is unlikely to be suitable for any significant increase in traffic movements. Not a safe pedestrian route to Edginswell.
Greenhill Road, Kingskerswell  REF: 7n13bhu  6v137tz	Site is contained in views and set back from properties on the opposite side of the road so limited amenity impact. A380 traffic noise audible and additional screening/noise buffering is likely to be required. Pedestrian access is possible into the village but road is narrow. Greenhill Road is constrained, particularly along the northern frontage of the site. Traffic calming is already in place. Vehicle and pedestrian access via Greenhill Road which is entirely within the flood zone and no alternative option for safe access in emergencies.
Vinegrove, Kingskerswell	Access onto part of site where there are industrial buildings/scaffolding materials. Access into the lower field did

**Table C.7: Villages**

Sites	Reason for not allocating
REF: f513ru6	not seem possible. Steep level change between the two parts of the site with no road frontage onto the lower field. Lower field is open in views approaching Torquay and development would breach the natural boundary with Torquay provided by the dense mature treelines at this point along Kingskerswell Road. The area containing industrial buildings appears to have an active business on site and is below the threshold for an allocation.
Fluder Hill, Kingskerswell  REF: 9m135ah	Site is steeply sloping north to south and is very prominent in views from parts of the village south of the railway line. There is potential access via the existing gateway onto Fluder Hill but it would need widening, involving hedge removal. There is no direct safe pedestrian access back into the village or means of creating one as the lane is too narrow in this section.
Longlands House, Kingskerswell  REF: CFS-R-24	Access can be achieved via existing entrance. Relatively level site but slopes down to the south east making it quite visible in long views from Torquay. Limited screening because of its elevation above the tree line. Quite a long way out of the centre of the village and up a hill making it difficult for attractive/sustainable pedestrian/cycle access to be achieved.
Land on north side of Old Liverton Road, Liverton  REF: nc13xpd	Site breaches the line of existing development which is currently contained to the south of Old Liverton Road. However, it is well screened and slightly lower than the level of Old Liverton Road so development would feel well contained and if sensitively developed would have minimal impact on the approach into the village along this route. Young woodland on the western and eastern site boundaries and mature tree boundary to the rear of the site. Pavement connecting the site to the village centre but on the other side of the road - a safe pedestrian crossing would be required. Site is opposite the pub. Access is available via the existing gateway entrance but would need widening. The existing visibility splay is poor so partial removal of mature

**Table C.7: Villages**

Sites	Reason for not allocating
	hedgerow is likely to be required to achieve a safe vehicular access.
Brickyard Lane, Starcross  REF: nz14y7n	Grade 1 agricultural land but only currently being used for pony paddock. Area in the east of the site is wet. Access could be achieved via Brickyard Lane just north west of the play area - but will need to be widened slightly. Relatively flat site. Mature tree boundaries provide natural screening into the site. Main vehicle access is in Flood Zone 3 but an alternative access is possible. There is a potential (highlighted through adjacent surveys) that the site may be functionally linked land for wintering birds at Exe Estuary SAC. Until such surveys have been completed for this site it is not possible to allocate the land.
Great Uppaton Farm, Tedburn  REF: q115ybb 9115ybb	Access available via existing gateway. Close to the A30 (borders to the south) but separated by a cutting so while traffic noise is audible it isn't too loud. Site is walkable to the village centre via relatively quiet estate roads but no pavement. South facing slope. Visible in views from the south but existing housing is already in this view. Site gently slopes towards the A30. Mature trees along the southern boundary. Well connected to existing development. Site has potential for development but there is an alternative site in the village with fewer constraints.
Westwater Hill, Tedburn  REF: jd121dc	Good access. However, site is partially brownfield with an existing business in active use. There is a small area of greenfield space but appears to be made up ground and shelves steeply away to the rear of the site where there is a large area of woodland. Any development here is likely to require a retaining wall between the site and woodland which would result in a significant loss of trees.

## 4 Employment Sites

Table C.8: Employment Sites	
Site	Reason for not allocating
Former BCT site, Heathfield  REF: ih16ylq	Site is already in active employment use and within settlement limit of Heathfield.
Southwest Chudleigh Knighton  REF: jy15ymy	Small site in prominent location immediately adjacent to cottages and village. Infrequent public transport services. Within SAC Sustenance zone. Reasonable alternatives including at Liverton and Ilford Park were preferred.
Blatchford Farm, A382  REF: 1u15yz4	Flat land with prospect for good access subject to improvements. However the site is within Mineral Safeguarding Area. Reasonable alternatives preferred.
Kingskerswell Road, Decoy  REF: if13b9q and zp77pqq	The area considered developable (6.5 ha) already benefits from planning permission for employment uses. Additionally, the developable area has been identified for an education campus. The remaining site area is a flood plain and identified as a nature reserve.
East of Old Newton Road, Kingskerswell  REF: 3r13bo0	Northern section of site under construction for employment use. The southern side is too steep and has very limited access for business development from Old Newton Road. Lack of safe cycle or walking links. Parcel is open in visual terms.
Zigzag Quarry, Kingskerswell	Site allocated for residential development.

**Table C.8: Employment Sites**

Site	Reason for not allocating
REF: zato32x	
<p>Brown's Farm, Splatford</p> <p>REF: br14yqq</p>	<p>Largely steep site with limited flat areas, bordered by belt of woodland / trees. Site is reasonably prominent in the landscape.</p> <p>Vehicle access likely to be achievable, although fairly tight and requiring significant work (new roundabout or substantial junctions) to avoid conflict with existing residential and holiday uses.</p> <p>Approximately 1.1 km to access Kennford by foot along poor narrow pavements. Over 5km from central Exeter.</p> <p>Reasonable alternatives including at Peamore and Ilford Park were preferred.</p>
<p>Opposite Exeter Court Hotel, Kennford</p> <p>REF: kg1374c</p>	<p>Undulating land and prominent in the landscape. The site contains more than 5 ha of grade 2 agricultural land.</p> <p>Access into Kennford by foot is along poor narrow pavements. Over 5km from central Exeter.</p> <p>Reasonable alternatives including at Peamore and Ilford Park were preferred.</p>
<p>Dolbeare Road, Ashburton</p> <p>REF: gb12vrt Land East of Ashburton; 9c13boy Land off Dolbeare Road, Ashburton;</p>	<p>The site was predominantly promoted for residential development. Occupies a sensitive landscape position, close to Dartmoor National Park and visible from A38 detached from Ashburton. Partly within critical drainage area. Development would require significant access improvements, including safe pedestrian/cycleway links towards the town.</p>

**Table C.8: Employment Sites**

Site	Reason for not allocating
<p>j315yx1 Land at Dolbeare Road, Ashburton; st15yep Land north of Dolbeare; and bs135di land off Dolbeare Road, Ashburton.</p>	
<p>Harcombe Farm, Chudleigh  REF: 8b138o1</p>	<p>The site occupies a prominent location in the landscape, adjacent to A38. It contains existing green infrastructure and located within the SAC Sustenance Zone with species rich grassland, hedges and woodland. Land is in proximity to minerals safeguarding area. Limited access arrangements for pedestrian/cycle use and to and from Chudleigh services.</p>

## 5 Proposed Settlement Limit Changes

Table C.9: Proposed Settlement Limit Changes	
Site	Reason for settlement limit change
<p>The Butcher's Arms, Abbotskerswell</p> <p>REF: y1141e4</p>	<p>Since submitting the site in the HELAA, ownership has changed hands and the new owners have confirmed that the site is no longer available for development. However, as a small brownfield site it provides an opportunity for a few homes in an accessible location, close to the village amenities.</p> <p>Proposed change: include pub car park within the settlement limit.</p>
<p>Meadow Park, Dawlish</p> <p>REF: 7w13bvj</p>	<p>Site encompasses 2 parts. The eastern part of the site, which is accessed on the level from Meadow Park, is brownfield land, but lies outside the settlement boundary. The yard area of the site is level but it drops away steeply to the south and rises steeply to the north. This area has great potential for development and would improve the unsightly yard. The land to the north of Meadow park is at a much higher level than the road and continues to rise to the northern boundary, where TPO trees are present. There is an informal footpath through the site, used to link to the right of way through the field to the north of the site. This indicates a desire line. Strong concern about the amount of excavation and earth removal required to develop this part of the site, even for small numbers. It is considered less sustainable and is highly likely to result in undue disturbance to neighbours/nearby residents, not only in the immediate locality, but further from the site, resulting from the use of steep, residential roads, with on street parking, and poor narrow lanes closer to and within the town centre to access the A379.</p> <p>Proposed change: include brownfield land within settlement limit.</p>

**Table C.9: Proposed Settlement Limit Changes**

Site	Reason for settlement limit change
Depot south of Pottery Road, Bovey Tracey  REF: UCS_TDC_BT_12	Unconfirmed availability so cannot allocate. Good existing access. Brownfield site but with some active businesses. Partially vacant. Some mature and semi-mature trees around the site. On a bus route. Walking distance to a shop and onwards into the town centre.  Proposed change: include all site within settlement limit.
Milbury Barton, Exminster  REF: Im141wz 39141hm	Very well enclosed site, surrounded with woodland/mature tree lines. Site is flat. The proposed development occupies the site of the now demolished buildings associated with Milbury Farm. Potential for archaeological and artefactual deposits. Access available into the site but unsure whether this is in private ownership. Potential capacity of 5 homes is below threshold for allocation.  Proposed change: include all site within settlement limit.
Sannerville Chase, Exminster  REF: i3141lf	Single track access into the site/grounds of Devington Park. Direct access into the site is good. High boundary wall with surrounding grounds grassed. Difficult to plan any comprehensive development but curtilage may be suitable for some very small scale additional sensitive development. Potential capacity of 5 homes is below threshold for allocation.  Proposed change: include all site within settlement limit.
East Town Farm, Kenton  REF: ro15yxl	Flat site. Access can only be achieved via existing driveway for East Town Farm. Contained in wider views. Appropriate for small development but below allocation threshold. Potential for 4 homes is below threshold for allocation.  Proposed change: include all site within settlement limit.
Staplake Road – east, Starcross	Large mature oak in western part of the site which would make a large portion of the site undevelopable. Very close to



**Table C.9: Proposed Settlement Limit Changes**

Site	Reason for settlement limit change
REF: hn13r2f	<p>adjoining bungalows and could have a significant impact on the amenity of existing residents. Access can be achieved via Staplake Road.</p> <p>Proposed change: amend settlement limit change to include a single plot in line with adjacent curtilage. Capacity of 1.</p>

## 6 Wind Turbine Sites

The filtering and subsequent discounting of wind sites is based on an iterative staged assessment of the original 27 wind turbine sites consulted on in the 'Part 3' of the draft Local Plan (Regulation 18).

- Stage 1: The first assessment reviewed consultation comments received for each site, including comments from Natural England, Historic England and Wind energy companies who attended an 'expert panel' meeting. Upon completion of this review 15 wind sites remained.
- Stage 2: The second assessment consisted of a Landscape and Visual Impact Assessment of the remaining sites. This evidence sought to understand impacts on landform/landscape scale, access, landcover and visibility from Dartmoor National Park, East Devon AONB and Undeveloped Coast. It also considered potential impacts on heritage asset receptors. Upon completion of this review 11 wind sites remained.
- Stage 3: The third assessment is based on SA/SEA and HRA comments. Upon completion of this review 10 wind sites remained.
- Stage 4: Following further discussions with Historic England, a Heritage Impact Assessment will be undertaken on the remaining 10 sites to identify potential harm to heritage assets.

This process has resulted in 10 wind turbine sites proposed for allocation in the Teignbridge Local Plan 2040 (Addendum to the Regulation 19). A summary of the allocated and discounted wind sites can be found below (Table 1). Each site was assessed individually through the general approach described and sites were discounted based on a balance of considerations.

It should also be remembered that all sites will have to provide significant additional information at planning application stage in accordance with the requirements of policy CC6 in the Local Plan Climate Change section.

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
WS1: East of Kingscourt Farm Dunsford	<p>The site is discounted at Stage 1:</p> <p>Landscape: Potential high landscape impact due to proximity to Dartmoor National Park (Approximately 1.4km). Panel feedback that this proximity is likely to strongly discourage turbine developers.</p>	Discount
WS2: North West of Bishopsteignton	<p>The site is discounted at Stage 1:</p> <p>Ecology: Potentially high ecology concerns, in particular proximity to a Grey Long Eared Bat maternity roost (only one of 8 in the country). The effect of a turbine on the GLEB population is not known and could present a high risk.</p> <p>Landscape: Panel feedback of industry reluctance to consider this site due to its proximity to the Teign estuary and sensitive estuarine landscape, with clear views from south of the river.</p>	Discount
WS3: North east of Holcombe Burnell	<p>The site is allocated with the following considerations:</p> <p>Ecology: Adjoins Priority Habitats and is close to Ancient Woodland, but it is anticipated that impacts on protected</p>	Allocate

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>species associated with these habitats could be avoided or mitigated. LSE screened out due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: Potential for impact on the significance of heritage assets, especially on Holcombe Burnell Conservation Area and Grade II* assets, which lie 625m from the site.</p> <p>Access: Close to the A30, however a new access road would need to be created via the narrow wooded lane to the south or north of the site.</p> <p>Landscape: A steep-sided slope rising from the Alphin Brook to the north west and a tributary to the south east of the site, to a rounded hilltop at 180m AOD overlain with a small-scale irregular field pattern of pastoral fields. The proximity of 35 properties within 500m of the site could also represent a constraint, these properties have visibility of the site. Some visibility from Dartmoor National Park (located 5.5km to the south west) and some theoretical visibility from the Undeveloped Coast for 100m turbines (located 8.5km to the south east).</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>However, it is considered that the site has lower landscape constraints for a single smaller size turbine (100m) on the hilltop, if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes.</p>	
WS4: Colley Lane	<p>The site is discounted at Stage 3:</p> <p>Ecology: Part of the site is within a South Hams SAC Sustainance Zone (and the rest within the Landscape Connectivity Zone). Radio-tracked GH at flyways and foraging areas are within the site. Much of the upper site is within the 250m buffer of a SSSI and it is within RSPB's Haldon Important Bird Area.</p> <p>Access: Via a farm track that connects to Rixafer Road, a narrow hedge lined lane in the west and south. Access arrangements could be designed off Coley Lane (100m to the east) with limited impact on field boundary hedgerows and streamside woodland.</p>	Discount

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>Landscape: Gradual slopes with steeper slopes in the north, with a wooded skyline extending north above the site into Haldon Forest. The landscape is overlain by a small to medium scale irregular field pattern. The proximity of the site to Haldon Forest and areas of open access heathland represents a constraint. Pylons south of the site contribute to a partly developed skyline. The proximity of 7 properties within 500m of the site could also represent a constraint, these properties have visibility of the site. Visibility from the Undeveloped Coast (located 1.8km to the east of the site), with some visibility from Dartmoor National Park (located 6.5m to the west of the site). It is considered that the site has lower landscape constraints for a single smaller size turbine (100m) at the top of the slope, if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes. However, the scale of turbine will transcend the scale of the landform (which is approximately 90m from the valley bottom to</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	the highest part of the site). The site has higher landscape constraints for multiple turbines due to existing landscape constraints including the landform and landscape scale, and visual amenity.	
WS5: East of Dunchideock	<p>The site is discounted at Stage 2:</p> <p>Ecology: Within 5km of Dartmoor National Park, within the South Hams SAC Landscape Connectivity Zone, contains Priority Habitats and is close to ancient woodland and an Unconfirmed Wildlife Site.</p> <p>Heritage: There is potential for impact on the significance of heritage assets and their settings, including II* Listed Haldon Belvedere, due to its visual relationship with it.</p> <p>Access: Could be designed with limited impact on hedgerows and mature higher grade trees on Dunchideock Lane.</p> <p>Landscape: Landscape character is less of a constraint for this site, due to the larger scale and open field pattern and arable land uses. The landform although</p>	Discount

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>sloping, is less intricate than other sites. However, development of this site may result in impacts on visual amenity. A total of 32 properties are located within 500m of the site, and the proximity of the hamlet east of Dunchideock Lane is a constraint, these properties here have direct visibility of the site. The village of Clapham, 420m to the north east of the site is more enclosed, except for properties off Clapham Hill Lane which have direct open views of the site. There will be visibility of the site from the viewpoint at Haldon Belvedere (Lawrence Castle) (Grade II*), and the public footpath located on this ridge 1.3km to the south west of the site. The proximity of Dartmoor National Park (4.5km) is a constraint for larger scale turbines, wide visibility for 175m turbines, but very limited theoretical visibility for 100m turbines. The Undeveloped Coast is 6.3km to the east, with theoretical visibility of 100m turbines. Overall landscape character is less of a constraint for this site, due to the larger scale and open field pattern and arable land uses. The landform although sloping, is less intricate than other sites. However, it is considered that</p>	



**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion	
	<p>the site has higher visual amenity constraints for turbines of any size to be accommodated due to the proximity of the hamlet east of Dunchideock Lane (where properties have direct visibility of the site) and visibility from the viewpoint at Haldon Belvedere (Lawrence Castle) (Grade II*), as well as from the public footpath located on this ridge 1.3km to the south west of the site. The village of Clapham, 420m to the north east of the site is more enclosed, except for properties off Clapham Hill Lane which have direct open views of the site.</p>		
<p>WS6: North of Langdon Road, Dawlish</p>	<p>The site is discounted at Stage 1:            Amenity: Proximity (Approximately. 450m) to large scale residential development in the north of Dawlish and Panel feedback that this would deter industry interest.</p>		Discount
<p>WS7: Hamlyn's Farm</p>	<p>The site is discounted at Stage 1:            Ecology: The site is considered to have a higher risk of ecology constraints as it is mainly within a South Hams</p>		

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>SAC Sustenance Zone, is adjacent to a SSSI and ancient woodland and an Unconfirmed Wildlife Site.</p> <p>Landscape: It is within 5km of Dartmoor National Park.</p> <p>Heritage: In addition, the proximity to a Grade II* Listed Building represents a constraint.</p> <p>Land availability: Strength of objection from the landowner of part of the site, who has submitted surveys in order to demonstrate the unsuitability of the site represents a high risk of challenge.</p>	
WS8: West of Lower Thornton Farm, Kenn	<p>The site is discounted at Stage 1:</p> <p>Heritage: Immediately abuts the south east end of the Kenn Conservation Area. Furthermore, the Conservation Area Character Assessment specifically refers to “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”.</p>	Discount

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
WS9: Telegraph Plantation	<p>The site is discounted at Stage 2:</p> <p>Ecology: The site contains Priority Habitat, is within the South Hams SAC Landscape Connectivity Zone, is within 2km of SSSI and close to woodland.</p> <p>Heritage: Site is close to heritage assets including Oxton RPG (Grade II), Mamhead RPG (II*) and Grade I Dawlish Cottage.</p> <p>Access: Direct access to the site to the east, but the steep and narrow hedged lane and farm track at Thornton Cottage would need to be widened. Access to the west is restricted by the steep wooded slopes.</p> <p>Landscape: Landscape character is a constraint for this site, due to its location on a prominent slope below Telegraph Hill, and the landscape pattern of small to medium irregular fields within an enclosed valley. A total of 30 properties are located within 500m of the site. Although visible from all of these properties, coniferous woodland of Haldon Forest provides a wooded backdrop and screen views from properties to the north west. The</p>	Discount

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>undulating topography, high hedge banks and woodland filter views from properties in close proximity to the site (e.g. North Kenwood, Oxton), although there are direct views from properties such as Thornton Cottage to the north. The Undeveloped Coast lies 3.5km to the east and Dartmoor National Park lies 7km to the west. Theoretical visibility from the Undeveloped Coast for 100m turbines (located 3.5km to the east) and some visibility from Dartmoor National Park (located 7km to the west). Overall, the site has higher landscape constraints for turbines of any scale due to its location on a prominent slope below Telegraph Hill, and the landscape pattern of small to medium irregular fields within an enclosed valley. Another constraint is the proximity of valued historic features including the Registered Park and Garden at Oxton House 350m to the west of the site. Coniferous woodland of Haldon Forest provides a wooded backdrop and screens views from properties to the north-west. The undulating topography, high hedge banks and woodland filter views from properties in close proximity to the site (e.g. North</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	Kenwood, Oxtou), although there are direct views from properties such as Thornton Cottage to the north.	
WS10: South of Middle Rixdale Farm	The site is discounted at Stage 1: Ecology: Contains Priority Habitats and is adjacent to a SSSI. A County Wildlife Site covers part of the site and this serves as Functionally Linked Land to the SSSI. The site contains radio tracked South Hams SAC flyways and is also within the Important Bird Area of Haldon.	Discount
WS11: North of Staddon Road, Dunsford	The site is discounted at Stage 1: Landscape: Proximity to Dartmoor National Park (Approximately. 600m), with a high risk of harm to the setting of the National Park, and Panel feedback that this proximity is likely to strongly discourage turbine developers.	Discount
WS12: West of Willsworthy Farm, Kenn	The site is discounted at Stage 2: Ecology: Contains Priority Habitats, is within the South Hams SAC Landscape Connectivity Zone, close to ancient woodland and is within 3km of both Exe Estuary	Discount

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>SPA and Haldon SSSI. Further investigation is required to ascertain impacts on birds and bats and whether these could be avoided or mitigated.</p> <p>Heritage: The Registered Parks and Gardens of Oxton (grade II) and Powderham (Grade II*) lie within 1km and 2km respectively.</p> <p>Access: Access arrangements could be designed off a narrow hedged lane (unnamed) to the north east via a farm track.</p> <p>Landscape: Landscape character is a constraint for this site, due to its location on prominent rounded hill on the upper slopes of the River Kenn valley. The site is surrounded by a small scale landscape of the River Kenn valley and overlain by medium regular fields in arable use. The valley bottom to the highest part of the site is approx. 75m, meaning that turbines of greater than 75m may appear unbalanced with the landform scale and would breach the undeveloped wooded skyline. Theoretical visibility from a total of 11 properties within 500m of the site, located in all directions from the</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>site. Most of these properties will have direct views of the turbines breaching the wooded skyline. Theoretical visibility from the Undeveloped Coast for 100m turbines (located 2km to the east). There is visibility from Dartmoor National Park (located 9km to the west) for smaller turbines, with some visibility of 175m turbines. Overall, the site has lower landscape constraints for a single smaller size turbine (100m) positioned at the top of the hill (minimising impact on the intimate river valley running along the River Kenn). However, the scale of turbine will transcend the scale of the landform (which is approximately 75m from the valley bottom to the highest part of the site). The site has higher visual amenity constraints due to its proximity to the local communities of Kenn and Kennford, Powderham Castle (Grade I), as well as to the Undeveloped Coast.</p>	
WS13: East of Fordland Farm	<p>The site is allocated with the following considerations;            Ecology: Contains Priority Habitats and is adjacent to ancient woodland and Unconfirmed Wildlife Site, however, the lack of additional ecology constraints</p>	Allocate

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>warrants further investigation of whether ecology impacts could be avoided or mitigated. No LSE due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: Scheduled Monuments, Listed Buildings and Conservation Areas, and their settings needs further investigation. This includes those within Exeter City. Liaison with the adjoining local authority is also considered to be prudent. Whilst there was concern raised at the Panel meeting from the Industry Rep about proximity to Ide, many of the sites are close to both defined and undefined settlements, and further work regarding impacts on visual amenity is being undertaken. 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.</p>	



**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>Access: Despite proximity to the A30, there is no direct access to the site, and the narrow, hedged lanes to the south or east would need to be widened with subsequent impacts on existing hedges.</p> <p>Landscape: Character is less of a constraint for this site, due to the regular medium to large scale fields, its location on an open, localised ridge which gentle slopes to the Fordland Brook. Pylons to the north west of the site contribute to a partly developed skyline. Theoretical visibility from a total of 24 properties within 500m of the site. Overall it is considered that the site has lower landscape constraints for a single smaller size turbine (100m) on the top of the ridge, if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes. However, the scale of turbine will transcend the scale of the landform (which is approximately 75m from the valley bottom to the highest part of the site).</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
WS14: North of Bishopsteignton	<p>The site is discounted at Stage 1:</p> <p>Ecology: There are radio tracked Greater Horseshoe Bat foraging and flyways (South Hams SAC) on the site as well as radio tracked foraging Grey Long Eared Bats; radio tracked Barbastelle Bats adjacent to the site; adjacent to SSSI and the County Wildlife Site serves as Functionally Linked Land for the SSSI, and is also within the Important Bird Area at Haldon.</p> <p>Heritage: Lindridge Registered Park and Garden (Grade II) lies in close proximity, as are other heritage assets.</p>	Discount
WS15: West of Tedburn St Mary	<p>The site is allocated with the following considerations:</p> <p>Ecology: The lack of additional ecology constraints warrants further investigation of whether ecology impacts could be avoided or mitigated. No LSE due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: Potential for archaeological heritage assets on the site and there is Grade II* Listed Church 400m from</p>	Allocate

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>the site, as well as other Grade II Listed Buildings in close proximity.</p> <p>Access: No direct access to the site, but access arrangements could be designed via A30 and along Goldcross Lane (a two way road). Alternative access is available via Town Barton along Golds Lane, a narrow hedged lane which would need to be widened with subsequent impacts on existing hedge banks.</p> <p>Landscape: Less of a constraint for this site, which is located on a rounded hill rising to 175m with gentle slopes descending to brooks extending across the site from the River Ted. The landform is overlain by a regular pattern of mixed sized fields used for pasture and arable. Theoretical visibility from a total of 31 properties within 500m of the site, most of which are located within Town Barton, where buildings and vegetation partially obscure views. Theoretical visibility from Dartmoor National Park for 100m turbines (2km from the site), however visibility is restricted to high points on the edge of the protected landscape and partially obscured by the</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>sweeping undulations of the landform. The Undeveloped Coast is 15km from the site. Overall, it is considered that the site has lower landscape constraints for multiple (up to 3) smaller size turbines (100m) on the hilltop, if residential visual amenity does not constrain the site (most nearby properties are located within Town Barton, where buildings and vegetation partially obscure views) and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes.</p> <p>However, the scale of turbine will transcend the scale of the landform (which is approximately 85m from the valley bottom to the highest part of the site).</p>	
WS16: South west of Ide	<p>The site is allocated with the following considerations:</p> <p>Ecology: Limited ecology constraints affecting the site. It lies adjacent to a Regionally Important Geological Site (an exposed quarry immediately north west of the site), where impacts are unlikely, but it does lie within 5km of Dartmoor National Park. No LSE due to distance and lack of impact pathways for all European sites.</p>	Allocate

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>Heritage: Object to the site due to the presence of a scheduled monument a to SE of the site and Grade II Listed Building and associated barn approximately 500m to the South and SW. The Scheduled Monument is not visible above ground and the significance of these heritage assets, and their settings may be able to be conserved and enhanced through siting of development.</p> <p>Access: Farm tracks extending from a number of narrow rural lanes surrounding the site, which would need to be widened with subsequent impacts on existing hedges.</p> <p>Landscape: Steeply undulating landform on an upland plateau, with elevations rising to 210m. The open landscape is overlain by regular large scale fields of arable and improved grassland, with low hedgerows and limited woodland. Theoretical visibility from a total of 8 properties within 500m of the site, however, plantation woodland to the west obscures visibility, and views from properties to the south (Idestone Barton, Marshall Farm) which are located at a lower elevation, are obscured by the undulating topography. Whiddon Farm, which is</p>	

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>located 350m north east of the site boundary, has full views into the site. Theoretical visibility from the Undeveloped Coast (6.5km from the site) and Dartmoor National Park (5km from the site) for 100m turbines. Overall, the site has lower constraints for multiple (up to 3) medium size turbines (125m) on the upland plateau, if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes. Alternatively, a single turbine of 175m may be accommodated, although it would transcend the scale of the landform (which is approximately 160m from the valley bottom to the highest part of the site).</p>	
<p>WS17: West of Downhouse Farm</p>	<p>The site is allocated with the following considerations;            Ecology: Within 5km of Dartmoor and contains Priority Habitats and is close to ancient woodland and other woodland, including Unconfirmed Wildlife Sites, in the absence of additional ecology constraints the site is considered to warrant investigation as to how potential</p>	<p>Allocate</p>

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>impacts could be avoided or mitigated. No LSE due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: Potential impacts on heritage significance, particularly given the proximity of a Grade II* Listed Building to the south of the site.</p> <p>Access: Available via a farm track from Dowhouse Farm, from the narrow hedged lane to the north.</p> <p>Landscape: An elevated landscape rising to 200m, with an undulating landform incised by wooded watercourses. The landscape in the east is more open with large scale field patterns on the rounded plateau, while to the west the landscape is smaller scale and more enclosed by adjacent woodland. The site is in use as improved grassland. Theoretical visibility from a total of 15 properties within 500m of the site, most of which are located on an unnamed lane to the north and south east of the site, although visibility is often oblique.</p> <p>Theoretical visibility from Dartmoor National Park (3.2km from the site) for 100m turbines. The Undeveloped</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>Coast is over 10km and has limited visibility of the site. Overall, the site has lower constraints for a single turbine (up to 125m) on the hilltop in the east, if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes. However, turbines above 100m will transcend the scale of the landform (which is approximately 100m from the valley bottom to the highest part of the site).</p>	
WS18: Land by Exwick Woods	<p>The site is allocated with the following considerations:</p> <p>Ecology: No LSE due to distance and lack of impact pathways for all European sites. Priority habitats – deciduous woodland. High likelihood of BMV (predictive).</p> <p>Amenity: Lies in close proximity to a large urban population in Exeter City and there may be a reluctance from industry to develop here.</p>	Allocate



**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>Heritage: The heritage assets whose significance could be impacted by the development lie within both TDC and Exeter City. This will also require liaison with Exeter City Council, East Devon District Council (as the site adjoins the mutual boundary) and with Mid Devon, which lies only 400m away.</p> <p>Access: There is no direct access to the site. Rowhorne Road which runs to the west of the site is a narrow hedge lane.</p> <p>Landscape: A steeply undulating landform rising from a stream in the centre of the site to a localised ridge in the north at 150m and a hill in the south at 140m. The landscape is overlain with small scale field pattern in use as improved grassland, with some arable to the west of the site, and is enclosed by deciduous woodland.</p> <p>Theoretical visibility from a total of 10 properties within 500m of the site, mostly located to the west of the site along Rowhorne Road which have direct and open views of the site. The Undeveloped Coast is 8km distance from the site and has visibility of the site for</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>100m turbines. The ZTV show limited theoretical visibility from Dartmoor National Park (9.1km from the site). Overall, 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, if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes. Turbines above 100m will transcend the scale of the landform (which is approximately 100m from the valley bottom to the highest part of the site).</p>	
<p>WS19: West of Cockwood</p>	<p>The site is discounted at Stage 1:</p> <p>Ecology: Lies within 770m of the Exe Estuary SPA and within 400m of Functionally Linked Land. There is therefore a high likelihood that the site could be used as a migration route for birds associated with the SPA.</p> <p>Within 5km of East Devon AONB, within 1km of Dawlish Warren SAC and contains Priority Habitats.</p>	Discount

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>Heritage: Including Grade II* Listed Building Approximately. 540m from the site, Powderham Castle and Registered Park and Gardens, and those on the north east of the river Exe may also combine to result in a high risk of unacceptability of wind turbine development at the site.</p>	
<p>WS20: Ducks Brook, Tedburn St Mary</p>	<p>The site is allocated with the following considerations;</p> <p>Ecology: The site is within 5km of Dartmoor and contains Priority Habitats, including a traditional orchard, County Wildlife Site and Other Site of Wildlife Interest. No LSE due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: Assets to the south east and south west which will need further assessing. In addition, the site is close to the boundary with Mid Devon and liaison with both Mid Devon and Dartmoor National Park authorities is considered prudent.</p>	<p>Allocate</p>

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>Access: Available from the A30, via an unnamed lane which is both narrow and steep, and a farm track to the east of the site.</p> <p>Landscape: A steeply undulating landform rising from Ducks Brooks with a broad open ridge rising to 160m to the north below Hackworthy Brakes. The landscape is overlain by an irregular small scale field pattern of mostly pastoral fields. Deciduous and mixed woodland and orchards, surrounds the site and provide some screening from local lanes. Theoretical visibility from a total of 12 properties within 500m of the site, located in all directions from the site. Most of these properties will have direct views of the turbines breaching the skyline. Properties along Pike Hill are afforded with some screening from woodland at Hackworthy Brakes. Deciduous and mixed woodland and orchards, surrounds the site and provide some screening from local lanes. Theoretical visibility from Dartmoor National Park (2km south west from the site) for 100m turbines. The Undeveloped Coast is over 10km and has no visibility of the site. Overall, the site has lower landscape</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	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) if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes. However, the scale of turbine will transcend the scale of the landform (which is approximately 70m from the valley bottom to the highest part of the site).	
WS21: Land north of West View Farm	<p>The site is allocated with the following considerations:</p> <p>Ecology: The site is with 5km of Dartmoor and contains Priority Habitats. It is adjacent to 3 Unconfirmed Wildlife Sites. No LSE due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: Assessment of impacts of development on heritage significance is also required, due to the presence of Listed Buildings to the south, east and north</p>	Allocate

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>west. Liaison with Dartmoor National Park is also considered prudent, given its proximity.</p> <p>Access: Via a private road to Ford Farm or Bilsdon off a narrow hedged lane to the west of the site.</p> <p>Landscape: An undulating landform, occupying lower to mid slopes (upper slopes continue to the west). The slopes rise from a wooded brook to the east and are incised by two tributaries. Turbines in this site would appear part way down the slope. The site is overlain by a small scale field pattern in use as improved grassland with wooded field boundaries and linear woodland along the watercourses. Theoretical visibility from a total of 25 properties within 500m of the site, most of which are located on an unnamed lane to the north and south east of the site, although visibility is often oblique.</p> <p>Theoretical visibility from Dartmoor National Park (3.km from the site) for 100m turbines. The Undeveloped Coast is over 10km and has limited visibility of the site.</p> <p>Overall, the site has lower constraints for a single smaller size turbine (100m) on the higher slope to the</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	<p>north, if residential visual amenity does not constrain the site and access arrangements can be designed so as to not result in unacceptable loss of Devon hedgerows and mature higher grade trees on the narrow lanes.</p> <p>However, the scale of turbine will transcend the scale of the landform (which is approximately 70m from the valley bottom to the highest part of the site).</p>	
<p>WS22: Powderham New Plantation</p>	<p>The site is discounted at Stage 2:</p> <p>Ecology: Contains Priority Habitats, is adjacent to large areas of woodland, and is within 3km of the Exe Estuary SPA.</p> <p>Heritage: The Grade II* Registered Park and Garden of Powderham Castle , less than 1km away.</p> <p>Access: Direct access into the site via a farm track off Exminster Hill – a narrow hedged lane.</p> <p>Landscape: An undulating landform associated with Red Hill, rising to 75m, above the floodplain of the Ex which lies to the east. The site is overlain by a larger scale field pattern of arable fields which is of lower sensitivity to</p>	Discount

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>turbine development. Theoretical visibility from a total of 19 properties within 500m of the site, however, plantation woodland to the south and north-west obscures visibility. Crablake Farm, which is located 380m north of the site boundary, has more open views into the site. The Undeveloped Coast is 0.5km distance from the site and has extensive visibility of the site for 100m turbines, and development of the turbines could potentially impact on visitors to Exminster Marshes Nature Reserve, and users of the Exe Valley Way promoted path as well as the Exminster Golf Centre. Limited theoretical visibility from Dartmoor National Park (9.3km from the site). Overall the site has higher landscape and visual amenity constraints for turbines of any scale including its proximity to the Undeveloped Coast which is 0.5km from the site with extensive theoretical visibility of 100m turbines.</p>	
<p>WS23: South of Broadhempston</p>	<p>The site is discounted at Stage 1:            Public comments: This site has received significantly greater objection than any other of the 27 sites</p>	



**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>submitted. An element of local objection would not prevent further investigation of a site's potential. However, in this case, and considering the proximity of the site to the village, being approximately 400m at its closest, the strength of local opinion objecting is considered to render the scheme unfeasible given national policy.</p>	
<p>WS24: North West of Tedburn St Mary</p>	<p>The site is allocated with the following considerations:</p> <p>Ecology: The site is within 5km of Dartmoor, contains Priority Habitats and is adjacent to woodlands. However, if wooded areas and stream corridors were avoided, further investigation as to the ecology mitigation required is warranted. No LSE due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: In addition, there is a Scheduled Monument and Listed Buildings in close proximity and further investigation is required to ascertain the impacts of development on heritage significance.</p>	<p>Allocate</p>

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>Access: Via a farm track via an unnamed lane which runs along the river.</p> <p>Landscape: The site forms part of a rounded open ridge rising from two tributaries of the River Ted. The landform is overlain by a medium scale field pattern of pastoral fields, with deciduous woodland rising from the stream valleys to the north and south. Theoretical visibility from a total of 10 properties within 500m of the site.</p> <p>Intervening vegetation screens views from Great Cummins in the south and Little Leigh in the north-west. Other properties to the south and east have relatively open views of the site. Theoretical visibility from Dartmoor National Park (3.8km from the site) for 100m turbines. The Undeveloped Coast is over 10km and has no visibility of the site. Overall, 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). However, the scale of turbine will transcend the scale of the landform (which is</p>	

Table C.10: Allocated and discounted wind sites		
Site	Assessment of Risks	Conclusion
	approximately 75m from the valley bottom to the highest part of the site).	
WS25: Summercombe Woods, Dawlish	The site is discounted at Stage 1:  Heritage: Unsuitable due to immediately adjoining the grade I Luscombe Castle Registered Park and Garden.	Discount
WS26: South West of Staddon Road, Dunsford	The site is discounted at Stage 1:  Landscape: Proximity to Dartmoor National Park (Approximately. 400m), with a high risk of harm to the setting of the National Park, and Panel feedback that this proximity is likely to strongly discourage turbine developers.	Discount
WS27: Upper Old Wheatley Farm, Exeter	The site is allocated with the following considerations;  Ecology: The site contains Priority Habitats, overlaps a County Wildlife Site, is within the Great Crested Newt Alert Zone and lies adjacent to a pond, and is close to a Local Nature Reserve. If siting avoided the land within the Country Wildlife Site, then further work is warranted to assess impacts on ecology and whether these could	Allocate

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>be avoided or mitigated. No LSE due to distance and lack of impact pathways for all European sites.</p> <p>Heritage: Assess the impacts on the significance of heritage assets, including those beyond the boundary of Teignbridge.</p> <p>Access: Via Tedburn Road, a two way road. which runs parallel to the A30. Night blight is impacted by the proximity of the A30 and the edge of Exeter.</p> <p>Landscape: The site has an undulating landform rising steeply to 105m from the Nadder Brook which lies to the east of the site. The landscape is overlain by a small scale field pattern of pastoral fields with some arable and wooded field boundaries. Theoretical visibility from a total 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. However, visibility from both these locations is partially obscured by intervening woodland vegetation along the Nadder Brook and the rising topography. Receptors along the A30 will be less sensitive to development of turbines on</p>	

**Table C.10: Allocated and discounted wind sites**

Site	Assessment of Risks	Conclusion
	<p>this site and woodland along the A30 obscures visibility from the west. The Undeveloped Coast is 6.5km distance from the site and has some visibility of the site for 100m turbines. The ZTV shows some theoretical visibility from Dartmoor National Park (7.5km from the site). Overall, the site has lower constraints for a single smaller size turbine (100m) on the highest slope to the south of the site. However, the scale of turbine will transcend the scale of the landform (which is approximately 50m from the valley bottom to the highest part of the site).</p>	